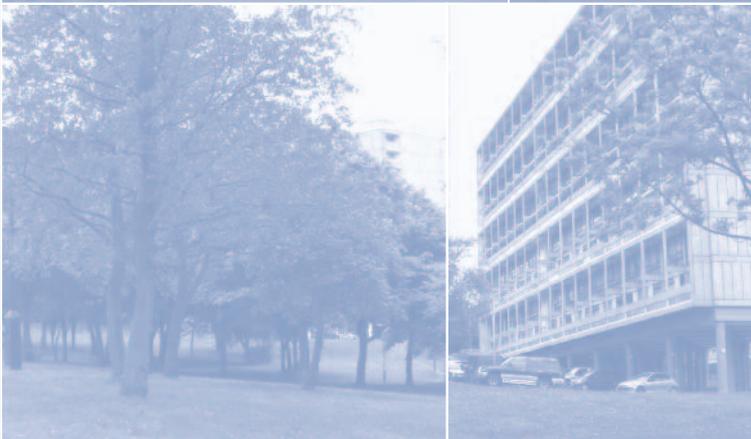


# Roehampton Supplementary Planning Document

## Statement of Consultation

September 2015



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## Introduction

Local planning authorities may prepare Supplementary Planning Documents (SPDs) to provide greater detail on Local Plan policies. The National Planning Policy Framework (NPPF) supports the production of SPDs where they can help applicants to make successful applications. To support the implementation of the Council's Core Strategy (October 2010, second submission version October 2014), Development Management Policies Document (DMPD) (February 2012, second submission version October 2014), Site Specific Allocations Document (SSAD) (February 2012, second submission version October 2014) and the current Local Plan Review, the council is committed to preparing a number of SPDs, which are detailed in the Local Development Scheme (LDS) (2014).

The Roehampton SPD is one of the SPDs listed in the Local Development Scheme and provides guidance that is supplementary to the policies contained within the Local Plan documents. The SPD details criteria that are material in determining planning applications within the SPD area. These criteria include, but are not limited to, land uses, building heights, housing standards, sustainability, urban design and approaches to conservation and heritage. As such, the Roehampton SPD provides guidance on the nature and form of development that the council is likely to find acceptable within the SPD area.

Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 states that consultation periods must be at least four weeks in length. The Roehampton SPD consultation was subject to a seven-week public consultation period between Tuesday, 7 April 2015 and Sunday, 24 May 2015.

The SPD was amended in response to the representations made during the consultation process. The amended document will be recommended for adoption by Executive Committee in October 2015.

This Statement of Consultation describes the consultation process that took place and provides a summary of received responses and the council's responses to these comments. It should be noted that many representations to the SPD commented on issues and subjects of a much wider nature than the specific land use and planning content of the SPD. Comments which are relevant to the SPD process, but are not planning specific, are summarised in the 'Other Comments' section of this report. Many representations were made via letter and email as opposed to through the council's online planning response system. The length and form of some representations mean that they are noted, but may not be referenced in detail in this consultation statement summary.

**Further information:**

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## Consultation Undertaken

The Roehampton SPD was subject to a thorough process of public consultation in accordance with the Town and Country Planning Regulations 2012 and Wandsworth Council's Statement of Community Involvement (SCI).

### Direct mailing

More than 1,000 consultation letters and emails were sent to individuals and organisations to notify them of the consultation period and to let them know where to find further information and how to make representations (Appendix 1 'Consultation Letters'). The Planning Service maintains a database of statutory (specific consultation bodies and duty to cooperate bodies) and non-statutory consultees. The Regeneration Team maintains a database of non-statutory consultees who have expressed a wish to be informed about the wider regeneration programme (Appendix 2 'List of Consultees' combines these lists).

### Websites

The Local Plan web page and SPD consultation web page provided details of the consultation (see Appendix 3 'Consultation web pages').

### Documents for inspection

In accordance with the Regulations, the council made a copy of the documents available on its website ([www.wandsworth.gov.uk/localplan](http://www.wandsworth.gov.uk/localplan)), at Balham, Battersea, Putney, Tooting and Wandsworth libraries and at the Town Hall Customer Services Centre. The site-specific SPD was also promoted and signposted on the Alton Area Regeneration website ([www.wandsworth.gov.uk/roehampton](http://www.wandsworth.gov.uk/roehampton)). Copies of the SPD were also available in Roehampton Library, the Western Area Office, Roehampton University, Danebury Avenue Surgery and Alton Surgery. All of these locations are within the SPD area.

### Public exhibition

Roehampton Library hosted an exhibition summarising the main SPD principles (see Appendix 4 'SPD Summary Boards'). These information boards were also available to view on the Alton Area Regeneration website.

### Print media

An SPD advertisement, containing information as per the Statement of Representations Procedure, was published in the Wandsworth Guardian newspaper on Thursday, 2 April 2015 (Appendix 5 'Consultation advertisement').

### E-newsletters and social media

The council's news web page included an article about the SPD on 7 April 2015. The SPD was also included in the council's e-newsletter, which has a circulation of more than 50,000 (see Appendix 6 'E-news Advertisements').

The Alton Area Masterplan Twitter account advertised the SPD presentation and the availability of copies of the full SPD at Roehampton Library (see Appendix 7 'Social Media Advertising').

### Pre-SPD consultation

A eighteen-month masterplanning process preceded the creation of the draft SPD. Two formal consultation stages and multiple informal consultation methods and events contributed to the formation of the final masterplan and the draft SPD. This pre-SPD consultation included pre-masterplanning baseline stakeholder meetings and interviews as well as arts and community activities, a six-week options consultation and an eight-week period of preferred option consultation. The later consultation stages included meetings with statutory and non-statutory groups, local businesses and residents as well as presentations at community groups and forums, a tailored door knocking exercise, a questionnaire and updates in local publications.

The two formal consultation phases are detailed in the Interim Consultation report and the Preferred Option Consultation report. Both of these reports can be found on the regeneration web page – [www.wandsworth.gov.uk/roehampton](http://www.wandsworth.gov.uk/roehampton). This masterplanning consultation, albeit clearly separate to the SPD consultation, helped to define certain elements of the final masterplan and, subsequently, the draft SPD.

### **Methodology Statement**

In order to ensure that a proportionate, accurate and comprehensive approach to the Statement of Consultation was taken, the council reviewed and considered each individual representation. Mindful of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the council's Statement of Community Involvement, the council ensured that due regard was given to each representation. Regulation 12 (a)(ii) of the Town and Country Planning (Local Planning) (England) Regulations explains that the Statement of Consultation must include a "summary of the main issues raised by those persons" (consulted). The regulations clearly state that a summary of the main issues is necessary and not an analysis of each individual point raised.

In order to ensure that comments were accurately summarised, the Statement of Consultation was laid out as best to address each of the main sections in the SPD. The majority of respondents presented their concerns and comments in relation to the core principles and not individual geographical areas. The council therefore decided that the Statement of Consultation would address each section of the SPD. However, any comments relating to the key intervention areas were included in the core principles sections of the report. This methodology was applied in order to reduce duplication and in order to best mirror the style in which representations had been made.

Main issues were selected in relation to each of the eight core principles and other main sections of the SPD. The evaluation process reviewed individual issues in regard to how often they were raised, whether SPD content regarding this issue was subsequently altered and whether the subject was deemed a main issue by a cross section of statutory consultees, non-statutory groups and individuals. The council noted that many representations made general comments relating to issues other than specific sections within the SPD. These comments have been summarised in the 'Other Comments' section of the Statement of Consultation.

## Overview of Responses

Representations were received from 38 consultees. These respondents are split into three categories as listed below:

### Statutory bodies and agencies:

- 1 Environment Agency
- 2 Health and Safety Executive
- 3 Highways England
- 4 Historic England
- 5 London Underground – Infrastructure Protection
- 6 London Borough of Richmond
- 7 London Borough of Wandsworth – Public Health
- 8 Marine Management Organisation
- 9 Natural England
- 10 Office of Rail and Road/Office of Rail Regulation
- 11 Transport for London

### Other organisations:

- 12 Alton Regeneration Watch
- 13 National Landlords Association
- 14 Putney Labour Party
- 15 The Putney Society
- 16 Roehampton Forum
- 17 Roehampton Methodist Church (represented by DP9)
- 18 Southlands Methodist Trust (represented by DP9)
- 19 St James Group

### Individuals:

- 20 Andalopoulos, K
- 21 Bishop, R
- 22 Cairns, J
- 23 Carazo Minguez, M
- 24 Ennis, J
- 25 Fannon, S
- 26 Gilmore, R
- 27 Greening, J (MP)
- 28 Lloyd, T
- 29 Lynch, A
- 30 Noonan, C
- 31 Parr, P
- 32 Proctor, C
- 33 Redfern, R
- 34 Rogers, A
- 35 Rowbottom, K
- 36 Saker, S
- 37 Simpson, T
- 38 Tiller, M

The 38 respondents expressed a wide array of opinions. Individual observations were split between those specifically relating to proposals and guidance in the SPD land use document, corrections regarding factual quality of content and general comments about the wider regeneration process and various other subjects. The breadth of issues covered in the SPD means that representations cannot easily be categorised as supportive or non-supportive. One respondent may have different levels of support for each element of the SPD.

In broad terms, of the 38 representations, 13 registered their support, 16 registered their opposition and nine made general comments or did not provide opinions. Three individual respondents and Highways England, London Underground, the Office of Rail and Road, the Health and Safety Executive, the Marine Management Organisation and the Roehampton Forum did not indicate either support or opposition to the SPD.

None of the statutory bodies and agencies registered opposition to the SPD in principle. Historic England and Transport for London (TfL) noted their reservations and concerns in relation to specific proposals in the SPD and continuing communication with stakeholders.

Four of the non-statutory organisations supported the overall aim of the SPD, whilst three registered objections. The Roehampton Forum commented solely on one aspect of the SPD. It was therefore deemed inappropriate to surmise any opinion regarding the wider SPD from this one comment.

Many of the comments did not register opposition or support for specific proposals in the SPD, but rather asked for clarification of detail or highlighted factual errors within the report. Responses from The Putney Society and the Methodist minister detailed a number of errors in the draft SPD. These omissions or factual inaccuracies have been rectified in the final SPD.

A number of the comments did not register opposition or support for specific proposals in the SPD, but instead noted support or opposition to the preceding masterplan process or the anticipated broader regeneration. The objections to the wider programme have been summarised in section 4 of this report. The form and nature of a number of representations meant that the comments were not made specifically in relation to the SPD's planning and land use proposals.

The main SPD issues reported included:

- a** support for proposals to provide better-quality housing
- b** support for proposals to include family-sized housing, but requests for this point to be made explicitly
- c** objection to the lack of specific referencing of overcrowding as an issue within the SPD area
- d** support for proposals to diversify the tenure mix
- e** objection to proposals to diversify the tenure mix, particularly in relation to the perceived impact on private rented sector landlords
- f** support for proposals to provide professionally managed student housing
- g** objection to proposals to provide professionally managed student housing within the SPD area
- h** objection to upper and lower limits placed on numbers of certain building types and uses within specific areas
- i** objection to restrictions placed on building heights in Portswood Place and Mount Clare
- j** support of restrictions placed on building heights in Portswood Place and Mount Clare
- k** objection to the size and scale of the buildings proposed for Portswood Place
- l** objection to the proposal to demolish and replace housing and retail units based on reasons including stock quality, layout and design
- m** support for the integration of new B1 space at Roehampton Local Centre
- n** objection to the inclusion of maximum retail floor space figures
- o** support for re-provision of community facilities
- p** objection to the SPD's handling of parking as an issue
- q** support for the landscaping proposals relating to Downshire Field
- r** objection to the landscaping proposals relating to Downshire Field
- s** support for the re-provision of public space and sports recreational facilities

- t** support, with the caveat that further research is required to be undertaken by the council, for the proposals that all development must enhance heritage buildings and conservation settings
- u** objection to the transport proposals, specifically those related to Highcliffe Drive and the relocation of the Danebury Avenue bus turnaround
- v** support for the proposal to better connect the SPD area to Richmond Park
- w** support for requirements pertaining to sustainable urban drainage systems and protecting and managing local biodiversity.

A summary of the main points raised in individual representations are considered in more detail in section 4 of this report. As outlined earlier in this report, this document summarises the main issues raised in the representations. Full copies of each representation are included as Appendix 8.

## Representations and the Council's Response

### Comments on Introduction and Background

The most significant changes to the SPD introduction all relate to clarification of detail. Residents and non-statutory groups expressed concerns regarding their understanding of the residents' offer. A paragraph reiterating the information included in paragraph 4.3 of the draft SPD has been included as paragraph 1.5 in the final SPD. A clear reference to the one-move policy is also incorporated into this paragraph. This policy is explained in full detail in the resident's offer booklets. A clear assertion that community facilities, including Roehampton Library, will be reprovided has also been added to the SPD introduction.

Alton Regeneration Watch (ARW) objects to the Alton Area Baseline Report being listed under its written date as opposed to the general publication date. In order to ensure clarity of understanding, the latter date has been included in the final SPD.

The Wandsworth Local Centres Survey (2014) has been included in the SPD evidence base list because it is now referenced in the section relating to core principle 2.

Residents and the Alton Regeneration Watch report confusion caused by the references to the 'Roehampton area' in the draft SPD. A clarification paragraph has been added to the introduction of the final SPD. This insertion explains that due to the SPD being a planning policy document it must follow the language of the council's Local Plan. These documents refer to Roehampton and not the Alton area. This is the reason why the SPD refers to Roehampton and not the Alton area in its title. In order to avoid confusion, the red line area shown in multiple draft SPD figures, is referred to as the SPD area throughout the final SPD.

ARW and a number of residents comment that there is confusion regarding which residential blocks are proposed for demolition under the masterplan proposals. The council has addressed this issue by including a list of all affected residential properties to the introduction of the final SPD. This list refers solely to any future development linked to the Alton Area Masterplan.

### Comments on Key Issues and Challenges

This section of the SPD detailed the main areas of improvement within the SPD area. It highlighted concerns in relation to the layout, design and quality of the current housing, public realm and community facilities.

The comments included in this section summarise the main points raised by respondents that are not covered in any of the core principle specific sections of this report. Multiple comments relate both to the key issues and challenges section of the draft SPD as well as one of the core principles sections. In these cases the main points have been outlined in the core principles section.

In reference to paragraph 2.6, on page 23 of the draft SPD, Transport for London (TfL) requests an increased focus on cycling in the area in the final SPD. The council has included wording relating to cycling in general and, more specifically, improved cycle routes between Roehampton Lane and Barnes station. This latter insertion was also deemed necessary by the London Borough of Richmond.

The council's public health department welcomes the SPD's proposals in general. Specifically, it supports the SPD's provisions regarding secure design, community facilities, open space, increased employment and active transport. The department comments that these proposals will have a positive impact on the health and well-being of residents.

Alton Regeneration Watch (ARW) and multiple individual respondents object to the SPD's reference to crime rates in the area. The council does not agree that there is a substantial case for the alteration of this wording. The Metropolitan Police data referenced in the SPD mirrors that used in the baseline. The council acknowledges that the dataset used is specific to one period, but does not agree that the information has been presented inaccurately.

### **Comments on Vision and Strategic Objectives**

This section of the report detailed the vision for the future of the SPD area as well as objectives of the SPD. These objectives are based upon those included in the masterplan.

Transport for London (TfL), although supportive of the detail of core principle 7, objects to there not being an overt reference to transport in the nine strategic objectives. Consequently, the council has inserted references to pedestrian, cycle and vehicular connections into objective 6.

Historic England has requested that reference to their Risk Register is included in the objectives. The council have included wording to this effect. Objective nine in paragraph 3.8 of the final SPD includes specific reference to the need to conserve and enhance existing heritage assets, including those on the Heritage at Risk Register

The Putney Labour Party comments that the SPD needs to better detail how it will address objective 3, to provide jobs and training opportunities for Roehampton residents. The council has not elaborated on this point in the final SPD for two reasons. The first is that the SPD is a land use document and it therefore concentrates on certain elements of the Alton Area Masterplan. Secondly, matters relating to employment, skills and enterprise are fully covered in Section 11 of the Adopted Planning Obligations SPD (March 2015). This chapter in the Planning Obligations SPD will be a material matter in any subsequent planning application relating to the SPD area. It is not possible at this stage (pre-developer procurement) to estimate jobs and training requirements for the regeneration scheme. However, the final SPD has been adapted to specify that planning applications should include a statement setting out how the proposals will adhere to the requirements for employment skills and enterprise as set out in the planning obligations SPD.

### **Comments on Core Principle 1 – Deliver high-quality homes within a mixed and balanced community**

This section of the SPD concentrated on the housing, the principal land use within the SPD area. Issues such as housing numbers, location, layout and design, quality and tenure mix were reviewed.

Justine Greening, the local MP, comments that it is particularly important to provide a better choice of family properties, including houses and maisonettes. The Putney Labour Party requests that the SPD specifically refers to provision of family-sized housing. The Labour Party also asks for the inclusion of the subject of household overcrowding within the SPD.

The council has inserted clearer references to family-sized housing within the SPD. The council uses the London Plan's definition of family housing in the Wandsworth Local Plan policy documents. The Glossary in Appendix 3 of the Development Management Policies Document (DMPD) (second submission version October 2014), describes a family-sized unit as having three bedrooms or more (at least one of which is a double bedroom) comprising at least 74 sqm. Paragraph 3.12 of the DMPD outlines policy regarding housing need and the requirement for family housing, both at strategic and local level.

The council has not included the direct reference to overcrowding requested by the Putney Labour Party. This dataset has yet to be compiled at the SPD area level. The Strategic Housing Market Assessment Update, 2014 (SHMA) explains how the London SHMA 2013 relies heavily on English Housing Survey (EHS) data, using this as a key source of information for subjects including overcrowding. However, EHS data is not available below borough level and, in order to ascertain the extent of overcrowding within the SPD area, the council must use different sources of information. A comprehensive housing needs survey is scheduled to commence in October 2015. The data collected from this survey will form the basis of an

area-specific assessment of overcrowding. The survey will include all households currently living in the properties proposed for demolition.

The National Landlords Association (NLA) objects to the SPD's reference to it being a design-led document. The NLA states that the SPD does not take into account the current tenure mix of the area, including those who have invested in the area. The NLA also objects to the use of tenure percentages in the SPD and asks how the council will keep tenures to prescribed levels.

The council disagrees with the NLA's assertion that the SPD does not consider the current tenure mix of the area. The existing tenure mix is referenced in the SPD in relation to levels of deprivation and the Local Plan's aim to create mixed and balanced communities. Specifically, Core Strategy Policy IS5 is referenced because it outlines how, whilst taking into account the particular location and nature of individual sites, new housing developments should include a mix of types and sizes of dwellings to reflect the varying needs in the borough.

Local residents and the NLA require clarification in relation to the housing offer being made to current residents. The NLA objects to the SPD on the grounds that it could result in many current residents being forced to leave their community and could increase costs for those residents who remain. The NLA expresses concerns relating to the council's message to existing and future landlords, but does not provide further explanation of what it means by this.

The council disagrees with the NLA's comments regarding the displacement of the current residents. The council reaffirms the point that all secure council tenants will be offered a secure tenancy within the Alton Estate. The council also reiterates its commitment, as noted in Section 4.3 of the SPD, that the masterplan offers all resident leaseholders and freeholders the opportunity to buy back into the new development. In order to ensure clarity, these assurances have been repeated in the introductory section of the SPD. A comprehensive housing needs survey is scheduled to commence in October 2015. This survey will include all tenants of non-resident leaseholders and freeholders. Advice will be provided to these tenants regarding their housing options and whether they are eligible to apply for a council tenancy. Non-resident leaseholders and freeholders are not being offered the opportunity to purchase a new property within the SPD area. The council has made this decision in relation to the SPD area in order to work towards the Local Plan's aim of balanced and mixed communities.

Individual respondents to the SPD consultation question as to whether the amount of social housing will be reduced, what percentage of new builds will be social housing and whether the area's population will increase.

The SPD outlines the expectation that the number of housing units within the SPD area is expected to increase by approximately 500 units. The council reiterates that all secure council tenants will be offered a new tenancy and home within the Alton Estate. Should a tenant wish to transfer from the Alton Estate, the unit they have vacated will continue to form part of the social housing re-provision. As detailed in the SPD, Core Strategy Policy IS5 requires the maximum reasonable amount of affordable housing. It sets out the mix of affordable tenures that will be required on new developments (intermediate (40 per cent), social and affordable rent (60 per cent)), as amended in the second proposed submission version.

The SPD's handling of student housing is a main objection of groups including Alton Regeneration Watch, Putney Labour Party, The Putney Society and the St James Group. The Putney Society and Putney Labour Party both object to the inclusion of student housing in Roehampton Local Centre. The Putney Society objects to student housing within the estate and suggests new accommodation should be built on campus grounds or at the site of 166 Roehampton Lane.

The council disagrees with The Putney Society and the Putney Labour Party on the subject of the Roehampton Local Centre's suitability for student housing. The Site Specific Allocations Document (SSAD) notes student accommodation as being suitable for the Roehampton Local Centre. The final SPD continues to allow for the option of student housing where it is linked directly to the needs of the University of Roehampton or Kingston University and is part of a balanced mix.

The Putney Labour Party requests clarification about the type of housing being proposed as suitable replacement for the student housing at Mount Clare. The Key Intervention Area 2 section of the SPD states that new homes and/or sheltered accommodation could replace the student accommodation around Mount Clare. The only stipulation is that of residential use.

In contrast to other respondents, DP9, responding on behalf of the Roehampton Methodist Church and the Southlands Methodist Trust, and the St James Group, do not object to the SPD's proposal to allow student housing in Roehampton Local Centre. The St James Group and DP9 object to the upper limit of 400 new student housing bedrooms. Requests for a detailed design of the site and market testing to ensure demand for spaces were made by the St James Group. DP9 consider it overly prescriptive for the SPD to identify specific locations that are suitable for certain types of housing. The council does not agree that detailing potential land uses within different parts of the SPD area is overly prescriptive. However, it acknowledges that student housing is currently in situ at Mount Clare. The wording in Section 5.2D in the draft SPD has been updated for the final SPD. References to housing and sheltered housing, which may have previously implied that student housing does not fall under the heading of housing, has been edited.

Alton Regeneration Watch and individual residents object to the SPD's representation of the current housing stock's challenges. These respondents do not think that there is enough evidence provided in the SPD to justify the demolition of residential properties. The referencing of a lack of secure entrances was mentioned by five residents as not being a significant enough reason to justify demolition of residential properties.

The council disagrees with the comments that secure entrances are not an important enough issue to justify the demolition of residential blocks, including Allbrook House. The SPD and the accompanying suite of masterplan documents provide detail regarding how residential units are not providing suitable homes within a suitable setting. The example of secure entrances is a specific point within a wider context of unsuitable housing. Issues regarding the suitability of housing were raised during the masterplan consultation process and again during the SPD consultation. Another respondent, a resident of a block proposed for demolition in the SPD, comments that there are multiple deficiencies with her housing. The respondent lists the size of her home, the inadequacy of kitchens and bathrooms and the need for modernisation as reasons for supporting core principle 1.

The Putney Society objects to the council's decision to demolish properties instead of refurbishing blocks. The Society specifically objects to the proposed demolition and rebuilding of Allbrook House, listing its role as an introduction to a collection of heritage assets on the estate. The Society states that the retention of Allbrook House and the Roehampton Library would enhance the new centre which would be created around them.

The council disagrees with The Putney Society. The retention of Allbrook House was discounted during the two formal masterplanning consultations that preceded the SPD consultation. The council also notes that Allbrook House is not currently listed either nationally or locally, or included in the conservation area as detailed in the council's Alton area Conservation Area Appraisal and Management Strategy. An individual respondent objects to the inclusion of properties which have previously been noted as 'positive buildings' on page 33, section 7.3 of the Conservation Area Appraisal and Management Strategy (CAAMS)

The council notes that the CAAMS Townscape Map for Alton West shows Nos.1-7 Portswood Place as buildings that make a positive contribution to the character of the area. The CAAMS does not make any further reference to these buildings. However, this is not uncommon in conservation area strategy and not all positive buildings are either described or have any explanation why they are considered to be positive buildings. In the case of Nos. 1-7 Portswood Place the buildings are shown as positive because they are contemporary with the original buildings of the Estate and were designed and built as part of the planned development as a whole. The SPD is not in conflict with the CAAMS. The assessment in the SPD is not made on historic or architectural grounds but is based on other criteria, in particular the qualities of the accommodation and services provided by these buildings. Any replacement buildings must preserve the character and appearance of this part of the Alton Conservation Area and the specific guidance in the SPD for Key Intervention Area 2, Portswood Place, as set out in paragraph 5.6G of the draft SPD emphasises the importance of conserving heritage assets in this location.

The Putney Society, Alton Regeneration Watch and a number of residents object to the inclusion of Hershams Close and Borden Walk blocks being included as options for potential demolition in the SPD. This is a misreading of the draft SPD.

The council disagrees that it should be assumed that because properties are within the wider SPD area that they are being incorporated into the list of properties proposed for demolition. There are many other areas, including the Tunworth Crescent and Tangle Grove neighbourhoods, which are included in the

wider SPD area, but are not listed in any of the consultation documents as proposed for demolition. In order to ensure clarity of understanding, a list of all the residential blocks proposed for demolition has been included in the introduction to the SPD.

### **Comments on Core Principle 2 – Breathe new life into the existing centres**

This section of the SPD concentrated on the centres at Danebury Avenue and Portswood Place. Issues including retail mix, housing mix, public spaces and employment opportunities were reviewed.

The Putney Labour Party and the local MP, Justine Greening, support the integration of new B1 space at Roehampton Local Centre in section 4.2D of the draft SPD. The Putney Labour Party's suggestion that enterprise and incubator space, as mentioned in the masterplan, could be detailed as possible inclusions within this B1 space, has been incorporated into the final SPD. However, the council does not agree that references to potential associations with organisations, including the Roehampton Business School, should be included in the final SPD. There has not been any preliminary contact with any such groups.

The Putney Labour Party cites the need to consider the spatial requirements of existing retail businesses whilst designing the new centres. The council reiterates that the Protected Core Frontage at 1–59 Danebury Avenue dictates that there must be a minimum threshold of retail (A1) space in this parade. The incorporation of other uses within this parade will only be accepted once this minimum level of retail usage (70 per cent) is reached. DMPD Policy DMTS 3 also highlights the expectation of no net loss in floor space, that shop fronts are provided, and that the development would not result in the inclusion of three adjoining non-retail uses in the frontage parade.

The St James Group supports the SPD's policy of revitalising the Roehampton Local Centre and Portswood Place Important Local Parade. However, it objects to the maximum retail floor space figures included in core principle 2 of the SPD. The St James Group contends that market demand and design should shape any future proposals for development in order to avoid the inclusion of empty and unused units. Alton Regeneration Watch also expresses concerns about the possibility of provision without having considered demand. One resident comments that local residents who have businesses located elsewhere and Job Centre Plus staff should be encouraged to relocate to the SPD area.

The council has retained the maximum floor spaces in the final SPD to provide a clear indication as to the level of development deemed acceptable within the SPD area. The floor spaces have been developed with consideration given to recent unit vacancy rates, the need for a balanced mix of retail and residential units and acknowledgement of the inclusion of Protected Core Frontages. The council agrees with the comment regarding the inclusion of employment advice within the SPD area. The new regeneration team site office will provide space for an outreach service delivered by the council's WorkMatch team.

Alton Regeneration Watch objects to paragraph 2.6 of the draft SPD describing commercial buildings as being poorly sited and constructed. Its main objection is that the reprovided retail units will be situated in the same location as those currently in situ. However, the site reference pertains to the wider context including public realm, service area design and accessibility. DMPD Policy DMTS 3 clearly explains that the Danebury Avenue parade will need to provide A1 space, but the SPD also refers to the context of these spaces. The wording in the final SPD has been adapted to clarify this point as raised by ARW.

Justine Greening, the local MP, supports the principle of revitalised centres. She comments that efforts should be made to develop a shopping area that includes locally run independent shops and larger national chains. The designation of spaces, once A1 space has been agreed, is not a planning issue and detail is therefore not provided in the SPD. The council intends to remain as the freeholder of the new blocks built in Danebury Avenue. As the freeholder, the council will give due regard to factors of occupation including the balance of mix.

DP9, responding on behalf of both the Southlands Methodist Trust and Roehampton Methodist church, welcomes core principle 2. Specifically, DP9 comments favourably on the preference for signature architecture to be used for community buildings to create focal points. The council notes this support. Nevertheless, individual respondents have requested clarification as to what the term signature architecture means exactly. In this instance, the preference is for distinctive buildings which create interest in the area. Examples are included in the masterplan.

### Comments on Core Principle 3 – Deliver new and improved community infrastructure

This section of the SPD concentrated on the community facilities and social infrastructure throughout the SPD area. Issues including the relocation of current community facilities, the incorporation of new services and facilities and the need to assess education and healthcare requirements were reviewed in this section of the SPD.

The Putney Society expresses its continued concerns regarding the co-located facilities at Portswood Place. It maintains that the location is not large enough for the services and facilities the council envisages operating from this new location. The Society and the local Methodist minister, state that the building will be too large for the location and cite its inclusion in the setting of the Grade I listed Mount Clare and rolling landscape as an issue for concern.

The council seeks to address The Putney Society's concerns by highlighting Section 5.6 B of the draft SPD. A summary of the services that could be co-located in this building is provided and does not list all the services currently located at 166 Roehampton Lane. As detailed in the masterplan, preliminary design work has been carried out to ascertain whether the site is suitable for buildings co-locating the expected services. The council also seeks to draw The Putney Society's attention to Section 5.6 G in the draft SPD. This section of the SPD details how existing heritage assets and their settings must be conserved and enhanced. The final SPD also includes the assertion that it is unlikely that development of more than three storeys would be supported in the Portswood Place area. The council has worked with Historic England throughout the SPD and masterplanning process to ensure that any impact of the development on heritage assets is positive. The initial idea proposed for this area was rejected during masterplanning options consultation and these new parameters constructed in its place.

The Putney Society supports the inclusion of centrally located community buildings which serve the needs of the whole of the Roehampton community, as detailed in the Roehampton Social Audit (2010). The Society details concerns as to whether community buildings are going to form part of the final SPD, stating that the SPD leaves the provision of community facilities in Roehampton in doubt. The Roehampton Forum concurs with the view that general community space is not properly defined in the SPD. The Society also comments that there is a possibility of Roehampton Parish Hall, known as The Cornerstone, located outside the SPD area, will be redeveloped.

The council has reaffirmed its commitment to the reprovision of community facilities throughout the masterplan and SPD process. To ensure this point is made clearly, wording to this effect has been added to the final SPD's introduction. The draft SPD references the provision of two new community facilities. Section 5.6 B details a new community pavilion and this wording has been adapted for the final SPD to make clear the accessible nature of the building's main hall. The draft SPD's core principle 3B notes that a new library and arts facility could be included at Roehampton Local Centre. This wording has been adapted to reflect the council's intention to include meeting space that is accessible to all local groups. The council notes that Roehampton Parish Hall was listed as an asset of community value in July 2015.

Parking provision for the new Portswood Place buildings is noted as a concern by individual respondents. The council refers those concerned to Figure 5.3 in the draft SPD and the parking strategy detailed on pages 140 and 141 of the Alton Area Masterplan. Figure 5.3 is being refined for inclusion within the final SPD, but the parking symbol and key will remain.

Residents and the local MP, Justine Greening, support the ongoing presence of a library within the Roehampton Local Centre. Residents also raise concerns that the Alton Activity Centre may not be included in the new development. The reprovision of the library is specified within the draft SPD, but to ensure understanding, wording to this effect has been inserted into the introductory section of the final SPD. The council's intention is that the Alton Activity Centre service will remain on the Alton Estate; the masterplan does not indicate a change of location.

Justine Greening, the local MP, comments on core principle 3 that it is vital that users of facilities being reprovided are fully involved in the discussion regarding their reprovision needs. The council notes this comment and has carried out preliminary meetings with service users. Any future development will include detailed working groups comprising the development team and service users.

Many of the responses received from individuals request confirmation that facilities including schools may need to be upgraded, or newly provided, to cope with anticipated increases in population. The council

refers the respondents to core principle 3C of the draft SPD. This section explains that the council will require an assessment of the educational and health care requirements generated by proposed developments to support planning applications.

#### **Comments on Core Principle 4 – Deliver a high-quality landscape and outdoor recreation facilities throughout the area**

This section of the SPD concentrated on the proposed changes to the landscape and recreation facilities within the SPD area. Issues reviewed in this section included the need to retain public open space, renew the setting of listed buildings and provide modern and practical sports and play facilities.

The St James Group registers support for the landscaping of Downshire Field. However, it also notes that Figure 4.1: Landscape strategy diagram does not allow for smaller local interventions. The council notes this comment, but reiterates the nature of the SPD: it is a land use document which gives development guidance in broad terms. The SPD is not expected to include the level of detail to which the St James Group refers. Figure 4.1 outlines upgraded landscape, new public spaces, new community gardens and shared surfaces which provide a basis for future development.

The Putney Society expresses concern that the proposals for Downshire Field may result in a cluttered appearance which would compromise the setting of the Grade II\* listed Highcliffe Drive slab blocks. Historic England echoes these concerns regarding the importance of heritage assets. They support the SPD's identification of Downshire Field as a heritage asset and the requirement to respect and restore the Georgian landscape. However, Historic England notes that the Conservation Area Appraisal and Management Strategy (CAAMS) requires further illustrative work. Historic England also cites the important role of landscape proposals, as detailed in Section 5.4, in strengthening the significance of the landscape as a major heritage asset within the conservation area. Historic England requests that wording in Section 5.13 be rewritten to provide a more accurate explanation for the reasoning behind the proposals for the central landscape.

The council appreciates Historic England's feedback and specific requirements. The council has commissioned heritage consultants to compose a comprehensive heritage statement. This document will fully cover the landscape issues and requirements as identified by Historic England in their SPD feedback. In regard to the Conservation Area Appraisal and Management Strategy, the council's planning officers intend to improve the graphic quality of the Townscape Map for the Alton Character Area in two specific ways. Firstly, they will clarify the status of the open land currently shown in order to show clearly that open land which is private amenity space and that which is public open space. Secondly they will clearly show important local views. The intention is that the Townscape Map in the Alton CAAMS will be clear and consistent with the information shown on the various figures in the SPD including 1.6 (Land Use), 3.2 (Site Wide Concept Diagram) and those used for the key intervention areas.

The Environment Agency expresses support for the SPD's proposals for a range of outdoor activities and enhancement of the landscape. However, residents raised general concerns regarding open space and its re-provision. The council reiterates that planning policies protect both public space and sports and recreation space. The council's Local Plan policies, Core Strategy policy PL4 and DMPD Policy DM01, provide for the protection and enhancement of open space. DMPD Policy DM02 states that there should be no net loss of sports and recreation space within a development. If the council re-provides sports space, such as the youth club's basketball court, the re-provided space must be at least equal in size to the original space.

Natural England welcomes the inclusion of the above detailed planning policies, as well as the SPD's assertion that there will be no net loss of publicly accessible land. The organisation states that the prevention of the loss of open space will assist in keeping residents active and better engaged with their local community. Natural England also voices support for core principle 4's provision for green infrastructure. The council notes these comments.

#### **Comments on Core Principle 5 – Respect the heritage of the area**

This section of the SPD concentrated on the landscape and building heritage of the SPD area. The issues reviewed included the need to respect and enhance existing heritage assets and their settings, the proposed restrictions upon the height and form of new buildings and the need to reveal the positive qualities of existing heritage assets.

The London Borough of Richmond (LB Richmond) reiterates that any development in the SPD area should not have a detrimental impact on Richmond Park or views to and from it. This neighbouring local authority is supportive of the aims set out in core principle 5C in the draft SPD. LB Richmond specifically supports the SPD's statement that development of more than three storeys is likely to be inappropriate at Mount Clare and Portswood Place.

Historic England is generally supportive of the SPD's proposals, but, like LB Richmond, it is concerned about the setting of particular assets. Historic England notes that the setting of Mount Clare is currently impeded by the university halls of residence and self-seeded woodland. Historic England has requested design guidelines to ensure future developments better reveal the significance of the Grade I listed building. The council agrees that existing heritage assets and their settings should be conserved and enhanced. Paragraph 5.6G of the draft SPD notes that landscape improvements are necessary in order to enhance the setting of Mount Clare.

LB Richmond welcomes and supports the requirement for major planning applications within the SPD area to include a visual impact assessment. This stipulation is set out in the delivery section of the draft SPD. The assessment should demonstrate that the proposals will not have a detrimental impact on local views from Richmond Park and Conservation Areas.

The minister for the Roehampton Methodist church objects to the scale of the buildings suggested for Portswood Place. The main concern noted is that the buildings may detract from their surrounding setting within a conservation area comprising many listed buildings. The council does not agree that the three storey maximum height set out in core principle 5C of the SPD draft will be detrimental to the wider setting. However, the council notes these concerns and intends to continue working with Historic England to ensure that developments in Portswood Place have a positive impact on listed buildings, including Grade I listed Mount Clare.

The St James Group, an individual respondent and DP9, representing the Southlands Methodist Trust (SMT) and the Roehampton Methodist Church (RMC), comment further about the option of taller buildings. The individual objects to paragraph 4.8 of the draft SPD. The paragraph notes that tall buildings are likely to be inappropriate in the SPD area. The respondent comments that buildings taller than five storeys already exist within the SPD area. The council agrees that there are tall buildings within the SPD area, but does not view this as reason enough to build additional tall buildings which would compromise the heritage and setting of certain parts of the SPD area. As outlined in the draft SPD, all proposed buildings of five storeys and above will need to satisfy the criteria of DMPD Policy DMS4.

Roehampton Methodist Church supports heritage core principle 5 with the exception of the restriction of building heights to three storeys as detailed in paragraph 4.5C of the draft SPD. The St James Group agrees with the RMC that this policy is too prescriptive a design parameter and will unnecessarily restrict development in the Portswood Place and Mount Clare areas. The St James Group objects to the wording of paragraph 5.6G of the draft SPD for the same reasons. The council does not agree that this element of the SPD is overly prescriptive. The NPPF (para. 59) states that planning authorities should avoid unnecessary prescription of detail and instead concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development. Considering the continued input from Historic England throughout the masterplanning and SPD process, the council maintains that the guidance regarding heights in this area is appropriate and necessary.

Individual respondents, LB Richmond and Historic England all comment on building heights. Individual respondents comment on their lack of support for high buildings and mention that Danebury Avenue wind tunnel modelling has not been carried out by the council. However, in the absence of a proposed scheme, the council does not carry out this type of modelling. Massing and layout of buildings need to be considered for such modelling and would relate to specific planning applications as opposed to an SPD.

Historic England comments that changes and opportunities to enhance the landscape need to be informed by a greater understanding of the relationship of the different layers of landscape and historic development. As detailed in the previous landscape section of this report, the council has commissioned heritage consultants to compose a comprehensive heritage statement. This document will fully cover the landscape issues and requirements as identified by Historic England in its SPD feedback.

Historic England has identified a number of heritage assets within the SPD area which are included in its Register of Heritage Assets at Risk. Historic England encourages a specific commitment to address the issues as part of the aim of preserving and enhancing the heritage assets and their settings.

The council has adapted the draft SPD wording to include specific reference to the risk register in the strategic objectives section. Specific references to the Doric Temple and the Watchers sculpture have also been incorporated into core principle 5's reasons section. Within a wider, non-SPD specific, context the council has a statutory duty under the Planning (Listed Buildings and Conservation Areas) Act 1990, to ensure that listed buildings, and buildings in conservation areas, are properly preserved. The council will continue to work in partnership with Historic England in compiling the Register of Heritage Assets at Risk.

### **Comments on Core Principle 6 – Update and activate the public realm**

This section of the SPD concentrated on the improvement of the public realm within the SPD area. Issues reviewed comprised the importance of a holistic place-making approach, the upgrading of streets and pedestrian links and the need to produce socially inclusive community spaces.

Transport for London (TfL) supports the council's intentions to upgrade existing spaces, pedestrian links and public spaces. However, it notes that access to new properties on Roehampton Lane will not be permitted to interfere with the free flow of traffic. This caveat has subsequently been incorporated in the final SPD.

Alton Regeneration Watch (ARW) comments on parking provision and security as highlighted in the SPD. ARW notes that the masterplan and SPD documents are vague in regard to detailing where parking for existing and new residents will be located. The council does not agree with this point and subsequently directs respondents to the parking strategy on pages 140 and 141 of the Alton Area Masterplan.

Justine Greening, the local MP, and the Environment Agency both welcome the design principles laid out in core principle 6. The Environment Agency positively receives the ideas incorporating design for environmental performance. Ms Greening supports the proposal to design out unused spaces, which can be conducive to crime and antisocial behaviour.

### **Comments on Core Principle 7 – Improve access and connections**

This section of the SPD concentrated on the connectivity and transport proposals for the SPD area. The main issues reviewed included new pedestrian and cycle links, a new access point to Richmond Park, proposals to relocate the Danebury Avenue bus turnaround and bus route extensions.

Transport for London (TfL) argues that there needs to be further discussion about the SPD's approach to the local bus network and bus infrastructure. The council concurs with this observation that further discussions will take place with TfL. As requested, the final SPD includes reference to TfL as a key stakeholder.

TfL makes the point that many SPD area residents are dependent on the bus network. The council agrees with TfL's assessment of the need for a robust and accessible bus network within the SPD area. The council also asserts that the changes proposed in the SPD will have a positive impact on local residents. The SPD does not propose a decrease in bus routes. To the contrary, point D in the core principle 7 of the draft SPD proposes enhancing the bus service available to local residents. This is suggested through the provision of a new bus route running through the SPD area, via Highcliffe Drive on to Barnes station along Roehampton Lane. The same section of the draft SPD suggests an increase in the frequency of buses on existing routes. An individual respondent supports this proposal and comments that TfL should introduce rapid shuttle services to rail stations.

TfL seeks assurances that the SPD does not allow for the relocation or removal of the Portswood Place bus stands. The council cannot provide these reassurances. Core principle 7 of the SPD makes reference to the possible relocation of the bus turnaround and bus stops. However, whereas the Alton Area Masterplan states that the intention is for these crucial elements of infrastructure to be relocated further to the west of Danebury Avenue, the draft SPD does not provide this specificity. The council has adapted the SPD to provide clarification. New wording has been added to core principle 7C confirming that the SPD supports the relocation of the bus stands within the SPD area and does not support their removal.

An individual respondent notes that the relocation of the bus turnaround would require the loss of part of the edge of Downshire Field. The council notes this comment and reiterates that planning policies protect public space and require re-provision where necessary. The council's Local Plan policies, Core Strategy Policy PL4 and DMPD Policy DM01, provide for the protection and enhancement of open space.

The Putney Society, Alton Regeneration Watch (ARW) and multiple individual respondents comment on the draft SPD's proposals regarding the Danebury Avenue and Highcliffe Drive traffic barriers. Individual responses comment on the previous masterplan consultation regarding the barriers and reiterate their understanding that the opening of the barriers is an unpopular proposal.

The Putney Society observes that the consultation regarding the barriers proved this subject to be one of the more contentious issues involved in the regeneration process. The Society asserts that the Council Leader has previously given clear assurances that the barriers will not be removed, but that the SPD does not make this point clearly.

The council disagrees with The Putney Society's contention that the draft SPD does not address properly the matter of the barriers. Figure 2.1 shows a clear break in the route arrows where the Danebury Avenue barrier is in situ. Figure 4.3 also shows the location of the Danebury Avenue barrier and the dotted red line shows that it is proposed that Highcliffe Drive be open to buses. These SPD figures do not deviate from the message communicated on page 143 of the masterplan. However, to ensure complete clarity, explanatory wording has been added to the core principle 7 section of the final masterplan.

A number of edits were made to the draft SPD as requested by TfL. These changes include the insertion, in core principle 7, of wording highlighting the importance of partnership working. This addition is specifically in relation to the heavily supported upgrading of pedestrian crossings at Danebury Avenue and Roehampton Lane. This need for collaborative working was also noted by Alton Regeneration Watch. TfL's comments regarding a Tranche 2 Quietways route are noted. Confirmation that new developments must be mindful of pre-existing and planned TfL projects, has been incorporated into point C of core principle 7. The council also notes TfL's comment regarding the existing scheme to improve northbound traffic flow between Danebury Avenue and Clarence Lane.

Both the London Borough of Richmond (LB Richmond) and the Environment Agency welcome and supports improving access to green spaces. LB Richmond notes that it will cooperate with the council in order to achieve the aspiration of a new connection from the SPD area into Richmond Park. The Environment Agency passes comment on the opportunity for the park to become an important community and educational resource. The council notes the Environment Agency's promotion of the opportunities provided by Richmond Park as a local amenity. The council concurs with LB Richmond's request that the detail of any such new route must involve further discussions between transport and parks officers and Royal Parks.

Comments from individual respondents often take the form of requests as opposed to comments pertaining to specific SPD proposals. Examples include requests for Underground links, improved bicycle storage and the addition of bicycle rental schemes. The council acknowledges these general comments, but notes that these subjects were either addressed during the masterplanning process or refer to detail appropriate to a planning application rather than a land use document such as the SPD.

Alton Regeneration Watch and individual respondents comment that certain transport destinations have been omitted from lists. These respondents and TfL have stated that the SPD is incorrect to state that there is no direct bus route to Barnes station. The council has inserted wording listing the omitted destinations. However, the council disagrees with the objection to the SPD's assertion that there is not a direct bus from within the estate to Barnes station. In order to ensure clarity of understanding, the council have inserted new wording into the SPD. This new wording differentiates between the edge and centre of the Alton Estate. These additions have been made to paragraphs listed respectively as 1.30 and 2.23 in the draft SPD.

TfL, individual residents and The Putney Society have made observations relating to travel times to rail and Underground stations. The council concurs with these comments and has subsequently updated paragraph 1.31 of the draft SPD through the inclusion of reference to Putney Bridge Underground station. The council has also clarified the travel time from the SPD area to Putney railway station.

### **Comments on Core Principle 8 – Create a Sustainable Environment**

This section of the SPD concentrated on the SPD's proposals regarding the creation of a sustainable environment. The main subjects covered comprised sustainable urban drainage, the minimisation of water consumption and the need for new developments to enhance and maintain biodiversity and habitats.

The London borough of Richmond (LB Richmond) supports the overall SPD approach. However, it is concerned about lighting at the proposed new entrance to Richmond Park. In order to address LB Richmond's concerns, wording regarding lighting and the effect on wildlife has been inserted into core principle 8B in the final SPD.

The Environment Agency supports core principle 8. However, they, along with DP9 and the St James Group, have highlighted that the Code for Sustainable Homes Level 4 has been withdrawn. The council has subsequently replaced references to the code. The new wording for core principle 8A references the London Plan, Core Strategy Policy IS2 and DMPD Policy DMS3.

The Environment Agency states that the council should require development proposals and planning applications to include landscaping and other ecological features that will contribute towards protecting, managing and enhancing local biodiversity. The council agrees with this comment and notes that core principle 8 of the SPD requires proposals to demonstrate that they will result in the maintenance and enhancement of biodiversity and habitats.

Justine Greening, the local MP, and the Environment Agency both comment that drainage should be addressed in all developments. The Environment Agency specifically notes that developers should seek to ensure that surface water run-off is managed as close to its source as possible. This statutory body states that the use of sustainable urban drainage systems should be promoted for all developments unless there are practical reasons for not doing so. The council notes and agrees with this comment. Core principle 8 of the draft SPD highlights London Plan Policy 5.13 which requires development to utilise sustainable urban drainage systems (SUDs). The council's DMPD Policies DMS3 and DMS6 specify that all new development should seek to incorporate sustainable urban drainage or demonstrate alternative sustainable approaches to the management of surface water.

Natural England has commented that reliance on the Habitats Regulations Assessment (HRA) should not cause any issues because the SPD only expands on policy already set out in the Core Strategy Policy PL15. However, Natural England notes that works carried out in the future may need to carry out a short screening assessment of their own. The council is mindful of this advice in relation to future development.

### **Comments on Delivery:**

This section of the SPD concentrated on the delivery approach and the council's intention to participate in a public-private sector partnership. Infrastructure funding, market demand factors and planning application requirements were also reviewed.

Transport for London (TfL) request the insertion of specific detail relating to two delivery points. Firstly, they highlight the need for TfL to be noted as a key stakeholder in paragraph 6.6. Secondly, they request wording to be inserted into paragraph 6.9 of the delivery section detailing that contributions may be sought towards the upgrading of crossings and cycle routes on the TfL network. This inclusion of improvements to TfL network roads was also requested by LB Richmond who made specific reference to Roehampton Lane and the link between the SPD area and Barnes station.

TfL note that, in order to allow them to appropriately determine the impact a planning application may have on the public transport network, as well as its conformity with the transport policies set out by the London Plan, it may be appropriate for any future planning applications to be accompanied by a Transport Assessment (TA), Travel Plan (TP), Draft Construction Logistics Plan (CLP) and draft Delivery and Servicing Plan (DSP). The council note this advice and the need for TfL to be fully included in the progressing regeneration.

TfL also reiterate their need for information relating to bus trips to be generated by any future development. This information will include origin and destination projections for the new travellers to and from the SPD area. The council note this advice and the need for TfL to be fully included in the progressing regeneration.

The Putney Society advise that it deems the delivery section of the SPD to be vague. It states that the one-move policy for residents should be made more explicitly within the SPD. The council has addressed this request by including reference to this policy in the introduction of the final SPD. This wording has been inserted into the section signposting those who wish to obtain detail about the residents offer towards the regeneration web page and the residents' offer booklets which were published in November 2014.

The Putney Society also advise that service charge limits should be listed in the delivery section of the SPD.

The council does not agree with this stipulation. The SPD is a planning and land use document. Detail regarding housing related subjects such as rent and service charge is addressed through committee papers sent to the Housing and Regeneration Overview and Scrutiny Committee. In the same vein, the Putney Society request further information relating to the proposed private-public partnership between the council and a developer. The council has not yet formally decided upon the nature and form of this contractual agreement and deems it inappropriate to include this information in the SPD.

### Other Comments

A number of representations do not register opposition or support for specific proposals in the SPD. They instead note support or opposition to the preceding masterplan process or the anticipated broader regeneration. The form and nature of a number of representations means that the comments are not specific to the SPD's planning and land use proposals. A number of these comments are detailed in this section.

Individual respondents comment that the consultation process for the SPD was not widely publicised. The council does not deem this to be a justifiable comment. The consultation was advertised in line with the recommendations in the Town and Country Planning (Local Planning) (England) Regulations 2012. The SPD consultation followed the form of previous council SPD consultations and in many instances included additional publicity. This included an advertisement in the Wandsworth Guardian, the standing presentation at Roehampton Library, the advertising of the SPD on three different council web pages and the availability of documents at five local locations.

As noted earlier in this report, both individual residents and the group Alton Regeneration Watch (ARW) report confusion caused by the references to the 'Roehampton area' in the draft SPD. A clarification paragraph has been added to the Introduction of the final SPD. This insertion explains that due to the SPD being a planning policy document it must follow the language of the council's Local Plan. These documents refer to Roehampton and not the Alton area. This is the reason why the SPD refers to Roehampton and not the Alton area in its title. In order to avoid confusion, the red line area shown in multiple draft SPD figures is referred to as the SPD area throughout the final SPD.

In relation to the masterplan process, a number of individuals comment that there had been a low level of engagement from residents and that masterplan changes have not been driven by them.

The council disagrees with this comment. The council references the extensive consultation programme undertaken before, during and after the formal options and preferred options consultation stages. The consultation stages included a plethora of engagement methods and techniques in order to ensure that residents could talk to the team through a number of mediums. More than 800 residents and local stakeholders discussed their opinions and thoughts regarding the proposed regeneration programme with the team. The regeneration team also held preliminary interviews with 70 per cent of the residents living in the properties listed for demolition in the masterplan. The council directs those who wish to learn more about the consultation process to the consultation reports available on the regeneration web page at: [www.wandsworth.gov.uk](http://www.wandsworth.gov.uk).

The council also contends that residents have prompted changes during the masterplanning process. Specific examples include the dismissal of ideas including the relocation of the Alton Primary School and the installation of a Downshire Field pond, the inclusion of community-focused spaces and halls, and the retention of the Danebury Avenue barrier.

Individual respondents comment that social regeneration has only recently been discussed by councillors and that the focus appears to be on buildings. The council reiterates that the SPD is a land use planning policy document. The main criteria for this land use document include building heights, housing standards, sustainability, urban design, land uses and approaches to conservation and heritage. The Roehampton SPD provides guidance on the nature and form of development that the council is likely to find acceptable in the SPD area.

Wandsworth's Public Health department comments that the sustainability appraisal's recommendation that a construction and demolition management plan (CDMP) is necessary in relation to future developments, needs to be clarified. Public Health comment that this wording may cause confusion to developers. The council notes these comments and confirms that this form of management plan would be considered during the planning application stage.

A representation from an individual queries why the relative merits of demolition or refurbishment of buildings are not discussed within the Sustainability Appraisal document. The council reiterates that the Sustainability Appraisal has been written with regard to the proposed plans, which include demolition of blocks as listed in the final SPD. The Sustainability Appraisal provides information pertaining to these proposals and not to any previous proposals which have already been through a consultation process.

One individual respondent notes that he was not aware of the October/November 2014 consultation regarding Local Plan documents. The council can confirm that public consultation for the Local Plan documents followed the correct procedure. The council contends that some respondents have conflated planning consultation procedures with the extensive engagement programme used during the masterplanning consultation.

## Appendices

### Appendix 1 - Consultation Letter



#### Wandsworth Council

Economic Development Office  
Administration Department  
The Town Hall, Wandsworth High Street  
London SW18 2PU

Please ask for/reply to: N Smales  
Telephone 020 8871 6207 / 6449  
Web: [www.wandsworth.gov.uk](http://www.wandsworth.gov.uk)

Our ref: EDO/NS  
Date: 1<sup>st</sup> April 2015

Dear Sir or Madam,

#### Re: Draft Roehampton Supplementary Planning Document

The consultation period for the Roehampton Supplementary Planning document begins on Tuesday 7<sup>th</sup> April 2015.

The Roehampton SPD reflects and builds on relevant policies in the Wandsworth Local Plan to provide additional guidance on how those policies should be implemented. In particular it builds upon the provisions of Core Strategy Policy PL15 and the area spatial strategy for Roehampton, as well as the relevant Site Specific Allocations and other general development management policies.

#### Consultation

In accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, the SPD is subject to public consultation. This consultation begins on 7<sup>th</sup> April 2015 and will run until the end of the 24<sup>th</sup> May 2015.

#### Copies of Documents

Copies of the draft SPD are available for inspection on the Council's website (<http://www.wandsworth.gov.uk/spd>), at Balham, Battersea, Putney, Roehampton, Tooting and Wandsworth libraries (for opening hours see [www.wandsworth.gov.uk/libraries](http://www.wandsworth.gov.uk/libraries)) and at:

Western Area Office (Opening House: 9:00am to 4.30pm Monday – Friday)  
38 Holybourne Avenue  
London, SW15 4JE

and

Customer Services Centre  
Town Hall Extension  
Wandsworth High Street  
London, SW18 2PU (Opening House: 9:00am to 5.00pm Monday – Friday)

#### Representations

Representations can be made during the consultation dates set out above either online at <http://www.wandsworth.gov.uk/spd>, by email to [planningpolicy@wandsworth.gov.uk](mailto:planningpolicy@wandsworth.gov.uk), or in writing to:

Planning Policy:  
Housing and Community Services  
Wandsworth Council  
The Town Hall  
Wandsworth High Street  
London  
SW18 2PU

Responses will be made public and a summary of the consultation findings will be made available on the website.

For further information, email [planningpolicy@wandsworth.gov.uk](mailto:planningpolicy@wandsworth.gov.uk), or telephone 020 8871 6207 or 020 8871 6449.

Yours sincerely,

Nick Smales  
Economic Development Officer

## Appendix 2 - List of Consultees

### Specific and Duty to Cooperate Consultees

Civil Aviation Authority  
Environment Agency  
Greater London Authority  
Highways Agency  
Historic England  
London Borough of Lambeth  
London Borough of Richmond  
Marine Management Organisation  
Mobile Operators Association  
National Grid  
Natural England  
NHS Wandsworth  
Office of Rail Regulation  
Royal Borough of Kensington & Chelsea  
Royal Borough of Kingston-upon-Thames  
Scotia Gas Networks  
Thames Water  
Thames Water Utilities Ltd  
Transport for London  
Virgin Media  
Vodafone Ltd  
Wandsworth Clinical Commissioning Group  
Westminster City Council

## Appendix 2 - General Consultees - Organisations

A2 Dominion	Battersea Conservation Concern
Abbotsleigh Road Residents' Association	Battersea Dogs and Cats Home
Ackroydon Residents' Association	Battersea Fields Residents' Organisation
Action Space London Events Ltd	Battersea Islamic Cultural and Educational Centre
Addition Land Ltd & Network Rail	Battersea Methodist Mission
Addition Land Ltd & Southwark Diocesan Trust	Battersea Police
Age Activity Centre	Battersea Power Station Community Group
Ahmadiyya Muslim Association	Battersea Power Station Development Company
Akzo Nobel (CPS) Pension Scheme	Battersea Project Land Company Limited (BPLCL)
Alex Imlach Architects	Battersea Society
All Saints C of E Church	Battersea Spiritualist Church
Allen Briegel New Homes & Development	Battersea Village Residents' Association
Alliance Environment and Planning	Baylight Properties Plc.
Al-Muzzammil Mosque & Community Centre	Behrens Sharp
Alsop Verrill LLP	Bellevue Road Residents Association
Amec	Bellway Homes (SE) Ltd
ANA Architecture	Berkeley Group Ltd
Anastasia Limited	Berkeley Homes (Central London) Ltd
Anchor Congregational Church	Big Yellow Self Storage Co. Ltd
Ancient Monuments Society	Binley & Winchfield Houses Tenants' Association
Antler Homes	Black Rights Group
Architects Journal	Boldfort Ltd
Architectural Practise	Bonsor Penningtons Commercial
Arndale Estate Residents Association	Borough Residents' Forum
Arqiva	Boyer Planning Ltd
Arriva London	Branston & Company Architects
Ashcroft Technology Academy	Brian Barber Associates
Asian Muslim Community Centre	Brindle Developments
Assael Architecture	British Gas plc
Assael Architecture	British Red Cross
Balham & Tooting Sports & Social Club	Broomwood Methodist Church
Balham Baptist Church	Buddapadipa Temple
Balham Mosque	Burgess Mean Architects
Balham Properties LLP	C G M S
Balham Seventh Day Adventist Church	C.E.P Developments Ltd
Balham Society	CABE
Balham Town Centre Management Office	Cable & Wireless
Balham Town Centre Partnership Board	Callington Estates Ltd & the Callington Trust
Ballymore Group	Campaign for Real Ale
Barclays Bank PLC	Campaign for Real Ale SW London Branch
Barratt London Ltd	Campaign to Protect Rural England (CPRE)
Barratt West London	CAMRA SW London
Barrowfen Properties Ltd	Canary Wharf Group PLC
Bartlett School of Planning	Capital Studios
Barton Willmore	Cappagh
Battersea Arts Centre	Care Quality Commission
Battersea Central Methodist Mission	Careline Information Centre for Wandsworth

Carey Gardens Co-operative Ltd	Corporation of London
Carmalt Gardens Residents' Association	Cory Environmental Ltd
Carter Jonas LLP	Council for British Archaeology
CB Richard Ellis	Courtney Joyce
CB Richard Ellis Ltd	Covent Co-operative Ltd
CBRE	Covent Garden Market Authority
CEMEX	Covent Garden Market Authority
Cemex UK Materials Ltd	Covent Garden Tenants' Association Ltd
Centre Academy School	Craftwork Interiors
Centre for Accessible Environments	Crest Nicholson Residential (South) Ltd
CgMs	Croatian Centre
CgMs Consulting	Curatus Trust (Mauritius) Ltd
CgMs Ltd	Curatus Trust (Mauritius) Ltd
Chartered Architects	Cyril Mansions Residents' Association
Charterhouse	D P 9
Chas Newens Marine Co Ltd	Dalton Warner Davis
Chatham Road Residents' Association	Dalton Warner Davis LLP
Chelsea Estates Ltd	Danemere St/Ashlone Road Residents' Assoc.
Chelsea Society	Danul Amaan Islamic Centre
Chesterton Primary School	David & Miriam Howitt Architects
Children and Young People's Network	David L Walker Chartered Surveyors
Childrens Flower Society	David Le Lay Ltd
Childrens Society	Dean & Co.
Christ Church C of E Church	Defence Estates (MOD)
Christie's	Delancy and Land Securities (Clapham Junction)
Christopher Wickham Associates	Deloitte
Church Commissioners	Dentons
Church of Our Lady and St Peter	Deodar, Merivale & Florian Roads Residents' Assoc.
Church of the Sacred Heart	Department for Culture, Media & Sport
City Designer	Department for Transport
Clapham Antiquarian Society	Department of Communities & Local Government
Clapham Junction Action Group	Design Group Nine
Clapham Junction T C Management Office	DevPlan
Clapham Society	Dialogue
Clifford Rance Associates	Diamond Conservation Area and Heathbrook Park Residents
Cluttons LLP	Diocese of Southwark Property Department
CMW (Property Preservation) Ltd	District Valuer Wimbledon
Colliers CRE	Doddington & Rollo Community Association
Community Safety Network	Doddington Resource Centre
Confederation of Indian Organisations UK	Dover House Residents' Association
Congregational Union of Ethnic Churches	DP9
Conservation Architecture & Planning	DP9 Planning
Conservation Dept, The Garden History Society	Drivers Jonas
Contact a Family	Dron & Wright
Co-operative Group food Ltd	DTZ
Coral Racing Limited	
Corby Borough Council	

Du Cane Court Residents' Association  
 E.ON  
 Earlsfield Baptist Church  
 Earlsfield Police Station  
 East Hill Baptist Church  
 Edward Potter Associates Architects  
 Edwin Evans  
 EKAYA Housing Association  
 Elias Topping  
 Ellisons  
 Elmbridge Borough Council  
 Empty Homes Agency  
 English Heritage (GLAAS)  
 Ernshaw Place Residents' Association  
 ESA Planning  
 Esher Gardens & Bisley House Residents' Assoc.  
 Ethelburga Tower Residents Association  
 European Metal Recycling Limited  
 Evangelical Church of Yahweh  
 Everyday Church  
 F J Keen & Son Ltd  
 Family and Childcare Trust  
 Fashion Street Regeneration  
 Faylands Area Residents' Association  
 Felsham Road Co-op Ltd  
 Fields in Trust  
 Firstplan  
 Forestry Commission  
 Forward Planning & Transportation, L B Newham  
 Foster and Partners  
 Freight Transport Association  
 Frenncastle  
 Friends of Battersea Park  
 Friends of Clapham Common  
 Friends of the Tooting Commons  
 Gander & White Shipping Ltd  
 Garden History Society  
 Garfield Community Centre  
 Gargoyle Wharf Community Action Group  
 Garratt Business Park  
 Geoffrey Reid Associates  
 George Wimpey City Ltd  
 Georgian Group  
 Gerald Eve  
 GL Hearn  
 GLE Properties  
 Go-Ahead London  
 Goldcrest Land  
 Granit Architects  
 Greater London Archaeology Advisory Service  
 Greater London Enterprise  
 Greek Church of St Nectarios  
 Green Party  
 Groundwork UK (London & SE Regional Offices)  
 GVA  
 Gwendolen Avenue Residents' Association  
 Hamilton Ice Sculptors  
 Hanover Housing Association  
 Hayward & Pullman Gardens Residents' Association  
 Hazlehurst Estate Residents' Association  
 Health & Safety Executive  
 Heathrow Airport Limited  
 Helical Bar and National Grid  
 Heritage of London Trust  
 Hightrees House (Clapham Common) Ltd.  
 Hilsea Residents' Association  
 Hindu Society  
 Hives  
 Hives Architects  
 HM Prison Service Headquarters  
 Holden & Partners  
 Holy Trinity C of E Church  
 Home Builders Federation  
 Hook Consultancy  
 Houston Lawrence Ltd  
 Indigo Planning Ltd  
 Inland Waterways Association (London Region)  
 Islamic Community  
 J C Francis & Partners  
 James Fisher & Son  
 JCMBP  
 Jehovah's Witnesses  
 Jensen Tyrrell  
 Job Centre Plus  
 Jonathan Smith Digital Architects  
 Jones Lang Lasalle  
 Jones Lang LaSalle Ltd  
 Katherine Low Settlement  
 Keildon Road Residents' Action Group  
 Kent Council Council  
 KFC (GB) Limited  
 Khalsa Centre  
 King Sturge  
 Kingsley Associates (Architects)  
 Kinleigh Folkard & Hayward

Kinley Financial Inc  
Kirkwells  
Kish Six Ltd  
KSP Building Design Consultants Ltd  
Labour Party  
Lambert Smith Hampton  
Lambeth Primary Care Trust  
Lammas Motors  
Lascelles Antiques  
Lavender Hill Traders Association  
Lawn Tennis Association  
Lennox Estate Residents' Association  
Lewis Hickey Planning Ltd  
Lidl Uk GmbH  
Life Tabernacle Church  
Linden Homes  
Lipinski Pates Architects  
Living Streets (Wandsworth Branch)  
Local Government Association  
Local Spiritual Assembly of the Baha'is of Wandsworth  
Local Spiritual Assembly of the Baha'is of Wandsworth  
London & Central European Investments  
London & Quadrant Housing Trust  
London Ambulance Service  
London Biodiversity Partnership  
London Borough of Barking and Dagenham  
London Borough of Barnet  
London Borough of Bexley  
London Borough of Brent  
London Borough of Bromley  
London Borough of Camden  
London Borough of Croydon  
London Borough of Enfield  
London Borough of Enfield  
London Borough of Hackney  
London Borough of Hammersmith  
London Borough of Haringey  
London Borough of Harrow  
London Borough of Havering  
London Borough of Hillingdon  
London Borough of Hounslow  
London Borough of Islington  
London Borough of Lewisham  
London Borough of Merton  
London Borough of Southwark  
London Borough of Sutton  
London Borough of Tower Hamlets  
London Borough of Waltham Forest  
London Citizens  
London Councils  
London Cycling Campaign  
London Fire and Emergency Planning Authority  
London Fire Brigade  
London First  
London Forum of Amenity & Civic Societies  
London Gypsy and Traveller Unit  
London Gypsy and Traveller Unit  
London Heliport Consultative Group  
London Heritage Properties Ltd  
London Historic Parks & Gardens Trust  
London Housing Federation  
London Mosque  
London Planning & Development Forum  
London Port Health Authority  
London Society  
London Tideway Harbour Co. Ltd  
London TravelWatch  
London Underground Ltd  
London Wildlife Trust  
Long & Co  
Lookers  
Lord Foster & Partners  
Ludo Press  
Manifest  
Marinezone Ltd  
Mark Jordan Architecture  
Mayor's Office for Policing and Crime (MOPAC)  
McDonalds PLC  
McDonald's Restaurants Ltd  
MDR Associates  
Metro Shopping Fund LP  
Metropolitan Housing Partnership  
Metropolitan Police  
Metropolitan Police Service  
Michael Aukett Architects  
Michael Shanly Homes  
Mimosa Women's Support Group  
Minerva  
Minerva/Delancey  
Molyneux Investments Ltd  
Mono Consultants  
Montagu Evans  
Montagu Evans LLP  
Motorcycle Action Group

Mr Carpet Ltd	Planning Aid
Museum of London Archaeology Service	Planning Bureau Ltd
Mushkil Aasaan Project	Planning Inspectorate
Nathaniel Lichfield and Partners	Planning Potential Ltd
National Air Traffic Services Ltd	Plantation Wharf Association
National Federation of Gypsy Liason Groups	Planware
National Grid Property	Planware
National Offender Management Service	Plowden & Smith
National Trust	Pocklington Resource Centre
Neighbourhoods Initiative Foundation	Polish Benevolent Fund Balham Parish
Network Rail	Ponton Road LLP
Network Rail Infrastructure Limited	Port of London Authority
NHS London Healthy Urban Development Unit (HUDU)	PRC Fewster Architects
NHS Property Services Ltd	Price Partnership
NHS Support Services Partnership	Primrose Mansions Ltd
Nightingale Hammerson	Prince of Wales Drive Environmental Committee
Northcote Books	Public & Commercial Services Union
Northcote Business Network	Puppet Centre Trust
Northcote Road Residents' Action Group	Pure Package
Northcote Ward Councillors	Putney Evangelical Church
Notting Hill Home Ownership	Putney Labour Party
Notting Hill Housing Group	Putney Society
Object Architecture Ltd	Putney Town Centre Partnership Board
OCS Group UK Limited	Putney Town Centre Partnership Board
Oily Cart Theatre Company	Putney Vale Residents' Association
Older Persons Forum Wandsworth	Quinton Scott & Co
Oliver Colvile	Quod
One Housing Group	R J Associates
Open City	Radcliffes LeBrasseur
Oracle Group	Raglan Housing Association
Orchid (Putney) Limited	Ramblers Association (Hammersmith, Fulham & W'worth)
Ormeley Road Residents' Association	Ranelagh Sailing Club Ltd (The Embankment)
Outer Space	Rapleys
P D A Partnership London	Rapleys LLP
P D Elkins Drawing Services Ltd	RB Kensington & Chelsea
P W Lee & Associates	Renaissance Planning
Parish of Battersea Fields	Residents of 25-37 Westleigh Avenue Committee
Parkinsons Disease Society Wandsworth	Rich Investments Ltd
Parkside Community Project	Richard Rogers Architects Ltd
Patmore Co-operative Ltd	River Thames Society
PCT	Riverhaven
Peabody Trust	Riverside Plaza Residents' Association
Peacock & Smith	Riverside Quarters Residents Association
Persimmon Homes Ltd	Road Haulage Association
Peter Pendleton Associates	Robert Beeby Architects
Plan Info	Robert Le Clerc Consulting
Planning	Roehampton Club Ltd

Roehampton Partnership	Southfields Grid Residents' Association
Roehampton Quadrant Residents' Association	Southfields Grid Residents' Association
Roehampton University	Southfields Triangle
Roger Khoryati T/A McDonalds	Southfields Triangle Residents' Association
Rolfe Judd Planning	Southwark Anglican Diocese
Rotary Club Tooting	Southwark Diocesan Advisory Committee
Royal Mail Group Limited	Space Design Consultants Ltd
Royal Parks Estate Management	Spacia Business Centre
Russell-Cooke Solicitors	Sport England
Rydevale Day Nursery	Sport England
Saloria Architects	Sport England London Region
Salvation Army	SSA Planning Ltd
Sapcote Property Developers	St Alban's C of E Church
Savills Commercial Ltd	St Barnabas C of E Church
Scotts	St Boniface R C Church
Scotts Surveyors	St George South London Ltd
Senex Capital Ltd	St George's Healthcare NHS Trust
Service Developments Holdings Limited	St Georges Hospital
Servite Thames	St James Group
Seymour Road SW18 Residents' Association	St James Group
Share a Family	St James Investments
Sheppard Robson	St James's Investments & Keltbray Ltd
Shire Consulting	St Joseph's R C Church
Sikh Gurwara	St Luke's C of E Church
Simon Smith & Michael Brooks	St Margaret's Church Office
Sir James Barrie School	St Mark's C of E Church
SITA UK	St Mary Magdalene C of E Church
Sleaford Street Management Company	St Mary's C of E Church
Sleaford Street Management Company Ltd	St Mary's Primary School
Society for the Protection of Ancient Buildings	St Nicholas C of E Church
Solid State Design Ltd	St Paul's Church of England
Solon Design	St Stephen's C of E Church
Somerset Residents' Association	St Thomas A Becket R C Church
South London Business	St Vincent de Paul Presbytery
South London Catholic Caribbean Association	St. George
South London Guardian Newspaper	Steer Davies Gleave
South London Islamic Centre	Stewart Ross Associates
South London Partnership	Summerstown Mission Evangelical Church
South London Press	Support and Housing for People with Disabilities
South Thames College	Sustrans
South Thames College Further Education	Sustrans-National Cycle Network
South West London and St Georges Mental Health NHS Trust	Sutherland Grove & Area Residents' Association
South West London Community NHS Trust Estates	Sutherland Grove Residents Association
South West London Health Authority	SW London & St George's Mental Health NHS Trust
South West London NHS Support Services Partnership	SW London Group of United Reformed Churches
Southern	Tandridge District Council
	Tara Arts Director

Taylor Williams Daley Partnership	Association
Taylor Wimpey	Victorian Society
Taylor Wimpey & Addition Land Ltd	Vinci St Modwen
Tenant Services Authority	Vinci St Modwen & Convent Garden Market Authority
Tesco Stores Ltd	Visit London
TfL	VSM Estates
TfL Consents & Environment	W J Marston & Son Ltd
Thames Angling Preservation Society	Walsh
Thames Valley Housing Association	Wandle Heritage Ltd
Thames Water Property Services	Wandle Trust
The British Land Company PLC	Wandle Valley Regional Park Trust
The London Planning Practice Ltd	Wandsworth Access Association
The Theatres Trust	Wandsworth Asian Community Centre
Theatres Trust	Wandsworth Bereavement Service
Threadneedle Property Investments and Prices Securities Ltd	Wandsworth Borough Police
Tileman House Investments (Putney) Ltd	Wandsworth Care Alliance
Tonsley Residents' Association	Wandsworth Chamber of Commerce
Tooting History Group	Wandsworth Common Management Advisory Committee
Tooting Liberal Democrats	Wandsworth Community Empowerment Network
Tooting Methodist Church	Wandsworth Community Transport
Tooting Police Station	Wandsworth Council
Tooting Town Centre Partnership Board	Wandsworth Cycling Campaign
Tooting United Reformed Church	Wandsworth Cyclists
Totteridge House Co-operative Ltd	Wandsworth EDO
Totting Islamic Centre	Wandsworth Environment Forum
Traffic Transport and Parking sub-committee	Wandsworth Friends of the Earth
Transformer Properties Ltd	Wandsworth Mencap
Transport for London Land Use Planning	Wandsworth Mind
Transport for London Street Management	Wandsworth Older People's Forum
Tranwood Properties	Wandsworth Primary Care Trust
Trident Business Centre	Wandsworth Public Health
Trinity Fields Trust	Wandsworth Society
Trovecroft	Wandsworth Town Centre Partnership
Trust Planning Ltd	Wandsworth Voluntary Sector Development Agency
Tunworth Crescent Residents' Association	Wandsworth, Chelsea & Fulham Sea Cadets
Turley Associates	Watson Woods Partnership
Turnberry Planning	WEF/Putney Society
Twentieth Century Society	Welcare in Wandsworth
UK Power Networks	Wereldhave Property Management Company Ltd
Unite Group Plc	West London River Group
University of Roehampton	West Side Church
Upper Tooting Methodist Church	Western Riverside Waste Authority
Valiant House Properties Ltd	Westmark Point Residents' Association
Vanik Association of the UK	Westminster Kingsway College
Vauxhall Society	Weston Aviation
Victoria Drive Conservation Area	Weston Aviation Ltd
Victoria Drive Conservation Area Residents	

Westrow Residents' Association  
Westside Residents' Association  
Wimbledon and District Synagogue  
Wimbledon and Putney Commons Conservators  
Wimbledon Park Co-operative Ltd  
Winckworth Sherwood  
WISH  
Wm. Morrison Supermarkets Plc.  
Woodland Trust  
Workspace Glebe  
Workspace Group Plc  
Youngs Brewery  
Zurich Assurance Ltd and Princess Securities Ltd

## Appendix 2 - General Consultees - Individuals

Abbas, Hina	Braun, Marcus	Deacon, Annette Rose
Abbas, Toqeer	Brennan, Nicola	Dehiri, Nabil
Adegboye, Tokunbo	Bretherton, Peter	Demicoli, Susan
Adjetey, Camilla	Brieger, Alexandra	Dewey, T
Afflick, Catherine Elizabeth	Brisha, Rodouane	Dhillon, Gurjit
Ahmed, Aijazhussen	Brook, Jeff	Dibben, Tom
Akinwunmi, Lanre	Brown, Alec	Dinshaw, Peter
Akwetey, Yvonne	Burke, David	Dixon, Tracey
Alasow, Sahra	Burns, Barbara	Doble, Richard
Albert, Ann	Busuttill, Carmen	Dogar, Razin
Alcazar, David	Butt, Kashif	Donaldson, Darlene
Alcazar, John	Butt, Uzma	Doring, Bernd
Allen, T	Buxton, Michael	Edwards, Danny
Ambache, Jeremy	Bygate, Siobhan	Eileen, Richard
Andalopoulos, Katerina	Bysosa, Tshibangu	Einloth, Charles Gerad
Angmor, Alicia	Carlisle, A	Encavey, Jonathan Martin
Ansah, Maria	Carpenter, Cllr Peter	Evans, Jon
Ansah, Thales	Carter-Smith, L M	Evans, Rachel
Anthony, Peter	Chapman, Deidre	Evans, Tony
Archer, John	Cheung, Paul	Faka, Orode
Arrogah, Desire	Chikhi, Tahar	Fannon, Steve
Asante, Vida	Clark, Giles	Farrell, Joanna Kim
Ashby, Kenneth	Clark, Kerry	Fayyad, Vivienne
Ashwell, Sarah	Clark, Terry	Felix, Bernardo
Atkins, Nick	Clarke, O	Fenelon, G
Auner, Heike	Colak, Nuray	Fisher, Maxine
Bailey, Florence	Coman, Tina	Flanagan, Mark
Baldwin, Penny	Comins, Matt	Folkes, Yvonne
Balogun, Latifat	Cook, Audrey	Fonseca, Katia
Barlow, Anthony	Coote, Anthony	Foss, Saffron
Barras, Tina	Cordery, Andrew	Furlong, Nicole
Barton, Gemma	Cortes, Maria	Garcia, Daniel Mula
Beasley, Stephen	Costiff, Andrew	Gardner, Carol
Beeney, Rachel	Creaser, Donna	Gardner, Clare
Belgahri, Aguida	Creber, Tim	Gardner, Neil
Bellamy, Alan	Cross, Terri-Anne	Garforth, Andrew
Benson, Philip	Crow, Rebecca	Ghani, Nasimul
Bishop, Robin	Dack, Lionel	Gianni, Tony
Bleach, Fiona	Dagoo, Lorraine	Gibson, Laurence
Blennerhassett, R	Dalziel, William	Gibson, Monica
Boateng, Eugenia	Daniel, Barbara	Gilbert, Andrea
Boston, Ali	David Phillips	Glen, Louise
Bouchatal, Dahmane	Davies, Joanne	Glendon, Lisa
Bourne, Heidi	Davies, Phillippa	Glenn, Kate
Bradford, Jo	Davis, Marios	Goddard, Ian
Bradley, Arthur	De Campos, Tatjana	Gooransingh, Madvi

Goose, Sara	John, Caroline	McDowall, Jaesher
Gordon-Smith, Mary Ellen	John, Stephen	McDowell, Monica
Gowhar, Mrs & Mr	Jones, Clinton	McKinney, Rev J.
Grabowska, Joanna	Jones, Colette	McKinney, Sue
Graves, Toni	Jones, Daniel	Menendez, Mary Luz
Gray, Adam	Jones, Michelle	Metouag, Maria
Gray, Adam	Julius, Hannah	Michell, Candida
Green, Alan	Kaleem, Mabroor	Miles, Charlotte
Green, Thurston	Keary, Teresa	Mills, Jessica
Griffiths, Robert	Kelly, Angela	Minguez, Maria Carazo
Groves, Jason	Kelly, Aveen	Misic, Jelica
Gul, Malik	Kennedy, Christopher	Mitchell, Candida
Gurnah, Omar	Kenyon, Justine	Mohamed, Araba Saidi
Hall, Crispin	Khan, Anser	Mohamed, Zeinab
Hall, Maria-Louise	Khulman, Lizzy	Mohammadi, Haji Dash
Hamilton, Belinda	Kidd, Susan	Mooney, Annabelle Nell
Harlow, Nicola	King, Gilly	Moore, Jonny
Harris, Pam	King, S	Moriba, Charlotte
Hayes, Ciaran	Knowles, Adam	Morris, Lucy
Hazell, C	Knowles, Cllr Adrian	Morris, Walter
Hebborn, George	Kokayko, Debra Austin	Morriss, Joanne
Heraty, Michelle	Kutrowski, Stefan	Morthaza, Sayd M
Heywood, Laura Clare	Lawrence, Brenda	Muhamud, Hawah
Higgins, Lisa	Le Goff, A	Mukuka, Shula
Higgon, David	Lecomber, Christine	Murphy, Penny
Homoud, Shemia	Lee, Shirley	Mytko, Elizabeth
Hoper, Stephen	Leigh, Jocelyn	Nasir, Tanveer
Horrocks, John	Levy, Denise	Ndagire, Sarah
Horsford, Karen	Levy, J	Newton, Stephen John
Huang, Lan	Lindsay, Paulette	Noel, Baby
Huczek, Antony Karol	Lindsay, Sandra	Noonan, Christine
Hudek, Miriam	Liszka, Lidia	Nottage, Jane
Hughes, Lucille	Lively, Olivia	Notyce, Garry
Hutt, Mark	Lopez, Jheanelle	O'Bryan, Michael
Hyder, Kirstie	Lucas, Pam	O'Dwyer, Nikki
Ichekwai, Catherine	Lunt, David	O'Reilly, Georgina
Ingram, Sarah	Lyden, Marguerite	O'Sullivan, Ann
Ingyon, Simon	Mabo, Orileke	Oates, Gerald
Ireland, Rosanne	Macfarlane, Benjamin	Okafor, Uzoamaka
Jabbie, Hajah	MacGranthin, John	Oola, David Dandie
Jahandar-Lashki, Farideh	Maclver, Mark	Opere-Addo, Jones
Jahn, Christine	Malcolm, Garfield	Orlando, Emanuele
Jammeh, Lamin	Malik Gul, Malik	Owen, Patricia
Javid, Fauzia	Markovic, E	Pakes, A
Jedosina, Kristina	Marshall, Ryan	Palmer, Gavin
Jeffery, Simon	Martin, Stephen	Palmer, Kiri
Jennings, Joanna	May, Eileen	Parish, Richard

Parr, Philip	Shidane, Leila	Wardhere, Farah Amina
Parry, Glyn	Shill, David	Warren, Ruth
Pattison, Maxine	Siwak, Monika	Webb, Trey
Perez-Pinzon, Cielo	Slav, Kasia	White, Emma
Phillips, Sumbo	Slav, Sophie	White, Sarah
Pilbeam, Justin	Smith, Iain	Wilks, Monique
Pinder, Charles	Smith, Josephine	Willsher, James
Playford, Joanna	Smith, Mark	Wilton, Sarah
Price, Shirley	Smith, Mo	Wood, J
Quarcoopome, Audrey	Smoczek, Monika	Woodbridge, Beverley
Radcliffe, R	Soamer, Nathan	Woodhams, Rebecca Wynne
Ramdeo, Kevin	Squibb, Teresa	Wright, Andrew
Raynsford, Paul	Stephens, Michael	Wright, Carol
Reeve, Stacey Louise	Sterling, Pauline	Wright, Richard
Regan, Kevin	Stirling, Iain	Wylie, Thomas
Regis, Winston	Strong, Ron	Young, Christopher
Reilly, I	Summers, Tracey	Youssefi, Nazir
Renwick, Helen	Sutherland, Brad	
Riordan, Diana	Sutton, Angela	
Rogala, Dorota	Swaffield, Keileen	
Roldar, Mahmood Abedi	Swallow, Paula Joanne	
Rose, Karen	Sylvestre, Julian	
Rossi, Diletta	Syrett, S	
Rowbottom, Keith	Taborin, Milica	
Russell, Mark	Taffurelli, Diana	
Ryan, Jane	Taffurelli, Louisa	
Rybinski, Peter Jon	Tariq, Norman	
Rymill, Melanie	Taylor, Claire	
Sacher, Chris	Thomas, Wendy	
Saker, Susan	Thompson, Chantelle	
Samms, Marjorie	Tiller, Matthew	
Sangamneheri, Asheesh	Titley, Simon	
Saya, Yoram	Tsega, Frehiwot	
Scale, Paulette	Tuhey, P	
Schooley, Charlotte	Tumba, Guslaine	
Schusser, Sabine	Tumba, Kasongo	
Scott, Helen	Turner, Michael	
Scott, Luke Alexander	Ungar, S	
Scott, Wendy	Van Der Wel, Shaun	
Seager, Heather	Van Der Wielen, Ryan	
Searle, Emma	Vandenberg, FIM	
Shafi, Abi	Venner, Francis	
Shafiq, Abdurrahman	Vieira, Patricia	
Sharifi, Sahar	Villoria, Maria Jose Gomez	
Shaw, Neil	Wall, Therese	
Sherzad, Morsal Yousof	Walton-Brown, Maire	

## Appendix 3 - Consultation web pages

Screenshot April 2015 - Planning Policy web page

The screenshot shows the 'Planning' section of the Wandsworth Council website. The left-hand navigation menu includes categories like 'Services', 'A-Z of services', 'Benefits and Council Tax', 'Births, deaths and marriages', 'Business and licensing', 'Council and democracy', 'Health and social care', 'Housing', 'Jobs and careers', 'Leisure and culture', 'Parking and streets', 'Pests, pollution and antisocial behaviour', 'Planning and building control', and 'Building'. The main content area is titled 'Planning' and contains several sub-sections: 'View planning applications' (with a 'Planning quick search' box), 'Planning permission' (a 5-step list), 'Planning policy' (text about the basis for promoting development), 'Planning enforcement' (reporting breaches), and 'Planning contact details' (email: [planning@wandsworth.gov.uk](mailto:planning@wandsworth.gov.uk)). The right-hand sidebar features an 'Advertising' section with a 'Need more recycling sacks?' campaign, a 'CLICK HERE' button, and a 'Wandsworth' logo. Below this is a 'What can I do?' section with links for 'Get alerts of new applications in your area' and 'Make a payment'. Further down are 'Consultations' (Housing SPD, Planning application requirements changes, Roehampton draft SPD) and 'What else is there?' (Local Plan Examination).

Screenshot April 2015 - SPD Consultation web page

The screenshot shows the 'Supplementary Planning Documents (SPDs)' section of the Wandsworth Council website. The left-hand navigation menu is identical to the previous screenshot. The main content area is titled 'Supplementary Planning Documents (SPDs)' and features a section for 'Draft Roehampton SPD - March 2015'. This section includes text about the regeneration of Roehampton, the masterplan, and the SPD consultation period (7 April 2015 until 24 May 2015). A 'Further information' sidebar lists links for 'Annual Monitoring Reports', 'Local Development Scheme (LDS)', 'Core Strategy > Adopted Version (October 2010)', 'Development Management Policies Document and Site Specific Allocations Document > Adopted Versions (February 2012)', and 'Housing policy performance'. Below this, it states 'Copies will be available during the consultation period at:' and lists locations: 'Balham, Battersea, Putney, Roehampton, Tooting and Wandsworth libraries', 'the Western Area Office (9am to 4.30pm, Monday to Friday), and', and 'the Customer Centre (9am to 5pm, Monday to Friday)'. The right-hand sidebar features an 'Advertising' section with a 'Time to quit?' campaign, a 'Wandsworth Grant Fund' logo, and a 'The New Wandsworth Grant Fund' logo.

Screenshot April 2015 - Consultation Portal web page

[Webpage has e...](#)
[Wandsworth...](#)

[Waiting for wa...](#)
[Webpage has e...](#)

[Who Said What?](#)
[Help](#)

[Login / Register](#)

[Wandsworth B...](#)
[Decisions, Deci...](#)

[Brockley Centr...](#)
[Preparing a Loc...](#)

[Wandsworth Planning Service Home](#)
[Contact Us](#)

[Accessibility](#)
[Privacy](#)

[Who Said What?](#)

[Help](#)

[Print](#)

[Who Said What?](#)

[Help](#)

Screenshot April 2015 - SPD Regeneration web page

[marriages](#)

[Business and licensing](#)

[Regeneration](#)

**Roehampton**

[Winstanley and York Road](#)

[Health and social care](#)

[Housing](#)

[Jobs and careers](#)

[Leisure and culture](#)

[Parking and streets](#)

[Pests, pollution and antisocial behaviour](#)

[Planning and building control](#)

[Rubbish and recycling](#)

[Schools and admissions](#)

[Your council and elections](#)

### Roehampton Supplementary Planning Document (SPD)

The regeneration of Roehampton has moved forward since the Alton area Masterplan was approved by the Council's executive in October 2014.

The masterplan represents the culmination of over a year of commitment and participation by residents, local organisations, service providers, institutions, elected members and Council officers to create a strategy to deliver the masterplan objectives. The recommended masterplan reflects the aspirations of the Council as landowner and planning authority following consultation with residents and stakeholder groups.

The Council is now working to formalise the masterplan's proposals in a **Supplementary Planning Document (SPD)**. The Roehampton SPD does not include new proposals, but presents existing proposals as planning policy.

The SPD focuses on planning issues such as land use, conservation issues, access & movement and will work as a framework to inform and guide development proposals.

#### SPD Consultation

An SPD consultation, focusing on land use and development guidelines, will run for seven weeks.

**When:** From 7 April to 24 May 2015

**Where:** The SPD will be available for inspection online as well as in hard copy at Roehampton, Balham, Battersea, Putney, Wandsworth and Tooting libraries, [The Town Hall](#) and the [Western Area Office](#).

For more information email [planningpolicy@wandsworth.gov.uk](mailto:planningpolicy@wandsworth.gov.uk), or telephone 020 8871 6207 or 020 8871 6449.

**Sign up for the Masterplan e-newsletter**

#### Roehampton regeneration

- What is a masterplan?
- Photos of open day (Facebook)

#### Further information

- Residents' offer
- Roehampton Partnership agenda - 25 March 2015
- Roehampton Partnership agendas
- Roehampton Partnership minutes
- More downloads...

Screenshot April 2015 - Council News web page

[Home](#) > [Latest news](#) > [Have your say on draft planning guidance for Roehampton](#)

**Services**

[A-Z of services](#)

[Benefits and Council Tax](#)

[Births, deaths and marriages](#)

[Business and licensing](#)

[Health and social care](#)

[Housing](#)

[Jobs and careers](#)

[Leisure and culture](#)

[Parking and streets](#)

[Pests, pollution and antisocial behaviour](#)

[Planning and building control](#)

[Rubbish and recycling](#)

[Schools and admissions](#)

[Your council and elections](#)

## Have your say on draft planning guidance for Roehampton

Published: Tuesday 7th April 15

[f](#) 1 [t](#) 8 [p](#) [g+](#)

[2](#) Comment

**A consultation is now underway on a draft supplementary planning document (SPD) for Roehampton.**

The draft planning guidance is based on the Alton Area Masterplan which has been developed in close consultation with local residents, businesses, organisations and landowners.

The SPD, if adopted by the council, would formalise the principles set out in the masterplan as formal planning guidance which will be taken into consideration in assessing planning applications received for the area.

The consultation is now underway and will run from until May 24, 2015.

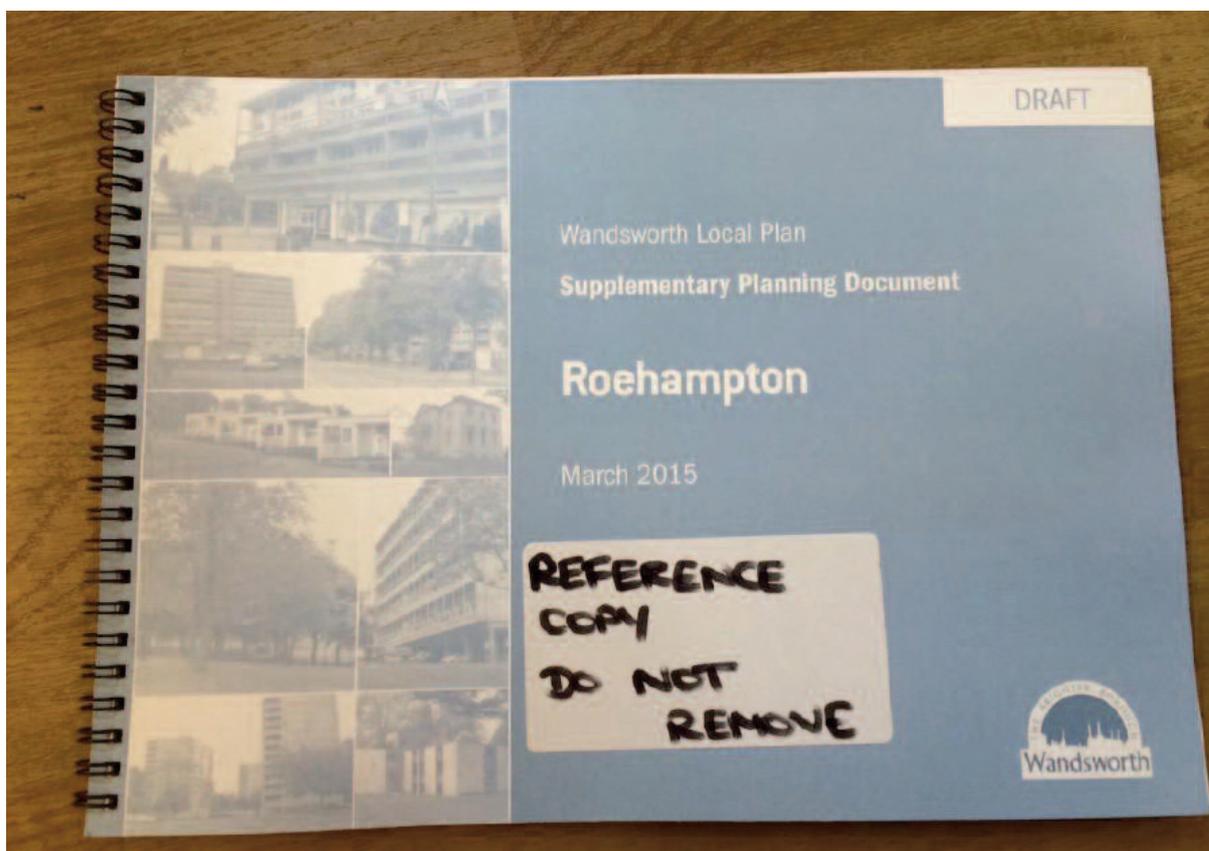
The SPD covers an area of around 47 hectares including a large part of the Alton Estate.

It sets out eight 'core principles' to guide regeneration including building high quality housing, improving infrastructure, delivering a high quality landscape and improving access and connections.

The document also includes planning guidance for four 'sub-areas' to help shape the development of these spaces in more detail.

A council spokesman said: "The Alton Area Masterplan provides outline proposals for how this part of the borough could be

### Appendix 4 - SPD Summary Boards



Appendix 5 - Consultation Advertisement (Wandsworth Guardian)

wandsworthguardian.co.uk/advertising

WE CLASSIFIED 2

**Public Notices**

**Licensing Act 2003  
Application for a Premises Licence**

Name of Applicant: Sainsbury's Supermarkets Ltd. Address: Sainsbury's, 408 Upper Richmond Road, London, SW15 6PJ. Licensing Authority: London Borough of Wandsworth. Licensing Authority Address: Administration Department, Environmental Services, Public Health, Town Hall, Wandsworth High Street, London, SW18 2PU (where a record of the application may be inspected during normal office hours). Licensing Authority Website: www.wandsworth.gov.uk. The applicant has applied to the Licensing Authority for a premises licence for the above premises for the following licensable activities: The sale of alcohol between the hours of 0700 and 2300 daily for consumption off the premises. Any person or responsible authority (as defined by the Licensing Act 2003) may make representations to the Licensing Authority no later than 24 April 2015. Any representations made to the Licensing Authority must be in writing. It is an offence knowingly or recklessly to make a false statement in connection with this application. The maximum fine for which a person is liable on summary conviction for this offence is £5,000. Dated: 26 March 2015  
Wandsworth Sherwood LLP, Minerva House, 5 Montague Close, London, SE1 9BB. Ref: EMI/26508/1858/RPB. Solicitors and authorised agents for the applicant.

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**Notice of application to vary a Premises Licence under Section 34 of the Licensing Act 2003**

Notice is hereby given that Young and Co's Brewery PLC in respect of Premises known as Trafalgar Arms, 148-156 Tooting High Street, Tooting, Broadway, London, SW17 0RT applied to Wandsworth London Borough Council for a Variation of a Premises Licence. The proposed variation is: To vary the layout of the premises in accordance with plans supplied by the applicant. All licensable activities, permitted hours and opening hours to remain as existing. Any

**WANDSWORTH BOROUGH COUNCIL**  
THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012  
**NOTICE OF PUBLICATION OF DRAFT SUPPLEMENTARY PLANNING DOCUMENT**

In accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, notice is hereby given that the Council is inviting representations on its draft Roehampton Supplementary Planning Document (SPD) as detailed below:

	Consultation Begins	Consultation Ends
Draft Roehampton SPD	7 <sup>th</sup> April 2015	24 <sup>th</sup> May 2015

**Roehampton SPD**  
The Council is inviting representations under Regulation 13 of the Town and Country Planning (Local Planning) (England) Regulations 2012 on its draft Roehampton SPD. The SPD sets out information on the borough's plans for the Alton area in Roehampton.

**Copies of Documents**  
Copies of the draft SPD are available for inspection on the Council's website (<http://www.wandsworth.gov.uk/spd>), in all the borough libraries (for opening hours see [www.wandsworth.gov.uk/libraries](http://www.wandsworth.gov.uk/libraries)) and at: Western Area Office (Opening House: 9:00am to 4.30pm Monday - Friday) 38 Holybourne Avenue, London, SW15 4JE and Customer Services Centre, Town Hall Extension, Wandsworth High Street, London, SW18 2PU (Opening House: 9:00am to 5.00pm Monday - Friday)

**Consultation Responses**  
Representations can be made during the consultation dates set out above either online at <http://www.wandsworth.gov.uk/spd>, by email to [planningpolicy@wandsworth.gov.uk](mailto:planningpolicy@wandsworth.gov.uk), or in writing to: Planning Policy: Housing and Community Services, Wandsworth Council, The Town Hall, Wandsworth High Street, London SW18 2PU  
Responses will be made public and a summary of the consultation findings will be made available on the website.  
For further information, email [planningpolicy@wandsworth.gov.uk](mailto:planningpolicy@wandsworth.gov.uk) or telephone 020 8871 6207.

---

**Wandsworth Borough Council**  
*The Wandsworth (Waiting and Loading Restrictions) (Special Parking Areas) (Amendment No 460) Order 2015*

1. NOTICE IS HEREBY GIVEN that the Council of the London Borough of Wandsworth on 31st March 2015 made the above mentioned Order under sections 6 and 124 of and Part IV of Schedule 9 to the Road Traffic Regulation Act 1984 as amended by the Local Government Act 1985 and

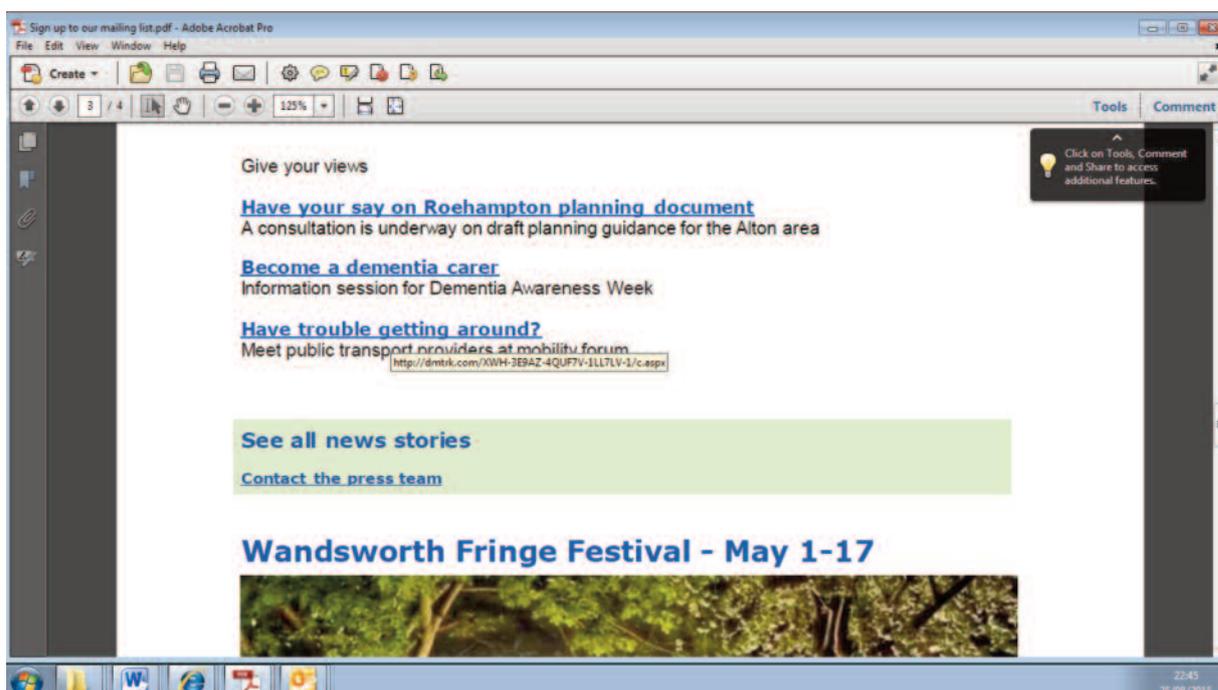
Find whatever business you're looking for.



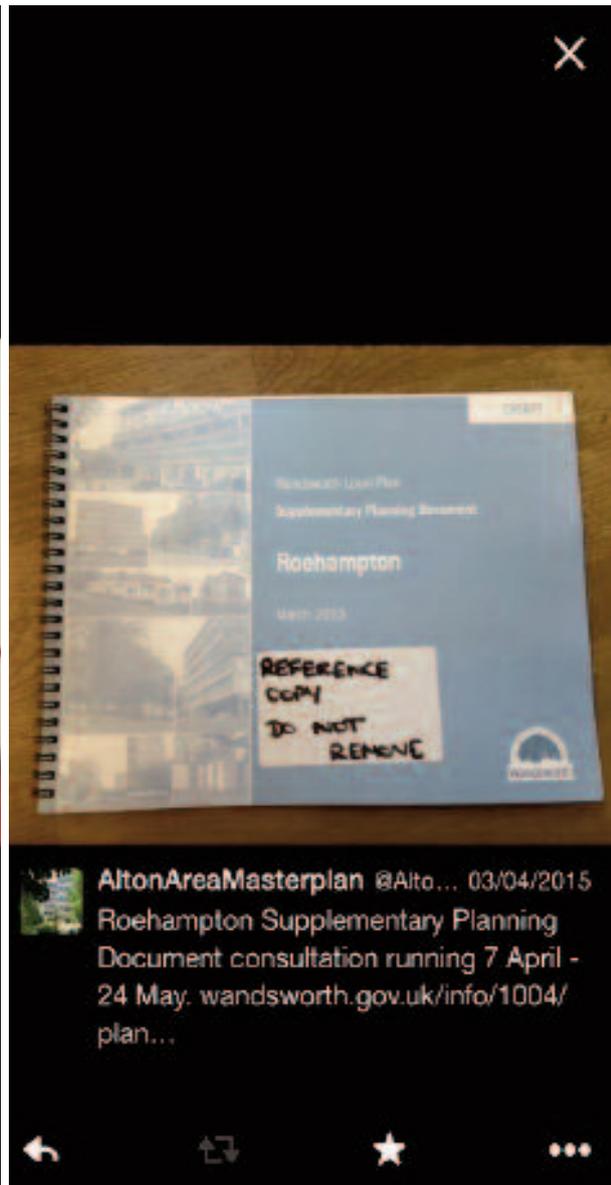
**Wandsworth Guardian**.co.uk

wandsworthguardian.

## Appendix 6 - E-news Advertisements



## Appendix 7 - Social Media Advertising



## Appendix 8 - Consultation Representations

The representations made in regard to SPD consultation are as follows. Copies of these representations are included after the below list. They are included in the order noted below.

### Statutory bodies and agencies:

- 1) Environment Agency
- 2) Health and Safety Executive
- 3) Highways England
- 4) Historic England
- 5) London Underground – Infrastructure Protection
- 6) London borough of Richmond
- 7) London borough of Wandsworth – Public Health
- 8) Marine Management Organisation
- 9) Natural England
- 10) Office of Rail and Road/Office of Rail Regulation
- 11) Transport for London

### Other organisations:

- 12) Alton Regeneration Watch
- 13) National Landlords Association
- 14) Putney Labour Party
- 15) The Putney Society
- 16) Roehampton Forum
- 17) Roehampton Methodist Church (represented by DP9)
- 18) Southlands Methodist Trust (represented by DP9)
- 19) St James Group

### Individuals:

- 20) Andelopoulos, K
- 21) Bishop, R
- 22) Cairns, J
- 23) Carazo Minguez, M
- 24) Ennis, J
- 25) Fannon, S
- 26) Gilmore, R
- 27) Greening, J (MP)
- 28) Lloyd, T
- 29) Lynch, A
- 30) Noonan, C
- 31) Parr, P
- 32) Proctor, C
- 33) Redfern, R
- 34) Rogers, A
- 35) Rowbottom, K
- 36) Saker, S
- 37) Simpson, T
- 38) Tiller, M



Planning Policy  
Planning and Development Services  
Housing and Community Services  
Department  
Wandsworth Council  
The Town Hall  
Wandsworth High Street  
London SW18 2PU

**Our ref:** SL/2006/100015/SD-12/IS1

**Your ref:** Email

**Date:** 21 May 2015

[planningpolicy@wandsworth.gov.uk](mailto:planningpolicy@wandsworth.gov.uk)

Dear Sir/Madam,

**Draft Roehampton Supplementary Planning Document (SPD) Consultation**

Thank you for consulting the Environment Agency on the above. We welcome the requirement of all developments to be of high quality of design and demonstrate that they positively contribute to the improvement of both the built and natural environments.

We welcome the proposals to refresh the existing green and open spaces coupled with a significant enhancement of the landscape, as well as provision for a range of new outdoor activities and new access for residents. We support the proposed network of new and improved streets, cycle paths and footpaths to connect the Roehampton area to its neighbours and surroundings.

We hope the guidance in the emerging SPD will adequately address the challenges presented by a combination of physical factors, including fundamental design flaws in the development layout, along with poorly sited and constructed residential buildings contributing to the area's problems whilst conserving and providing an appropriate response to the positive qualities of the area. The SPD offers the opportunity to produce development with the highest environmental standards. By continuing to work closely together at all stages we can ensure new development addresses environmental issues and achieves environmental protection and enhancement.

We have attached further comments below for your consideration. Please do not hesitate to contact me should you wish to discuss this further.

Yours faithfully,

Charles Muriithi MRTPI  
Planning Specialist

Kent and South London  
Direct dial 0203 263 8077  
Direct e-mail [charles.muriithi@environment-agency.gov.uk](mailto:charles.muriithi@environment-agency.gov.uk)

Environment Agency, Ergon House, Horseferry Road, London, SW1P 2AL  
03708 506 506

[ksiplanning@environment-agency.gov.uk](mailto:ksiplanning@environment-agency.gov.uk)

[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)



## Overarching Core Principles

### **Urban design (Core Principle 6)**

#### 4.6 Core principle 6 - update and activate the urban fabric

We welcome Core principle 6 which will incorporate design for environmental performance. Design quality is fundamental to how places work. Places that respect their context, using it as a starting point to enhance local character, and so connect, physically and socially, to the surrounding built environment and landscape, are more likely to have a strong, positive identity.

Quality design should create landscapes that are multi-functional and provide opportunities for public spaces that are safe and attractive and buildings that are at appropriate scale and density to support local services. It should also create neighbourhoods where it is convenient and safe to walk or cycle to shops, schools and access to public transport. Well designed places should create mixed neighbourhoods where a range of types and tenures of houses and flats are available for all, where people can move to another home locally when their circumstances change. Neighbourhoods that are functional, sustainable socially, economically and environmentally and distinctive are consequently more attractive to investors and home-buyers alike.

### **Transport and access (Core Principle 7)**

#### 4.7 Core principle 7 - improve access and connections

We support Core principle 7 especially the proposed improved connections to nearby rail and underground stations, green spaces and centres through the creation of a new traffic free, green pedestrian and cycling route between Downshire Fields and Richmond Park and the creation of a pedestrian axis through the neighbourhood by providing clear pedestrian routes through the park.

We see the regeneration as an opportunity for the Richmond Park to become a major recreational, educational and community resource. Improving and linking green spaces to local residents and wider population and visitors is essential and we welcome proposals for the improvement and enhancement of the public realm. Providing new and attractive green grid style development, improving entrance ways and knowledge of parks, enhancing and possible extension of the existing green spaces, would be welcome development.

We welcome the upgrading of the existing and creation of new streets, public spaces and pedestrian links to make them more attractive, convenient and usable and create a more attractive area with a high quality and active landscape. This will aid the delivery of the vision and achieve the strategic planning objectives. The Environment Agency considers new development in urban areas an opportunity to create enhancements and opportunities for biodiversity.

The SPD provides an ideal opportunity for enhancement of low value conservation sites and create and enhance ecological networks and ecologically resilient and varied landscapes, to support a range of species. The council should require development proposals to include landscaping and other ecological features that contribute towards protecting, managing and enhancing local biodiversity. Information on these measures must be submitted with an application.

Environment Agency, Ergon House, Horseferry Road, London, SW1P 2AL

03708 506 506

[kslplanning@environment-agency.gov.uk](mailto:kslplanning@environment-agency.gov.uk)

[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

## **Sustainability (Core Principle 8)**

### **4.8 Core principle 8- create a sustainable environment**

We support Core principle 8 which aims to create sustainable environment by requiring development to meet high standards of sustainable design by seeking to achieve a minimum Code for Sustainable Homes Level 4. However we would wish to point out that the government has confirmed it will withdraw the Code for Sustainable Homes and incorporate rules on energy efficiency into the Building Regulations. It is anticipated that streamlined draft regulations and technical standards will be published in the late summer, with the regulations and supporting documents coming into force later this year.

We commend the use of water efficiency measures to reduce demand on water resources and to accommodate growth in business, housing and population requirements without the need to increase overall consumption. Building Regulations (Part G) will be updated to include an optional tighter water efficiency standard of 110 litres/person/day (l/p/d), in addition to the current baseline standard of 125 l/p/d. However, this tighter standard would need to be justified with local evidence. On implementation, Local Authorities will not be able to specify any other standards for domestic new build.

### **Surface water run-off**

Developers should seek to ensure that surface water run-off is managed as close to its source as possible in line with the London Plan drainage hierarchy. The use of sustainable urban drainage systems should be promoted for all developments unless there are practical reasons for not doing so. Developers should aim to achieve greenfield run off from their site through incorporating rainwater harvesting and sustainable drainage.

As you may be aware the Government has announced changes to our statutory consultee duties for planning applications regarding surface water drainage. This also means making Lead Local Flood Authorities statutory consultees for surface water drainage issues for major developments. This has necessitated a change to the Development Management Procedure Order (DMPO) which includes these changes and consolidates the original DMPO and the amendment. To support the new consultation arrangements, DCLG has changed the Planning Practice Guidance. The main changes are to these pages:

### **[Why are sustainable drainage systems important?](#)**

**[How the local planning authority should involve the lead local flood authority when determining planning applications and what advice should be given about local flood risks](#)**  
**[Water supply, wastewater and water quality considerations in plan-making](#)**

### **Sustainable drainage systems (SUDs)**

Sustainable drainage systems (SUDs) reduce run-off and store water, managing water at source to lower flood risk downstream whilst also providing pleasant open space to enhance the amenity of an area. The restoration and creation of new habitats and other green infrastructure can help to compensate for those lost to development. Concerns are often expressed by developers that using SuDS will reduce the amount of open public space. However imaginative design of SuDS can simultaneously provide open public space and surface water management, whilst also improving a development by creating habitats that encourage biodiversity. This can be achieved by creating visually attractive green (vegetated and landscaped) areas that are also blue (water) infiltration, storage and transfer corridors in developments, connecting people to water.

Environment Agency, Ergon House, Horseferry Road, London, SW1P 2AL

03708 506 506

[ksiplanning@environment-agency.gov.uk](mailto:ksiplanning@environment-agency.gov.uk)

[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

Blue corridors' in urban areas provide flow paths and water storage to manage flows and flooding whilst also providing green infrastructure, resilience to climate change and improved urban access

#### Further guidance available

##### Data Share service

For other most up to date and accurate environmental evidence we recommend using our Data Share service where you can access our environmental datasets and also datasets from Natural England, Forestry Commission and English Heritage.

<http://www.geostore.com/environment-agency/>

##### Developing Urban Blue Corridors

Defra, in association with URS/Scott Wilson, Kingston University and London Borough of Croydon has published initial guidance (FD2619 Developing Urban Blue Corridors) in the form of a scoping study. This Scoping Study highlights the current gaps in the delivery of Urban Blue Corridors and provides an initial quantification of their benefits. It also provides an over-arching framework for developing these corridors.

<http://randd.defra.gov.uk/Default.aspx?Menu=Menu&Module=More&Location=None&Completed=0&ProjectID=16218>

##### Accessible Natural Greenspace

Natural England's 'Nature Nearby' - Accessible Natural Greenspace Guidance (2010) specifically identifies SuDS as an opportunity for creating new green space in urban areas and states that when incorporated into site master plans alongside new footpaths, greenways and woodlands, they deliver a range of benefits to wildlife as well as people.

<http://publications.naturalengland.org.uk/publication/40004>

##### Ecosystem Services and Flood and Coastal Erosion Risk Management

The Environment Agency published a report in September 2013 (*Ecosystem Services and Flood and Coastal Erosion Risk Management*). This report investigates the potential for integrating ecosystem services and the Ecosystem Approach into Flood and Coastal Erosion Risk Management (FCERM) activities at the Environment Agency. It demonstrates the practicalities and challenges of incorporating ecosystem services assessments into FCERM maintenance activities. It uses three case studies from different regions in England to illustrate the use of ecosystem services assessments for different maintenance challenges. These case studies have read-across to spatial planning. For the full report please see:

[http://evidence.environment-agency.gov.uk/FCERM/Libraries/FCERM\\_Documents/Ecosystem\\_Services\\_and\\_FCERM\\_PDF\\_3\\_01\\_MB.sflb.ashx](http://evidence.environment-agency.gov.uk/FCERM/Libraries/FCERM_Documents/Ecosystem_Services_and_FCERM_PDF_3_01_MB.sflb.ashx)

##### Research by the University of Manchester

By developing and restoring green infrastructure with a presumption in favour of open water courses through channel restoration and de-culverting, a more natural and slower response to heavy rainfall can be achieved. In this sense, conserving river corridors can help to absorb fluctuating water volumes as well as increasing their aesthetic quality and public enjoyment. Research by the [University of Manchester](http://www.manchester.ac.uk) has shown that:

- increasing the green space cover in urban areas by 10 per cent reduces surface runoff by almost 5 per cent

Environment Agency, Ergon House, Horseferry Road, London, SW1P 2AL

03708 506 506

[ksiplanning@environment-agency.gov.uk](mailto:ksiplanning@environment-agency.gov.uk)

[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

- increasing tree cover in urban areas by 10 per cent reduces surface water run-off by almost 6 per cent
- adding green roofs to all the buildings in town centres can reduce surface water run-off by almost 20 per cent

Charles Muriithi MRTPI

Environment Agency, Ergon House, Horseferry Road, London, SW1P 2AL

03708 506 506

[ksiplanning@environment-agency.gov.uk](mailto:ksiplanning@environment-agency.gov.uk)

[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)



## Health and Safety Executive

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Planning Policy  
Housing and Community Services  
Wandsworth Council  
The Town Hall  
Wandsworth High Street  
LONDON SW18 2PU

Hazardous Installations Directorate

**John Moran**

CEMHD5  
2.2 Redgrave Court  
Merton Road  
BOOTLE L20 7HS

Tel: 01519514551

LOCAL.PLANS.CEMHD.5@hse.gsi.gov.uk

<http://www.hse.gov.uk/>

Stuart Reston – Head of Unit

7<sup>th</sup> April 2015

Dear Sir/Madam

### **CONSULTATION ON YOUR LOCAL PLAN – REPRESENTATIONS BY HSE**

#### *ROEHAMPTON SUPPLEMENTARY PLANNING DOCUMENT*

Thank you for your request to provide a representation on the Roehampton Supplementary Planning Document. When consulted on land-use planning matters, the HSE where possible will make representations to ensure that compatible development within the consultation zones of major hazard installations and major accident hazard pipelines (MAHPs) is achieved<sup>1</sup>.

We have concluded that we have no representation to make on this occasion. This is because your consultation request is not concerned with the potential encroachment of future development on the consultation zones of major hazard installations or MAHPs. As the request is not relevant for HSE's land-use planning policy, we do not need to be informed of the next stages in the adoption of the Roehampton Supplementary Planning Document.

#### **Future Consultation with HSE on Local Plans**

The HSE acknowledges that early consultation can be an effective way of alleviating problems due to incompatible development at the later stages of the planning process, and we may be able to provide advice on development compatibility as your plan progresses. Therefore, we

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<sup>1</sup> Planning authorities are advised to use HSE's *Planning Advice for Developments Near Hazardous Installations Information Package (PADHI+)* to verify any advice given. Please see below for further information on PADHI+ including accessing the package.

would like to be consulted further on local plan documents where detailed land allocations and use class proposals are made, e.g. site specific allocations of land in development planning documents. Please send any future request for consultation to:

The Administrator – Local Plans  
HID CEM HD5  
Health and Safety Executive  
2.2 Redgrave Court  
Merton Road  
Bootle  
Merseyside  
L20 7HS

or by e-mail to: [LOCAL.PLANS.CEMDH.5@hse.gsi.gov.uk](mailto:LOCAL.PLANS.CEMDH.5@hse.gsi.gov.uk)

#### **NOTE: INCORPORATING PADHI ADVICE INTO LOCAL PLANS**

The HSE recognises that there is a requirement for you to meet the following duties in your plan, and that consultation with the HSE may contribute to achieving compliance:

1. The National Planning Policy Framework (Para. 172) requires that planning policies should be based on up-to-date information on the location of major accident hazards and on the mitigation of the consequences of major accidents.
2. Regulation 10(b) of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires that in local plans and supplementary planning documents, regard be had for the objectives of preventing major accidents and limiting the consequences of such accidents by pursuing those objectives through the controls described in Article 12 of Council Directive 96/82/EC (Seveso II)<sup>2</sup>. Regulation 10(c)(i) requires that regard also be had to the need in the long term, to maintain appropriate distances between installations and residential areas, buildings and areas of public use, major transport routes as far as possible and recreational areas.

To assist you in meeting these duties, information on the location and extent of the consultation zones associated with major hazard installations and MAHPs can be found on the HSE extranet system along with advice on HSE's land-use planning policy. Lists of all major hazard installations and MAHPs, consultation zone maps for installations, and consultation distances for MAHPs are included to aid planners. All planning authorities should have an authorised administrator who can access the HSE's *Planning Advice for Developments near Hazardous Installations Information Package* (PADHI+) on the extranet; further information is available on the HSE website: <http://www.hse.gov.uk/landuseplanning/padhi.htm>. When sufficient information on the location and use class of sites becomes available at the pre-planning stages of your local plan, the use of PADHI+ could assist you in making informed planning decisions about development

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<sup>2</sup> Article 12 provides that the objectives of preventing major accidents and limiting the consequences of such accidents are taken into account in land-use policies, and these objectives should be pursued through controls on the siting of new establishments, modifications to existing establishments, and new developments in the vicinity of existing establishments such as transport links, locations frequented by the public and residential areas where the siting or development is such as to increase the risk or consequences of a major accident.

compatibility. We recommend that for speculative testing of advice that the PADHI+ training database is used. This can be accessed on the land-use planning extranet services screen.

PADHI+ cannot be used for developments around nuclear sites, explosives sites or quarries. In these cases you must consult the appropriate HSE directorate for advice. Guidance on consulting the HSE about developments that could encroach on specialised major hazard sites is also available on the website:

<http://www.hse.gov.uk/landuseplanning/padhi/faqs.htm#hazardous-substances-consent>

### **Identifying Consultation Zones in Local Plans**

The HSE recommends that where there are major hazard installations and MAHPs within the area of your local plan, that you mark the associated consultation zones on a map. This is an effective way to identify the development proposals that could encroach on consultation zones, and the extent of any encroachment that could occur. The proposal maps in site allocation development planning documents may be suitable for presenting this information. We particularly recommend marking the zones associated with any MAHPs, and the HSE advises that you contact the pipeline operator for up-to-date information on pipeline location, as pipelines can be diverted by operators from notified routes. Most incidents involving damage to buried pipelines occur because third parties are not aware of their presence. Details of pipeline operators and their contact details are also found on the HSE extranet pages.

### **Identifying Compatible Development in Local Plans**

The guidance in *PADHI - HSE's Land Use Planning Methodology*, available at <http://www.hse.gov.uk/landuseplanning/padhi.pdf>, will allow you to identify compatible development within any consultation zone in the area of your local plan. The HSE recommends that you include in your plan an analysis of compatible development type within the consultation zones of major hazard installations and MAHPs based on the general advice contained in the PADHI guidance. The sections on *Development Type Tables* (pg.9) and the *Decision Matrix* (pg.17) are particularly relevant, and contain sufficient information to provide a general assessment of compatible development by use class within the zones.

If you have any questions about the content of this letter, please contact us at the address given.

Yours faithfully



John Moran

HM Specialist Inspector of Health and Safety (Risk Assessment)

**From:** Barnes, Barbara <Barbara.Barnes@highwaysengland.co.uk>  
**Sent:** 28 April 2015 11:00  
**To:** PlanningPolicy  
**Cc:** M25 Planning; growthandplanning  
**Subject:** Consultation: Draft Roehampton Supplementary Planning Document

**For the attention of:** Nick Smales  
Economic Development Officer  
Wandsworth Council

**Consultation: Draft Roehampton Supplementary Planning Document**

Dear Nick,

Thank you for your email dated 2nd April 2015 advising Highways England of the above consultation.

Highways England has been appointed by the Secretary of State for Transport as Strategic Highway Company under the provisions of the Infrastructure Act 2015 and is the Highway Authority, Traffic Authority and Street Authority for the Strategic Road Network (SRN).

The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Having examined the information available Highways England can confirm that they have no comment to make.

Sent on behalf of Janice Burgess (Asset Manager) Highways England

**Barbara Barnes**

**Tel:** +44 (0) 300 470 1027

**Web:** [www.highwaysengland.co.uk](http://www.highwaysengland.co.uk)

Highways England Company Limited | Registered Office: Bridge House, 1 Walnut Tree Close,  
Guildford GU1 4LZ | Registered in England and Wales No. 9346363

Safe roads, Reliable journeys, Informed travellers

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Historic England

Planning Policy  
Housing and Community Services  
Wandsworth Council  
The Town Hall  
Wandsworth High Street  
London SW18 2PU

Our ref:  
Your ref:

Telephone 020 7973 3717

6 May 2015

Dear Sir/Madam

### **Draft Roehampton Supplementary Planning Document – Public Consultation**

Thank you for consulting Historic England on the Draft Roehampton SPD (March 2015).

As the Government's Statutory Adviser on the Historic Environment we have reviewed your consultation in light of the *National Planning Policy Framework* (NPPF) which requires, as one of its core principles, that heritage assets be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations. NPPF Policy 126 sets out the requirement for local planning authorities to set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including those most at risk from neglect, decay or other threats. It also states the desirability of new development making a contribution to local character and distinctiveness and seeking opportunities to draw on the contribution made by the historic environment to the character of place.

Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) sets out the obligation on local planning authorities to pay special regard to preserving or enhancing the character or appearance of conservation areas and to preserving the settings of listed buildings.

### **English Heritage Advice**

#### **General comments**

The Draft Roehampton SPD consultation is presented as an opportunity to deliver a new future for Roehampton, delivering improved transport, public realm, services and new housing. The area encompasses numerous designated and local historic assets which are sensitive to change and Historic England (formerly English Heritage) has previously engaged with the Council to ensure the Masterplan which informed the draft SPD sustained and enhanced the significance of heritage assets (my letter dated 27 October 2014 set out our final comments in respect of the Draft Masterplan).

We provided further comments on the developing SPD in March 2015 stating we were



Historic England, 1 Waterhouse Square, 138-142 Holborn, London EC1N 2ST  
Telephone 020 7973 3700 Facsimile 020 7973 3001  
HistoricEngland.org.uk



Please note that Historic England operates an access to information policy.  
Correspondence or information which you send us may therefore become publicly available.

generally happy with the wider aspirations of housing renewal and recognised that this is concentrated outside of the conservation areas around Roehampton Town Centre and Danebury Avenue. In addition we set out that:

The changes and opportunities to enhance the landscape needed to be informed by greater understanding of the relationship of the different layers of landscape development;

The setting of Mount Clare is currently harmed by the form and layout of the University buildings and overgrown self-seeded woodland. There is therefore an opportunity to set out broad design guidelines which ensure new development will better reveal the considerable significance of this important grade I listed asset and its setting, and improve views to and from the house;

In our view the SPD should set out a positive vision for the whole Estate including the existing heritage assets which already add enormously to its unique character and if integrated to the wider aspirations will help ensure a the estate is a safe, attractive, and desirable place to live. Including consideration of how the existing listed LCC buildings could be positively enhance for the benefit of residents with better reception/management/sympathetic alteration;

Heritage at Risk issues were identified and addressed.

In light of the above comments and in response to the formal consultation we have set our detailed specific comments on the text in Appendix 1 and our main observations below.

We are pleased to note that the SPD sets out policies which support the preservation and enhancement of the designated heritage assets and now identifies and promotes the opportunity to support direct improvements to those assets. We have however identified some areas within the SPD where the requirement to preserve and enhance heritage assets and their settings needs to be made more explicit. Particularly in respect of any renewal of student accommodation within the setting of the Grade I listed Mount Clare House. This is addressed in our detailed comments. We also consider that the SPD would benefit from further reference to the design development which informed the Masterplan process. Additionally:

- The Draft Roehampton SPD does not appear to identify the ten grade II listed point blocks which form a significant element of the historic LCC estate (see Figures 1.4 and 4.2). Whilst this is no doubt an oversight it is an important omission that needs to be addressed in both the illustrative plans and in the text.
- We are pleased to note the identification of Downshire Fields as a heritage asset and the requirement to respect and restore the Georgian landscape. However, during discussions we noted that the landscape section of the Council's conservation area appraisal requires completion. We are therefore concerned that any landscape proposals are developed on the basis of detailed analysis of its historic development and its significance. This should include identification of surviving and key landscape features, the setting of heritage assets and important local views. This will enable the local authority to assess proposals and help ensure proposals are developed on the basis of a



detailed understanding.

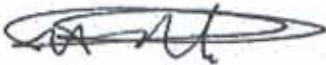
- On the basis of information provided by the Council we have also identified a number of heritage assets within the SPD area which are included on our *Register of Heritage Assets at Risk*. We would reiterate our comments encouraging a specific commitment to address the issues as part of the aim of preserving and enhancing the heritage assets and their settings.

## Conclusion

We hope you find the above comments helpful in developing the proposed Roehampton SPD. We would be happy to discuss these comments further or answer any queries you might have..

It must be noted that this advice does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this request and which may have adverse effects on the environment

Yours faithfully



Richard Parish  
Historic Places Adviser

## Appendix 1

### Detailed Comments: Roehampton

Page 8 & 9. Para 1.21. We would recommend checking the heritage assets, including archaeological priority area, across the plan area for accuracy. The 10



Historic England, 1 Waterhouse Square, 138-142 Holborn, London EC1N 2ST  
Telephone 020 7973 3700 Facsimile 020 7973 3001  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)

Please note that Historic England operates an access to information policy.  
Correspondence or information which you send us may therefore become publicly available.



grade II listed point blocks are not identified and no reference is made to potential archaeological issues.

In addition, we would recommend referring to the grade I listed Temple and the grade II listed Watchers statue being included on the Heritage at Risk Register for England, compiled by Historic England on information provided by local authorities.

Para 1.25. Consider adding "and contributes greatly to their significance." to this paragraph.

Page 20 Para 2.5 . We would recommend stating there are *numerous or many good quality buildings* to reflect the high number of heritage assets across the plan area.

Page 28 Para 3.7. We would welcome inclusion of an objective to address the issues affecting those assets identified as "at risk".

Page 30 4.1 Core Principle 1. We would welcome inclusion of acknowledgement that the quality of the historic landscape and setting of heritage assets requires that new homes and community must achieve a high standard of design which both underpins local distinctiveness and is informed by the sensitive local context. The reference to "signature architecture" (Page 34 D) should be explained and guidance provided to ensure that those community building provided demonstrably enhance the setting of heritage assets. The Masterplan approach, developed as a result of consultation, adopted a modern but contextual approach reflecting the modernist ideals that informed the LCC scheme and the former school buildings which once occupied part of the site. It would be beneficial that those principles remain reflected in the SPD.

Page 37 Para 4.4 Core Principle 4. We support objective B. However, as set out in our principal comments, the delivery of an enhanced landscape in term of both heritage and facilities needs to be developed on the basis of an understanding of its historic development, including surviving and lost features and opportunities to better reveal its significance, and the assets within it. This element of understanding had yet to be developed as part of the Masterplan or wider evidence base.. The understanding of the landscape should be developed and used to inform where play facilities etc. can be integrated without harm to significance and in accordance with the Core principle 5E, page 40.

Page 41 Para 4.5 Core Principle 5E. We would recommend substituting *positive* for *highest* within the objective, so as to better reflect the intentions in the NPPF . Heritage assets may display a broad range of qualities which contribute to their significance. There may therefore be opportunities to better reveal or enhance a range of qualities or attributes such as reinstating historic views, settings, or condition rather than only "highest qualities".

In respect of the reference to sensitive extensions etc. we would recommend this is caveated by reference to the need for listed building consent in respect of alteration to listed heritage assets.

In respect of sensitively designing new developments we would suggest that, in addition to scale, reference should be made to appropriate materials and the



opportunity to reflect local character and distinctiveness (better reflecting the reasons set out at 4.8). Particularly in respect of opportunities to reflect the positive aspects and intentions of the LCC Estate proposals. Different locations within the plan area may be subject to different contexts and development should react appropriately. However, the legibility of the planning of the LCC Estate will remain an important consideration.

Page 41 Para 4.5 F. The ten listed Point Blocks should also be identified.

Page 44. 4.6 Core Principle 6. We are not sure what is meant by "activate" the urban fabric and wonder whether a clearer term can be used (does this mean activate the public realm?).

This section is less accessible than previous sections and more heavily reliant on urban design jargon. We would recommend that the terminology in this section is reviewed so that where design flaws and issues which need to be addressed are raised these are clearly explained and the justifications identified. For example reference to new development repairing edges and interfaces and design flaws need to be more clearly articulated. The issues raised apply to certain elements of the Estate and this is better illustrated in the Masterplan. We would therefore recommend clearer identification and expansion of the specific issues e.g. the maisonette blocks along Danebury Avenue being set back on podiums and physically divorced from the street by walkways making unattractive and inaccessible street frontages.

The identification of opportunities for new homes in the Mount Clare area presumably refers to the opportunity to redevelop the poor quality existing student housing in the grounds of the Grade I listed House. This does not appear to be clarified in the Sub-area guidance. We would recommend clarification of this opportunity and linking to 5.6 G on page 56. The exploration of new development in this location was not extensively explored through the Masterplan and would need to be subject to development of detailed proposals and testing of the impact on the setting of the house and wider views.

Page 44. 4.6D. We would recommend this be amended to read The Council will support proposals that retain and improve good quality buildings *and enhance heritage assets and their settings*. A number of designated heritage assets are included on the heritage at risk register and efforts should be made to bring these into good repair.

Page 55. 5.2 Sub- area 2 Portswood Place. We would recommend reference to the design development undertaken as part of the Masterplan process is referred to in respect of an indicative approach to the proposed community hub, and reiterating the need for development to respond to the design principles of the LCC Estate, whilst enhancing facilities and amenity. We would also value identification of the opportunities to address the at risk status of the Temple, be included in this section.

Para. 5.6 D This paragraph should note that extension proposals for the elderly persons bungalows are subject to listed building consent.



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HistoricEngland.org.uk



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Page 62. 5.4 Sub-area 4 I would reiterate my comments in respect of the need for landscape proposals to be developed on an informed basis which understands the development of the landscape, its historically significant features and identifies the opportunities to enhance views, vistas, planting, statuary and landscape features and paths. Any proposals will need to ensure new uses and features do not harm, and seek to strengthen the significance of the landscape as a major heritage assets within the conservation area.

Page 63. 5.13 The LCC Estate overlays the former Capability Brown designed landscape and the estates of Downshire House and Mount Clare, As such the central landscape was not initially envisaged as a "glue" between neighbourhoods. It became an important amenity space for the LCC proposals, which implemented Corbusian ideals of setting high density blocks with a landscaped setting rather than in streets. The rationale for the provision of new facilities needs to more clearly set out and locations informed by the landscape significance.



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**London Underground  
Infrastructure Protection**

3<sup>rd</sup> Floor  
Albany House  
55 Broadway  
London SW1H 0BD

[www.tfl.gov.uk/tube](http://www.tfl.gov.uk/tube)

Your ref:  
Our ref: 20878-SI-12-130415

Nick Smales  
Economic Development Officer  
[PlanningPolicy@wandsworth.gov.uk](mailto:PlanningPolicy@wandsworth.gov.uk)

13 April 2015

Dear Nick,

**Draft Roehampton Supplementary Planning Document**

Thank you for your communication of 2<sup>nd</sup> April 2015.

We have no comments to make at this stage except that London Underground Infrastructure Protection need to be consulted as Statutory Consultees on any planning application within 50 metres of the railway. Where there are intended works in the Highway we would need to be notified of these so that we can ensure there is no damage to them.

If I can be of further assistance, please contact me.

Yours sincerely

**Shahina Inayathusein**  
Information Manager  
Email: [locationenquiries@tube.tfl.gov.uk](mailto:locationenquiries@tube.tfl.gov.uk)  
Direct line: 020 7918 0016

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**From:** Planning Policy <PlanningPolicy@richmond.gov.uk>  
**Sent:** 26 May 2015 09:27  
**To:** PlanningPolicy  
**Subject:** Draft Roehampton SPD: Follow up comment

Dear Planning Policy

Further to the response from Richmond sent on Friday 22/05/15, David Allister, Head of Parks would like to make an additional comment, as follows:

*My only concern would be lighting, within the Barnes Village plan we are looking to create a dark corridor from Richmond Park down to the River Thames (by a number of routes) and so any extra lighting at the top from the Richmond Park would be very disappointing and potentially prevent the bats from leaving the Park. any additional lighting along the Richmond Park boundary wall or roads should consider bats and their movement.*

David Allister  
Head of Parks, Document & Delivery  
[d.allister@richmond.gov.uk](mailto:d.allister@richmond.gov.uk)  
02088316135

Apologies that this will be received after the deadline, but I hope you will be able to take it into consideration.

Best wishes  
Yvette

Yvette Ralston  
Planning Policy Officer

London Borough of Richmond upon Thames  
Second Floor | Civic Centre | 44 York Street | Twickenham | TW1 3BZ

☎: 020 8891 7445 | ✉: [yvette.ralston@richmond.gov.uk](mailto:yvette.ralston@richmond.gov.uk)

♻️ Reduce your environmental footprint... think before you print!

**From:** Planning Policy <PlanningPolicy@richmond.gov.uk>  
**Sent:** 22 May 2015 15:47  
**To:** PlanningPolicy  
**Subject:** RE: Draft Roehampton Supplementary Planning Document

## **Response from London Borough of Richmond upon Thames**

Thank you for consulting the London Borough of Richmond upon Thames on the draft Roehampton SPD. Please note these are officer comments.

Overall we are supportive of the vision and core principles as set out in the SPD, which are considered in accordance with the policy and area spatial strategy for Roehampton set out in the Local Plan (Policy PL 15, Local Plan Review - 2nd Proposed Submission Version (October 2014)). We have identified a couple of points / comments to raise in respect of Principles 5 and 7 which relate to Roehampton's location on the north west boundary of Richmond Park, just to the south of Barnes.

### Access

We note that the Roehampton area has a low to medium level of public transport accessibility; Barnes train station, to the north of the site and in Richmond borough, is the closest train station at approximately a 20 minute walk from the SPD area. There is currently no direct link to Barnes station from Roehampton and we therefore support the aspiration for 'enhanced transport linkages to and from the Barnes Station' as stated in the vision.

In addition to transport linkages, we would also encourage improved cycle routes between the Roehampton SPD area and Barnes. Previous Duty to Cooperate discussions between Richmond and Wandsworth have suggested that improved cycle links between these areas is something we are working towards together, but the aspiration is only stated very weakly in the Principle 7D of the SPD and does not appear on Figure 4.3 *Access and movement principles diagram* or on Figure 2.1 *Key Sites and Opportunities*. We would suggest strengthening the recommendation for improved cycle links between Roehampton and Barnes, perhaps including it under Principle 7A where potential new cycle links are listed and within the Figures.

The focus for improved pedestrian and cycle facilities seems to be between Roehampton and Richmond Park where the SPD states that currently there are barriers to direct, safe and efficient pedestrian and cycle accessibility to Richmond Park and the surrounding areas because of impermeable boundaries. We are supportive of the aspiration to overcome this as set out in the vision for 'improved pedestrian and cycle access to and from Richmond Park'. This is expanded in Principle 7B which aims for 'the creation of a new traffic free, green pedestrian and cycling route between Downshire Fields and Richmond Park (via Portswood Place)'. Figure 4.3 shows a new connection to Richmond Park. We will cooperate with Wandsworth Council to achieve this aspiration. There should be discussions between transport and parks officers and the Royal Parks to ensure the details of such a connection is acceptable.

### Views & vistas

Richmond Park, directly adjoining the Roehampton SPD area to the west, is an important but sensitive site within Richmond which has a number of important designations including Metropolitan Open Land, Conservation Area, Historic Park and Garden, Other Site of Nature Importance, Public Open Space, and is located within Flood Zone 3. We do not have any specific concerns at this time about the proposals set out in the SPD in terms of impact on Richmond Park, and are supportive of the improved links and permeability between the two locations, but just wish to reinforce Richmond's desire to ensure that any development in Roehampton does not have a detrimental impact on the Park or on views to and from the Park.

Further to this, we are supportive of the aims set out in Core Principle 5C that the scale of buildings must respond sensitively to the character of the site and its context including Richmond Park, and welcome the statement that development of more than 3 storeys is likely to be inappropriate at Mount Clare and Portswood Place Important Local Parade. We note that much of the SPD area is within a Conservation Area so certain restrictions on development would apply anyway.

Finally, we also welcome the requirement, set out in the Delivery section at the end, for major applications within the SPD area to include a visual impact assessment to demonstrate that the proposals will not detrimentally impact on local views from Richmond Park and Conservation Areas. We would encourage Wandsworth to uphold this requirement.

Student accommodation

We note the potential for up to 400 additional student units with a net gain of approximately 250 units in Roehampton to replace the existing accommodation at Mount Clare in order to meet the identified shortfall for student housing in this area. We do not have any comments with regard to this proposal.

**From:** Aldred, James  
**Sent:** 22 May 2015 12:24  
**To:** PlanningPolicy  
**Subject:** FW: Consultation response: Draft Roehampton SPD

Apologies – minor correction to the below.

Thanks and rgds,  
James

---

**From:** Aldred, James  
**Sent:** 22 May 2015 12:10  
**To:** PlanningPolicy  
**Cc:** Donaghy, Stephen  
**Subject:** Consultation response: Draft Roehampton SPD

*Response on behalf of the Director of Public Health*

Public Health supports the content and ambitions of the SPD to improve the living conditions and quality of life in the SPD area. We welcome the SPD's provisions regarding adherence to Lifetime Homes standards, secure design, improvements to community facilities and open space, increased employment opportunities and measures to encourage active transport. We consider that the delivery of these provisions could have a significant positive impact on the health and wellbeing of residents.

In response to the sustainability appraisal, we consider that air quality, noise and land contamination issues are already thoroughly built into Wandsworth's core planning documents, in particular the Local Plan and Development Management Policy documents. These make it clear that all major developments in the Borough will be required to provide an Air Quality Assessment and to identify and mitigate negative impacts arising from poor air quality, dust, land contamination and from construction and noise pollution which may impact on new developments or the local environment.

We therefore would respectfully disagree with the appraisal's recommendation of requirements Construction and Demolition and Construction Environment Management Plans, as we consider that adding this requirement to the SPD would be redundant and may cause confusion to developers.

Kind regards,  
James Aldred  
Public Health Board Support Officer  
020 8871 5215  
[jaldred@wandsworth.gov.uk](mailto:jaldred@wandsworth.gov.uk)



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By email:  
[planningpolicy@wandsworth.gov.uk](mailto:planningpolicy@wandsworth.gov.uk)

Our reference: 1051

9 April 2015

Dear Sir/Madam,

**Re: Draft Roehampton Supplementary Planning Document**

Thank you for inviting the Marine Management Organisation (MMO) to comment on the above consultation. I can confirm that the MMO has no comments to submit in relation to this consultation.

If you have any questions or need any further information please just let me know. More information on the role of the MMO can be found on our website [www.gov.uk/mmo](http://www.gov.uk/mmo)

Yours sincerely

Angela Gemmill  
Relationship Manager

E [stakeholder@marinemanagement.org.uk](mailto:stakeholder@marinemanagement.org.uk)



INVESTORS  
IN PEOPLE

Date: 18 May 2015  
Our ref: 149826



FAO: Nick Smales,  
Planning Policy  
Housing and Community Services  
Wandsworth Council  
The Town Hall  
Wandsworth High Street  
London  
SW18 2PU

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

**BY EMAIL ONLY**

Dear Mr Smales,

**Planning consultation:** Draft Roehampton Supplementary Planning Document (SPD).  
**Location:** Wandsworth Borough Council.

Thank you for your consultation on the above dated 02 April 2015.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

**Wildlife And Countryside Act 1981 (As amended)**

The following comments are made with relation to the Draft Roehampton SPD as it stands and the associated Sustainability Appraisal (SA). Broadly the document itself is in line with what would be expected for such a plan in London, with good provision for Green Infrastructure (GI) as mentioned in Core Principle 4 and keeping open spaces as publicly accessible land ("no net loss" as described in section 4.4 under Core Principle 4) for use by local residents. Sustainable Urban Drainage Systems (SUDS) are also mentioned by the document and there is emphasis placed upon the creation of a management plan for these, which is welcomed as this will ensure that they are maintained and kept functional for the foreseeable future.

The reuse of open space and prevention of its loss to new development are a positive move to see implemented and the better use of space within the SPD area will help keep residents active and better engaged with their local natural environment. Relying upon the Habitats Regulations Assessment (HRA) which was carried out for the Core Strategy and which concluded that there wouldn't be an impact upon either Richmond Park Special Area of Conservation (SAC) and Wimbledon Common SAC should not cause issues here as this document does only expand on policy which was set out higher up in the Core Strategy Policy PL15. This doesn't exclude works that are carried out in due course as part of the SPD from potentially needing to carry out a short screening assessment of their own in order to establish if an impact might be possible or not.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Piotr Behnke on 0300 060 1963. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).



We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely,

Piotr Behnke  
Sustainable Development and Regulation  
Thames Valley Team



**From:** CCT Contact <contact.cct@orr.gsi.gov.uk>  
**Sent:** 20 April 2015 10:42  
**To:** PlanningPolicy  
**Subject:** RE: Draft Roehampton Supplementary Planning Document - notice of consultation

Dear Sir/Madam,

Thanks for your e-mail of 2.4.15 in regard to the consultation on the Draft Roehampton Supplementary Planning Document. We have reviewed your proposals and supporting documents & note that your proposals do not affect the current or (future)operation of the mainline network in Great Britain.

It might be helpful if I explain that the office has a number of key functions and duties in our role as the independent regulator of Britain's Railways. If your plans relate to the development of the current railway network including the operation of passenger and freight services, stations, stabling and freight sites (including the granting of track and station access rights and safety approvals) within your administrative area, we would be happy to discuss these with you once they become more developed so we can explain any regulatory and statutory issues that may arise.

I have attached a copy of our localism guidance for reference, which can be found at: <http://www.rail-reg.gov.uk/upload/pdf/localism-guidance.pdf>

Kind regards

A Harrison  
Planning Executive

Office of Rail and Road | One Kemble Street | 2<sup>nd</sup> and 3<sup>rd</sup> Floors | London | WC2B 4AN

Tel: 020 7282 3829 | e-mail [anneli.harrison@orr.gsi.gov.uk](mailto:anneli.harrison@orr.gsi.gov.uk)

Web: [www.orr.gov.uk](http://www.orr.gov.uk)

---

**From:** PlanningPolicy [mailto:PlanningPolicy@wandsworth.gov.uk]  
**Sent:** 02 April 2015 2:24 PM  
**Subject:** Draft Roehampton Supplementary Planning Document - notice of consultation

Dear Sir or Madam,

The consultation period for the Roehampton Supplementary Planning document begins on Tuesday 7<sup>th</sup> April 2015.

The Roehampton SPD reflects and builds on relevant policies in the Wandsworth Local Plan to provide additional guidance on how those policies should be implemented. In particular it builds upon the provisions of Core Strategy Policy PL15 and the area spatial strategy for Roehampton, as well as the relevant Site Specific Allocations and other general development management policies.

### **Consultation**

In accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, the SPD is subject to public consultation. This consultation begins on 7<sup>th</sup> April 2015 and will run until the end of the 24<sup>th</sup> May 2015.

### **Copies of Documents**

Copies of the draft SPD are available for inspection on the Council's website ([http://www.wandsworth.gov.uk/info/1004/planning\\_policy/1225/supplementary\\_planning\\_documents\\_spds/5](http://www.wandsworth.gov.uk/info/1004/planning_policy/1225/supplementary_planning_documents_spds/5)), at Balham, Battersea, Putney, Roehampton, Tooting and Wandsworth libraries (for opening hours see [www.wandsworth.gov.uk/libraries](http://www.wandsworth.gov.uk/libraries)) and at:  
Western Area Office (Opening House: 9:00am to 4.30pm Monday – Friday)  
38 Holybourne Avenue  
London, SW15 4JE  
and  
Customer Services Centre  
Town Hall Extension  
Wandsworth High Street  
London, SW18 2PU (Opening House: 9:00am to 5.00pm Monday – Friday)

### **Representations**

Representations can be made during the consultation dates set out above either online at <http://www.wandsworth.gov.uk/spd>, by email to [planningpolicy@wandsworth.gov.uk](mailto:planningpolicy@wandsworth.gov.uk), or in writing to:

Planning Policy:  
Housing and Community Services  
Wandsworth Council  
The Town Hall  
Wandsworth High Street  
London  
SW18 2PU

Responses will be made public and a summary of the consultation findings will be made available on the website.

For further information, email [planningpolicy@wandsworth.gov.uk](mailto:planningpolicy@wandsworth.gov.uk), or telephone 020 8871 6207 or 020 8871 6449.

Yours sincerely,



Nick Smales  
Economic Development Officer

**Draft Roehampton SPD, Wandsworth March 2015**  
**Transport for London's Comments (reference 15/1146) 22/05/2015**

These comments follow the receipt of the notification that Wandsworth Council are consulting on the draft Roehampton SPD.

*Please note that these comments represent an officer level view from Transport for London and are made entirely on a 'without prejudice' basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. These comments also do not necessarily represent the views of the Greater London Authority, which has been consulted separately. The comments are made from TfL's role as a transport operator and highway authority in the area and do not necessarily represent the views of TfL's commercial property team who may respond separately.*

TfL understands that the council is now working to formalise the Master plan's proposals in a Supplementary Planning Document (SPD). The SPD focuses on planning issues such as land use, conservation issues, access & movement and will work as a framework to inform and guide development proposals.

Overall TfL notes that the SPD requires further discussions and work on the approach to the local bus network and bus infrastructure and its role in supporting the new development opportunities outlined in the SPD. A lot of residents in this area are dependant on the bus network and protecting and improving the bus infrastructure that is there already should be included in the text, with particular reference to the stands that provide a terminus for routes 170 and 430 on Danebury Avenue. The SPD indicates the area in very close proximity to these stands as an area of improvement. TfL would like assurances this does not mean altering or attempts to relocate or remove these vital pieces of infrastructure. The site also sits close to parts of the TLRN between the A3 and the A205, and the A306 linking them, and therefore the effects of the development proposals on these roads and any improvements will need to be considered.

**Key issues and challenges**

Page/Section	Extract	TfL Response
Pg. 23 2.6	Transport accessibility	TfL would welcome an increased focus on cycling in the area as currently there is only passing reference to cycling, in 2.26 and 2.27
Pg. 23	'A number of rail, tube stations and centres are within a 40 minute	The Roehampton bus terminus to Putney Station is scheduled to

2.22	<p><i>journey time via bus. This includes Barnes (approximately 20 minute walk) and Putney rail stations which provide regular trains to Richmond, Waterloo and East Putney which provides access to central London via the District London Underground Line.</i></p>	<p>take 19 minutes in the morning peak and as such the journey time considerably below 40 minutes. TfL suggests this is reflected in the text.</p>
Pg. 23 2.23	<p><i>Roehampton Lane acts as a north-south bus corridor with routes providing access to Putney, Wandsworth, Richmond, Clapham, Tolworth, Kingston, White City, Hammersmith, Fulham, South Kensington, and Victoria. There is however no direct local route to Barnes Station and local buses tend to pass by or terminate within the estate, contributing to the sense of the estate being a cul-de-sac.</i></p>	<p>TfL advises that the statement 'No direct bus to Barnes Station' is not factually correct considering two routes 72 and 265 run along Roehampton Lane and pass the station entrance.</p>

Vision and strategic objectives		
Page/Section	Extract	TfL Response
Pg. 27 - 29 3	<p><i>This section sets out the vision and strategic objectives (in line with the area spatial strategy for Roehampton in the Site Specific Allocations Document) that underpin the guidance for the future regeneration of Roehampton.</i></p>	<p>TfL notes that the Strategic Objectives make no reference to transport. Having identified issues in the previous sections of the document, there is no objective of making good the perceived problems.</p>

<b>Core principles</b>		
<b>Page/Section</b>	<b>Extract</b>	<b>TfL Response</b>
<p>Pg. 44 <b>Core principle 6 F</b> Update and activate the urban fabric</p>	<p>Existing streets, public spaces and pedestrian links should be upgraded so that they are more convenient and usable through buildings that provide frontage and definition to the edges.</p>	<p>TfL welcomes the Council's intentions to upgrade existing streets, public spaces and pedestrian links. However it appears to relate only to the relationship of new buildings to their frontages and TfL suggests this extract is reworded.</p>
<p>Pg. 44 <b>Core principle 6 G</b> Update and activate the urban fabric</p>	<p>Streets and spaces should be enlivened by increasing public access and permeability, including new uses within the spaces, and through the addition of active ground floor uses in appropriate locations. A key intervention in this regard will be incorporating active frontage along Roehampton Lane in order to enliven this route and announce arrival to the Roehampton area.</p>	<p>TfL requests clarification on the location of the proposed active frontages along Roehampton Lane. It should be noted that access and parking will not be permitted to interfere with the free flow on traffic along Roehampton Lane.</p>
<p>Pg. 45 - 46 <b>Core principle 7 C</b> Improve access and connections (Sub-Area 1)</p>	<p>Developments will be required to deliver (and contribute towards) improvements to existing routes and facilities through the following interventions:</p> <ul style="list-style-type: none"> <li>• Upgrading pedestrian crossings at Danebury Avenue and Roehampton Lane.</li> <li>• Upgrading existing pavements and the public realm across the area.</li> <li>• Relocating the bus turnaround and stops to remove a barrier between Portswood Place Important Local Parade and the Park.</li> </ul>	<p>The section that refers to upgrading pedestrian crossings at Danebury Avenue and Roehampton Lane should refer to working with TfL.</p> <p>Currently there is a proposal to take a Tranche 2 Quietways route across Roehampton Lane and along Danebury Avenue. Subsequently the junction could be modified to accommodate this.</p> <p>TfL requests further discussions on the proposed changes to the bus turnaround and stops.</p>
<p>Pg. 46</p>	<p>Developments will be required to make an appropriate contribution towards improvements to public transport</p>	<p>These sections should refer to working in conjunction with TfL.</p>

<p><b>Core principle</b> 7 D Improve access and connections (Sub-Area 1 &amp; 3)</p>	<p>to improve connectivity in and through the estate (based on assessed impacts). Any step change in service requirements may necessitate funding from strategic CIL contributions. Improvements to public transport that may be required include:</p> <ul style="list-style-type: none"> <li>• An increase in the frequency of buses on existing routes, including the 72 on Roehampton Lane.</li> <li>• The provision of a new route passing through the heart of the area – this may be achieved through the extension of the existing K3 service.</li> <li>• Improving the connection to Barnes Station along Roehampton Lane through better signage, road markings and the addition of cycle lanes.</li> </ul>	<p>TfL has a scheme to improve the flow of traffic northbound between Danebury Avenue and Clarence Lane following engagement with Wandsworth and the local MP and therefore it is essential all parties are involved.</p> <p>Funding may also be sought via site specific section 106 agreements.</p>
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**Delivery**

Page/Section	Extract	TfL Response
Pg. 65	<i>Delivery Approach</i>	As previously mentioned, TfL is currently working on junction and cycle improvements for the area, considering this and TfL's role in managing the bus network and routes serving the area TfL request the SPD refers to TfL as a key stakeholder in the delivery approach.
Pg. 65	<i>Infrastructure Funding</i>	TfL notes that Borough CIL and site specific s106 contributions are envisaged to support, inter alia, public realm improvements and public transport which is welcomed, however asks that the provision of upgraded crossings and cycle routes on the TfL network are also included.
Pg. 66	<i>Planning Application Requirements</i>	<p>In support of an application, to allow TfL to appropriately determine the impact the application may have on the public transport network as well as it's conformity with the transport policies set out by the London Plan, it may be appropriate for an application to be accompanied by a Transport Assessment (TA), Travel Plan (TP), Draft Construction Logistics Plan (CLP) and draft Delivery and Servicing Plan (DSP). Further information can be found at: <a href="http://www.tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guidance">http://www.tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guidance</a>;</p> <p>The London Bus Network is planned strategically and developments can have a wider impact on network planning than can usually be captured by consultants using loadings data on routes in the immediate vicinity. Such exercises will not allow a full view of the network to be obtained.</p> <p>TfL therefore does not require developers and consultants to carry out assessments of bus loadings and capacity. Instead, TfL Buses requires information on bus trip numbers to be generated by the development, including origin and destination projections for new travellers to and from the development</p> <p>These impacts can then be assessed by network planners at TfL</p>

		(Please see <a href="http://www.tfl.gov.uk/tfl/pdfdocs/TAGuidance_LQ.pdf">http://www.tfl.gov.uk/tfl/pdfdocs/TAGuidance_LQ.pdf</a> , Tfl guidelines)
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# Wandsworth Local Plan: Supplementary Planning Document: Roehampton: March 2015

(final draft web version 27-03-2015)

## Response of the Alton Regeneration Watch

Throughout this document, the *Wandsworth Local Plan: Supplementary Planning Document: Roehampton: March 2015 (final draft web version 27-03-2015)* is simply referred to as 'SPD'.

Our response will refer to Wandsworth Borough Council as 'WBC'.

The six main parts of the SPD will be referred to throughout our response as Chapters; major parts within chapters as Sections, and the smallest (numbered) sub-sections as Paragraphs.

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## 1. Introduction and Background

In March 2008, WBC set in motion its first pass at an Alton Estate regeneration, plans for which were developed up until being called off in October 2009. Later in 2012 a completely new plan began to arise, introduced disingenuously by Cllr. Govindia thus:

A lot of planning work needs to be done. These things will happen, but first we want to ask the community. This is not a top-down approach, we want to ask how we can take this forward. We have no preconceived ideas – A bolder vision means that we would look quite extensively at Danebury Avenue, the library block, the car park and so on, if there is an appetite and support from the community, we would have to go out and procure a competitive market solution.

Issue #6 of 'Roehampton Voice', July 2012

Already, the contradictions underlying what WBC says and what it does are there to be seen. A plan is announced, lip service is paid to the intention to 'involve the community', but at the end, it remains clearly stated that the regeneration will go ahead. The plan is currently a clean sheet of paper, open to all ideas, but yet at the same time it as a result of WBC's "bold vision" will involve "quite extensive[]" work on Danebury Avenue, Allbrook House and the Library. An imaginary space is opened up for residents' participation, but yet the desired end result is already presaged in this short paragraph for those who have eyes to see it.

At the same time as the first and second regenerations were being planned, national and regional plans were being laid to increase housing supply. The late Coalition government's 2011 housing policy paper states in its preamble:

In 2009/10, there were 115,000 new build housing completions in England. Meanwhile, the latest household projections suggest that the number of households will grow by 232,000 per year (average annual figure until 2033). While house building starts in 2010/11 were 29 per cent higher compared with 2008/09, and 17 per cent higher compared with 2009/10, there is still more to do.

Laying the Foundations: A Housing Strategy for England, 2011

and proceeds from there to propose and announce the way forward to bridging this gap.

For his part, the Mayor of London laid out his "policies to meet the housing needs of London's growing population" in response to:

[A]n epic challenge: to double house-building and build 42,000 new homes a year, every year, for the next 20 years.

Homes For London: The London Housing Strategy June 2014

At Borough level, responding to the above ("49,000 new homes per year are needed in London to meet demand", exceeding even the Mayor's stated 42,000) this trickled down to putting in place:

A planning regime that actively responds to market housing conditions to ensure that development is sustained over the period of this plan . . . . setting ambitious delivery targets and increasing housing development to meet local demand and

London's demand for housing. The Council will, through its own means and working with local developers, deliver a minimum of 18,000 new homes over the next ten years . . .

**The Wandsworth housing offer: A new housing delivery strategy for Wandsworth (Appendix 1 To Paper No. 15-15), Jan 2015**

The paper commits to "the right level of permissiveness, risk taking and creativity" and

Having a permissive planning regime focused on sustaining housing development . . . maximising supply of housing available to local residents and workers . . . focused on sustaining development over economic and funding cycles.

**Ibid, p.5**

Down at the lowest (ward) level, the SPD is strangely altogether less forthcoming about the nett increase in housing which its current incarnation, if brought to fruition, will bring about. Its chapter 3, Vision and strategic objectives, speaks vaguely:

approximately 309 existing homes replaced with high quality new accommodation. Approximately 500 new homes with a range of houses, maisonettes and apartments. The potential for up to 400 student units.

**SPD, p.27, paragraph 3.7**

and chapter 5 only muddies the issue:

The Council will support proposals for approximately 250-275 new homes through the following: Existing homes replaced where necessary to provide high quality living accommodation for existing residents.

High quality new homes added to reinforce activity within Roehampton Local Centre, including homes above shops and services.

G. The Council will support professionally managed student accommodation in this location (up to 400 new student units)

**SPD, p.52, paragraph 5.2**

Paragraph 3.7 is saying  $500 - 309 = 191$  new homes ? Paragraph 5.2 now says 250 to 275 new homes ? Or is 3.7 saying 309 homes replaced, and then 500 new ones built ? And is the student accommodation figure a nett or gross one ?

And these are the only references to the proposed new housing, which surely in terms of both cost and intent lie at the core of the regeneration.

Something fundamental seems to have been lost in the translation from higher-level policy; but the link between top-level policy and its implementation on the Alton Estate may be found in the now-notorious Foreword to the Savills proposal for research document:

[T]his Government believes there is an opportunity to look at a mass regeneration of our existing brownfield estates into new and attractive areas that house more people.

It would appear that the proposed regeneration of the Alton Estate is the outworking of policies originated far from its residents, in terms of power, if not in geographical distance. Plans have been made at the highest levels of power in our nation, not ten miles away in Westminster, and at City Hall in Southwark. For all the control those who live in the Roehampton and Putney Heath Ward have, these places may as well be ten thousand miles removed.

There has never been appetite on the Estate for regeneration. The first sign that this was known and being acted on, was in January 2009, when WBC was forced to present a report by Councillor Randall on a proposal to conduct further market research about the then-current version of the “regeneration of Roehampton” because:

Extensive consultations have been carried out with local residents about various proposed changes. The original consultation did not involve the complete demolition and rebuilding of all the buildings on the four regeneration sites. Following the appointment of Savills to prepare an outline planning application, the regeneration proposals were changed. The altered plans now include the demolition of all the buildings, the rebuilding and relocation of the library and a substantial increase in the number of residential units, along with an increase in the height of the buildings . . . .

The Economic Development Office conducted a reconsultation exercise on these amended proposals. It was estimated that 1000 attended the exhibition at Roehampton Library. 350 comment forms were taken, a newsletter was sent to every household in Roehampton. However, only 65 responses were received. Of these, the majority appeared to be in favour of the amended plans. However, the response rate was very low . . . .

The survey by Stuart King [the Labour Prospective Parliamentary Candidate for Putney at that time] is at odds with that conducted by the Council and has a more comprehensive response, with the demographic more representative of those who live on the Alton Estate. It has always been really important for the Council to have the support of local residents for their regeneration plans and there is now growing evidence that this support is not forthcoming.

**WBC Paper 09-31: Regeneration And Community Safety Overview And Scrutiny Committee, January 2009**

By the end of the year at the beginning of which this report was made, the first regeneration was dead in the water, with WBC claiming this was due to “[t]he deterioration in the financial markets in the past twelve to eighteen months mean[ing] that it is highly unlikely that the Council would receive a suitable financial package at this time” (WBC paper 09-912, November 2009).

The narrative cycle in the extract above will be re-enacted all through the second (current) iteration of the regeneration:

- WBC proposes a minimally-invasive intervention

- Having inserted the thin end of the wedge (a ‘soft market testing’ of the receptivity of the native population)
- It then further along the consultation proposes an altogether more hard-core intervention – demolitions
- It solicits approval, or at least, non-outright condemnation, from the resident population
- Questionnaires and other feedback reveal that the demolition-based regeneration options are not popular
- It seeks to parlay away the restlessness of the natives by listening even harder and emphasising the benefits of the regeneration, whilst turning a tin ear to any substantive protests

So here we return again. In 2012 the second regeneration recommences. The first one was abandoned, according to WBC, due to “deterioration in the financial markets” (see above), but the second one was able to be relaunched because

[N]ow the Council has been able to borrow up to £100,000,000 to be able to do some estate regeneration in Battersea and Roehampton

**Cllr. Govindia, quoted in Issue #6 of ‘Roehampton Voice’, July 2012**

All mention of the reason for abandonment of the first regeneration has been dropped. The impression given is that of an immensely slow-moving machine (a bulldozer, perhaps ?) inexorably grinding on to its pre-determined end-goal. The regenerations first surfaced in 2004, as a series of ‘soft’ projects, before assuming their later demolitional forms. In between regenerations mark I and II, Cllr. Lister leaves his position as WBC leader, and Cllr. Govindia steps up, but it makes no difference. The machine rolls on, weathering recession, lack of a “suitable financial package”, puny local opposition, top Council personnel changes, elections, re-elections, a full sweep of New Labour councillors into the Ward – nothing seems to hold it back.

We on the Alton Estate now find ourselves at a key intersection, where the metaphorical and the physical bulldozers coalesce into one and the same.

## 2. Key Issues And Challenges

From the start, the story of the regeneration has been slippery, elusive, hard to grasp.

The first shot fired in the second regeneration, apart from Cllr. Govindia's remarks in Roehampton Voice #6 quoted above, were in an A4 two-page document, also from around July 2012, which told us:

It is important to stress that there are no firm proposals on the table. We are only exploring early ideas . . . . . if, after talking to local people, we do come up with proposals . . . you will see some very early sketches of possible ideas for the area. These are not proposals because there are none.

**Roehampton Local Centre: Help us look at ways to improve Roehampton, WBC leaflet, mid-2012**

A later leaflet originating from autumn 2012 has Cllr. Govindia telling us:

It is obvious that there is a desire for change in the area. You provided us with the best response to a large-scale consultation in Roehampton that we have ever recorded.

It is clear that there is support for improving the quality of existing housing.

There is support for redevelopment, with many people prepared to see the demolition of some buildings to pave the way for more housing to be built.

**Resident newsletter: Investing in Roehampton, WBC leaflet, autumn 2012**

The tone of the newsletter, over a quarter of which is signed as being written personally by Cllr. Govindia, is congratulatory. Well done, chaps! "You provided us with the best response to a large-scale consultation in Roehampton that we have ever recorded" (and, although not stated, provided us with the answer we wished for): It has taken but three months for the "large-scale consultation" to endorse demolition. The natives have spoken, and *mirabile dictu*, they agree demolition's the way to go! How exactly the wishes of the natives have been ascertained, how many responded, exactly how many said that they were in favour of demolition, the newsletter remains entirely silent on.

We propose here to pass quickly over the nightmare that was "StickyWorld", in which residents are invited to affix virtual Post-It® notes onto a computer simulacrum of "Roehampton town centre", to the 'Options Consultation', in which the (at that time) three designated regeneration areas – Danebury Avenue Town Centre; Portswood Place; and the top of Danebury Avenue on the north side to Roehampton Lane (the Danebury Housing Area) – are each offered three Options, ranging from Option One (refurbishment with small-scale new build) through to Option Three (the current schema laid out in the SPD), via Option Two (intermediate in thoroughgoingness between One and three). Two more double-page spreads follow, outlining a single overall plan for each of the Bull Green area and public space over all of Alton West. The document ends with proposed upgrades to bus, cycle and 'express bus' connections. One enormous, yet barely mentioned fly in the ointment is the caveat "changes to local bus services would need to be approved by Transport for London". Given that an endeavour to reroute the 493 bus through Clarence Drive and Priors Lane in early 2014 (reported in Roehampton Voice issue #15 in February 2014), going so far as to have Transport

for London report back to WBC in June of that year, seems to have come to nothing, when that must be the simplest rerouting of all to effect, does not bode well for the massive (and massively expensive, not to say unpopular) work required to reroute the 72 bus through the heavily residential and barred-off Highcliffe Drive. Indeed, the 493 proposition followed Transport for London's refusal to reroute the 22 bus on grounds of cost (source, Roehampton Voice issue #15 again) – and this rerouting is the second of the two proposed reroutings in the Options Consultation !

So, Alton Estate residents, how was the Consultation for you ?

The Interim Consultation questionnaire of September/October 2013 attracted 257 responses from the 3,800 sent out, a response rate of 7%, as helpfully calculated in the Interim Consultation Report of February 2014.

By no means can this be called a ringing endorsement, and even amongst those pitifully few respondents, 16% wanted to see student housing introduced into the Danebury Avenue shopping area. That's 41 people who expressed an opinion, or 1% of the 3,800 questionnaires sent out. Around 50% of actual respondents – around 130 returned questionnaires – were in favour of demolitions in Danebury Avenue Town Centre and the Danebury Housing Area. Figures were little better for “new residential buildings on vacant sites”, evincing a distinct lack of enthusiasm for Option Two appropriation of open and green spaces in the public realm and consequent raising of housing densities.

This didn't stop the WBC-liveried bulldozer. With breath-taking disregard for the lack of mandate it received from the ‘Options Consultation’, it went on to decide that yes, the Alton Estate has spoken and it wants Option Three all the way !

The next step came soon enough, with the release of the ‘Preferred Option Consultation’, bearing the publication date February 2014 and another congratulatory foreword from Cllr. Govindia:

Thank you to everyone who took part in the options consultation and gave their time to help shape these new proposals. Thanks to your input we now have a much clearer picture of how this neighbourhood can change for the better.

The ‘preferred option’ booklet sets out an outline plan for the estate which combines the ideas and proposals which received high levels of local support. Less popular options have been removed.

Preferred Option Consultation, WBC, February 2014

Possibly the only honest conclusion the august Leader of the council draws from the facts is the acknowledgement “It also involves major upheaval”.

The next page, preparatory to unveiling the repackaged Option Three for Danebury Avenue Town Centre and the Danebury Housing Area, restates what will happen to leaseholders, freeholders and Council secure tenants. On tenants who do not fall into these categories, the document remains once again silent – they have to understand from this lack of mention that if their homes go, then so do they, to cope as best they can in the new post-regeneration world.

A subject oddly barely mentioned, is Portswood Place, slipped into the section ‘A Revitalised Park Centre’.

Stunningly, the universally unwanted Danebury Avenue Town Centre student housing (“16% wanted to see student housing introduced into the Danebury Avenue shopping area” as per the ‘Interim Consultation’ questionnaire) is there, albeit moved through 90° and several metres to the west.

The hugely unpopular, expensive, and almost certainly unagreed by TfL rerouting of buses through Highcliffe Drive is there, as is the opening of the Danebury Avenue barrier. However, the Highcliffe bus is now to be the 22, not the 72, as was the original proposal.

On the principle that the locals should be canvassed again until they return the right result (might it not be easier to dissolve the population and vote in a new one ?), another consultation (the Preferred Option Consultation) took place. It seems odd that such exhaustive consulting took place only a few months after the one designed to form the Preferred Option, but another consultation there was.

Unfortunately, this fared no better than its predecessor with the ungrateful Altonians.

The Preferred Option Consultation questionnaire of February to April 2014 attracted 254 responses from the 3,800 sent out, a response rate of 6.7%, as calculated (with nice accuracy, to one decimal place) in the Preferred Option Consultation Report of July 2014.

To make this report more convincing and engaging, it was published replete with graphs and charts showing the reception accorded the newly unveiled Preferred Option. No graph depicting response rate was included.

In order to minimise the poor impression given by the abysmal questionnaire response rate, several pages were given over to reporting the outcomes of “direct feedback received during the door knocking programme”. The least contentious issues (new facilities at Portswood Place, and upgrading of the Bull Green and associated green areas) merited highly colourful pie charts exhibiting satisfyingly large green slices (signifying, Will use facilities and Support proposals, respectively). Issues which would have made rather less satisfyingly green-sliced pie charts were depicted as rather less visually striking tables. For instance, 33% supporting opening the Danebury Avenue barrier – for only certain hours of the day, at that – got the dull treatment.

One wonders what exactly was said at the door-knocking exercises by trained WBC officials ? A questionnaire, at least, asks what it asks, and does not speak, or influence. This may not always be said of people in face-to-face encounters, who are already *parti pris*.

The pattern of downplaying the less favourable, and highlighting the acceptance of the less controversial, carried on into the July 2014 “Alton Area Masterplan: Presentation to Roehampton Partnership” document. This “reminded” the august members of that body what the Preferred Option was, showed some cute pictures of children being face-painted and attentive residents eagerly being shown the Preferred Option at an Open Day, before some funky architectural models, and then more colourful charts – again, all with satisfyingly large green bars and slices, denoting as before, “support”, for, again, the least contentious issues of the regeneration.

The almost simultaneous appearance of the “Baseline Report” with the “Masterplan Report” came next. The “Alton Area Masterplan Baseline Report (August 2013)” is falsely represented as having been published in August 2013. In fact, the online document was only published two days after the October Masterplan was confirmed by the Council Executive on 6th October 2014. This is borne

out by the document's PDF name (filename and internal properties): September 2014. As supposedly the underpinning for the regeneration project, even if published at the date claimed for it, it would have come very late in the regeneration timeline. Its late emergence seems to argue that its lack was perceived as an omission in the planning and consultation process, and that it was necessary to knock it up quite quickly and pretend that it had been in existence for far longer than in fact appears to be the case. Its recital of the woes of the Alton Estate (many lovingly curated full colour photographs of minor architectural deviations in the built environment; a series of tables under the heading "The Residents" killing us softly by statistics) is designed to persuade us and the world in general that the Estate is in dire need of rescue from its current critical state; we would argue that it is WBC which is critical, not the state of our Estate.

Its one leavening of (unintended) humour in its pompous verbosity is the definition of the less fortunate of us living here as being "deprived in 2 or more dimensions", presumably a post-post-modern way of saying "poor", to be found on page (gulp) 137.

Autumn 2014 also saw the invisible public appearance of the core document of the "Wandsworth Local Plan" and its opening up for public consultation. Presumably having learnt that too much publicity given to consultations might be a bad thing when response rates – and within those, favourable responses – might be hard to come by, the opening and closing of the consultation period came and went out of sight of Alton Estate residents. The single most germane document contained within it (the "The Second Proposed Submission Versions Wandsworth Local Plan (2014)" was apparently "subject to public consultation" but we never knew of it until reading the SPD documentation. We wonder just how many members of the public knew about it? We would guess close to zero, given that "44 organisations, groups and individuals" made representations pertaining to it, not one of which came from an individual rather than a commercial or other body (source: [[http://www.wandsworth.gov.uk/downloads/download/1542/lpr111\\_-\\_local\\_plan\\_review\\_-\\_2nd\\_proposed\\_submission\\_2014\\_individual\\_representations\\_as\\_received](http://www.wandsworth.gov.uk/downloads/download/1542/lpr111_-_local_plan_review_-_2nd_proposed_submission_2014_individual_representations_as_received)]). The SPD is quite clear on the importance of the Local Plan, and how the two should be read together.

Autumn 2014 was a season of fruitfulness for WBC regeneration documentation. The big one for us was the Masterplan, in its Full and Executive Summary versions. It represents the final flowering of the regeneration process, and is, indeed, flowery. Long gone are the modest slides of the modest revamping of Sheffield's Park Hill Estate that Studio Egret West showed us at the beginning of the 'consultation' process, showing what could be done with a bit of brightly coloured panelling and some imagination. We're now regaled with full-coloured mock-ups of Library Pluses, Metro Food Stores, Flexible spaces For Meeting, Performing, Creating And Exhibiting, Modern And Efficient Student Accommodation, Danebury Avenue Upgraded To Become More Pedestrian Friendly, A New Landscaped Village Green, New Wellness Centre, and, and, and, the list goes on, including a Business Start-Up And Incubator Spaces. This last one is interesting, in that the finding in 2005 was that:

[N]o clear demand for a business incubator in Roehampton exists at present. Before a business incubator is viable, a critical mass of business activity and demand for premises needs to be generated. To plan for future business premises needs, business support agencies need to identify well in advance the nature of demand generated in terms of property needs to ascertain the point at which there is significant enough demand for an incubator/innovation centre

But in the shiny Masterplan world, all things appear possible. We wonder if the business environment is more or less favourable to incubators and start-ups now than in 2005.

The Masterplan is a gorgeous 147-page brochure, and little more. Hence the need for the SPD, in order to make at least a stab at setting up a realistic framework for future development plans. The Masterplan is a beautiful dream of the future. So what is now needed is the SPD.