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:
Visit our website: www.wandsworth.gov.uk/spd
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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), 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). 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’).
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. 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:

- Support for proposals to provide better-quality housing
- Support for proposals to include family-sized housing, but requests for this point to be made explicitly
- Objection to the lack of specific referencing of overcrowding as an issue within the SPD area
- Support for proposals to diversify the tenure mix
- Objection to proposals to diversify the tenure mix, particularly in relation to the perceived impact on private rented sector landlords
- Support for proposals to provide professionally managed student housing
- Objection to proposals to provide professionally managed student housing within the SPD area
- Objection to upper and lower limits placed on numbers of certain building types and uses within specific areas
- Objection to restrictions placed on building heights in Portswood Place and Mount Clare
- Support of restrictions placed on building heights in Portswood Place and Mount Clare
- Objection to the size and scale of the buildings proposed for Portswood Place
- Objection to the proposal to demolish and replace housing and retail units based on reasons including stock quality, layout and design
- Support for the integration of new B1 space at Roehampton Local Centre
- Objection to the inclusion of maximum retail floor space figures
- Support for reprovision of community facilities
- Objection to the SPD’s handling of parking as an issue
- Support for the landscaping proposals relating to Downshire Field
- Objection to the landscaping proposals relating to Downshire Field
- Support for the reprovision of public space and sports recreational facilities
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.

- Objection to the transport proposals, specifically those related to Highcliffe Drive and the relocation of the Danebury Avenue bus turnaround.

- Support for the proposal to better connect the SPD area to Richmond Park.

- 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 Hersham 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 reprovision. 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 reprovides sports space, such as the youth club’s basketball court, the reprovided 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 storey 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 reprovision 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.

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 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.
Dear Sir or Madam,

Re: Draft Roehampton Supplementary Planning Document

The consultation period for the Roehampton Supplementary Planning document begins on Tuesday 7th 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 7th April 2015 and will run until the end of the 24th 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) 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, 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, 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
Vodaphone Ltd
Wandsworth Clinical Commissioning Group
Westminster City Council
Appendix 2 - General Consultees - Organisations

A2 Dominion
Abbotsleigh Road Residents’ Association
Ackroydon Residents’ Association
Action Space London Events Ltd
Addition Land Ltd & Network Rail
Addition Land Ltd & Southwark Diocesan Trust
Age Activity Centre
Ahmadiyya Muslim Association
Akzo Nobel (CPS) Pension Scheme
Alex Imlach Architects
All Saints C of E Church
Allen Briegel New Homes & Development
Alliance Environment and Planning
Al-Muzzammil Mosque & Community Centre
Alsop Verrill LLP
Amec
ANA Architecture
Anastasia Limited
Anchor Congregational Church
Ancient Monuments Society
Antler Homes
Architects Journal
Architectural Practise
Arndale Estate Residents Association
Arqiva
Arriva London
Ashcroft Technology Academy
Asian Muslim Community Centre
Assael Architecture
Assael Architecture
Balham & Tooting Sports & Social Club
Balham Baptist Church
Balham Mosque
Balham Properties LLP
Balham Seventh Day Adventist Church
Balham Society
Balham Town Centre Management Office
Balham Town Centre Partnership Board
Ballymore Group
Barclays Bank PLC
Barratt London Ltd
Barratt West London
Barrowen Properties Ltd
Bartlett School of Planning
Barton Willmore
Battersea Arts Centre
Battersea Central Methodist Mission
Battersea Conservation Concern
Battersea Dogs and Cats Home
Battersea Fields Residents’ Organisation
Battersea Islamic Cultural and Educational Centre
Battersea Methodist Mission
Battersea Police
Battersea Power Station Community Group
Battersea Power Station Development Company
Battersea Project Land Company Limited (BPLCL)
Battersea Society
Battersea Spiritualist Church
Battersea Village Residents’ Association
Baylight Properties Plc.
Behrens Sharp
Bellevue Road Residents Association
Bellway Homes (SE) Ltd
Berkeley Group Ltd
Berkeley Homes (Central London) Ltd
Big Yellow Self Storage Co. Ltd
Binley & Winchfield Houses Tenants’ Association
Black Rights Group
Boldfort Ltd
Bonsor Penningtons Commercial
Borough Residents’ Forum
Boyer Planning Ltd
Branston & Company Architects
Brian Barber Associates
Brindle Developments
British Gas plc
Bristol Red Cross
Broomwood Methodist Church
Buddapadipa Temple
Burgess Mean Architects
C G M S
C.E.P Developments Ltd
CABE
Cable & Wireless
Callington Estates Ltd & the Callington Trust
Campaign for Real Ale
Campaign for Real Ale SW London Branch
Campaign to Protect Rural England (CPRE)
CAMRA SW London
Canary Wharf Group PLC
Capital Studios
Cappagh
Care Quality Commission
Careline Information Centre for Wandsworth
Carey Gardens Co-operative Ltd
Carmalt Gardens Residents’ Association
Carter Jonas LLP
CB Richard Ellis
CB Richard Ellis Ltd
CBRE
CEMEX
Cemex UK Materials Ltd
Centre Academy School
Centre for Accessible Environments
CgMs
CgMs Consulting
CgMs Ltd
Chartered Architects
Charterhouse
Chas Newens Marine Co Ltd
Chatham Road Residents’ Association
Chelsea Estates Ltd
Chelsea Society
Chesterton Primary School
Children and Young People’s Network
Childrens Flower Society
Childrens Society
Christ Church C of E Church
Christie’s
Christopher Wickham Associates
Church Commissioners
Church of Our Lady and St Peter
Church of the Sacred Heart
City Designer
Clapham Antiquarian Society
Clapham Junction Action Group
Clapham Junction T C Management Office
Clapham Society
Clifford Rance Associates
Cluttons LLP
CMW (Property Preservation) Ltd
Colliers CRE
Community Safety Network
Confederation of Indian Organisations UK
Congregational Union of Ethnic Churches
Conservation Architecture & Planning
Conservation Dept, The Garden History Society
Contact a Family
Co-operative Group food Ltd
Coral Racing Limited
Corby Borough Council
Corporation of London
Cory Environmental Ltd
Council for British Archaeology
Courtney Joyce
Covent Co-operative Ltd
Covent Garden Market Authority
Covent Garden Market Authority
Covent Garden Tenants’ Association Ltd
Craftwork Interiors
Crest Nicholson Residential (South) Ltd
Croatian Centre
Curatus Trust (Mauritius) Ltd
Curatus Trust (Mauritius) Ltd
Cyril Mansions Residents’ Association
DP 9
Dalton Warner Davis
Dalton Warner Davis LLP
Danemere St/Ashlone Road Residents’ Assoc.
Danul Amaan Islamic Centre
David & Miriam Howitt Architects
David L Walker Chartered Surveyors
David Le Lay Ltd
Dean & Co.
Defence Estates (MOD)
Delancy and Land Securities (Clapham Junction)
Deloitte
Dentons
Deodar, Merivale & Florian Roads Residents’ Assoc.
Department for Culture, Media & Sport
Department for Transport
Department of Communities & Local Government
Design Group Nine
DevPlan
Dialogue
Diamond Conservation Area and Heathbrook Park Residents
Diocese of Southwark Property Department
District Valuer Wimbledon
Doddington & Rollo Community Association
Doddington Resource Centre
Dover House Residents’ Association
DP9
DP9 Planning
Drivers Jonas
Dron & Wright
DTZ
Wandsworth Council

Du Cane Court Residents’ Association
E.ON
Earlsfield Baptist Church
Earlsfield Police Station
East Hill Baptist Church
Edward Potter Associates Architects
Edwin Evans
E.KAYA Housing Association
Elias Topping
Ellisons
Ellis Apartments
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
Frendcastle
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 & SeroRegional 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 Associtaion
Local Spiritual Assemsbly of the Baha’is of Wandsworth
Local Spiritual Assemsbly 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
Montag Evans
Montagu Evans LLP
Motorcycle Action Group
Mr Carpet Ltd
Museum of London Archaeology Service
Mushkil Aasaan Project
Nathaniel Lichfield and Partners
National Air Traffic Services Ltd
National Federation of Gypsy Liaison Groups
National Grid Property
National Offender Management Service
National Trust
Neighbourhoods Initiative Foundation
Network Rail
Network Rail Infrastructure Limited
NHS London Healthy Urban Development Unit (HUDU)
NHS Property Services Ltd
NHS Support Services Partnership
Nightingale Hammerson
Northcote Books
Northcote Business Network
Northcote Road Residents’ Action Group
Northcote Ward Councillors
Notting Hill Home Ownership
Notting Hill Housing Group
Object Architecture Ltd
OCS Group UK Limited
Oily Cart Theatre Company
Older Persons Forum Wandsworth
Oliver Colville
One Housing Group
Open City
Oracle Group
Orchid (Putney) Limited
Ormeley Road Residents’ Association
Outer Space
P D A Partnership London
P D Elkins Drawing Services Ltd
P W Lee & Associates
Parish of Battersea Fields
Parkinsons Disease Society Wandsworth
Parkside Community Project
Patmore Co-operative Ltd
PCT
Peabody Trust
Peacock & Smith
Persimmon Homes Ltd
Peter Pendleton Associates
Plan Info
Planning
Planning Aid
Planning Bureau Ltd
Planning Inspectorate
Planning Potential Ltd
Plantation Wharf Association
Planware
Planware
Plowden & Smith
Pocklington Resource Centre
Polish Benevolent Fund Balham Parish
Ponton Road LLP
Port of London Authority
PRC Fewster Architects
Price Partnership
Primrose Mansions Ltd
Prince of Wales Drive Environmental Committee
Public & Commercial Services Union
Puppet Centre Trust
Pure Package
Putney Evangelical Church
Putney Labour Party
Putney Society
Putney Town Centre Partnership Board
Putney Town Centre Partnership Board
Putney Vale Residents’ Association
Quinton Scott & Co
Quod
R J Associates
Radcliffes LeBrasseur
Raglan Housing Association
Ramblers Association (Hammersmith, Fulham & W’worth)
Ranelagh Sailing Club Ltd (The Embankment)
Rapleys
Rapleys LLP
RB Kensington & Chelsea
Renaissance Planning
Residents of 25-37 Westleigh Avenue Committee
Rich Investments Ltd
Richard Rogers Architects Ltd
River Thames Society
Riverhaven
Riverside Plaza Residents’ Association
Riverside Quarters Residents Association
Road Haulage Association
Robert Beeby Architects
Robert Le Clerc Consulting
Roehampton Club Ltd
Roehampton Partnership
Roehampton Quadrant Residents’ Association
Roehampton University
Roger Khoryati T/A McDonalds
Rolfe Judd Planning
Rotary Club Tooting
Royal Mail Group Limited
Royal Parks Estate Management
Russell-Cooke Solicitors
Rydevale Day Nursery
Saloria Architects
Salvation Army
Sapcote Property Developers
Savills Commercial Ltd
Scotts
Scotts Surveyors
Senex Capital Ltd
Service Developments Holdings Limited
Servite Thames
Seymour Road SW18 Residents’ Association
Share a Family
Sheppard Robson
Shire Consulting
Sikh Gurwara
Simon Smith & Michael Brooks
Sir James Barrie School
SITA UK
Sleaford Street Management Company
Sleaford Street Management Company Ltd
Society for the Protection of Ancient Buildings
Solid State Design Ltd
Solon Design
Somerset Residents’ Association
South London Business
South London Catholic Caribbean Association
South London Guardian Newspaper
South London Islamic Centre
South London Partnership
South London Press
South Thames College
South Thames College Further Education
South West London and St Georges Mental Health NHS Trust
South West London Community NHS Trust Estates
South West London Health Authority
South West London NHS Support Services Partnership
Southern
Southfields Grid Residents’ Association
Southfields Grid Residents’ Association
Southfields Triangle
Southfields Triangle Residents’ Association
Southwark Anglican Diocese
Southwark Diocesan Advisory Committee
Space Design Consultants Ltd
Spacia Business Centre
Sport England
Sport England
Sport England London Region
SSA Planning Ltd
St Alban’s C of E Church
St Barnabas C of E Church
St Boniface R C Church
St George South London Ltd
St George’s Healthcare NHS Trust
St Georges Hospital
St James Group
St James Group
St James Investments
St James’s Investments & Keltbray Ltd
St Joseph’s R C Church
St Luke’s C of E Church
St Margaret’s Church Office
St Mark’s C of E Church
St Mary Magdalene C of E Church
St Mary’s C of E Church
St Mary’s Primary School
St Nicholas C of E Church
St Paul’s Church of England
St Stephen’s C of E Church
St Thomas A Becket R C Church
St Vincent de Paul Presbytery
St. George
Steer Davies Gleave
Stewart Ross Associates
Summerstown Mission Evangelical Church
Support and Housing for People with Disabilities
Sustrans
Sustrans-National Cycle Network
Sutherland Grove & Area Residents’ Association
Sutherland Grove Residents Association
SW London & St George’s Mental Health NHS Trust
SW London Group of United Reformed Churches
Tandridge District Council
Tara Arts Director
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**

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Gordon-Smith, Mary Ellen
Gowhar, Mrs & Mr
Grabowska, Joanna
Graves, Toni
Gray, Adam
Gray, Adam
Green, Alan
Green, Thurston
Griffiths, Robert
Groves, Jason
Gul, Malik
Gurnah, Omar
Hall, Crispin
Hall, Maria-Louise
Hamilton, Belinda
Harlow, Nicola
Harris, Pam
Hayes, Ciaran
Hazell, C
Hebborn, George
Heraty, Michelle
Heywood, Laura Clare
Higgins, Lisa
Higgon, David
Homoud, Shemia
Hoper, Stephen
Horrocks, John
Horsford, Karen
Huang, Lan
Huczek, Antony Karol
Hudek, Miriam
Hughes, Lucille
Hutt, Mark
Hyder, Kirstie
Ichekwai, Catherine
Ingram, Sarah
Ingyon, Simon
Ireland, Rosanne
Jabbi, Hajah
Jahandar-Lashki, Farideh
Jahn, Christine
Jammeh, Lamin
Javid, Fauzia
Jedosina, Kristina
Jeffery, Simon
Jennings, Joanna
John, Caroline
John, Stephen
Jones, Clinton
Jones, Colette
Jones, Daniel
Jones, Michelle
Julius, Hannah
Kaleem, Mabroor
Keary, Teresa
Kelly, Angela
Kelly, A vene
Kennedy, Christopher
Kenyon, Justine
Khan, Anser
Khalman, Lizzy
Kidd, Susan
King, Gilly
King, S
Knowles, Adam
Knowles, Cllr Adrian
Kokayko, Debra Austin
Kutrowski, Stefan
Lawrence, Brenda
Le Goff, A
Lecomber, Christine
Lee, Shirley
Leigh, Jocelyn
Levy, Denise
Levy, J
Lindsay, Paulette
Lindsay, Sandra
Liszka, Lidia
Lively, Olivia
Lopez, Jheanelle
Lucas, Pam
Lunt, David
Lyden, Marguerite
Mabo, Ori leke
Macfarlane, Benjamin
MacGranthin, John
Maclver, Mark
Malcolm, Garfield
Malik Gul, Malik
Markovic, E
Marshall, Ryan
Martin, Stephen
May, Eileen
McDowall, Jaesh er
McDowell, Monica
McKinney, Rev J.
McKinney, Sue
Menendez, Mary Luz
Metouag, Maria
Michell, Candida
Miles, Charlotte
Mills, Jessica
Minguez, Maria Carazo
Misis, Jelica
Mitchell, Candida
Mohamed, Araba Saidi
Mohamed, Zeinab
Mohammadi, Haji Dash
Mooney, Annabelle Nell
Moore, Jonny
Moriba, Charlotte
Morris, Lucy
Morris, Walter
Morriss, Joanne
Morthaza, Sayd M
Muhamud, Hawah
Mukuka, Shula
Murphy, Penny
Mytiko, Elizabeth
Nasir, Tarveer
Ndagire, Sarah
Newton, Stephen John
Noel, Baby
Noonan, Christine
Nottage, Jane
Notyce, Garry
O’Bryan, Michael
O’Dwyer, Nikki
O’Reilly, Georgina
O’Sullivan, Ann
Oates, Gerald
Okator, Uzoamaka
Oola, David Dandie
Opere-Addo, Jones
Orlando, Emanuele
Owen, Patricia
Pakes, A
Palmer, Gavin
Palmer, Kiri
Parish, Richard
Parr, Philip
Parry, Glyn
Pattison, Maxine
Perez-Pinzon, Cielo
Phillips, Sumbo
Pilbeam, Justin
Pinder, Charles
Playford, Joanna
Price, Shirley
Quarcoopome, Audrey
Radcliffe, R
Ramdeo, Kevin
Raynsford, Paul
Reeve, Stacey Louise
Regan, Kevin
Regis, Kevin
Reilly, I
Renwick, Helen
Riordan, Diana
Rogala, Dorota
Roldar, Mahmood Abedi
Rose, Karen
Rossi, Diletta
Rowbottom, Keith
Russell, Mark
Ryan, Jane
Rybinski, Peter Jon
Rymill, Melanie
Sacher, Chris
Saker, Susan
Samms, Marjorie
Sangamneheri, Asheesh
Saya, Yoram
Scale, Paulette
Schooley, Charlotte
Schusser, Sabine
Scott, Helen
Scott, Luke Alexander
Scott, Wendy
Seager, Heather
Searle, Emma
Shafi, Abi
Shafiq, Abdurrahman
Sharifi, Sahar
Shaw, Neil
Sherzad, Morsal Yousfi
Shidane, Leila
Shill, David
Siwak, Monika
Slav, Kasia
Slav, Sophie
Smith, Iain
Smith, Josephine
Smith, Mark
Smith, Mo
Smoczek, Monika
Soamer, Nathan
Squibb, Teresa
Stephens, Michael
Sterling, Pauline
Stirling, Iain
Strong, Ron
Summers, Tracey
Sutherland, Brad
Sutton, Angela
Swaffield, Keileen
Swallow, Paula Joanne
Sylvestre, Julian
Syrett, S
Taborin, Milica
Taffurelli, Diana
Taffurelli, Louisa
Tariq, Norman
Taylor, Claire
Thomas, Wendy
Thompson, Chantelle
Tiller, Matthew
Titley, Simon
Tseg, Frehiwot
Tuhey, P
Tumba, Guslaine
Tumba, Kasongo
Turner, Michael
Ungar, S
Van Der Wel, Shaun
Van Der Wielen, Ryan
Vandenberg, FIM
Venner, Francis
Vieira, Patricia
Villoria, Maria Jose Gomez
Wall, Therese
Walton-Brown, Maire
Wardhere, Farah Amina
Warren, Ruth
Webb, Trey
White, Emma
White, Sarah
Wilks, Monique
Willsher, James
Wilton, Sarah
Wood, J
Woodbridge, Beverley
Woodhams, Rebecca Wynne
Wright, Andrew
Wright, Carol
Wright, Richard
Wylie, Thomas
Young, Christopher
Youssefi, Nazir
Appendix 3 - Consultation web pages

Screenshot April 2015 - Planning Policy web page

Screenshot April 2015 - SPD Consultation web page
Roehampton SPD Statement of Consultation - September 2015

Screenshot April 2015 - SPD Regeneration web page

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.

Further Information

- Residents' offer
- Roehampton Partnership agenda - 23 March 2015
- Roehampton Partnership agendas
- Roehampton Partnership minutes
- More downloads...

Screenshot April 2015 - Council News web page

Have your say on draft planning guidance for Roehampton

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)

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: 7th April 2015
Consultation Ends: 24th 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 Albion 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) and at Western Area Office (Opening House: 9am to 4.30pm Monday – Friday) 35 Holybourne Avenue, London, SW18 4JE and Customer Services Centre, Town Hall Extension, Wandsworth High Street, London, SW18 2PU (Opening House: 9am to 5pm Monday – Friday)

Consultation Responses
Representations can be made during the consultation period set out above either online at http://www.wandsworth.gov.uk/spd, by email to 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 or telephone 020 8871 6201.

Wandsworth Borough Council

The Wandsworth (Waiting and Loading Restrictions) (Special Parody Areas) (Amendment No 486) Order 2015

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 1 (4 of Schedule 9 to the Road Traffic Regulation Act 1991 as amended by the Local Government Act 1985 and
Appendix 6 - E-news Advertisements
Appendix 7 - Social Media Advertising

Copies of Roehampton SPD and display available to view in Roehampton library.
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) 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
Planning Policy
Planning and Development Services
Housing and Community Services
Department
Wandsworth Council
The Town Hall
Wandsworth High Street
London SW18 2PU

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 6077
Direct e-mail charles.muriithi@environment-agency.gov.uk

Environment Agency, Ergon House, Horseferry Road, London, SW1P 2AL
03708 506 506
keplanning@environment-agency.gov.uk

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
kefpplanning@environment-agency.gov.uk
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
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.


**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.


**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.


**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:


**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 has shown that:

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

Environment Agency, Ergon House, Horseferry Road, London, SW1P 2AL
03708 506 506
keplanning@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
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.¹

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

¹ 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 H/DS
Health and Safety Executive
2.2 Redgrave Court
Merton Road
Bootle
Merseyside
L20 7HS

or by e-mail to: LOCAL.PLANSCEMDH.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)\(^2\). 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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\(^2\) Article 12 provides that the objectives of preventing major accidents, and limiting the consequences of such accidents, can be 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.html#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)
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

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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...
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 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

[Signature]

Richard Parish
Historic Places Adviser

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**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
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 buildings 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.
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.
Your ref:  
Our ref: 20878-SI-12-130415

Nick Smales  
Economic Development Officer  
PlanningPolicy@wandsworth.gov.uk

13 April 2015

Dear Nick,

Draft Roehampton Supplementary Planning Document

Thank you for your communication of 2nd 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  
Direct line: 020 7918 0016
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
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 3DZ
☎: 020 8891 7445 | ☏: yvette.ralston@richmond.gov.uk
节能环保... think before you print!
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 Portwood 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 Portwood 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.
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
jalred@wandsworth.gov.uk
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

Yours sincerely

[Signature]

Angela Gemmill
Relationship Manager

E stakeholder@marinemanagement.org.uk
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

BY EMAIL ONLY

Dear Mr Smales,

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.
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
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 | 2nd and 3rd Floors | London | WC2B 4AN
Tel: 020 7282 3829 | e-mail anneli.harrison@orr.gsi.gov.uk
Web: www.orr.gov.uk

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Dear Sir or Madam,

The consultation period for the Roehampton Supplementary Planning document begins on Tuesday 7th 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 7th April 2015 and will run until the end of the 24th 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), at Balham, Battersea, Putney, Roehampton, Tooting and Wandsworth libraries (for opening hours see 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, 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, or telephone 020 8871 6207 or 020 8871 6449.

Yours sincerely,

Nick Smales
Economic Development Officer
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

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<th>Extract</th>
<th>TfL Response</th>
</tr>
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<tbody>
<tr>
<td>Pg. 23 2.6</td>
<td>Transport accessibility</td>
<td>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</td>
</tr>
<tr>
<td>Pg. 23</td>
<td>'A number of rail, tube stations and centres are within a 40 minute</td>
<td>The Roehampton bus terminus to Putney Station is scheduled to</td>
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</table>

...
2.22 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.

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.

2.23 Pg. 23

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.

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.

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### Vision and strategic objectives

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<th>TfL Response</th>
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<tr>
<td>Pg. 27 - 29 3</td>
<td>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.</td>
<td>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.</td>
</tr>
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## Core principles

<table>
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<tr>
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<th>TfL Response</th>
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<tbody>
<tr>
<td>Pg. 44</td>
<td>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.</td>
<td>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.</td>
</tr>
<tr>
<td>Pg. 44</td>
<td>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.</td>
<td>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.</td>
</tr>
</tbody>
</table>
| Pg. 45 - 46 | Developments will be required to deliver (and contribute towards) improvements to existing routes and facilities through the following interventions:  
- Upgrading pedestrian crossings at Danebury Avenue and Roehampton Lane.  
- Upgrading existing pavements and the public realm across the area.  
- Relocating the bus turnaround and stops to remove a barrier between Portswood Place Important Local Parade and the Park. | The section that refers to upgrading pedestrian crossings at Danebury Avenue and Roehampton Lane should refer to working with TfL.  
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.  
TfL requests further discussions on the proposed changes to the bus turnaround and stops. |
| Pg. 46       | Developments will be required to make an appropriate contribution towards improvements to public transport | These sections should refer to working in conjunction with TfL. |
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.

Funding may also be sought via specific section agreements.

- An increase in the frequency of buses on existing routes, including the 72 on Roehampton Lane.
- 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.
- Improving the connection to Barnes Station along Roehampton Lane through better signage, road markings and the addition of cycle lanes.
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<th>TFL Response</th>
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<tr>
<td>Pg. 65</td>
<td>Delivery Approach</td>
<td>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.</td>
</tr>
<tr>
<td>Pg. 65</td>
<td>Infrastructure Funding</td>
<td>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.</td>
</tr>
<tr>
<td>Pg. 66</td>
<td>Planning Application Requirements</td>
<td>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>; 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. 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. These impacts can then be assessed by network planners at TFL.</td>
</tr>
</tbody>
</table>
(Please see Tfl guidelines http://www.tfl.gov.uk/tfl/pdfs/docs/TAGuidance_1Q.pdf.)
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.


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


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 #5 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 unto 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 re-route the 493 bus through Clarence Drive and Priory 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 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-livered 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. Govinda:

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 form 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]). 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.