

London Borough of Wandsworth
Wandle Delta Masterplan Supplementary Planning Document – Public Consultation (March 2021)
Schedule of Representations and the Council’s Responses

Background

The following is a schedule of representations that were made in response to the public consultation that the Council held on draft Wandle Delta SPD from 15 February to 21 March 2021. The schedule also incorporates further changes that have been identified by the Council. The draft Wandle Delta SPD provides guidance to support the Council’s adopted Local Plan policies with regard to the comprehensive redevelopment of sites in the Wandle Delta area. Its primary purpose is to provide guidance to prospective developers, stakeholders and residents on the nature and form of development that the Council is likely to deem acceptable in the SPD area. It is the Council’s intention to adopt the Wandle Delta SPD having made the amendments as set out below. Once adopted, the SPD will be a material consideration when assessing any planning application within the SPD’s defined area.

How to use this document

Representations are listed in the schedule alphabetically by the organisation or individual submitting them. Each representation has been included in full, with a reference number assigned to each comment in the format ‘X.Y’. ‘X’ refers to each organisation or individual that has submitted comments, and, in instances where they have made multiple and distinct comments on different parts of the Wandle Delta SPD, this denoted by ‘Y’. For completeness, where more general or introductory text has been included in the representation, this is identified by the reference number ‘X.0’. Where changes are proposed as a result of the representations made, these are recorded in the fifth column. Proposed additions to the text are recorded in bold and underlined text. Proposed deletions are recorded with a strikethrough. For example: ‘This text is to be retained and this text is to be added but ~~this text is to be deleted.~~’

#	Representor	Representation	Officer Comment	Proposed Changes
1.1	Caroline Alexander (Individual)	It is not clear to me how cycle lanes link up and cross the area to link to other through routes. Care needs to be directed at linking safe cycle routes. It is not enough to have cycle routes on quieter streets as commuters on a bike will a) look for the fastest route through, and b) want to be physically separated from cars. Low curbs work, with	Noted. The SPD supports TfL’s cycling strategy for the area. TfL is proposing that CS8 is extended	Section 2.2 a reference added to Figure 18

		care needed at cross roads. Bike lanes that suddenly stop are not appropriate anymore. Look to Rotterdam's separation of cars and bikes to encourage people to use bikes to travel and get out of cars. This plan needs to embed strategies for this to improve health and the environment	along Old York Road to allow better access to Wandsworth Town Centre and to link with National Cycle Route 20. In addition to this strategic cycle route, a number of other cycle routes are proposed for enhancement within the study area: Swandon Way, Smugglers Way to the spit and Frogmore to Putney Bridge Road. The document LTN 1/20 Cycle Infrastructure Design sets guidance for cycle infrastructure design.	which show the existing cycle infrastructure .
2.1	Michael Aston (Individual)	Excellent plan. Crossing from the Causeway, through the Ram Quarter would give a direct route to the Town Centre. This would encourage pedestrian access from the increasing riverside population into the heart of Wandsworth.	Comments noted. As mentioned in Section 5.2 the document supports the aspiration of creating a direct pedestrian access between the town centre and Wandle Area.	N/A
3.1	Diana Barber (Individual)	More trees please, more greenery in general, and lots of no waiting areas so that cars are prevented from running their engines near to residential areas.	Comments noted. Section 5.3 encourages	N/A

			tree planting and the creation of Healthy Streets.	
4.0	the blue green economy	<p>Preliminary Remarks</p> <p>The Wandle Delta Masterplan - the clue is in the name. But the plan ignores the actual Rivers themselves. Why?</p> <p>(p99) 5.10.10 ‘This is a key gateway into the borough and will need achieve a high quality development..’</p> <p>We agree it is a key gateway but suggest that the two Rivers - the Wandle with its short tributary, Bell Lane Creek, and the Thames - have <i>not</i> been given centre stage to enable this ambition. River traffic and usage of any sort is not mentioned. Therefore it will not function as a River gateway into the borough at all.</p> <p>The Rivers barely rate a mention other than as a pretty backdrop to entirely land-based activities. A ‘key gateway’ in this context surely means a small harbour, a river-village hub, a celebration of a precious and rare chalk stream tributary entering old Father Thames? Something to be wholeheartedly embraced by the boating and marine world. And a natural, linking blue extension of the green spaces we have learned to deeply appreciate during the pandemic - the water just waiting to be enjoyed by so many.</p> <p>As Ratty famously told Mole in ‘Wind in the Willows’: “Believe me, my young friend, there is nothing—absolutely nothing—half so much worth doing as simply messing about in boats.”</p>	<p>Comments noted. The Wandle and Thames are central to the vision for the area, in particular the SPD highlights their significance in terms of public realm, placemaking and sustainability. Opportunities for water-based activities could be further explored in the document. Though, consideration must be given to minimising impacts on sensitive habitats.</p>	<p>New para 5.2.21: <u>“The Council will work with partners to consider opportunities to enable river traffic or leisure / educational use of the Wandle or Bell Lane Creek as a key gateway between the Thames and wider Borough, with consideration of environmental priorities and</u></p>

		<p>‘Simply messing about in boats.’ This is a River development. The necessary important marine facilities need to be factored centre-stage into this River del- ta masterplan and brought to the fore as the raison d’être of the whole plan.</p>		<p><u>sensitivities as set out in section 5.7.</u></p>
4.1	<p>the blue green economy</p>	<p>From the SPD Wandle Delta 1 INTRODUCTION</p> <p>(p3) ‘Figure 4 Key messages: Many of the comments made can be grouped into a few ‘key messages’. The size of the boxes on the right are related to how many times the comment was made.’</p> <p>The green box at bottom left, Make More of Rivers, is the same size as Tackle the traffic, Improve public transport capacity before more growth, Improve walking and cycling, More community amenities and significantly larger than More green and public space, yet has been com- pletely overlooked in the masterplan, while the other messages, all of which we endorse, have been well-embedded. To essentially overlook both Rivers’ huge potential to attract the people of Wandsworth and beyond to actually use the rivers, rather than simply admire them, is a glaring oversight.</p> <p>The emerging London Plan (Sustainable Infrastructure SI14 Waterways) sets out extensive recommendations and polices for the Blue Ribbon Network of which the River Thames, Wandle delta and the River Wandle themselves are all parts. Has this informed the draft masterplan?</p> <p>Recreational River use should include any form of non-fossil-fuelled nautical transport of suitable size - rowing boats, canoes, sailing boats, dinghies, ribs, kayaks, water-taxis — in fact anything of suitable size and with the stipulation it must be electric, wind or human-powered, opening up the heritage of the Wandle River again to navigation to</p>	<p>The vision and guidance are considered to be appropriate in balancing the various aspirations for the area. Positive reference to the active use of the river is acknowledged as an area that could be strengthened.</p>	<p>See response to 4.0.</p>

	<p>and from the River Thames. Fossil-fuelled, noisy, air-polluting motorised boating would not be allowed, aligned with your Carbon Neutral by 2030 policy.</p> <p>There is much evidence that, with careful management, quiet boating communities are well-positioned to care for marine biodiversity and Riverbank ecologies and are well known to actively enhance the local environment. (references available)</p> <p>Feathers Wharf could be considered as site to base these activities, with a chandlery in the retail quarter for all boating requirements (a glorious place to explore on wet Saturday afternoon). However, before any decisions are made a full, robust Environmental Assessment made be made for the whole River environment. (NPPF requirement)</p> <p>Public-access undercover storage at low cost or free for all boats and equipment (as for street bicycle parking) at suitable height, bearing in mind tides and future flooding, should be explored. Alternatively, all boating needs could be available for public hire at low cost to ensure availability across the community, with an emphasis on giving young people experience and knowledge of the water through community and social amenity organisations. (see PLA/Thames Academy skills)</p> <p>Education (added as heading)</p> <p>The other overlooked aspect of the Rivers is their educational potential - an easily accessible resource for both children and adults to enjoy while learning about chalk streams and marine environments generally - to understand the tides and learn about the wide range of biodiversity flourishing at the water's edge and below the surface - waterfowl, insects, tiny fish darting in the shadows. To 'splodge' around in the mud at low tide searching for clay pipes and Roman coins. To fish for crabs with string lines from a wooden jetty. These childhood activities foster a life-long love of the Rivers.</p>		
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	<p>Clearly, jetty access is required in this plan.</p> <p>And for more advanced education, PLA Training</p> <p>https://www.pla.co.uk/Thames-marine-training-and-skills-to-be-stepped-up</p> <p>(p4) Fig 6: Shows considerable concern that tall buildings are not appropriate. We suggest from these indices the feeling is, that a community green and open space with nature trails, and walking and cycling prioritised (always linked to the River) rather than intense development, is preferred. Unfortunately, under the Rivers graph there was no options for 'Enabling sail & oar-powered boating' and 'Nature exploration activities in the delta waterways and the wider surrounding River Thames'.</p> <p>We support the general approach around retaining historical buildings and features as well as emphasis on active travel - walking, cycling and public transport, creation of play streets and play zones, minimal car access and parking provision, creation of work hubs and community spaces and provision of amenities within a 10-15 minute walk from homes. If people will be living much more locally-based lives post-pandemic, it is vital to provide an urban realm with maximum greening - which requires maximum water i.e. blue-green infrastructure and attenuation (IWRM+BGT-see below and http://www.bluegreenuk.com/freewater/tbge/LocalPlans.html).</p> <p>It must be emphasised that this vision needs to always inter-connect with the River Delta water itself.</p> <p>However, we noticed a contradiction regarding minimal vehicle access into the general masterplan area at point 2.2.26 stating that TfL and Council proposals to decrease traffic dominance in Wandsworth town centre through various changes will require 'significant traffic diversion within the town centre, and will directly impact on the Masterplan area.'</p>		
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		This contradiction must be seriously addressed to maintain enhancement of the Delta area.		
4.2	the blue green economy	<p>from the SPD 2 EXISTING CONTEXT (p17) Environment, Landscape (add) and Riverscape</p> <p>‘2.2.15 Much of the area is at high risk of flooding, though this context has potentially been im- proved by recent alleviation works.’</p> <p>We would question the assertion that sufficient flood mitigation is in place. There is high risk of flooding during the lifespan of the envisioned realm, due to polar ice melt and rising sea levels from climate change, with prediction of annual flood zones well beyond the masterplan area. Local surface water flood- ing events are also predicted to increase with heavier, more extreme storms. (see also point 3.5.1 below)</p> <p>‘Nonetheless, integrated water management and sustainable urban drainage should be part of any new developments to improve resilience. Uses at ground floor should be allocated with this risk in mind.’</p> <p>Integrated Water Resource Management and deployment of Blue Green Tech- nologies (IWRM+BGT), such as porous roads and permeable pavements, reti- culating rainwater into a wide range of new green infrastructure as well as ex- isting parks, gardens and street trees, is internationally-accepted best practice in urban realm design. The long term investment in blue-green infrastructure will bring a range of benefits, beginning from early stages - biodiversity in- crease, flood/drought/Urban Heat Island effect mitigation, physical and mental health and well-being as well as financial. Sustainable Urban Drainage Systems (SuDS) is just one element in the Blue Green toolkit.</p> <p>‘2.2.16 The River Thames and the River Wandle are both ecologically significant, with designations as sites of metropolitan and borough importance respectively. Strong</p>	<p>As part of the Local Plan, the Council has prepared a Strategic Flood Risk Assessment which establishes a strategic context for the allocation of key sites in the Wandle Delta area alongside the principal designations in the area which have been further assessed as part of the SFRA level 2. This information will be used as part of mitigating (SUDS) and preventing flooding in accordance with the latest modelled flood risk scenarios and the Thames Estuary 2100 Plan.</p> <p>The various strategies and techniques identified in the response are broadly supported through the SPD and any subsequent</p>	N/A

		<p>guidance is needed to maximise the opportunities that exist to protect and enhance the rivers' ecology.'</p> <p>In rural or semi-rural spaces, 'rewilding' land and river systems from cultivated and controlled forms back to their former non-manipulated, natural states is the corollary of urban Blue Greening. Very different from actively-managed conservation, rewilding is the removal/absence of human interference, allowing native flora and fauna biodiversity to flourish, and mitigating both drought and flood.</p> <p>Feathers Wharf and Causeway Island are ideal for rewilding, with <i>no</i> new island development allowed to proceed. Maximum stretches of the Wandle Riverbanks should also be set aside for rewilding.</p> <p>The River Wandle should be 'de-culverted' with appropriate bridges where required.</p> <p>https://www.theguardian.com/cities/2016/may/25/story-cities-reclaimed-stream-heart-seoul-cheonggyecheon</p> <p>'2.2.17 Compared with the surrounding context the study area has relatively little green space, planting and trees. Some planting and green corridors exist alongside the railway tracks and the River Wandle, but this space is not usable and can cause issues of visibility and safety. Future changes to the SPD area should build on and enhance the green network to encourage greater biodiversity.'</p> <p>The reason so little green space exists is precisely because historical development has subsumed the natural River banks and mud flats. The Rivers Thames and Wandle should be at the top of the planning hierarchy with the aim of re-naturalising them as much as possible by not developing anywhere near the River edge (littoral) zones. Where possible along railway tracks and River banks, existing green areas should be left to rewild, ensuring visibility and safety are maintained. Intense human activity eg restaurants/bars along the River banks are likely to cause far more damage to nature</p>	<p>more detailed design and strategies. Biodiversity objectives and environmental enhancements are incorporated as part of the SPD. However, as set out there is an expectation that ecological and open space proposals would be balanced with development as set out in the document. The need for more detailed assessments and management is set out in the document.</p>	
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		<p>than a family in a rowing boat. Clear evidence exists that excessive use during 2020 of the</p> <p>Thames towpath has been detrimental to the wildlife ecology. Therefore, we need areas which are completely protected from human activity.</p>		
4.3	the blue green economy	<p>(p21) Movement and access</p> <p>While walking (with particular emphasis on improving the Wandle Trail facility), cycling and public transport use is prioritised, with car entry actively discouraged and parking provision minimal, boating for recreation, leisure use and local water-based passenger transport (water taxis) must be included at the top of the transport hierarchy.</p>	<p>Comments noted. Section 5.2 highlights the Thames Clipper as part of the transport network in the area. As 5.2.19 mentions, in the long-term, the SPD supports the future consideration of additional services and stops as part of a coordinated public transport strategy for the Wandle Delta and broader Central Wandsworth area.</p> <p>See 4.0 which confirms additional wording.</p>	See response to 4.0
4.4	the blue green economy	<p>Planning Policy Context (p22) 3.1.1</p> <p>Add: International Planning Context</p> <p>Rio Declaration 199</p>	<p>In relation to the international planning context – these documents and declarations are important, but it is not standard practice to</p>	<p>Para 3.5.8: ‘marine recreation’ inserted into <u>marine recreation</u>, leisure and</p>

		<p>The Aarhus Convention 1998</p> <p>The UN Sustainable Development Goals (SDGs)</p> <p>The UN Paris Climate Agreement 2015</p> <p>Add to: Regional Planning Policy Context</p> <p>Thames Landscape Strategy - Kew to Chelsea</p> <p>http://thames-landscape-strategy.org.uk/who-we-are/vision/partnership/</p> <p>PLA Thames Vision</p> <p>http://www.pla.co.uk/About-Us/The-Thames-Vision/About-the-Vision-Project</p> <p>Add to: Local Planning Context</p> <p>Wandsworth Borough Council declaration of climate emergency and commitment to becoming Carbon Neutral by 2030, Carbon Zero by 2050 (obliges this development to be carbon zero, requiring carbon accounting to be embedded from the start of firm plans.)</p> <p>There is no mention of how the masterplan incorporates considerations of the Clean Air Strategy 2019. TBGE have included feedback into Section 2.18 of the draft Local Plan (access via http://www.bluegreenuk.com/freewater/tbge/LocalPlans.html)</p>	<p>include a comprehensive list of the international context in an SPD. It is worth noting that the Local Plan (and Sustainability Appraisal) make explicit reference to these where appropriate.</p> <p>The regional documents referenced form a relevant background but are not formal components of the regional planning context</p> <p>In relation to ecology and re-wilding, the SPD provides guidance on how this should be balanced. More prescriptive guidance is not considered to be appropriate.</p> <p>The text already acknowledges the</p>	<p>social infrastructure facilities with public spaces at focal points' and</p> <p>And 'and onto' inserted into 'a riverside walk and cycle way and increased public access to and onto the River' (p28) '</p>
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	<p>Other designations</p> <p>IWRM+BGT can be utilized in support of better air quality. The SDP requires</p> <p>) on how sufficient flexibility built into it to incorporate upcoming amendments within the Environment Bill update (as does the Local Plan).</p> <p>‘3.5.7 The western segment of the site forms part of a wider ‘Focal Point’ designation. The Local</p> <p>Plan sets out that focal points of activity along the Thames will be created to be a focus for new homes, jobs and leisure facilities located around public spaces.’</p> <p>Add: These River-based focal points should put the Rivers Thames and Wandle with their marine ecology and water-based activities first and foremost as the focus for the human community.</p> <p>‘3.5.8 The land to the north of the railway line is within the Thames Policy Area (TPA).....’</p> <p>We endorse ‘enhance the open quality of the River and Riverside public realm’ but emphasise this should be achieved by <i>not</i> building within an agreed distance from both rivers and encouraging rewilding, and build no hard-paved open space which may satisfy a planning idea of ‘open’.</p> <p>The River will require ‘marine recreational’ inserted into ‘marine recreational, leisure and social infrastructure facilities with public spaces at focal points’ and</p> <p>And ‘and onto’ inserted into ‘a riverside walk and cycle way and increased public access to and onto the Rivers’</p>	<p>position of the site in Food Zone 3. The Council has undertaken flood risk work as part of the Local Plan evidence base.</p>	
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		<p>(p28) '3.5.11 Parts of the study area fall within Flood Zone 3.'</p> <p>However, as alluded to above, there is high risk of regular annual flooding during the lifespan of the envisioned realm, due to polar ice melt, rising sea levels and more frequent violent storms, with predictions of an annual flood zone well beyond the masterplan area.</p> <p>https://coastal.climatecentral.org/map/11/0.118/51.4848/?theme=sea_level_rise&map_type=coastal_dem_comparison&basemap=roadmap&contiguous=true&elevation_model=best_available&forecast_year=2050&pathway=rcp45&percentile=p50&refresh=true&return_level=returnlevel_1&slr_model=kopp_2014</p> <p>Indeed, climate scientists warn that with locked-in total melt of the Arctic ice cap increasing the albedo effect and the likely complete melting of the Greenland Ice Sheet could lead to a 7M sea level rise by 2100, forcing the evacuation of all coastal cities around the globe. This forecast must be borne in mind by the council as it moves towards its 2030 climate emergency aspirations, guided by the Precautionary Principle.</p> <p>https://www.carbonbrief.org/new-climate-models-suggest-faster-melting-of-the-greenland-ice-sheet</p>		
4.5	the blue green economy	<p>(p32) 4.1 VISION</p> <p>4.1.3 (Revised to now read)</p> <p>4.1.2 (Revised to now read)</p> <p>"The Wandle Delta will be a place that puts the Rivers first in order to protect them and their ecology as well as maximise their attraction for the people who live, work and visit in the area - strengthened as a mixed urban neighbourhood with the rivers</p>	The sentiment of these statements is noted and is largely compatible with the vision as drafted.	Para 4.1.5 revised to insert 'and its tributary, Bell Lane Creek,' to read: "The Thames and the Wandle and its

	<p>and Riverscape at its core, a focus for living and working, and a local destination for visitors.</p> <p>With the Rivers and waterscape at its heart, the area will be transformed by creating an accessible and permeable network of water routes, inter-connected with streets and land spaces. It will be easy and enjoyable to get around by boat, on foot and by bike. Enhancements to the existing station access, and the creation of a new northern entrance will also improve the experience of train travel to and from Wandsworth Town.</p> <p>4.1.4 (Revised to now read)</p> <p>With a range of new open spaces, a wide variety of greenery will dominate the hard grey infrastructure surfaces, connected by the blue/water infrastructure, bringing nature to the fore across by a range of marine and land-based leisure and community activities; creating a green buffer zone between the Riverscape and built landscape, to enable maximum naturalisation and rewilding of the water and land/water boundary zones.</p> <p>4.1.5 (Revised to now read)</p> <p>The Thames, the Wandle and its tributary, Bell Lane Creek, will be a key focus for placemaking in the area, with clear access onto the Rivers for boating and water-based recreation, complemented by continuous nature-based and sympathetic riverside paths and spaces along the way for nature, play and leisure, connecting to Old York Road, the wider Wandle corridor, King George’s Park and beyond. The natural blue-green riverside theme will extend into streets and spaces of urban and industrial character, making a feature of the existing railway line, arches, infrastructure and listed buildings, softened by greenery and natural water features.</p>	<p><u>tributary, Bell Lane Creek,</u> will be a key focus for placemaking in the area, with continuous riverside paths and spaces along the way for nature, play and leisure, connecting to Old York Road, the wider Wandle corridor, King George’s Park and beyond.” (p32).</p>
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		<p>4.1.6 (Revised to now read)</p> <p>A diverse mix of workspace, homes and local amenities will serve this growing community. The Wandle Delta Area will also benefit from the continued presence of safeguarded wharves which play a vital role in maintaining river access to the whole community, particularly for oar and sail powered recreational boating, as well as to service waste management and recycling. Opportunities to combine cultural and leisure activities with new forms of workspace, set against the backdrop of distinctive waterway and waterside spaces and connections, and enhanced links to Old York Road, the Ram Quarter and the town centre, will announce the Wandle Delta as an important destination for both incoming visitors from the upper and lower Thames and those from the Borough.”</p>		
<p>4.6</p>	<p>the blue green economy</p>	<p>PLANNING, DESIGN AND DELIVERY GUIDANCE we draw your attention to an extract from our recent submission to the WBC draft Local Plan below.</p> <p>In brief, the two Rivers must be at the heart of the planning, design and delivery for the project to warrant the name ‘Wandle Delta Masterplan’, with the maximum embedding of IWRM with RWH and BGT in the built environment and maximum rewilding of the green and river ecology. We would like to be involved in the development of plans going forward with other River stakeholders and amenity groups along the Rivers Thames and Wandle.</p> <p>(from our TBGE Local Plan comments)</p> <p>5.4 BLOCK STRUCTURE, TYPOLOGIES AND FRONTAGE</p> <p>In consideration of meeting updated air quality demands, building massing should be considered to promote ‘breathways’ taking advantage of the proximity to the Thames to facilitate wind penetration further into the southern areas of the</p>	<p>Block structure – agreed, it would be appropriate to make positive reference to wind. This is already picked up in para 5.6.17</p> <p>The use of the phrase “green and blue infrastructure” is considered appropriate in this context.</p> <p>Detailed points around tree planting and IWRM should be picked up in overarching planning</p>	<p>New para 5.7.18:</p> <p><u>Proposals should include assessment of microclimate including wind in relation to tall buildings and the introduction of a new street / block structure as</u></p>

	<p>masterplan and beyond for NW and NE quadrant winds. Also applicable to Section 5.6.</p> <p>5.7 ENVIRONMENT AND SUSTAINABILITY</p> <p>Suggest renaming ‘green and blue infrastructure’ title to ‘Integrated Water Resource Management with Blue Green Technologies (IWRM+BGT)’ and incorporating best practice as highlighted in TBGE comments to draft Local Plan.</p> <p>General Note</p> <p>All Policy references in Place Making sections should include IWRM with BGT in clauses referencing Blue and Green Infrastructure.</p> <p>LP55 Protection and Enhancement of Green and Blue Infrastructure</p> <p>Suggest addition of new item, Point F. The council will embark on developing and implementing an Integrated Water Resource Management (IWRM) Plan encompassing Rainwater Harvesting (RWH) and all available blue green Technologies (BGT) to complement the natural rivers, streams, other watercourses and bodies of water in order to generate a scaled expansion of green spaces and a program of planting within and on the existing built (grey) infrastructure.</p> <p>LP58 Tree Management and Landscaping – Point 8</p> <p>There must be consideration of the tree pit design and potential water supply (e.g. direct drainage off street) to promote healthy trees. It should be noted that poor design leads to stunted trees that may require replacement should they fail and negative carbon impact as a result.</p>	<p>policies rather than in the SPD.</p>	<p><u>well as of existing air quality and future mitigation where required.</u></p>
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	<p>Another key consideration for developments is for the use of trees to shade and, as a result, reduce cooling / energy requirements. Consideration of the wind environment is also required, such as reducing windiness in the pedestrian zone for comfort and safety as well as increasing windiness for pollution dispersion purposes.</p> <p>LP59 Urban Greening Factor</p> <p>Point A. All development proposals should contribute to the greening of Wandsworth borough by including urban greening (Integrated Water Resource Management with Blue Green Technologies) as a fundamental element of site and building design, and by incorporating measures such as high quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. and Point B2. incorporate as much soft landscaping and porous / permeable pavement and road surfaces as possible. In consideration of their wider benefits, these can be included at a reduced cost to traditional surfaces.</p> <p>LP60 River Corridors</p> <p>A. The natural, historic and built environment of the River Thames corridor and watercourses within the borough will be protected and, where appropriate, enhanced by rewilding to ensure the achievement of a high quality and accessible environment including through the provision of connections to existing and new communities and to maximise biodiversity benefits.</p> <p>[NB good to see Thames development being disallowed]</p> <p>E. Development which encroaches onto the river foreshore will not be supported. Opportunities will be taken, in consultation with partner agencies including Natural England, the Port of London Authority and the Environment Agency, to create new</p>		
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		<p>habitats and reduce flood risk in accordance with the requirements of the Thames Estuary 2100 Plan.]</p> <p>LP62 Moorings and Floating Structures</p> <p>We very much support this clause especially naturalisation element C. The culverting of river channels and watercourse will not be permitted and the naturalisation of river channels and watercourses will be sought as part of development proposals where appropriate and feasible</p>		
5.1	<p>Annette Boyd (Individual)</p>	<p>As someone who has watched Wandsworth's transformation since the days of the Arndale Centre I find this an exciting proposal.</p> <p>I live very close to the Wandsworth Depot and since I moved here 6 years ago have always felt that the site could be transformed into something much more resident friendly and visually more pleasing. I realise that the council needs somewhere to keep its equipment but a site so near the river should have a more appropriate use for the future.</p> <p>From what I have read the future proposals will not detract from the historic nature and architecture that residents like.</p> <p>I am pleased that it has been recognised that more local amenities are needed as the developments of the high rise buildings on the Thames in Riverside Quarter very much lack this and the whole area, apart from the actual river is soulless.</p> <p>The River Wandle is historic in so many ways and is also a precious chalk stream and as such, a rarity in London, It is an unique habitat for many fish, birds and animals and for me the protection and enhancement of this resource is paramount. I know that the River Wandle is amongst the 10 most recently improved rivers in England and Wales but it does not take much to destroy such a habitat. Much of the river, at least in Wandsworth, is now underground due to past developments and this is something to be avoided at all costs.</p> <p>For me the height of buildings and the ability to walk safely around the area are important. There are way too many very high buildings that do nothing to enhance</p>	<p>Comments noted.</p> <p>In terms of car parking, development will be guided by the London Plan and Wandsworth's Local Plan policies. Both documents promote a minimum approach to car parking with a view to supporting sustainable movement patterns. Impacts of new residents on existing resident parking can be resolved through parking regulation.</p> <p>Relating to the provision of affordable arts venues, Section 5.11 on planning obligations</p>	N/A

		<p>the area and to me feel threatening when I am walking around, especially in the dark evenings of winter.</p> <p>Where I live cyclists use the roads as a cut through instead of taking Armoury Way. This is a good thing but I still feel the road is dangerous for them at certain times of day such as when children are being dropped off at school in the mornings and collected in the afternoons. There will need to be careful thought about traffic in the quieter streets if there is to be more housing built.</p> <p>My main concern will be increased traffic due to more housing and lack of suitable parking. I would like to think that there was a limit to the number of cars allowed at each address rather than the number of residents at each address. Where I live it is just about manageable as far as parking is concerned but any more cars will make it impossible.</p> <p>My main concern is with car parking. There must be sensible provision and restrictions in place so that present residents are not inconvenienced and pushed out.</p> <p>I would hope that affordable art studios are part of the development plan. These are lacking in Wandsworth despite an excellent Putney School of Art and design and the many artists who live and work in this area.</p> <p>There are far too many high-rise buildings in Wandsworth that do nothing architecturally to enhance the look of the area. Keep all the buildings low.</p> <p>As flooding is a very real possibility it is so important to do all that can be done to alleviate this with natural defences that also attract the wildlife we need.</p> <p>It looks good on paper but I expect there is much that will be changed once developers become involved. I hope the planning department are ready for some battles and local objections if things change.</p> <p>Some proposed buildings are going to be too high</p> <p>Some proposed buildings are going to be too high. 8 stories is way too high for this area. We are surrounded by buildings that are way too high already.</p> <p>Car parking must not impact on the residents who already live here. We definitely should not expect to be paying more for on street parking and the amount of additional cars in the area must be restricted</p>	<p>indicates the need for all developments over 100 dwellings or 10,000 sqm of non-residential space to contribute to arts and culture in the area, setting a Cultural Plan in collaboration with the Council.</p> <p>The SPD promotes a mix of different building types. In terms of building heights, the SPD takes a contextual approach to future building heights, considering existing heights and the physical assets in the area. The SPD does not identify prescriptive locations on a plan to identify where tall buildings should go, nor is it prescriptive in setting maximum heights or limits. As part of the emerging Local Plan evidence base, the</p>	
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		<p>The buildings are going to be too high and parking must not impact on resident who already live in the vicinity.</p> <p>Buildings are going to be far too high and car parking must be restricted and not impact on residents already living in the area</p> <p>Buildings will be far too high and car parking must be restricted so that it does not impact on residents already living here.</p> <p>No indication of the height of the buildings but car parking must be restricted so that it does not impact on residents already living here.</p> <p>As long as the buildings are a reasonable height such as 4 stories max it should be OK. Car parking must be restricted so that it des not impact on residents already living there.</p> <p>My only concern with the Waste recycling facility is that is is visually ugly. I know it is an industrial building but it is possible to make these attractive. You only have to look at Victorian Industrial building to realise this. Even using modern materials it should be possible to build a good looking facility.</p> <p>Having affordable art studios and exhibition areas is as important as preserving and enhancing the existing historic architecture and the natural habitat of the River Wandle.</p>	<p>Council is producing an Urban Design Study to guide character and height across the Borough. The SPD is aligned with the approach of the Urban Design Study which should be cross-referenced along with this guidance.</p>	
6.1	Sandra Brady (Individual)	<p>I haven't time to study the plans but am writing to ask you to change the dreadful round-about at Wandsworth end of Wandsworth bridge. It is an abomination for lone walkers or cyclists as one is not safe!!! In all the years it has been there I only used it once when I was with a bunch of friends. On all other occasions I would prefer to 'dice with death' and cross the roads illegally (ie above ground) rather than use the underpaths intended for walkers and cyclists. At least with the cars one has a chance of survival but as a lone woman in the underpaths one has no chance if one encounters dodgy people who are up to no good.</p> <p>Imo the cars should be below ground and then so much ground could be enjoyed for walkers and cyclists and cafes and restaurants and parks and open gyms. The whole area could be a touch of paradise with a place where people could enjoy clean air, businesses could thrive and there would be space for flowers, grass, (no astro-turf</p>	<p>Regarding the Wandsworth Bridge roundabout, the SPD promotes short to medium term improvement (5.3.26) through new signage, lighting and art, as well as highlighting the longer term opportunity for re-development (5.10).</p>	N/A

		<p>please), and space for bees and insects. This is vital for all our mental health and people would flock to the area.</p> <p>Atm cars dominate and ruin the whole environment. Going by foot from the shopping centre to the rubbish dump is one of the most unpleasant walks ever -I've done it on occasions and vow -never again -the fumes from the cars are appalling. One time I thought -well if the fumes were really bad, then it would not be allowed. But now some decades on, I realise that I was mistaken! God knows how much damage I've done to myself by trying to recycle without a car! and there is no public transport to the recycling centre to facilitate the trip !!! Shocking -the whole design was awful when it was conceived and needs to be made people-friendly asap. People -men and women -need to feel safe from vandals and car fumes. We need pleasant surroundings and business life thrive naturally -indeed it could boom!</p> <p>Please please stop putting up big ugly blocks -with a strip of lawn but otherwise all paved. It is not good -pile them in and stack them high approach might look good on the drawing board but generally these developments do not wear the test of time well.</p> <p>Wish I had time to study plans -why don't you consult residents in time? I have been living in Wandsworth for 60 years and feel I should be consulted in time -I just noticed your proposals in the email from putneySW15. com. Such a shame.</p> <p>How can I get prior warning?</p>	<p>One can receive notifications about engagement and consultation in the area by subscribing to the planning policy email list or following the Council on social media.</p>	
7.1	Chris Brodie (Individual)	<ul style="list-style-type: none"> • The document is an excellent basis for decision making and the proper planning of the area. It is unfortunate that the work wasn't undertaken at an earlier stage so that it could have addressed the over-engineered Swandon Way and Wandsworth Bridge roundabout. • In describing context, the document should show the extent of the Wandle Valley. Its guidance should ensure that at a detailed level there is consistency 	<p>Comments noted.</p> <p>In relation to Swandon Way, the section 5.3.5 acknowledges the need to work closely with TfL on the emerging proposals, while also setting out additional</p>	<p>Para 5.3.12 (page 51, wayfinding). Additional sentence: "<u>Proposals for wayfinding should make</u></p>

		<p>in the Wandle Valley in signs, information boards, lighting, hardsurfacing and planting, with a landscape input at an early stage.</p> <ul style="list-style-type: none"> • A question about possible access to the water was raised at one of the webinars and the potential for this should be explored as part of the masterplan process. • The exploration of connections and routes within and beyond the area is a positive aspect of the masterplan and these should be developed as part of the public realm enhancements. • The masterplan should include information on air quality to ensure that proposed uses are compatible with levels of pollution. Similarly there should be initial testing for contamination on sites identified for open space and play. • Para 5.8.8 identifies uses that could be provided as a result of development. Although para 5.5.49 indicates that adequate provision for education is available outside the masterplan area, further studies should consider whether this is the case in respect of ease of access to any spare capacity. If community uses are needed within the masterplan area, suitable sites should be identified to ensure adequacy of access and space to serve that use. Any new education facility should add to open space and sports provision rather than add pressure on existing facilities. • The Masterplan helpfully discusses long term opportunities at 5.10. It might benefit from a section on “Next Steps” to indicate where further work is required to move from high level SPD guidance towards delivery. 	<p>measures for improvement of the street as development comes forward.</p> <p>Wandsworth Bridge roundabout – see comment 6.1</p> <p>Access to water – see comment 4.0</p> <p>In terms of education and other social infrastructure, the possible need for additional facilities is being tested by the Council as part of the wider Local Plan review process.</p> <p>Contamination acknowledged in SPD.</p> <p>Additional guidance point on air quality suggested.</p>	<p><u>reference to the wider Wandle Valley context and seek to achieve consistency in terms of signage and design.</u></p> <p>Add new para 5.7.18: <u>“Proposals should provide a clear assessment of microclimate including wind in relation to tall buildings and the introduction of a new street / block structure as</u></p>
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			Given the sites are largely in private ownership, next steps are not within the Council’s remit.	<u>well as of existing air quality and future mitigation where required.</u>
8.1	Bridget Casey (Individual)	<p>I was interested to see the information you provided relating to the Wandle Delta. Many of your proposals seem admiral, however I am very concerned about the inclusion of my high rise buildings in this area.</p> <p>The current development of Smugglers Way I have found very disheartening and leads me to question you policies. The first flats that were built on this site were attractive and had gardens associated with them. However each phase has seen less greenspace or even communal space allocated to each housing block. The blocks that are just recently finished are ridiculously close together and remind me of Hong Kong.</p> <p>The current phase of building that is underway is a great disappoint, could not this small parcel of land have been left as a communal play area. If you look back to the 1950’s and 1960’s council blocks build near Westbourne Grove they are all set in plenty of green space for recreational purposes. This idea seems to have been lost, which has led to great suffering to residence since the pandemic started.</p> <p>The Riverwalk has been packed with people because there is no where else to go.</p> <p>I am also concerned about the increase in population in Wandsworth overall. The influx of people puts strain on other infrastructure such as leisure centres, and parks.</p> <p>We have the huge brutalist, unattractive development around the American Embassy. The flats are not affordable for local residences and there is very little social</p>	<p>Building type and heights -see response to comment 5.1</p> <p>In terms of amenity space, the SPD promotes the creation of significant public space to support the existing and growing population. Section 5.3 explains these ambitions, including the creating of a continuous Wandle Trail, new parks at the Causeway and Feathers Wharf, as well as green, pedestrian and play spaces within the development sites.</p>	N/A

		<p>housing and what is provided is at the top end of the scale.</p> <p>You frankly crammed in as many units as possible along the river walk. Flats dwarfing Plantation Wharf which used to be the tallest building in the area, which is now overshadowed.</p> <p>So yes develop the Wandle so that it is a wildlife habit. But don't build more high rise. It may line the pockets of developers but does little to help with the housing crisis.</p> <p>I believe that currently you are destroy Wandsworth not enhancing it. Enough is enough.</p>			
<p>9.1</p>	<p>Angela Clarke (Individual)</p>	<p>In general I welcome the revitalisation of the Wandle Delta and the benefits that it will bring to the entire area. Environmental issues are a key part of this proposal and I would like to see these extended to the existing properties namely Sudlow Road, which appears to have been excluded from consideration in your proposal. I am also bewildered that I have only found out about these proposals from a neighbour in the street, who in turn found out by chance. Ignoring the needs and considerations of existing residents, particularly those clearly impacted by this development, is not an inclusive, environmentally-sensitive or community based approach.</p> <p>Sudlow road houses do not have garden space and the development would give an opportunity for opening up the back of the terraces for private gardens, or communal gardens. At present space is limited and the houses and flats in the street do not allow families the opportunity to enjoy outside space, which causes many to move to other parts of London when extending their families. Many families cannot afford to move which restricts their opportunities further. The opportunity to extend outside space would vastly improve the residential quality of the houses of Sudlow Road.</p> <p>The building proposed to be erected directly behind the terraces on Sudlow road in the existing car park appears to contravene the Wandsworth Local Plan drawn up in 2018 highlighting the Council's 'spatial vision for Wandsworth'. It states that the site is 'sensitive to tall buildings', which in this location is considered to be tall at five</p>	<p>Comments noted.</p> <p>The SPD acknowledges at a high level the need for a sensitive design response to existing buildings and residents on Sudlow Road. Further text should be added to strengthen the SPD in this regard and address local residents' concerns. The Council has met with Sudlow Road residents to discuss their concerns specifically and will continue to engage them in any future</p>	<p>Section 5.9.6 Additional bullet to acknowledge the sensitivity of Sudlow Road residents stipulating <u>"Any adjacent development at Frogmore should consider the safety and security of residents, and seek to</u></p>	

	<p>storeys. Any building in this area would block the light and overlook the terraces, and this would particularly impact the ground floors which receive very little light at present. I would ask that this building be moved further back, allowing a satisfactory amount of green space between the buildings, that could be either purchased by individual properties or form part of a council owned communal garden that can be accessed at the back of each property. This solution would be more in keeping with the environmental vision of the council as set out in the plans and incorporate Sudlow Road into the overall vision of the Wandle Delta development.</p> <p>The vision statement is excellent and I welcome this approach to the area. I note that the area will be 'greener, with new open spaces' and I hope that Sudlow road will also be afforded the opportunity to enjoy this by ensuring that it is not encroached by buildings too close to the boundary that would block light and create a cramped environment that is not in keeping with the above vision.</p> <p>In general the objectives of the proposal are excellent and will provide a vibrant cultural hub with the added environmental and visually appealing benefit of the Wandle River. I note that a 'Balanced approach to density and massing which responds to character, context and sensitivity of individual sites in the SPD' is a consideration in the objectives and once again I would ask that any building proposed to flank the back of the Sudlow Road terraces be positioned so that it does not block light or overlook our properties.</p> <p>Another objective of 'Improving health and wellbeing for people living, working and visiting the area' cannot be met if you create cramped and damp living conditions for the residents of Sudlow road by building too close to the boundary.</p> <p>This seems to be a comprehensive approach to transport</p> <p>I would like to see new express buses from the area linking directly with the new Battersea tube stations via Nine Elms (bypassing Clapham Junction route that takes too long) that would allow fast access to the centre of London. This could ease the demand at Wandsworth Town train station.</p> <p>I support all the initiatives to create a greener space in Wandsworth and particularly the planting of more trees in the area. Once again, I ask that part of this initiative</p>	<p>development of Frogmore Depot.</p> <p>Any discussions regarding acquisition would need to be progressed in detail with the Council estates team alongside more detailed masterplanning.</p> <p>In terms of the illustrative masterplan, the block backing onto the Sudlow Road terrace is shown as 2-3 storeys in recognition of the height at Sudlow Road. The indicative height ranges look to mediate between the height of the existing buildings and proposed.</p>	<p><u>allow for a gentle transition between existing and new buildings.”</u></p> <p>Review indicative masterplan drawings to illustrate increased separation.</p>
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<p>include the area behind Sudlow road (existing car park). that could form part of this initiative through the allocation of gardens to Sudlow Road residents or alternately the creation of an ecologically friendly and sensitive communal garden that can be accessed by residents of both Sudlow Road and the new developments. This would allow the 'breathing space' needed behind Sudlow Road properties and afford them the light and space required for their health and well being.</p> <p>A block structure positioned directly behind the terraces in Sudlow Road would cause massing and density that is not in keeping with the overall vision of the development. To honor this vision sufficient green space should be allowed between the properties to allow sufficient light to enter the properties from the rear particularly on the ground floor.</p> <p>I think it's a good idea to increase the availability of office space in the area and to create a green working hub in the Wandle Delta. As many may also be working from home in the future the importance of green and outside space cannot be underestimated. Many people are moving out of London presently to gain more outside space in case lockdowns recur in the future. In terms of Sudlow Road and the Frogmore development, any encroachment on the light and space around the houses would severely impede the ability to enjoy outside space, light or indeed work from home in the future and this should be an important consideration for planning and development especially since a block building is being proposed to sit directly behind the houses.</p> <p>As you state in your document consideration needs to be give to the 'Setting of a heritage asset or conservation area beyond the immediate boundary of the site; Relationship with immediately adjacent lower-rise townscape setting'. This statement directly impacts Sudlow Road as the houses back onto the new proposed Frogmore cluster and notably a block building that would block natural light and create a cramped and overlooked feel to these traditional 2 storey Victorian terraces. This proposal would not be in keeping with the heritage of the area and would severely impact its residents. I would ask for a suitable amount of green space to separate the buildings and ideally that this would be allocated to Sudlow Road residents as</p>
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	<p>gardens, alternately as communal green space that can be accessed from the rear of the properties.</p> <p>The environmental plans look impressive, I would like to see more detail in terms of potential flood mitigation due to a possible surge up the river Thames or down the Wandle river as more and more wild weather events occur.</p> <p>A precedent has already been set as part of the Frogmore complex is currently privately owned and another part council owned. This would provide an opportunity to offer a parcel of land to existing residents of Sudlow Road to allow them to have a rear garden. Houses would not be permitted to be built today without sufficient outside space. At the very least a communal garden could be allocated at the rear of the properties that would allow access from the rear of the properties.</p> <p>Overall the development has merit although I can't comment on the specific issues with the other clusters.</p> <p>The Frogmore complex is adjacent to Sudlow road, and mentions the importance of a 'sensitive design response' to this heritage street. The erection of a 2-3 storey building flanking the backs of the properties, blocking light and green space is not a sensitive approach to this street nor the area in general. I would suggest widening the distance between the back of the properties and the building (if it has to go there), and allowing garden space inbetween either allocated to Sudlow road residents as private gardens or as communal space to be shared by residents of Sudlow road and the building in question.</p> <p>New pedestrian crossings are a benefit</p> <p>More green space required here as so many tall apartment buildings dominate this area</p> <p>Looks good</p> <p>Looks ok</p> <p>Sufficient green space at the front of the buildings would create less of an imposing feel while walking to the station</p> <p>The Waste Station occupies prime land and is an eyesore that could be moved elsewhere</p>			
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		<p>I agree with the planning obligations and I sincerely hope that these will be adhered to, particularly the creation of new parks, green and public spaces. With this in mind I hope that Sudlow Road residents will not be forgotten in this plan, as the current proposals for the Frogmore Complex will negatively impact the houses in the street in terms of light, cultural/heritage sensitivity and overall wellbeing. Please consider allocating land behind our properties for use as private gardens or as a communal garden, a decision that would be in keeping with the overall vision of this project and also respect the current residents of the borough.</p>			
10.0	<p>Rolfe Judd on behalf of Cory Riverside Energy (Cory)</p>	<p>Background to Cory Riverside Energy</p> <p>Incorporated 125 years ago in 1896, Cory Riverside Energy (“Cory”) is one of the UK’s leading resource management, recycling, and energy recovery companies.</p> <p>Cory company operates one of the largest energy from waste facilities in the UK in Belvedere, which is supported by unique river-based infrastructure on the Thames, including a fleet of tugs and barges.</p> <p>Recognising Cory’s important role in managing London’s waste, the UK Government granted development consent for the Riverside Energy Park (“REP”) project in April 2020. REP will be developed next to Cory’s existing facility in Belvedere and will significantly increase the scale and extent of Cory’s operations, as well as London and the South East’s overall waste management capacity. REP will require the investment of approximately £800 million into the wider London and South East economy over the next 3-4 years.</p> <p>Cory operates two facilities in the London Borough of Wandsworth on behalf of Western Riverside Waste Authority (WRWA):</p> <ul style="list-style-type: none"> • At the Materials Recycling Facility at Western Riverside, Wandsworth, Cory receives sorts and segregates dry mixed recyclables for WRWA’s four boroughs 	Comments noted.	N/A	

		<p>– Hammersmith & Fulham, Kensington & Chelsea, Wandsworth and Lambeth. Cory also manages the Household Waste and Recycling Centre and transfer station at Western Riverside.</p> <ul style="list-style-type: none"> • Cringle Dock transfer station in Battersea. <p>Both these facilities are designated safeguarded wharves and play a crucial role in ensuring that</p> <p>London’s recyclable and non-recyclable waste is processed sustainably.</p> <p>Our client is constantly striving to improve its operational and environmental performance and is therefore actively considering a range of renewal, upgrade and redevelopment options at both of the Wandsworth facilities.</p> <p>With this in mind, we set out our representations to the Consultation Document with waste management; expected future waste demand; the consolidation of waste sites and; future mixed use development opportunities at the forefront of these representations. For ease of reference we have included extracts of the relevant policy (highlighted in bold) together with Cory comments.</p>			
10.1	<p>Rolfe Judd on behalf of Cory Riverside Energy (Cory)</p>	<p>Vision</p> <p>"The Wandle Delta will be a place that puts people first - strengthened as a mixed urban neighbourhood, a focus for living and working, and a local destination for visitors. The area will be transformed by creating an accessible and permeable network of streets and spaces, making it easy and enjoyable to get around on foot and by bike and supporting the intensification of uses. Enhancements to the existing station access and the creation of a new northern entrance will also improve the experience of travelling to and from Wandsworth Town.</p> <p>[..]</p>	<p>Comments noted. The SPD does seek to recognise the importance of the waste management facilities. Agent of change principle could be included in the site-based guidance (Section 5.9) to strengthen this point.</p>	<p>New bullet point, 5.9.13:</p> <p><u>Adjacent development proposals must not prejudice the on-going operation of the safeguarded</u></p>	

	<p>A diverse mix of workspace, homes and local amenities will serve this growing community. The Wandle Delta Area will also benefit from the continued presence of safeguarded wharves which play a vital role in maintaining river access, particularly for waste management and recycling. Opportunities to combine cultural and leisure activities with new forms of workspace, set against the backdrop of distinctive waterside spaces and connections, and enhanced links to Old York Road, the Ram Quarter and the town centre, will announce the Wandle Delta as an important destination for the Borough.”</p> <p>Cory Comments</p> <p>As significant property owners within the Wandle Delta Area, we are acutely aware of the pressure for new development. Through this, we are also aware of the impact new development, notably new housing can place on existing occupants within these areas especially uses such as waste management. The New London Plan sets out that new development should through the Agent of Change Principle respect key existing uses and infrastructure and not seek to introduce incompatible uses (through location or design).</p> <p>We therefore request that the Council, throughout the masterplan document and specifically within the Vision introduce wording that is cognisant of the crucial role of waste management facilities in the Borough and wider London and note the importance of not undermining the on-going operation through new and surrounding development. The current wording of the vision is welcomed however does not go far enough to ensure the existing use of Smugglers Way is protected from new development.</p> <p>In relation to transport improvements, whilst we support opportunities to improve connectivity and in turn pedestrian / road safety in the Wandle Delta area the existing</p>	<p>Any changes to the road network would be subject to a transport assessment.</p>	<p><u>wharves, in relation to the Agent of Change principle as set out in the NPPF and London Plan.</u></p>
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		<p>road network must be taken into consideration and fully reviewed in the Wandsworth Gyratory proposals.</p> <p>We understand that TFL and LB Wandsworth are consulting on the improvements and that as part of these improvements a new southbound exit on Smugglers Way is proposed. We strongly encourage that full traffic analysis is undertaken assessing this new southbound exit given the number and frequency of commercial waste vehicles which use Smugglers Way and the surrounding roads. We would highlight that a two way street and new southbound exit would narrow the road network for commercial waste trucks and would likely require widening of the road. We are concerned that the proposed improvements would lead to Smugglers Way becoming a rat run and therefore recommend this new southbound exit is heavily examined in all future Wandsworth Gyratory consultations.</p> <p>Notwithstanding the above we are not opposed to new development surrounding the Smugglers Way Site and continue to welcome the promotion of directing appropriately conceived and designed proposals to sustainable areas of the borough. We are also pleased to see that the Council has identified the long-term potential for the incorporation of the Smugglers Way site within the wider regeneration of the area and would be keen to work with officers to ensure a suitable approach and allocation.</p>		
10.2	<p>Rolfe Judd on behalf of Cory Riverside Energy (Cory)</p>	<p>Proposed Height and Massing</p> <p>Paragraph 5.6.12 - There are a number of key areas, which are considered sensitive which will necessitate the careful moderation of proposals as appropriate. Figure 37 illustrates these considerations graphically. Applications for tall buildings (over 6-storeys) will be required to demonstrate that sensitivities have been considered and adequately addressed within proposals.</p>	<p>Wharf areas are considered to be sensitive to tall buildings. Any review of site designations would be best be undertaken through a future review of site allocations in the Local Plan.</p>	<p>N/A</p>

	<p>5.6.14 - The massing of proposals within sites containing or adjacent to local assets including those identified above should be varied to mediate between the existing and proposed building heights.</p> <p>Cory Comments</p> <p>The Masterplan SPD outlines that tall building clusters are considered acceptable in this location. This approach accords with the Urban Design Study and Tall Building Maps in Appendix 2 of the emerging draft Local Plan. However, we have concerns regarding the “sensitive” designation, which appears to accompany the Smugglers Way site, and would question its requirement.</p> <p>The Council should provide additional information relation to the designation and why heights in this area are sensitive. Should through the long term aspirations of the Council and Cory, the Smugglers Way site be identified for redevelopment, then flexibility on height and massing will be key to ensuring a viable development can come forward.</p> <p>Viability should always be viewed as a key constraint for any future development especially on safeguarded waste and wharf sites and can significantly restricts the opportunity for mixed-use development. This is exemplified in the approval of permission 2015/6357 granted in July 2016 for a new enclosed waste transfer unit at Cringle Dock with residential uses above.</p> <p>This Cringle Dock scheme has not been implemented on site and given its imminent expiry it is considered unlikely to be implemented in the future. The viability of the scheme has been a key driver for the project stalling and inserting additional barriers at Smugglers Way, restricting height and ultimately quantum, will only lead to a similar scenario</p>		
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		<p>In addition whilst it is appreciated that the New London Plan only provides board guidance for wider London; given that site allocations are the key strategic reservoir for new homes within the Borough we would question the logic of placing restrictions on their capacity without undertaking detailed design development through the planning process.</p> <p>We strongly suggest that the Council amend the approach in relation to Smugglers Way and its designation as “sensitive” to ensure development has the potential to come forward in the future and alignment with the New London Plan.</p>			
10.3	Rolfe Judd on behalf of Cory Riverside Energy (Cory)	<p>Feathers Way Site Allocation</p> <p>It is a significant concern that the Site Allocation makes only passing comments to the Wharf designations or waste uses of Smugglers Way. Whilst the draft guidance for the Masterplan states future mixed-use development will need to ensure that it does not have a negative impact on the operation of the safeguarded wharves we consider the allocation does not go far enough to fully address the operation and infrastructure requirements of the wharves.</p> <p>This is contrary to subsequent Policy LP43 (Protected Wharves) of the draft New Local Plan specifically part C which emphasises development proposals on sites adjacent or in close proximity to safeguarded wharves should be designed to minimise the potential conflicts of use and disturbance, in line with the Agent of Change Principle. We strongly recommend that the wording of the Site Allocation is reviewed and emphasis added that future mixed-use development within the Feathers Way allocation is assessed in line with Protected Wharf Policy LP43.</p> <p>Smugglers Way Waste Station will play a key role in the regeneration of the area whether it is retained in its current format or redeveloped as part of long-term aspirations for the area. With this in mind, we strongly recommend that the red line boundary for Feathers Way be amended to include Smugglers Way Household Waste</p>	<p>See response to 10.1</p> <p>The text (including additional bullet point noted above) seeks to encourage a comprehensive and holistic approach for any future scheme.</p> <p>While the ‘Western Riverside Waste Transfer Station’ is designated as a safeguard wharf and is protected under the provisions of the waste management policy, the adjacent site to the west, Feathers Wharf, is not. The SPD cannot extend the boundaries of the</p>	N/A	

	<p>& Recycling Centre that immediately abuts the existing red line boundary to the east. This enables a comprehensive approach to be taken through the masterplan process and ensures that development coming forward in the short term does not affect the ability for the waste use to function and does not jeopardise its potential future regeneration.</p> <p>Whilst the above comments relate to the immediate and current use of the site, we acknowledge and support the opportunity for future redevelopment at Smugglers Way either through encapsulation or through transfer of waste capacity. This approach is also directly linked to the long terms ambitions of the SPD set out in chapter 5.10 and we have provided comments in this below.</p> <p>Chapter 5.10 - Waste recycling facility Paragraph 5.10.2 - There is potential for the redevelopment of the Western Riverside Waste Authority facility, which is arranged perpendicular to the River Thames. The facility could be reprovided in a similar location with potential addition of residential uses above waste facility. This would offer an opportunity to create a better relationship with the Waterside Path and the Riverside West development to the east.</p> <p>Paragraph 5.10.3 - Alternatively, subject to the long-term strategy for the waste transfer site a more comprehensive approach to development could be considered should the safeguarded wharf be de-commissioned.</p> <p>Paragraph 5.10.4 - Any proposal would need to demonstrate that the addition of residential dwellings would not compromise the operation of the adjacent wharf uses. Proposals would need to consider how edge conditions and access to adjacent waste facilities are managed</p> <p>Chapter 5.10 identifies the potential inclusion of the Western Riverside Waste Authority facility as a development site as part of long terms aspirations of the area.</p>	<p>site allocations – it can only supplement existing policy in the Local Plan.</p> <p>The possible re-development of the Waste recycling facility is noted as a potential long-term opportunity (beyond the plan period), as noted in Section 5.10.</p>	
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		<p>We support this approach in acknowledging the benefits a comprehensive approach to redevelopment could bring the area.</p> <p>Combined with this we would also strongly support the recognition that the Cory ownership could also be incorporated within the allocation noting its long-term potential for redevelopment and linking through to Feathers Way. Both Western Riverside and the Household Waste & Recycling Centre are operated by Cory and whilst their operational capacity and use is separate (household and commercial) it is imperative they are viewed as one site under Site Allocation as they are intrinsically linked. The inclusion of Smugglers Way Household Waste & Recycling Centre within the red line boundary will allow for a holistic approach towards waste management and future development of both sites for Cory.</p> <p>As discussed above the potential of the site should not undermine its current use and we would note that in current policy and the Masterplan the Council must continue to protect the waste facility and its important role from emerging vulnerable uses under the agent of change principles.</p> <p>Policies LP13 (Waste Sites) and LP43 (Protected Wharves) of the draft Wandsworth Local Plan alongside and Policies SI7 and SI15 of the New London Plan are clear that existing waste and wharf uses must be protected from surrounding development and provide further justification for the above approach.</p>		
10.4	<p>Rolfe Judd on behalf of Cory Riverside Energy (Cory)</p>	<p>Way Forward</p> <p>In summary while we are supportive of the aspirations of the SPD we have concerns that in promoting the long terms regeneration of the area the Council has not introduced sufficient protection within the masterplan for existing uses such as waste centres and safeguarded wharves. It is imperative that Cory’s assets can continue to provide their strategic function in processing waste for Wandsworth and further</p>	<p>The Masterplan SPD looks to protect safeguarded wharves, in alignment with existing policy. This is addressed in Paras 3.5.5 and 5.5.14.</p>	<p>N/A</p>

		<p>afield. Only then can the potential long terms redevelopment aspirations for the sites be truly considered.</p> <p>We also have concerns regarding the lack of consistency between the masterplan document and a number of Local Plan Policies. Government guidance is clear that Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. We therefore request that the Council give more weight to Policies LP13 (Waste Sites) and LP43 (Strategic Wharves) within the Masterplan SPD to ensure that the existing use of the Cory sites are not jeopardised before any long terms aspirations can be considered.</p> <p>We trust the above representations will assist with your consideration of emerging planning policy review within the Borough and we look forward to working with you over the course of the Wandle Delta Masterplan review process.</p>			
11.1	Joanne Crow (Individual)	<p>Redevelopment of such an area certainly needs a master plan. Without having an overall plan and then sticking to it over the short, medium and long-term until completion results in the unfortunate jumble of mis-matched buildings that make up the area to the west of the Wandle - Riverside Quarter and all the developments that have gone up and continue to go up behind. I'm sure the initial 'plan' for this area looked great. Sadly after the first 4 buildings on the riverfront were completed, over the years developers seek to squeeze the most out of the land and the council wants to tick the box that they are building more homes, even though they are clearly not 'affordable'. And so the 'plan' keeps changing and the buildings get higher and closer together and open space disappears.</p> <p>I really hope not but I do fear in the long term the same thing will happen with the Wandle Delta Plan.</p> <p>Transport infrastructure and capacity needs to be put in place first, and then development and building of new homes and businesses can occur.</p>	<p>Comments noted.</p> <p>In terms of transport capacity, Section 5.2 sets out the Council will continue to encourage the creation of a new entrance to Wandsworth Town Station from the north, as well as interventions to make the station step-free and fully accessible. The Council will also continue to promote enhanced rail service</p>	N/A	

			<p>capacity through Wandsworth Town railway station, subject to rail demand patterns in the period following the current COVID-19 pandemic. However given the constraints, any improvements to capacity are unlikely to happen in the short to medium term. Bus service improvements could provide a more immediate solution to any shortage of public transport capacity.</p>		
12.1	<p>James Couper (Individual)</p>	<p>As a resident of property within the red boundary of this image I feel angered that I have not been consulted about any of this. Feel an attempt is being made to hide behind the pandemic and rush this through. How were these two supposed events advertised? How well attended? Has any attempt been made to communicate to those that might be shielding or isolating?</p> <p>Context conveniently overlooks the three buildings that now overlook my property that have been built in last three years.</p>	<p>Comments noted.</p> <p>Two stages of engagement were carried out: the first in February 2020 and the second in September 2020, both of which were well-attended. One can receive notifications about engagement and</p>	<p>See changes proposed in 9.1</p>	

		<p>Transport - so using pandemic usage figures (including periods of national lockdown) to argue that increasing population density is not going to require transport improvements. Seems like letting developers off the hook to me - don't believe it!</p> <p>Building a neighbourhood while ignoring those unfortunate enough to already be living there, create way to build confidence and trust.</p> <p>People first! Rubbing salt in lack of consultation wounds now ...</p> <p>Confused - are you trying to pedestrianise Sudlow Road?</p> <p>More public space is welcome but disruption caused by removal of established trees in favour of new growth limits the carbon offset of design. Can't see any consideration given to those resident in terraced housing having more 8-10 storey buildings being built adjacent to, and overlooking, their property. How much light will I lose to my property? Has other recent development been factored into these calculations? By my count there will be as many as six new buildings overlooking my property since I moved to area.</p> <p>No mention of proportion of residential units being affordable.</p> <p>Finally a mention of Sudlow Road as a moderating factor. Instead of worrying about light for planned development, maybe more concern for already existing assets - but no have a potentially ten storey and a potentially eight storey building where currently nothing bigger than five</p> <p>Removal of established trees and their carbon holding has been ignored which undermines much of the value in this section.</p>	<p>consultation in the area by subscribing to the planning policy email list or following the Council on social media.</p> <p>Regarding transport capacity, see response to Comment 11.1.</p> <p>The London Plan sets the strategic target of 50 per cent of all new homes delivered across London to be affordable.</p> <p>Regarding Sudlow Road, see the response to comment 9.1.</p> <p>Regarding the assessment of impact on the borough's facilities, see the response to comment 7.1.</p> <p>The framework encourages a flexible approach to land uses – a mix is considered</p>	
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		<p>We will stick three large buildings into an area of previous low-scale development and hope nobody notices. Dishonest or disingenuous - take your pick!</p> <p>Interesting that no mention of Sudlow Road being a moderating factor despite it being clearly illustrated adjacent to cluster. Even the nearest three buildings will overlook what already exists. What is justification for anything over 6 stories?</p> <p>Council profiting by ignoring its residents.</p> <p>Has the council done an impact study on the effect of this potential rise in population density on the borough's facilities? Affordable Housing quota?</p> <p>Is all this development necessary? As council declared a 'Climate Emergency' last year, how does it plan to off-set the carbon from this development?</p> <p>If council expect most to be working from home in medium term, why are they building 14,100 m2 of office space? Building offices for the workers staying at home and not putting pressure on adjacent railway services.</p> <p>So building over 20,000 m2 of office space within a five minute work of Wandsworth Town Rail Station is going to have no effect on demand for transport services? Is that what the Council expects us to believe?</p> <p>Planning for this site has been contested for years - obviously packaging it within this larger development in hope of better luck.</p> <p>At what point do we reach capacity? Where are the studies supporting this environmentally or socially?</p>	<p>positive and broadly deliverable, but the amounts are largely indicative for illustrative purposes. Please also refer to Council's Employment Land evidence base.</p> <p>The Council's Environment and Sustainability Strategy sets out a committed to being carbon neutral as an organisation by 2030 and zero carbon overall by 2050. Carbon offsetting would be required in accordance with emerging policy LP10 which requires that all new major development should achieve zero carbon standards with a minimum on-site reduction of 35%. Where it is justified that zero carbon cannot be met on site then any shortfall</p>		
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		Interesting that these are published as a catch-all at the end of the plan and not incorporated into plan earlier - almost like details that have been over-looked and quickly given lip service.	must be provided through a cash in lieu contribution to the Council's Carbon Offset fund.		
13.1	Rolfe Judd on behalf of Downing	<ol style="list-style-type: none"> 1. This representation is prepared on behalf of Downing, owners of land within the Wandle Delta. Downing participated in the Wandle Valley Workshop. 2. Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As an SPD does not form part of the development plan, it cannot introduce new planning policies into the development plan. SPDs are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development. 3. Downing object to the SPD as it is currently drafted and consider significant amendments are required in order for the Wandle Delta Masterplan to meet the tests of the role of an SPD at this time, or it should be put on hold and be reviewed following the adoption of the forthcoming Wandsworth Local Plan. 4. We refer the Council to the following representations (paragraph reference are within the WDM SPD):- <ul style="list-style-type: none"> Paragraph 1.3 – Vision and Framework Paragraph 3.11 – Local Planning Context Paragraph 3.42 – Emerging Local Plan Paragraph 5.1.2 – Planning Design and Delivery Guidance 5. There is concern that the SPD is being used to introduce new development plan policy. As set out above the SPD should build upon the adopted development plan, whereas paragraph 1.3 clearly sets out that the SPD will be used as part of the Delivery Framework and the emerging Local Plan; and at 	SPD adoption and compliance – the SPD is considered to be appropriate in relation to the existing policy context, and suitably worded to relate appropriately to the emerging and future planning policy framework.	Para 3.4.1 final sentence amended to read: <u>This SPD will align with the existing Local Plan and will relate appropriately to the emerging Local Plan.</u>	

		<p>paragraph 3.1.3 where it states the emerging plans and guidance of the Wandsworth Local Plan and Emerging Urban Design Study. At paragraph 3.4.1 it states, <i>This SPD will be used to inform decision making when applying the emerging site allocations and area strategies to be contained within the Local Plan Review.</i></p> <ol style="list-style-type: none"> 6. At paragraph 5.1.2 the authors have suggested the guidance will supplement the adopted policy whilst informing the new Wandsworth Local Plan which is currently being developed and support its delivery. 7. There are several matters, including site allocations that will be tested at the forthcoming Wandsworth Local Plan (Reg 19) EiP. It is therefore unreasonable for the Council to adopt an SPD now that will inform or rely on policies and site allocations that have not been tested or found ‘sound’ as part of the Local Plan adoption process. 8. The SPD is not part of the development plan and cannot introduce new policies that are not viable (NPPF). The SPD has not been subject of any viability testing to support the vision. <p>Paragraph 1.4 – Process</p> <ol style="list-style-type: none"> 9. Downing attended the Virtual workshop in Summer 2020. Further to the workshop, Downing provided written feedback to the masterplan team, and requested a meeting to discuss the workshop, however Downing were advised that no meeting would be accommodated and to wait and comment on the forthcoming SPD. 10. Downing’s experience of the virtual workshop was whilst the workshop was informative, the Q&A sessions did not easily lend to in-depth discussion nor time to digest the plans and provide detailed feedback on the masterplan itself. It was in practice a Q&A session as opposed to a productive workshop. As such we question the quality of the feedback that was received and 			
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		<p>recorded and what was used to enhance the proposals before the production of the draft document. The comments submitted by Downing to the Masterplan team following the ‘workshop’ do not appear to have been considered - letter appended to this representation at Annex 1.</p> <p>11. Paragraph 2.2.3 of the SPD second bullet states <i>‘Engagement with landowners has sought to factor their ambitions into the vision for the area. The SPD must set a flexible framework to accommodate development at varied timescales and through varied delivery models’</i></p> <p>12. We reiterate the point that the public engagement as part of the SPD is not a substitute for the Local Plan process and Examination in Public, therefore it is inappropriate and premature for the Council to adopt this masterplan as supplementary planning guidance – given it is not supported by an adopted development plan.</p>			
13.2	<p>Rolfe Judd on behalf of Downing</p>	<p>Indicative Analysis</p> <ol style="list-style-type: none"> 1. Section 5 of the SPD sets out the vision. However none of the aspirations or indicative targets within the masterplan consider viability. Paragraph 67 of the NPPF (2020) states, ... <i>planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.</i> 2. The masterplan is not supported by any economic viability appraisal. As such whilst sections 5.2 and 5.3 set out the aspirations for public realm, bridges and public parks- commendable and supported in principle – all need to be delivered from economically viable developments. 3. The indicative sections of the masterplan are misleading and will cause confusion. As the masterplan has not had any economic viability – it is unsafe to rely on the indicative typologies of development – simply because it is impossible for the masterplan to crystal ball gaze and confirm that the 	<p>The emerging Local Plan will be subject to whole plan viability.</p> <p>The identification of appropriate height ranges aligns with the approach set out in the London Plan.</p> <p>‘Principles’ suggests inherent flexibility appropriate to a masterplan.</p>	<p>5.9.10 Delete the reference to courtyard typologies</p> <p>Varied height, scale and massing of buildings with a focus on courtyard typologies.</p> <ul style="list-style-type: none"> • Incorporation of lower elements 	

		<p>indicative quantum of development suggested is viable for the overall vision of the masterplan to be delivered.</p> <ol style="list-style-type: none"> 4. Section 5.6 - should be significantly reviewed. Again the SPD is seeking to bridge between the existing development plan and inform the emerging Local Plan- relying on untested evidence base for the new Local Plan. Sections that refer to adopted policy can be supported, but where the SPD relies on emerging guidance or seeks to inform the emerging Local Plan this is not accepted for reasons set out above. 5. Paragraph 5.6.16 should be deleted. There is no current policy stating tall buildings only to the north of the railway. 6. Figure 41 should be deleted. There is no economic viability to support the indicative heights in the diagrams throughout the masterplan. 7. Gross Capacity estimates - no economic viability to support these estimates. Housing and employment targets will be set in the Local Plan – this section should be deleted 8. Downing’s site ownership is within the Hunts Truck/ Gasholder cluster. We have the following comments on Principles (page 89) 9. Amend paragraph 5.9.10 – Proposals must [should seek to] incorporate the following principles. This flexibility should be applied to all cluster principles throughout the masterplan <p>Must is too prescriptive – this is a masterplan and needs to support a level of flexibility for the sites to come forward.</p> <ol style="list-style-type: none"> 10. Second column first, second and third bullets <ul style="list-style-type: none"> - Varied height, scale and massing of buildings with a focus on courtyard typologies. 	<p>Agreed – removal of specific reference to courtyard in context of comments on constraints.</p>	<p>allowing daylight and sunlight into perimeter block courtyards.</p> <ul style="list-style-type: none"> • Low-rise buildings to Consider an inner spine route to provide a more human scale.
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		<p>- Incorporation of lower elements allowing daylight and sunlight into perimeter block courtyards.</p> <ul style="list-style-type: none"> • Low-rise buildings to make inner spine route to provide a more human scale. <p>Delete the reference to court yard typologies and building design, this cluster has significant constraints with underground utilities and gas pipes etc – therefore the building typology, height and layout cannot be dictated as part of the masterplan principles.</p>			
13.3	Rolfe Judd on behalf of Downing	<p>Conclusion</p> <ol style="list-style-type: none"> 1. Downing support the principles of the linear park, improved pedestrian movement/environment including the opportunities to cross the Wandle and road network. 2. The inclusion of illustrative capacity is a real concern, as the figures and densities suggested significantly underestimate the potential for the Hunts Truck site and the financial investment required to remediate these significantly contaminated industrial sites for redevelopment . In order for the Hunts Truck/Gasholder Site to come forward and deliver the principles, it will inevitably have to support higher densities than currently suggested in the masterplan. 3. The 2018 Site Allocation requires : <i>Mixed use development including residential and economic uses. Redevelopment of the site should provide at least a 25% increase in the existing amount of industrial (use classes B1c/B2/B8/SG) and office (use class B1a) floorspace. The replacement floorspace should include light industrial workspace for cultural SMEs. Part of the site will be required for the realignment of Armoury Way to enable the removal of the Wandsworth gyratory.</i> 	The illustrative capacities provide an indication of what the Council would like to see in terms of place making, while accepting other factors might impact on this. The approach is informed by the 2018 guidance and the EUIA designation and conforms with the intent of the London Plan. The document provides a broad indication of capacity but notes the importance of further technical work and	N/a	

		<ol style="list-style-type: none"> 4. It is unclear if the illustrative targets have been based on the 2018 Site Allocation. In addition, there is reference around the potential for underground servicing together with vehicular access and egress to the site. We see this as having another very significant negative impact upon the viability of these sites, as it would result in complicated and highly costly sub structure arrangements of circa 7m in height per level. 5. To conclude, the masterplan, whilst seeking not to dictate targets or caps on the potential of sites, will in practice (if the current estimated capacity/ targets are retained) set a benchmark or cap for local residents, Cllrs etc – creating a further hurdle for new schemes coming forward having to justify the perceived ‘additional development/height/density’ being sought over and above the indicative thresholds. 6. The Masterplan should be amended to remove all indicative capacities, heights and typologies. 7. The Masterplan as currently drafted <ol style="list-style-type: none"> 1. Goes beyond the adopted development plan and is seeking to introduce new policy 2. Is intended to inform the emerging Local Plan polices – even though it is not part of the development plan and will not have been subject of the rigorous testing of an EiP 3. Is not supported by economic viability as such the assumptions regarding gross capacity targets are flawed 4. The masterplan clearly states that it will not set height restrictions, but then includes indicative plans showing heights – these plans should be deleted as they conflict with the text and cause confusion to the application of the SPD 	<p>studies including viability and ground conditions.</p> <p>The capacity is illustrative in recognition that there may be other proposals which meet the guidance set out in the SPD and may be other factors impacting on the approach.</p> <p>Section 5.6 has been reviewed to clarify that the final UDS will be aligned with the SPD and will be used as evidence to inform the emerging Local Plan.</p>		
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14.1	<p>Sheila Enright (Individual)</p>	<p>The proposal to develop Wandsworth Delta is positive, however there has been no engagement with those of us living on Sudlow Road in the houses immediately adjacent to the depot. I have found out purely by chance from another resident. There does not seem to have been any effort to engage with the residents of Sudlow Road.</p> <p>Given the consideration of the potential impact of the pandemic and the need for private outdoor space, it seems reasonable that the needs of existing residents are also considered with regard to this identified need.</p> <p>People First - there appears to have been no consideration for the residents of Sudlow road, given the fact we are directly impacted by the proposal and our small numbers there appears to have been a missed opportunity to engage directly with us. Car parking is already currently difficult, and recently made worse by the development on Osier Road, this needs consideration as this development would only see this becoming worse.</p> <p>Consideration of a space at the back of Sudlow Road so that the block planned is not back to back with Sudlow Road. Current residents need to be afforded the same consideration as new residents.</p> <p>Whilst there is reference to the fact that the block by Sudlow Road will be lower, there still needs to be clarification on the impact this will have to the houses on Sudlow road and the right to light. Back to back would also imply that residents in the new blocks will be overlooking our houses. Creating an opportunity for Sudlow Road residents to secure additional garden space would help create some space.</p> <p>Concern regarding loss of light to the houses on Sudlow Road.</p> <p>What consideration is being given to Sudlow Road with regards to the Frogmore Cluster ?</p> <p>The Frogmore Cluster has the biggest impact on Sudlow Road residents. There are concerns regarding loss of light, over crowding in the area with an impact on parking. Lack of effective engagement with the residents of Sudlow Road.</p>	<p>Relating to Sudlow Road – see the response to comment 9.1</p> <p>Car parking – see response to comment 5.1.</p>	<p>N/A</p>
15.1	<p>Environment Agency</p>	<p>Biodiversity and river corridors</p>	<p>Noted.</p>	<p>5.2.16 – add further</p>

		<p>In general, we are supportive of the vision. It has a strong emphasis on environmental improvements to the River Thames and River Wandle to ensure they provide quality public realm as well as being enhanced for biodiversity. We strongly support that biodiversity and habitat improvements are championed along the river corridors. We have the following suggestions regarding biodiversity and river corridors:</p> <p><i>New bridges over the river</i></p> <p>The draft SPD, section 5.2.13 page 42, encourages two additional bridges across the river. We understand the importance of improving permeability through the Wandle Delta and that the river itself is a major block for walkways. Section 5.7.9 page 78 highlights the importance of considering the negative impacts a new bridge may have on river biodiversity and emphasises the need for mitigation measures to attempt to offset this. We encourage early discussions with the Environment Agency for any proposals considering new bridges over the river to ensure adequate mitigation is provided. We understand these bridges are of strategic importance to the London Borough of Wandsworth for their wider place making ambitions and ask that these are only supported where strategically necessary.</p> <p><i>Set back</i></p> <p>Section 5.3.11 page 51 mentions a ‘minimum policy set back of 6m’. We would like to highlight that we require a minimum 16m set back from the River Thames and associated Thames Tidal Flood Defences and a minimum of 8m set back from all other main rivers. This distance is specified in the draft Wandsworth Local Plan.</p> <p><i>River edge treatment</i></p> <p>The suggested river edge treatment ‘Condition C’ on page 49 presents a an urban edge to the river. This does not comply with the policy requirement for a minimum 16m set back from the River Thames and associated Thames Tidal Flood Defences and</p>	<p>Strengthen reference to bridge crossing liaison.</p> <p>Update minimum setback distance accordingly.</p> <p>Condition C – This approach could be appropriate if the minimum setbacks (corrected as requested) are adhered to,</p> <p>Reference to setback in 5.3.13 to be amended.</p>	<p>sentence: <u>Early discussion with the Environment Agency will be encouraged in relation to any new bridge crossings.</u></p> <p>Para 5.3.13 – update: “This treatment greatly exceeds the minimum policy requirement of <u>a setback of 8m from the Wandle's edge (16m from the Thames)</u>, in order to deliver on the</p>
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		<p>a minimum of 8m set back from all other main rivers. It also does not comply with policy requirements to enhance river corridors for the benefit of biodiversity. We recommend that this suggestion is revisited to ensure the river corridor is provided an appropriate buffer from any built development.</p> <p><i>Estuary edges guidance</i></p> <p>We strongly recommend signposting the Estuary Edges website (https://www.estuaryedges.co.uk/) where developers can find guidance on improvements to tidally influenced river corridors. In particular it provides best practice for tidal terracing designs which provide significant enhancements for biodiversity and river corridors.</p>		<p>SPD vision for the area.”</p>
<p>15.2</p>	<p>Environment Agency</p>	<p>Flood risk and flood defences</p> <p><i>Flood risk</i></p> <p>We welcome that the SPD identifies that the majority of the Wandle Delta is in an area at high risk of flooding. We would strongly recommend that this point is emphasised within the document. National policy as well as Wandsworth’s own policy requires development to be made safe for its lifetime and ensure flood risk is not increased elsewhere. This can be achieved by raising finished floor levels, installing flood resistance and resilience measures and providing compensation on a level for level volume for volume basis for any losses in flood storage (further details set out in the local plan). These requirements can significantly influence the design of developments so it is important developers are aware of these constraints at the outset of their design process. We strongly recommend the document signposts these policies as a minimum.</p>	<p>Further reference to flood defences agreed.</p> <p>Other points noted.</p>	<p>New para after 5.7.19:</p> <p><u>Development proposals will be required to demonstrate that the flood defence provision is adequate for the design lifetime of the development</u></p>

	<p><i>Flood defences</i></p> <p>Whilst the SPD places huge importance on biodiversity enhancements along the river corridors, which we fully support, it fails to mention the flood defences also found along the river corridor. The document also makes no reference to the Thames Estuary 2100 (TE2100) Plan which identifies the Tidal Thames flood defence height requirements both now and in the future.</p> <p>Development sites in such locations must demonstrate that the flood defence is fit for purpose for the design lifetime of the development, for example developments with a residential element must ensure the defence is fit for purpose for a span of 100 years. Whilst developments do not have to raise defences to the 2100 statutory level, they must demonstrate how this would be done in the future to ensure their proposals do not restrict these works. We strongly encourage developers to raise the flood defences to the 2100 statutory level in the first instance. This is because the defence raisings are a major engineering operation which could hugely impact the public realm vision of the river corridor. By designing it in early, you safeguard the attractive public realm for future years. If developers fail to do this, when future raisings are required it could result in an unattractive public realm with reduced walkway sizes and diminished views of the riverside which are so valued. In some cases where too small a river corridor buffer is provided it could lead to disruptions in the riverside paths which has a big impact on movement and permeability. Please refer to the TE2100 Wandsworth briefing note and Riverside Strategy guidance attached.</p> <p>A minimum 16m set back from the River Thames and associated Thames Tidal Flood Defences and a minimum of 8m set back from all other main rivers is required. The new Wandsworth Local Plan policies specifically support these set back requirements and the current adopted local plan supports Environment Agency requested set back</p>		<p><u>. Proposals will be required to make positive reference to accommodating the Thames Estuary 2100 plan.</u></p>
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		<p>from flood defences in general. This set back is required to ensure access for any maintenance, inspection, emergency repairs and future raisings of the flood defences can be achieved in a cost effective manner. As highlighted above, it is vital to safeguard this set back distance to ensure future flood defence raisings do not negatively impact the high quality, attractive riverside public realm this SPD champions.</p> <p><i>Causeway Island</i></p> <p>Section 3.18 page 53 of the draft SPD highlights the ambition for a new public park on the Causeway Island. It also recommends that some buildings may be acceptable. This site is vulnerable to flood risk and so we would like to ensure the council is mindful of national, London and local policy on flood risk suitability and protection measures that development here would need to be in line with.</p> <p><i>Wandsworth draft local plan</i></p> <p>We also refer you to our comments on the draft local plan (attached) for completeness. You may wish to refer to this for a greater understanding of our flood risk and biodiversity requirements.</p>			
15.3	Environment Agency	<p>Contamination</p> <p>We welcome that the SPD recognises that the site has an industrial history and consequently any redevelopment proposals will be expected to remediate any pollution. The Environment Agency expects to be consulted on any such sites to support the council in assessing any potential pollution and remediation strategies to prevent groundwater contamination.</p>	Noted	N/A	
15.4	Environment Agency	<p>Waste Transfer Station</p>	Noted	N/A	

		The SPD mentions its ambitions for the waste transfer station, including reconnecting a pedestrian bridge over the site. We strongly encourage any organisation bringing forward proposals for this site to contact the Environment Agency at an early stage to ensure the proposals are in line with our permitting responsibilities for the site.			
15.5	Environment Agency	<p>Other</p> <p><i>Gross capacity estimates</i></p> <p>The SPD estimates the gross capacity of the sites within the SPD boundary. Will these need to be updated now the minimum 16m/8m river buffer zone has been identified?</p>	This is unlikely to have a significant impact on capacity estimates as the setbacks typically exceeded the minima, and the SPD allows flexibility in layout / typology and other design factors subject to justification.	N/A	
16.1	Kate Faithfull (Individual)	<p>I am concerned about building heights if the Frogmore depot is redeveloped. More greenery would be welcome.</p> <p>I live on Sudlow Road, one of the few residential areas in the development area. I am concerned about the development being directly next to my house. I am particularly concerned about my house being overlooked, the impact on natural light and the noise of the development.</p> <p>I would like the opportunity, with other neighbours on the west side of Wandsworth Road, to buy a few metres of land at the back of my house. This would mean the new residential development would not look directly into my house, and vice versa.</p> <p>An efficient use of land would involve giving the west side residents of Sudlow Road a strip of land adjacent to our properties so that our houses are not directly overlooked, nor do we look directly into the new homes.</p> <p>This strip of land would also mean that both Sudlow residents and those in the new build will have sufficient right to light.</p> <p>In addition, we will be able to grow proper gardens and increase the biodiversity in the local area.</p>	<p>Comments noted.</p> <p>Relating to Sudlow Road – see the response to comment 9.1</p> <p>Regarding the example of the gasholder redevelopment, thank you for the reference, however there are no standing gasholders on the Wandsworth site.</p>	N/A	

	<p>I am delighted that the project is about putting people first. I hope that you will consider the impact of a massive development immediately adjacent to my home and those of my Sudlow Road neighbours.</p> <p>Allowing the residents of Sudlow Road (west) to have the land at the back of our houses as a garden will make a positive contribution to the local area.</p> <p>I am concerned that a three storey building directly at the back of my house on Sudlow Road will enormously impact my privacy and right to light. I would like the opportunity to have a garden at the back of my property so there is space between my house and the new buildings.</p> <p>What is the streetscape project for Sudlow Road? Residents have not been involved in the planning of this at all.</p> <p>Planting of more street trees is a great idea.</p> <p>I am very concerned that building a three storey terrace directly next to my house on Sudlow Road will mean my house is completely overlooked and has less natural light. I would like a six metre space at the back of my property so that both the residents of the new terrace and the existing residents of Sudlow Road can have gardens.</p> <p>It is important to consider the needs of existing residents of the area. Again: I am very concerned that a new development directly outside my house on Sudlow Road would mean my home is completely overlooked and literally overshadowed. Please consider leaving a strip of land between Sudlow Road and the new proposed terrace so that both streets can have outdoor space between the buildings.</p> <p>As previously mentioned: a three storey terrace directly next to my house will mean my home is overlooked and the natural light is compromised. Please allow a strip of land between Sudlow Road and the proposed new terrace so that we can all enjoy outside space and some privacy inside our homes.</p> <p>Allowing the residents of Sudlow Road some garden space would increase the biodiversity of the local area.</p> <p>As previously mentioned: a three storey terrace directly next to my house will mean my home is overlooked and the natural light is compromised. Please allow a strip of</p>		
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		<p>land between Sudlow Road and the proposed new terrace so that we can all enjoy outside space and some privacy inside our homes.</p> <p>In order to be sensitive to the character of Sudlow Road, please allow six metres of space between us and the proposed three storey terrace. This means we can all enjoy outside space and some privacy inside our homes.</p> <p>In order to be sensitive to the character of Sudlow Road, please allow six metres of space between us and the proposed three storey terrace. This means we can all enjoy outside space and some privacy inside our homes.</p> <p>Please develop the gasholder site like this beautiful one in King's Cross: https://gasholderslondon.co.uk/?gclid=Cj0KCQjwutaCBhDfARIsAJHWnHvcJg_kDBENR5IBX_64xn2dkWLYC_03APZjOrCkUHka54CI6A7xmDkaAqPMEALw_wcB</p> <p>Community space and green space would be welcome.</p> <p>Community space and green space would be welcome.</p> <p>Community space and green space would be welcome.</p> <p>Green space, community space and independent shops would be welcome.</p> <p>If the waste and recycling facilities could be relocated and allow public access to the Thames path that would be lovely.</p>			
17.1	Faversham Creek Trust	<p>As one of the Trustees of the Faversham Creek Trust, where we have been actively campaigning for over decades for restoration and regeneration of maritime activity on our historic tidal waterway, I would like to record my firm belief that it's really important for any planning decisions on the River Thames and its tributaries really must take boats into account.</p> <p>These need not be large boats. In fact small boats are the very source and origin of our country's maritime heritage... People need places to get their small boats into the water, to row and sail, learn how to be safe on the water, pass these skills on to the younger generation. Boatyards, and moorings and wharves and quays and slipways may be insignificant when looking at the great scheme of things, but they are vitally important to community health and wellbeing. That includes training and education, maintenance contracts, tourism, economic benefits for the surrounding area, etc.</p>	Comments noted. See the response to comment 4.0 regarding boating.	N/A	

		<p>Although I am not resident in your area, I am a user of the Thames and feel that we are at a tipping-point in terms of planning decisions for our great river. Small boats and their facilities are a key indicator of health for a waterway. Alongside these local and much-loved community assets come biodiversity, peacefulness, solitude, and other almost-unquantifiable qualities, which are in the end the only real reason for living.</p> <p>Please make sure that small boats (and larger boats) get a look-in on the lovely River Wandle Delta.</p>			
18.1	Paulina Fazowiczka (Individual)	General Support, No specific comments.	Comments noted.	N/A	
19.1	Diego Fiore (Individual)	<p>Consider also sport facilities areas. Ex. basketball</p> <p>Great point on Frogmore depot building allocation area. Tall buildings will heavily affect Sudlow Road.</p>	Comments noted	N/A	
20.0	Geotechnical Consulting Group (Individual)	<p>We would like to comment on the draft Wandle Delta Masterplan Supplementary Planning Document (SPD) dated January 2021.</p> <p>We are both Civil Engineers by profession and as part of our work we have been involved in the design of many projects in London and around the world varying from small residential properties to prestigious redevelopments including the Shell Centre, the Victoria Nova project, Bloomberg, Leadenhall building, developments in St. Johns Wood etc. among others.</p>	Comments noted.	N/A	
20.1	Geotechnical Consulting	We would however like to comment on the Wandle Delta Masterplan Supplementary Planning document in our capacity as local residents. We live in a three-storey townhouse on the south side of Frogmore (36 Frogmore), opposite the Frogmore	Comments noted.	Amend Figure 36 to show	

	<p>Group (Individual)</p>	<p>Depot and Panorama Antennas sites (referenced as sites 4 and 5 in the SPD document). Our house and the adjacent property (38 Frogmore, also a three-storey townhouse) are new build houses which were completed in September 2015 (planning reference 2014/5320).</p> <p>As local residents we welcome the redevelopment of the Wandle Delta and the overall vision of the SPD document in terms of redevelopment and improving the connectivity with the river.</p> <p>However, there are a number of important points we would like to raise:</p> <ol style="list-style-type: none"> 1. The SPD document does not appear to recognise the height and nature of the existing buildings on the south side of Frogmore. <p>All the buildings on the south side of Frogmore have a height between 2 and 3 storeys (with the only exception of Fuller’s House on the corner of Frogmore and Armoury Way which is 3 storeys plus a Dorma roof).</p> <p>Figure 35 from the SPD document (reproduced here as Figure 1) shows the existing building heights in storeys. It is noted that our house (36 Frogmore) and the adjacent property (38 Frogmore) are not shown in the base map used to produce this figure. As discussed above, these two houses are 3 storeys high (or rather are equivalent to 2 storey houses with a loft conversion). Moreover, the adjacent building to our house is wrongly shown in this figure as 4 stories high; this is in fact 3 stories high.</p> <p>Dr Angeliki Grammatikopoulou Dr Stuart Hardy 36 Frogmore SW18 1HJ London UK</p> <p>21st March 2021</p>	<p>The baseplan showing existing building heights (figure 35) should be updated to add missing buildings.</p> <p>In terms of building heights, the SPD takes a contextual approach to future building heights, considering existing heights and the physical assets in the area. The SPD does not identify prescriptive locations on a plan to identify where tall buildings should go, nor is it prescriptive in setting maximum heights or limits. As part of the emerging Local Plan evidence base, the Council is producing an Urban Design Study to guide character and height across the Borough. The SPD is aligned with the approach set out in the Urban Design Study</p>	<p>buildings missing on the southside of Frogmore.</p>
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		<p>It is important that the proposed buildings that will front on to the north side of Frogmore reflect the height of the existing buildings on the south side. Buildings between 2 and 3 storeys would reflect the heights of the existing buildings on the south side of Frogmore, whereas the currently proposed 3 to 5 stories would be excessive and intrusive (see Figure 2).</p> <p>2. It is important to note that all buildings on the south side of Frogmore are residential. Although the residential nature of Sudlow Rd is recognised in the SPD document, the residential nature of the south side of Frogmore is not mentioned.</p> <p>The SPD document suggests that the Frogmore Depot (site 4) and Panorama Antennas (site 5) have the potential to accommodate standalone industrial typology which would be arranged on multiple levels in a more intensive stacked format.</p> <p>This again is not in accordance with the residential nature of the existing buildings on the south side of Frogmore.</p> <p>3. On the basis of the SPD document the indicative development capacity of the areas covered by the SPD are:</p> <ul style="list-style-type: none"> o 2,616 new homes (1,650 proposed + 966 in already consented schemes) o 23,485m² light industrial workspace (11,600m² proposed + 11,885m² in already consented schemes) o 26,826m² office space (21,000m² proposed + 5,826m² in already consented schemes) <p>The above proposals would indicate approximately 5,000 new residents in addition to</p>	<p>which should be cross-referenced along with this guidance.</p> <p>In terms of the illustrative masterplan, urban blocks on the north side of Frogmore are shown with an indicative height range of 3-5 storeys in order to mediate between the existing buildings to the south and proposed building heights to the north.</p> <p>The Frogmore site is currently in industrial use, with multi-storey buildings. The proposed standalone industrial typology therefore represents no change in use of the site.</p> <p>For capacity of public facilities – see the response to comment 7.1.</p>	
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	<p>the people employed in the light industrial workspace and office space. This is a significant increase on the current population and the people currently employed/working in the areas covered by the SPD. The SPD document does not give an indication as to what percentage increase these corresponds to.</p> <p>Notwithstanding the provisions of amenities discussed in the SPD document, it is imperative that the capacity of the public facilities is reviewed before the SPD document is finalised (as also recommended in the SPD document). Without enough capacity this will lead to excessive overcrowding and will negatively impact the local community.</p> <p>The SPD document mentions that any improvements to the capacity of the railway system, which is one of the main methods of commuting to central London for local residents, are unlikely to happen in the short to medium term. Without any improvements in this method of transport the significant proposed increase in the number of residents and people working in the areas covered by the SPD will result in significant overloading of the railway system.</p> <p>It is essential that the number of proposed new homes and workspace areas can be accommodated by the public facilities. At the moment this is not addressed by the proposals.</p> <p>Overall, we are very supportive of the proposals and excited to see much needed improvements to the area around our house. The tall buildings recently completed along the Thames are acceptable in their context, however it is important that this scale is not continued towards Frogmore and also that adequate provisions are made for public amenities, particularly Wandsworth Town Network Rail station, schools and open spaces for recreation.</p>	<p>Regarding public transport capacity – see the response to comment 11.1.</p>	
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21.1	<p>Carrie Harding (Individual)</p>	<p>It appears the proposed townhouse are very close to Sudlow road. Also some of the buildings are very tall As a Sudlow road resident I am worried about rights of light, privacy, density. I have a young daughter and would like to purchase some land for garden. I have only just been made aware of the plans to transform frogmore and feel blindsided and feel consultation could have been stronger with local residents. Very dense and doesn't take into account a transition from Sudlow road. Especially the proposed row of residential properties backing onto existing Sudlow road.</p>	<p>Comments noted. In regards to Sudlow Road, see the response to comment 9.1.</p>	N/A
22.1	<p>Guy Harding (Individual)</p>	<p>I only heard about these 'proposals' very recently which is disappointing given that - as a Sudlow Road resident - I am one of the few directly impacted residents throughout the entire subject area. A door drop would have been a courteous and appropriate method through which to flag the proposals for affected residents. This could have occurred in addition to the pop-up events at Southside/Civic Suite in early 2020. It was only because a friend of a resident who worked at the council flagged the plans for Frogmore that we were made aware of the SPD. I therefore think the engagement and communication has been very poor. That said, I thought the webinars were useful and interesting albeit too high level to address any of our concerns in gradual detail.</p> <p>Special attention needs to be given to the heritage assets, not least Sudlow Road, which as the SPD notes would be highly sensitive to new development and therefore necessitates careful moderation of any proposals which are tabled. The terraced houses on the east side of Sudlow Road currently have very limited outside space having previously formed a back-to-back terrace with Wharf Road part of which – from what I understand - was bombed during WW2 and subsequently demolished. It should be noted that the Sudlow Road residents have previously enquired about the purchase of land from the council and would be willing to engage in discussions again regarding this matter. Entertaining such an idea could allow the Sudlow Road residents to be more accommodating to the wider development whilst also ensuring</p>	<p>Comments noted. In regards to Sudlow Road, see the response to comment 9.1.</p>	N/A

		<p>the provision of an adequate transition between the old (Sudlow Road) and new (Frogmore complex)</p> <p>According to The Wandsworth Local Plan, which was drawn up in 2018 and sets out the Council's 'spatial vision for Wandsworth', the site is 'sensitive to tall buildings', which in this location is considered to be tall at five storeys. Any application for tall buildings will not be permitted to overshadow the Wandle or Bell Lane Creek.</p> <p>As the vision statement itself stresses, the Wandle Delta needs to put people first and this must start with existing residents. There are very few residential areas which are directly impacted by the plan so it should be easy for residents of these pockets to be actively consulted with.</p> <p>Again, the SPD talks about developments which “knit into its surrounding neighbourhoods” – I feel that the current draft doesn't go far enough to address how the potential new development will interact with the existing residential elements of the delta.</p> <p>It is reassuring to see land earmarked for a 'doorstep play space' east of North Passage, but its inclusion in the plan also draws attention to the need for adequate transition space between the rear of Sudlow Road terrace and the proposed new terrace within the Frogmore complex.</p> <p>The Allies and Morrison representative on the second webinar suggested the proposed terrace to the east of Sudlow Road could be either townhouses or mews. It is reassuring that the architect is sympathetic to the importance of appropriate development this close to the existing properties, but it is worth re-stressing that adequate space between such development would be necessitated. Any opportunity for Sudlow Residences to create garden space should therefore be diligently explored.</p>		
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		<p>Owing to the sensitive low-rise terracing of Sudlow Road especially careful consideration needs to be given to the Frogmore cluster development to ensure i) a sensible transition between old and new and ii) the right to light for existing residents of this heritage asset.</p> <p>Given that the Frogmore depot is owned by The London Borough of Wandsworth it makes sense for the council to engage with Sudlow Road residents regarding the potential for land to be purchased/awarded to the rear of the terrace in advance of the site going to tender for development. This would not only keep existing residents 'on side' with the development proposals but would also create a natural green/garden buffer between the existing terrace the proposed one.</p> <p>What does this mean? "Sensitive design response to existing fabric"</p> <p>Since the council is likely to lead the delivery of the Frogmore cluster and that it is therefore also likely to be one the quickest opportunities for re-development it would make complete sense for the council to engage Sudlow residents to ensure that their needs are met and voices listened to. Sudlow Road residents are organised and welcome the opportunity to engage with the council as soon as possible.</p>		
23.1	<p>Hattie Harding (Individual)</p>	<p>I am only 13 weeks old but I am worried about my nursery being overlooked by lots of tall buildings. I am currently lucky enough to benefit from lots of morning light This plan looks like that there will be a terrace directly outside my bedroom window. This means I will no longer be able to see the Bell which marks high tide of the Thames and is inscribed with the words 'I am rung by the tides'. The Frogmore site needs careful consideration since there is low scale Victorian terracing on Sudow Road which is a heritage asset and needs to be respected as a result. It would be great if we could purchase garden space that I can play in as I grow up. There are lots of other children on my side of the road and we don't have a garden. If I had a garden I would be able to get a bird feeder.</p>	<p>Comments noted.</p> <p>In regard to Sudlow Road, see the response to comment 9.1.</p> <p>Regarding public transport capacity, see the response to comment 11.1.</p>	<p>See 9.1</p>

<p>24.1</p>	<p>Charlotte Harris (Individual)</p>	<p>I feel so sad this is really the first we have heard about it. We have lived on Sudlow Road for 10 years and absolutely love it here and to hear the development is in it's last phase when we, as a group of residents will have a direct impact seems misleading. I don't understand why letters haven't been sent or our door bell rung. A friend of a friend on the street alerted all of us to this - we have got together as a group and not one resident knew of this.</p> <p>The webinars however last week and the week before were informative and it does look like a great opportunity for the wider area.</p> <p>Special attention needs to be given to the heritage assets</p> <p>It should be noted that the Sudlow Road residents have previously enquired about the purchase of land from the council and would be willing to engage in discussions again regarding this matter. Entertaining such an idea could allow the Sudlow Road residents to be more accommodating to the wider development whilst also ensuring the provision of an adequate transition between the old (Sudlow Road) and new (Frogmore complex)</p> <p>According to The Wandsworth Local Plan, which was drawn up in 2018 and sets out the Council's 'spatial vision for Wandsworth', the site is 'sensitive to tall buildings', which in this location is considered to be tall at five storeys. Any application for tall buildings will not be permitted to overshadow the Wandle or Bell Lane Creek.</p> <p>Sudlow road is the biggest community of residents affected and the plan must put it's people first, starting with existing residents. The majority of us are families and we don't have gardens but we have wonderful light and space to look out on. This will change and we understand change is important but family homes are hard to find and our wellbeing so important. I do think the overall plan is good.</p> <p>There is no detail in the transition between the old and the new in this</p>	<p>Noted – the Council met with a group of residents and is grateful for the feedback provided.</p> <p>In regard to Sudlow Road, see the response to comment 9.1.</p>	<p>See 9.1</p>
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		<p>Open spaces are great but it is nice to have specific areas for certain activities. I am a personal trainer and if I am doing step ups on a bench in Wandsworth park some people shout 'it is for sitting on' - which I respect - so take client down to the river to use steps there and security stop me and say they aren't insured. Exercise is so important and through the pandemic people you would not have seen are running and spending time outside. I think a specific area for exercise - an outdoor gym - would be great to incorporate. London Fields and Battersea Park are really good examples. They have a great set up - nothing fancy - a few bars (for TRX, bands etc) and some areas for boxing or balancing, a few benches etc. I don't mean a cross trainer metal machine like in clapham common - these can go wrong easily and aren't for all the community - both Battersea and London Fields have built great communities around these areas.. I also think a small bike park or skate park would be incredible for younger kids. Post school - somewhere to go that has a purpose - an area they can really use.</p> <p>The borders between developments look good apart from the transition surrounding Sudlow rd. These houses have no gardens and the rear wall of these properties joins the proposed development site.</p> <p>The plan indicates there will be housing backing straight onto Sudlow Roads houses - with no transition. This will mean there is no privacy for residents and it is detrimental to existing context and character of the street</p> <p>Frogmore complex: Whilst from a building height perspective it looks like there has been thought given to the transition between the existing terraces and the larger buildings it seems the spatial planning has not been quite so. It seems very dense and very tight gaps between buildings, omitting light and privacy of the existing properties. This need not be the case. With careful transition between old and new there has the potential to be an excellent development for existing and new residents.</p>		
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		<p>Sensitivity needs to be given to Sudlow Road - a terraced street. It currently seems that both light and privacy are being compromised with the new development to frogmore complex</p> <p>We feel sad that we are only being involved now and given our interest in purchasing land on a number of occasions we feel that someone should have come and spoken to us directly about this some time ago.</p> <p>We understand the need to build more houses. However, Sudlow rd is a terrace of houses with no outside space and no gardens. Todays planning standards would not allow a new house to be built like this but we have the opportunity to enhance the existing housing stock of the borough as well as create new. This is an opportunity to positively impact the wellness of existing residents as well as create additional housing units for the borough.</p> <p>Again we feel saddened not to have been brought into conversations earlier. We have lived here for 10 years - although noisy (and covid testing making it even more so!), we like living with the council land behind us - we can sit on our terrace and we have clear skies.. bright light and we feel safe. This is going to dramatically change for us with the new plans and we are asking you to please look after your people and your existing residents.</p> <p>It came up on both calls - transport. Wandsworth town is impossible at rush hour. When I was pregnant it was really horrible and I would avoid it whenever I could or walk 15 minutes further to Clapham Junction or get the bus there. I think that really needs to be considered - more trains or something. better cycle lanes around one-way system and more street lights.</p>		
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<p>25.1</p>	<p>Rob Harris (Individual)</p>	<p>My introduction to this scheme feels like it is at the eleventh hour despite living in between two of the proposed sites - as a Sudlow Road resident - I and my neighbours are a group of the few directly impacted residents</p> <p>I am very surprised that a door drop or specific local engagement has not happened for those directly impacted.</p> <p>It was only because a friend of a resident who worked at the council flagged the plans for Frogmore that we were made aware of the SPD. The engagement and communication has been very poor. Whilst this has been a difficult time to consult with residents much more could have been done to directly engage those affected .</p> <p>The webinars were useful and interesting but specific engagement with those directly impact is important.</p> <p>Special attention needs to be given to the heritage assets, not least Sudlow Road, which as the SPD notes would be highly sensitive to new development and therefore necessitates careful moderation of any proposals which are tabled. The terraced houses on the east side of Sudlow Road currently have very limited outside space having previously formed a back-to-back terrace with Wharf Road part of which – from what I understand - was bombed during WW2 and subsequently demolished. It should be noted that the Sudlow Road residents have previously enquired about the purchase of land from the council and would be willing to engage in discussions again regarding this matter. Entertaining such an idea could allow the Sudlow Road residents to be more accommodating to the wider development whilst also ensuring the provision of an adequate transition between the old (Sudlow Road) and new (Frogmore complex)</p>	<p>Comments noted. Regarding Sudlow Road, see the response to comment 9.1.</p> <p>Regarding public transport capacity, see the response to comment 11.1.</p>	<p>Regarding Sudlow Road, see the response to comment 9.1.</p>
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		<p>According to The Wandsworth Local Plan, which was drawn up in 2018 and sets out the Council's 'spatial vision for Wandsworth', the site is 'sensitive to tall buildings', which in this location is considered to be tall at five storeys. Any application for tall buildings will not be permitted to overshadow the Wandle or Bell Lane Creek.</p> <p>The vision is admirable and I am supportive of the scheme but how this blends with the existing context is rather ambiguous. The Wandle Delta needs to put people first and this must start with existing residents. This is primarily a brown field development as such there are few residents directly impacted. It is critical the scheme respects it's existing context and the experience and wellbeing of the residents directly impacted. The residents of Sudlow Rd being the biggest community affected</p> <p>The SPD indicates the desire to meld and knit into the existing fabric but with such little consultation and little detail about how the old and new will transition more needs to be done to address this aspect of the scheme.</p> <p>this is quite difficult to understand given the previous consultation about the wider Wandsworth one way system review. How will that link with the proposals what are the new proposed traffic flows ?</p> <p>There has clearly been great attention paid to the need for additional green space and I welcome the additional green spaces. The borders of the development look to be well through through apart from the transition surrounding Sudlow rd. These houses have no gardens and the rear wall of these properties joins the proposed development site.</p> <p>The map in this section indicates a development directly backing onto Sudlow rd. From the illustration there is no space granted between the two terraces. The concern of the residents of Sudlow rd indicates a new structure will adjoin the rear of their</p>		
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		<p>properties. This feels unnecessarily dense and detrimental to the existing context and character of the street.</p> <p>I am writing specifically with regards to the re development of the Frogmore complex. Whilst from a building height perspective it looks like there has been thought given to the transition between the existing terraces and the larger buildings it seems the spatial planning has not been quite so. The transition spatially between the existing buildings and the new is very dense, too tight and will limit both light and privacy of the existing properties. This need not be the case. With careful transition between old and new there has the potential to be an excellent development for existing and new residents.</p> <p>Owing to the sensitive low-rise terracing of Sudlow Road especially careful consideration needs to be given to the Frogmore cluster development to ensure i) a sensible transition between old and new and ii) the right to light for existing residents of this heritage asset.</p> <p>this is now an expectation of all new development. I have not so far seen any detail on the carbon footprint of the build and the ongoing fuelling of the developments. There is little evidence of local energy and heat generation which I would have thought would be an opportunity with a development of this size.</p> <p>Much of the land the borders the existing residents is owned by the council the direct engagement with those residents that have been neighbours of the council would have been a good start. The residents of Sudlow Rd have on numerous occasions over the past three decades attempted to acquire some space to the rear of their homes. I am saddened that this scheme has not engaged with them directly to date.</p> <p>There is a comment about a sensitive design response to Heritage assets which feels a little ambiguous and also seems to be contradicted by the images and land use plans</p>		
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		<p>within the report. I specifically refer to the terrace of properties that seems to adjoin the rear of Sudlow Rd. Whilst this is an new development there is the opportunity to enhance the existing housing stock. Sudlow rd is a terrace of houses with no outside space and no gardens. Todays planning standards would not allow a new house to be built like this but we have the opportunity to enhance the existing housing stock of the borough as well as create new. This is an opportunity to positively impact the wellness of existing residents as well as create additional housing units for the borough.</p> <p>The council are in direct control of the Frogmore complex as it is their land. As a neighbour of the complex I am saddened at the lack of engagement or recognition about how I and my family will be impacted. We have been neighbours for over 10 years with all the noise, the dust, the lorries and shouting... whilst not picturesque I like you as my neighbour, you let a lot of light in, you are private, you help keep me safe. I will lose all of this and be overlooked and my light impeded. I would have liked to have known what was being planned without finding out by chance.</p> <p>I am supportive of all elements of the obligations outlined but I fear one of the biggest is with regard to transport enhancements ? This seems not to be there and with Wandsworth town already at capacity and with many more units being built I am not sure how Wandsworth will cope with it's now much greater number of residents.</p>		
26.1	<p>Sam Hawthorne (Individual)</p>	<p>I only heard about these 'proposals' very recently which is disappointing given that - as a Sudlow Road resident - I am one of the few directly impacted residents throughout the entire subject area. A door drop would have been a courteous and appropriate method through which to flag the proposals for affected residents. That said, I thought the webinars were useful and interesting albeit too high level to address any of our concerns in gradual detail.</p> <p>The terraced houses on the east side of Sudlow Road currently have very limited outside space having previously formed a back-to-back terrace with Wharf Road part</p>	<p>Comments noted. Regarding Sudlow Road, see the response to comment 9.1.</p>	<p>Regarding Sudlow Road, see the response to comment 9.1.</p>

		<p>of which was demolished. It should be noted that the Sudlow Road residents have previously enquired about the purchase of land from the council and would be willing to engage in discussions again regarding this matter. Entertaining such an idea could allow the Sudlow Road residents to be more accommodating to the wider development whilst also ensuring the provision of an adequate transition between the old (Sudlow Road) and new (Frogmore complex)</p> <p>According to The Wandsworth Local Plan, which was drawn up in 2018 and sets out the Council's 'spatial vision for Wandsworth', the site is 'sensitive to tall buildings', which in this location is considered to be tall at five storeys. Any application for tall buildings will not be permitted to overshadow the Wandle or Bell Lane Creek.</p> <p>As the vision statement itself stresses, the Wandle Delta needs to put people first and this must start with existing residents. There are very few residential areas which are directly impacted by the plan so it should be easy for residents of these pockets to be actively consulted with.</p> <p>The SPD mentions developments which “knit into its surrounding neighbourhoods” – I feel that the current draft doesn’t go far enough to address how the potential new development will interact with the existing residential elements of the delta.</p> <p>The proposed inclusion of new cycling routes are very much welcomed but the SPD should consider the inefficiencies and lack of clarity of other cycling networks on the Delta and plan accordingly.</p> <p>It is reassuring to see land earmarked for a ‘doorstep play space’ east of North Passage, but its inclusion in the plan also draws attention to the need for adequate transition space between the rear of Sudlow Road terrace and the proposed new terrace within the Frogmore complex. There does not seem to be current provisions for this on the plan.</p>		
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		<p>The Allies and Morrison representative on the second webinar suggested the proposed terrace to the east of Sudlow Road could be either townhouses or mews. It is reassuring that the architect is sympathetic to the importance of appropriate development this close to the existing properties, but it is worth re-stressing that adequate space between such development would be necessitated. Any opportunity for Sudlow Road Residences to create garden space should be diligently explored.</p> <p>Owing to the sensitive low scale terraced housing on Sudlow Road (as mentioned in the SPD), especially careful consideration needs to be given to the Frogmore cluster development to ensure:</p> <ul style="list-style-type: none"> - a sensible transition between old and new (including appropriate spacing) - the right to light for existing residents of this heritage street <p>I welcome the sustainable and environmentally friendly developments to the area</p> <p>Given that the Frogmore depot is owned by The London Borough of Wandsworth it makes sense for the council to engage with Sudlow Road residents regarding the potential for land to be purchased/awarded to the rear of the terrace in advance of the site going to tender for development.</p> <p>This would not only keep existing residents 'on side' with the development proposals but would also create a natural green/garden buffer between the existing terrace and the proposed one.</p> <p>Is there more clarity to be offered on the below statement?</p> <p>"Sensitive design response to existing fabric including Sudlow Road, Crane public house, Wentworth House and making a positive contribution to the setting and character of Wandsworth Town Conservation Area."</p>		
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		<p>Given that the council is likely to lead the delivery of the Frogmore cluster and that it is therefore also likely to be one the quickest opportunities for re-development it would make complete sense for the council to engage Sudlow residents to ensure that their needs are met and voices listened to. Sudlow Road residents are organised and welcome the opportunity to engage with the council as soon as possible.</p>		
27.1	<p>Emma Heathcote (Individual)</p>	<p>Our house is on the east side of Sudlow Road. We chose to buy there because of the nice open aspect at the back of the house. We are not overlooked by anyone and enjoy a high level of privacy. The amount of daylight coming into the property is very good. We are very concerned about the negative impact on Sudlow Road if the planned development goes ahead in its current form.</p> <p>A three storey building sited as close as the plans show to the east side of Sudlow Road would be extremely detrimental to the quality of life of Sudlow road residents. All privacy would be lost as residents in the new terrace would look directly into the rear of the existing Victorian terrace. Even more importantly the loss of light to the existing terrace would be severe. At such close proximity the new terrace would feel oppressive. The two storey Victorian terrace will be dwarfed by a three storey modern block behind it, and two five storey blocks behind the new terrace. Sensitive planning would consider the existing Victorian terrace and incorporate a green 'buffer' between Sudlow Road and the new buildings. This could either be land [currently in the depot] purchased by Sudlow Road residents to form gardens, or could be a communal green space. The proposal talks of providing green spaces for residents but the plans for the depot show that the priority is to squeeze in as many blocks as is possible. The plans for the development of the Frogmore depot do not incorporate any open space between the east side of Sudlow Road and the new buildings. Altering the plans to include a green 'buffer' between the existing Victorian terrace and the new buildings would not only improve the aesthetic appearance of the entire area, but would also make the new residences more attractive to prospective buyers.</p> <p>It is very important that the new buildings are in proportion to the existing Victorian streets, especially if they are constructed in close proximity. Otherwise residents in two storey houses will be forced to live literally in the shadow of the new blocks.</p> <p>A three storey building sited as close as the plans show to the east side of Sudlow Road would be extremely detrimental to the quality of life of Sudlow road residents. All privacy would be</p>	<p>Comments noted.</p> <p>Regarding Sudlow Road, see the response to comment 9.1.</p>	<p>Regarding Sudlow Road, see the response to comment 9.1.</p>

		<p>lost as residents in the new terrace would look directly into the rear of the existing Victorian terrace. Even more importantly the loss of light to the existing terrace would be severe. At such close proximity the new terrace would feel oppressive. The two storey Victorian terrace will be dwarfed by a three storey modern block behind it, and two five storey blocks behind the new terrace. Sensitive planning would consider the existing Victorian terrace and incorporate a green 'buffer' between Sudlow Road and the new buildings. This could either be land [currently in the depot] purchased by Sudlow Road residents to form gardens, or could be a communal green space. The proposal talks of providing green spaces for residents but the plans for the depot show that the priority is to squeeze in as many blocks as is possible.</p> <p>An additional concern in respect of the current proposals: if the new terrace is positioned as close to Sudlow Road as the plans suggest, vibrations caused by construction work could cause structural damage to the Victorian terrace.</p> <p>It is crucial that existing residents' right to light is properly considered in every stage of the planning process. The current plans for the Frogmore depot which show a three storey building in very close proximity to the Sudlow Road Victorian terrace would result in a severe reduction in the amount of light afforded to Sudlow Road residents. A green 'buffer' separating the new buildings from the existing terrace would help to mitigate this whilst improving the overall appearance of the development.</p>		
28.1	Cllr Graeme Henderson	<p>Vision, Objectives etc</p> <p>It is vital that developments in the Wandle Delta works for everyone and not just people who can afford expensive housing / accommodation or up-market, expensive hospitality as has happened with very many areas along the River.</p> <p>Residential accommodation should include a high percentage of genuinely affordable properties for both purchase and rent including social housing.</p> <p>Facilities in the area should be attractive to all income groups and families.</p> <p>The Delta should not become an exclusive hub for purely well off residents and visitors.</p>	Comments noted.	<p>Amend 4.1.6:</p> <p>“A diverse mix of workspace, homes and local amenities including affordable provision will serve this growing community.”</p>

28.2	Cllr Graeme Henderson	<p>Heights of Buildings and Density</p> <p>Any development should not be so high as to completely overshadow the surrounding area, as is the case with many other developments along the River. Purely financial rewards to developers should not determine the density of accommodation in the area.</p>	Comments noted. The SPD provides a contextual, design-led response to building height, density and massing.	N/A
28.3	Cllr Graeme Henderson	<p>Wandle Trail</p> <p>This is a once in the life time opportunity to complete the Wandle Trail which should not be missed. Although not part of the Delta Consultation, any improved access for pedestrians and cyclists along the River Wandle within the Delta will be wasted if there is not a separate commitment to eradicate the Wandle Trail 'Missing Link' between Summerley St and Penwith Rd. in my Ward, Earlsfield. This should be seen as a clear commitment to complete the entirety of the Wandle Trail.</p>	Comments noted. The creation of the Wandle Trail within the study area is supported by the SPD. Further improvements outside of this area are beyond the scope of the SPD.	N/A
28.4	Cllr Graeme Henderson	<p>Environmental and Sustainability Issues</p> <p>This is a great opportunity to create a development that is an exemplar in environmental and sustainable design and practice.</p> <p>Whilst I support the generality of what is contained in the consultation on environmental sustainability, this needs to be given real teeth to ensure it happens in practice and not something that will be watered down when faced with developers demands on grounds of financial or economic considerations.</p>	Comments noted.	N/A

28.5	Cllr Graeme Henderson	<p>Transport</p> <p>Whilst I support much in the consultation in terms of improvements to public transport, particularly improvements to Wandsworth Town Station and improved bus services / links, I could not find anything about public river transport.</p> <p>The provision of a River Station or similar for environmentally friendly public waterbuses, either for commuting or leisure purposes, could provide a significant attraction to the area and further reduce reliance upon road transport. It may also be possible for supplies to restaurants and business to be delivered by boat</p>	Comments noted. See the response to comment 4.3 regarding river transport.	N/a
29.1	Historic England	<p>Thank you for inviting Historic England to comment on the above document. As the government's adviser on the historic environment, we are keen to ensure that all levels and stages of plans consider the historic environment appropriately.</p> <p>We are concerned that the building heights identified in the masterplan do not appear to be justified.</p> <p>Policy context</p> <p>The SPD will support local plan policies and site allocations that apply to the Wandle Delta Masterplan area. The relevant adopted local plan (employment and industrial document) includes a number of site allocations in the masterplan area. This includes high-level development principles such as suggested new routes and areas for public realm enhancement but does not include more detailed requirements such as</p>	<p>Section 5.6 of the document sets the context for the indicative building heights in the document, and guidance principles. This approach is considered to be appropriate and in accordance with the Local Plan context.</p> <p>Section 5.6 has been reviewed to clarify that the final UDS will be aligned with the SPD and will be used as evidence</p>	N/a

		<p>appropriate building heights or floorspace (other than minimum uplifts above existing floorspace in some cases).</p> <p>The local plan is currently being updated and this will replace all four of the current development plan documents that make up the borough’s development plan. The same site allocations are included in the emerging local plan and the approach to site requirements is very similar to that in the adopted plan: broad principles rather than detailed site requirements. We have commented on the emerging plan separately. Our comments should therefore be read alongside our representations on the local plan.</p> <p>An Urban Design Study (Arup/WBC, December 2020) has also been commissioned to support the emerging local plan. This document considers the character of the borough and its capacity for growth, with specific focus on tall buildings, drilled down to seven areas and further sub-areas. The Wandle Delta Masterplan SPD area broadly corresponds to sub-area G1d. Most of the area, with the exception of parts immediately adjacent to Wandle Creek are identified as areas with ‘opportunities for tall buildings and/or landmarks’ or ‘opportunities for tall buildings within town centres and along strategic routes’. This is expanded upon in the text in section G1d, which states that <i>“clusters of tall buildings should remain focused north of the railway to provide separation from the smaller scale urban grain/lower building heights to the south.”</i> With regard to the historic environment, the study states, <i>“All development in this area should respect the heritage value of Conservation Areas, listed buildings (including locally listed buildings) and their settings. Tall buildings should ensure they do not adversely affect the character and visual setting of the small scale Wandsworth ‘old town’ in and around the conservation area.”</i></p> <p>The Urban Design Study does not consider building heights for individual sites.</p>	<p>to inform the emerging Local Plan.</p>	
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<p>29.2</p>	<p>Historic England</p>	<p>The masterplan</p> <p>The masterplan includes a vision for the Wandle Delta, although it is unclear if this is based on the emerging local plan or developed as part of the masterplan. The masterplan includes objectives based around placemaking, smart growth and people first. In terms of the historic environment, the placemaking objective is of most relevance and we would support the approach set out in general terms, although we would like to see reference to the historic environment and/or heritage assets in the paragraph that mentions conservation areas.</p> <p>Section 5.6 of the proposed SPD considers height, scale and massing. This comprises:</p> <ul style="list-style-type: none"> • Summary of key factors relating to suitability for, and sensitivity to tall buildings; • Definition of physical assets and constraints; • General area-wide guidance on height, scale and massing; and • Provision of site-by-site guidance to stimulate high design quality <p>However, the introduction to this section explains that the SPD is not prescriptive in terms of locations for tall buildings, nor does it set maximum heights or limits. The SPD states that all development proposals must provide an assessment of the site’s suitability for tall buildings, as well as sensitivities to factors such as views and heritage assets. The section on building height strategy identifies a number of areas that are considered to be sensitive. We agree that the identified areas are sensitive, due to their relationships with heritage assets.</p> <p>Up until this point, the approach of the masterplan is to set out principles that developments should meet, but to avoid being specific in terms of development parameters, such as building heights. However, Figure 41 identifies a range of heights for each to the main sites in the area. There is no explanation as to why these heights</p>	<p>Expand reference to historic environment in placemaking objective.</p> <p>See response to 13.2 and 13.3 on indicative height ranges and illustrative capacity.</p>	<p>Para 4.2.2: Amend 5th bullet point:</p> <p>“Balanced approach to density and massing which responds to character, context and sensitivity of individual sites in the SPD and the setting of adjacent Conservation Areas <u>historic environment including heritage assets.</u></p>
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		<p>have been chosen. Despite some fairly wide ranges (e.g. 4-10 stories, 6-15 stories, 4-8 stories), we would question the merit and justification of including building heights, especially as the rest of the SPD focuses of principles and specifically avoids detailed development parameters. This is likely to give rise to uncertainty as to the status of these height figures. Furthermore, it does not appear that sufficiently detailed work has yet been undertaken to justify building heights and there is no explicit support for them in either the adopted or emerging local plan. While we agree that tall buildings may be appropriate in some of the masterplan area, this will need careful consideration site by site. This point is reinforced by the caveats referred to above, that development proposals should identify site suitability to tall buildings and other sensitivities.</p> <p>Therefore, we are concerned that while reasonably wide ranges are given, the masterplan could well be used to justify building heights at the upper end of the ranges across all of the sites. This may or may not be appropriate, but this can only be known once the area has been comprehensively tested, at site scale, including cumulatively, in terms of site suitability for tall buildings and taking into account sensitivities of the area and other factors.</p> <p>We would recommend the use of 3D modelling as part of the evidence base to justify the approach to building heights. We would be happy to comment on 3D modelling evidence where it impacts on heritage are likely. Both using 3D modelling and having clearly defined height limits would be in accordance with the new London Plan policy D9 on tall buildings.</p>		
30.1	John Holyfield (Individual)	Some vision - too much emphasis on tall blocks and tokenism to green spaces, with little consideration of the impact upon the infrastructure. I think we have had a flavour of what this area will be like by viewing the new developments along the Thames close to Wandsworth Bridge. Initially developments were low rise and of	Comments noted. See response to comment 8.1 about green and amenity space provision.	N/A

		<p>human proportions. Recent developments are a series of high rise towers that appear not to be built on sustainable principles, pay little attention to the quality of life of the occupants(made more so by recent covid impact) and ignore the impact upon the infrastructure of the area - eg Wandsworth Town station was already, pre covid, at breaking point. The motivation appears to be to satisfy developers and investors. I view with despair the suggestions about the height of the proposed tall blocks. What is wrong with building HOUSES? Let me guess, it does not satisfy the demands of the corporate power of the developers!! What little space devoted to open space and leisure areas is bordering on the pathetic ie not enough of green space. This is not consultation because the ordinary citizen has no say in the outcome of these plans. Tokenism, the malaise of our age.</p>	<p>This is a cornerstone of the SPD</p> <p>See response to comment 5.1 about building types and heights which are considered to be appropriate.</p>	
31.1	<p>Elizabeth Hopkirk (Individual)</p>	<p>:: I support the ambition to promote biodiversity above all.</p> <p>:: I support the idea of protecting the precious historic and industrial character of this small and sensitive and cherished area. I’ve noticed you have done a lot of good things to the actual delta area over the years in terms of cleaning it up and making it more attractive for pedestrians and cyclists: thank you.</p> <p>:: I am, however, concerned by the quality and quantity of the rather soulless Osiers area development and would ask you not to pursue any more ‘units at all costs’ development. This should be a place where all development is landscape-led and the numbers of housing and kind of commercial/retail units very carefully considered. This should retain a backwater feel both to respect its fragile historic character and to avoid putting unsustainable pressure on the biodiversity. Brick is good. Permeable tarmac or even grass growing ‘between’ car tracks would have been good a) for biodiversity and b) to hammer home to any drivers that this is an area where they should be driving dead slow and as a huge privilege not a right. When I first discovered the dark, alluring alley leading down to the river with the Cat’s Back tucked down it I was blown away by it. You could imagine smugglers hanging out there! Now that crass development has been built and it’s traduced the character of the place.</p>	<p>Comments noted.</p> <p>The SPD supports the preservation of existing features and character.</p> <p>The SPD also encourages the improvement of streets and routes for people walking and cycling (see 5.3)</p> <p>Regarding the provision of arts space, see the response to comment 5.1.</p> <p>Regarding the potential for boating, see the</p>	N/A

		<p>:: I support your plan to improve links to the area from other parts of the town centre - but only for pedestrians and careful cyclists (such as myself, of course!!). But this must be done very carefully to a) avoid the area becoming swamped with more people than it can handle and b) to preserve as much of its post-industrial character as possible. Wandsworth is so lucky to have several small areas like this that are rich in 19th-century character - small-scale brick buildings, arches, cobbles, blue infrastructure, alleyways, forgotten patches. We are just custodians for future generations. So much of these areas (eg Wandsworth High Street) has been almost-fatally damaged by traffic engineers and traffic. Let's see more widening of pavement, modal filtering, discouraging of speeding traffic. You're beginning to do some good stuff in Putney. Let's have some of that in Wandsworth too.</p> <p>:: Can we encourage independent retailers and creative/industrial uses? No more 'animating frontages' with mini supermarkets - could developers be told to create very small shop units and bigger units reserved for artists and independent businesses like bike repair shops at the bottom of their blocks of flats? Could this be a place where the next Jude's ice cream is incubated, or Putney's equivalent of Notting Hill Carnival floats are made?!</p> <p>:: Would it be possible/safe to have a canoe club here?</p>	<p>response to comment 4.0.</p>	
<p>32.1</p>	<p>Madeleine Zoe Jane Hughes (Individual)</p>	<p>As a resident of Sudlow Road, I am very concerned by block height, structure and proximity to our homes. Whilst access to the river and surrounding areas would undoubtedly be a very good thing, we have already lost a lot of light and view with the expansion of the river development and I am very concerned about further development to the rear of our property.</p> <p>This area has changed dramatically over the last 15 years and it seems very important to me that a link to the past needs to be maintained. I am pleased that some buildings are protected, but it needs to be more than that. They cannot be choked by the new development.</p>	<p>Comments noted.</p> <p>Regarding Sudlow Road, see the response to comment 9.1.</p>	<p>N/A</p>

	<p>It is very important that this is not all about the value of the land and maximising profit. Good, sizeable, useable, open green spaces are of great importance. Building design must be sympathetic to the local environment. The low level terrace of Sudlow Road is already being suffocated by the erection of so many high buildings, the view (or lack of) from our rear windows has already been reduced significantly. Consideration of this must be made.</p> <p>Armoury way needs to be crossed and far better provision for this must be made. It currently feels like a barrier of cars between us and the rest of Wandsworth. Access to the river across the railway is of course important, as is connecting the Delta area with public transport, including Wandsworth Town train station. Further, the more cycle routes and pedestrian access the better. However, I am also very concerned by Armoury Way which acts as a barrier between the properties and amenities north of Armoury Way (along the river) and the rest of Wandsworth (south of Armoury Way). I realise that this is already being considered by the Council as part of the Brewery development, but it is crucial. As the number of people living north and south of Armoury Way further increases with lots of development either side of the road, safe access and crossing of the road is imperative. Traffic along Armoury Way, especially during quieter times, can be very fast and there are very few places to cross. Making Armoury Way less of a barrier and the crossing of it easier and safer is very important.</p> <p>Very keen to see far more made of the Wandle Trail, both as an area of great biodiversity, but also a greener route through the Borough. Again, I have major concerns around access across Armoury Way, which acts as a racetrack.</p> <p>I also think that consideration should be made of Sudlow Road as a play street. New developments will make the area much busier. The street already struggles with the Roche School traffic (cars tend to be large) at drop off and pick up . The traffic and parking of people accessing the new Frogmore site development, or the river generally, could be catastrophic for the street.</p>		
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		<p>I would also encourage "play space" for older children and young adults. Fixed concrete table tennis tables (as at Bishops Park), basketball/netball posts, outside fitness equipment.</p> <p>Sudlow Road is the one Victoria terrace in the area and should be preserved. The view from the back of the property, looking left, has already been closed down by the new railway bank development on Osiers Road. Further development behind Sudlow Road on the Frogmore site will suffocate Sudlow Road and completely limit the view. I note you intend to have a low rise terrace immediately behind the back of Sudlow Road, but careful consideration should be had in terms of the blocks of flats further back. The road should not just be swallowed up by the new development.</p> <p>I remain very concerned about the height of buildings around Sudlow Road. Over the last 15 years we have seen buildings closing in on this road more and more. Any development of the Frogmore depot, if not handled with great care, would be catastrophic.</p> <p>I have considerable concern about the security to Sudlow Road properties with the proposed development of the Frogmore depot. I note that it is expected that mews housing would run along the back of these properties. Sudlow Road residents see this development as an opportunity for the Council to provide these properties with gardens to the rear. None of the properties have gardens which make them far less attractive for families. By gaining gardens the road will increase the stock of family homes which is something the area needs.</p> <p>However, that aside, whether gardens are obtained or not for Sudlow Road, if the back of the Sudlow Road properties are bordered by anything other than private gardens for the proposed dwellings immediately behind Sudlow Road, my view is that Sudlow Road houses would become very vulnerable to criminal behaviour. If the space behind these properties becomes public or communal private garden space, the security of Sudlow Road properties would be enormously impacted.</p>		
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		The properties on Sudlow Road are currently pretty secure because of the Council depot. Public space behind Sudlow Road would provide easy access for criminal access and would make the properties very vulnerable.		
33.0	Quod on behalf of Kin Developments Limited	<p>Background</p> <p>Mitheridge and Scotia Gas Network (SGN) have formed a Joint Venture Partnership to bring forward the redevelopment of the Wandsworth Gasworks site on the Wandle Delta. It is an exciting opportunity and one that will help complete the transformation of the River Wandle between the Ram Brewery and the River Thames. Kin Developments Limited (Kin) is the partner appointed to deliver the opportunity.</p> <p>SGN first engaged with Wandsworth Council in 2013 to create an appropriate policy framework for decommissioning the gas works and the realisation of a new residential quarter for Wandsworth Town. SGN has subsequently taken part in Wandsworth’s Local Plan review to inform the current adopted development plan policy for the site which promotes residential led mixed-use development.</p> <p>SGN has also worked alongside National Grid to inform policies of the London Plan. Policy H1 of the adopted London Plan allocates gasworks sites as strategic sources of housing. This carries significant weight.</p> <p>SGN demonstrated its desire to assist Wandsworth Council in the delivery of the Wandle Delta masterplan by revoking its Hazardous Substances Consent in 2019. The Calor site still benefits from a Hazardous Substances Consent, which impacts the development capacity of the Wandle Delta, but can be revoked with a successful masterplan.</p> <p>Through the joint venture with Mitheridge, a partnership now exists to realise the policy requirements of the Wandsworth / London Plan for this site. The partnership is</p>	Comments noted.	N/A

		<p>working towards the submission of a hybrid planning application at the end of 2021 through its appointed developer Kin.</p> <p>In respect of the Wandle Delta SPD, SGN (then sole owners of the Gasworks) were invited to a one hour briefing session in 2019 by Avison Young. At this session we raised several policy issues with regards to Gasworks sites and the London Plan albeit we did not receive a response.</p> <p>SGN/Kin was invited to a virtual presentation in August 2020. We received a draft copy of the SPD “Stakeholder workshop summary of feedback”. We made comments on this document on 9th September 2020, and 14th January 2021, albeit did not raise a response to these. Kin circulated draft representations on 25th February 2021 requesting a meeting with the authors of the SPD.</p> <p>Kin will lead the exciting journey to finally transform this strategic, but underused, brownfield site which sits centrally within the Wandle Delta. It forms an integral link between the Ram Brewery development and the River Thames and has the potential to deliver many public benefits for Wandsworth Town.</p>		
33.1	<p>Quod on behalf of Kin Developments Limited</p>	<p>Wandle Delta Masterplan SPD</p> <p>Kin welcomes the approach taken by Wandsworth Council to add further guidance on how the Wandle Delta can be transformed into a major asset for the existing and new Wandsworth Town community.</p> <p>Whilst the SPD must remain in conformity with the Wandsworth / London Plan, its vision and delivery framework will tie several important sites together, of which the Gasworks comprises the central site, located on the River Wandle and Bell Lane Creek, fronting Armoury Way and the new one-way system.</p>	<p>Comments noted.</p>	<p>N/A</p>

		Wandsworth’s new draft Local Plan also recognises this opportunity. It identifies the Wandle Delta as a Borough Investment and Growth Area of low sensitivity but with a high probability of change and development capacity. It allocates the Wandle Delta as a tall building opportunity area.		
33.2	Quod on behalf of Kin Developments Limited	<p>Public Benefits</p> <p>The initial workshops undertaken by the Council indicate a broad agreement that development within the Wandle Delta should help deliver a significant range of public benefits, many of which will be delivered on site at Wandsworth Gasworks. We summarise these benefits below.</p> <ul style="list-style-type: none"> ▪ The Wandle: The creation of a continuous ‘Wandle Trail’ and linear park along the eastern bank of the River Wandle. The creation of a cultural quarter along the Wandle with leisure, open space, food & beverage and culture to attract people. ▪ Riverbank enhancement: Enhancement of the river edge through naturalisation techniques to enhance biodiversity value of the Wandle including the creation of new habitats. These improvements will be balanced with new activity and new crossings and the remediation of the Gasworks site. ▪ Movement: Support for the creation of a permeable street network and the focus on walking and cycling. Crossings to overcome severance caused by Swandon Way/Armoury Way, and a new footbridge (east/west) connection across the River Wandle. New connections north/south under the railway line, and a proposed pedestrian space east/west along the southern edge of the railway line. A vehicle limited free green/play street east/west across the Gasworks site. Ongoing enhancements to the existing station access through the creation of a new northern entrance at Wandsworth Town. 	Comments noted.	N/A

		<ul style="list-style-type: none"> ▪ Uses: Positivity around the creation of a mixed-use neighbourhood with the need for flexibility around uses (particularly at ground floor), and a desire to see increased business floorspace and/or managed workspace including affordable incubation space for new businesses. Achieving an uplift in employment floorspace in the Economic Use Intensification Area is important, noting that those sites closer to Wandsworth Town Station (e.g., the Gasworks) are more suitable for office and/ or co-working with residential above. Housing proposals are expected to deliver a policy compliant level of affordable housing. ▪ Industrial character: During the workshop sessions there were a range of views around building heights. Making a feature of the existing railway line, arches, and infrastructure is encouraged. Developments should achieve an Urban Greening Factor. ▪ Obligations: Development will be expected to contribute to Mayoral and Wandsworth Community Infrastructure Levy. Wandsworth Council will seek s.106 obligations towards strategic transport improvements, affordable workspace, employment and training initiatives and arts and culture where these meet the necessity tests. <p>Kin support the vision to create public benefits across the Wandle Delta, and at the Gasworks site.</p>		
33.3	Quod on behalf of Kin Developments Limited	<p>Challenges</p> <p>Kin also welcomes the Council’s acknowledgement that there will be challenges to delivery. The Council consider that development should respond positively to existing constraints associated with utilities restrictions, easements, HSE guidance, and multiple land ownerships. The SPD recognises that several sites are likely to be contaminated and/or have services running through them. Further consideration will therefore need to be given to each individual site/cluster to fully understand specific</p>	Information on ground conditions are noted. It would be beneficial to make stronger reference to this in various sections of the SPD.	Add additional paragraph 2.2.12: <u>It is important to note that</u>

	<p>contamination and/or servicing issues. Kin supports the SPD in recognising that the cumulative constraints which arise specifically with a gasworks site will have an impact on deliverability, site capacity and viability.</p> <p>The exceptional nature of Wandsworth Gasworks results from years of gasworks production and gas storage. There is a need for substantial decontamination to address the contamination of the soil and groundwater. Some materials may have been buried in underground tar wells, liquor wells, pipes and purifier beds and will require removal. The major contaminants (hydrocarbon sludges, spent oxide wastes, ash and ammoniacal recovery wastes) will need to be remediated and removed from the site.</p> <p>Rationalisation of the existing pressure reduction station, and underground gas mains will also be required as will removal of underground structures and obstructions, and demolition of the existing holder. The site also contains a backfilled canal which previously brought barge ships into the site. The complexity of these constraints can only be recognised in the SPD but dealt with in detail through a planning application.</p> <p>The implications of these complex site constraints is two fold:-</p> <ul style="list-style-type: none"> ▪ Financial viability: The exceptional costs associated with site remediation/ constraints, drives the need for density on a viability level. ▪ Spatial / developable area: It is also the specific spatial constraints which can drive the need for both height and the associated non-linear/orthogonal approach to massing that bring with it larger/better open spaces at ground. <p>The gasholder basin is a spatial constraint. If it is a fixed spatial constraint because we believe that it should be retained (on sustainability/embodied carbon/historic reference grounds). It joins the River Wandle, railway, National Grid head house,</p>		<p><u>Wandsworth Gasworks presents substantial delivery challenges in relation to a long history of gas production and storage. Substantial decontamination is likely to be required in relation to soil and groundwater.</u></p>
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		<p>pressure reduction system, easements and offsets as an array of spatial constraints that dictate the figure ground of any future masterplan.</p> <p>These constraints prevent a blanket courtyard typology approach and, in reducing/dictating developable area at ground, necessitate both the height of certain plots and the circular approach to the master planning.</p>		
33.4	<p>Quod on behalf of Kin Developments Limited</p>	<p>Flexibility</p> <p>The need to address contamination and infrastructure rationalisation across the Gasworks site, and the abnormal costs associated with this, require a flexible and reactive SPD. This is necessary if the extensive public benefits that are proposed are to be effectively and viably delivered.</p> <p>It is for this reason that we support the SPD’s flexible approach to allow the vision to adapt to the constraints of delivery. The SPD does indicatively illustrate gross capacity and storey heights but is explicit that these are not prescriptive, are illustrative only, and it is not the role of the SPD to set prescriptive maximum buildings heights or limits. Indeed, how could it? The SPD has not yet tested the cost of achieving the public benefits set out above.</p> <p>It is our opinion at this stage that the public benefits advocated by the SPD are achievable and can be delivered, but this is likely to be viable only through increased residential capacity and can only be achieved with increased building heights. Importantly the SPD allows for this subject to detailed testing at the planning application stage. As we discuss in detail below, the SPD may therefore be more effective if the illustrative capacity and heights are omitted, to be informed instead by the more objective, evidenced based planning application process.</p>	<p>Need for flexibility is acknowledged and specific reference to block structure as set out in 33.3 could be reflected in the guidance.</p>	<p>In section 5.4 – new para 5.4.8:</p> <p><u>“It is noted that the existing gasholder basin and presence of other utilities infrastructure might be a spatial constraint on the layout of the gasholder site. It is acknowledged that a degree of flexibility should be applied to</u></p>

				<p><u>the detailed layout of this site subject to more detailed design and supporting engineering studies as part of a future planning application.</u></p>
<p>33.5</p>	<p>Quod on behalf of Kin Developments Limited</p>	<p>The principles exclude reference to residential uses which is not in conformity with LPH1 or Site Allocation Hunts. Residential uses should be included to conform with LPH1 or Site Allocation Hunts.</p> <p>Paragraph 5.9.11 positively notes that the <i>site contains a former gas holder and significant infrastructure that supported its former use, including a gas mains and gas ‘governor’</i>. A combination of these factors may have an impact on deliverability, capacity and viability. The sentence should be revised to reflect LPH1, LP Footnote 59 and Site Allocation Hunts as follows “<i>The site contains existing utilities restrictions, easements; a Hazardous Substances Consent; a former gas holder and significant infrastructure that supported its former use, including a gas mains and gas ‘governor’</i>. This area, along with others in the cluster may be subject to substantial decontamination, enabling and remediation costs which may have an impact on deliverability and viability. If it is robustly demonstrated that extraordinary decontamination, enabling or remediation costs must be incurred to bring the site forward for residential led mixed-use development (in accordance with LPH1, LP</p>	<p>Para 5.9.11 – agreed that there is merit in providing a more explicit context for flexibility on the site. However, the reference to how flexibility will be applied is already adequately dealt with in the SPD.</p> <p>The illustrative capacities provide an indication of what the Council would like to see in terms of place making, while</p>	<p>Amend para 5.9.11 to include:</p> <p>“The site contains existing <u>utilities restrictions, easements; a Hazardous Substances Consent; a former gas holder and significant</u></p>

		<p><i>Footnote 59 and Site Allocation Hunts) then the Council will apply flexibility to the guidance set out in the SPD (noting that the indicative housing capacity and indicative storey heights may need to increase)”</i>.</p> <p>Figure 44 and Illustrative example (gross capacity estimates) are indicative only and in our opinion are unnecessary. An indicative housing density of 177dph for example is inappropriate for a central accessible location in Wandsworth. The Gasworks is a PTAL 5 location, located on the edge of Wandsworth Town Centre. This low indicative density underutilises the site and therefore conflicts with the NPPF and London Plan. The Council supports much higher densities in the Wandle Delta (484dph at the Homebase site for example). It is also unclear how the SPD has derived a figure of 3,750m2 light industrial uses and 1,260m2 flexible ground floor uses including community space in the context of policy LPH1; Footnote 59 or Site Allocation Hunts. We would welcome clarification of this. Further the indicative heights do not reflect the local context, and have no relationship with the appropriate level of development required to deliver the site allocation principles, or address the abnormal costs associated with the former Gasworks use.</p>	<p>accepting other factors might impact on this. The approach is informed by the 2018 guidance and the EUIA designation. The document provides a broad indication of capacity but notes the importance of further technical work and studies including viability and ground conditions.</p>	<p><u>infrastructure that supported its former use, including a gas mains and gas ‘governor’.</u> <u>This area, along with others in the cluster may be subject to substantial decontamination, enabling and remediation costs which may have an impact on deliverability and viability.</u></p>
33.6	Quod on behalf of Kin Developments Limited	<p>Other</p> <p>Figure 11 (Ground Floor Uses) incorrectly applies ground floor uses at the Gasworks site. The Delta Business Park for example is Class B1, not industrial and warehouses.</p>	<p>Agreed – make factual updates to figure 11.</p> <p>Comments regarding the Wandle Trail and edge</p>	<p>Figure 11 – update accordingly</p>

		<p>The Calor Gas site is sui generis containing retail functions. The Gasworks is not industrial and warehouses and is a sui generis use.</p> <p>Para 3.5.12 incorrectly refers to HSE Hazardous Substances Consents H1733 – Southern Gas Networks, Wandsworth Holder Station, Fairfield Street, Wandsworth, SQ18 1EG. This has now been revoked.</p> <p>Figure 24, 25 and 26 the vision expressed in these diagrams is to be commended but the practicalities of delivery should also be recognised. We would like to work with the Council further to understand how the uninterrupted Wandle Trail along the east bank of the River Wandle will be delivered. The SPD suggests a tunnel under the railway line and access along the electrical utilities site to the north of the railway. We do not believe this to be deliverable. Across the Wandle to the west at this point is more electrical infrastructure which has been excluded from any SPD annotation because it is not deliverable. It is unclear why the SPD treats these two sites differently? Figure 26 indicates Condition</p> <p>A, B and C for banks of the River Wandle and Bell Lane Creek. We would suggest that <i>Animated/Industrial Edges (Condition C)</i> are most appropriate for the Gasworks site due to the proposed active ground floor uses on this site; the issues arising from remediation and decontamination (which limit naturalisation); the requirement to optimise the site for housing (LPH1, Footnote 59) which requires land take; the character established by the Ram Brewery development which naturally links into the site to the south (Condition C); the west facing aspect for commercial uses and the bridge link to Bell Lane Creek Park (excellent scope for F&B); and the existing access along the Causeway to the River Thames (the natural desire line which exists at present). It would appear to us that Bell Lane Creek Park should be the focus of Category A and B. The Frogmore Estate may also have limitations for Category C as it is north facing and does not have direct access to the Causeway.</p>	<p>conditions are noted.</p> <p>Para 5.3.10 acknowledges the commitment of working with developers on the approach, and there is clear reference to the technical challenges will require discussion and resolution through detailed design.</p> <p>Add reference to date of figure 36.</p> <p>Section 5.6 has been reviewed to clarify that the final UDS will be aligned with the SPD and will be used as evidence to inform the emerging Local Plan.</p> <p>Agreed – amend all references to Hunts Trucks to read Gasworks site</p>	<p>Para 3.5.12 – amend following bullet:</p> <p>“H1733 – Southern Gas Networks, Wandsworth Holder Station, Fairfield Street, Wandsworth, SQ18 1EG. <u>(this has been subsequently revoked)</u>”</p> <p>Add reference to date of figure 36.</p> <p>Para 5.6.8 – amend as follows:</p>
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	<p>Figure 35 (Existing Building Heights) and 36 (Planning Consents) are not comparable drawings and therefore do not offer the reader an easy comparison. It would be appropriate to apply building heights to the consented and built out developments in the Wandle Delta including Osiers Road, Homebase, B&Q and the Ram Brewery. The context to the Wandle Delta clearly comprises a number of significant developments which are not accurately conveyed within the SPD. It also excludes the Council’s Feasibility Report for the Town Hall site which indicates the scope for a 16 storey building.</p> <p>Para 5.6.4 refers to the Emerging Urban Design Study (2020). This document (fig 12) identifies the Wandle Delta as having a low level of sensitivity, highest probability of change and highest capacity for development. The study identifies the Wandle Delta as an opportunity for tall building clusters, landmarks and tall buildings within town centres and along strategic routes (Fig. 15: Tall buildings opportunity map). Character Area G1 Wandsworth Town and Riverside notes that towers have recently become a feature of the skyline, the area is undergoing substantial regeneration and that landmarks at key junctions are important to the legibility and framework of the town. Fig.222: G1 Wandsworth Town and Riverside sensitivity plan notes that sub area (d) (Wandle Delta) is a planned area of change with a low sensitivity to change. New development should positively enhance character. It also notes that there is a lack of clear, legible routes connecting the town centre to the River Thames and Wandle. The SPD does not currently refer to these conclusions and it appears that the text used at 5.6.4, 5.6.12, 5.6.15, 5.6.16 requires revision/updating. We do not believe that it is correct to state that taller buildings should be focused north of the rail line, reflecting the height of the context buildings and this should be removed. Whilst we recognise that development should respect the scale of the Wandle river corridor, its scale is not small as it adjoins the Gasworks site as suggested. At the junction between the River Wandle and Bell Lane Creek, the Council propose to create a 1ha blue and green park, the corridor will be 120m wide between riverbanks. Bell Lane and the River Wandle are not sensitive to building height at this juncture (5.6.12). Indeed, Tall Buildings are</p>		<p>Amend all references to Hunts Trucks to read “Gasworks site” Including Fig 22, Fig 44 caption, paras 5.2.13, 5.3.10, 5.5.22, 5.9.1, 5.9.6, 5.9.23</p>
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		<p>a specific character of the River Wandle within Wandsworth Town and the Wandle Delta. The 70m River Wandle bank to the north of this junction is also heavily overshadowed by existing vegetation along the riverbanks. The SPD should therefore seek to avoid overshadowing <i>only where it has a detrimental effect on habitat</i> (5.6.15).</p> <p>Page 89 it is unclear why Gasworks site is referred to as “Hunts Trucks”. This name is personal to a previous occupier, who no longer is in situ as has not been for many years. The term “Hunts Trucks” should be removed from the SPD.</p> <p>5.11.4 should recognise that it may be appropriate to balance the infrastructure requirements set out in section 5.11 with the on-site requirements required by the site-specific guidance within the SPD, certainly in the case of non-site specific tariff requirements such as education, arts and culture and community uses.</p>		
<p>34.1</p>	<p>Stephen Knowles (Individual)</p>	<p>I would like to comment on the Wandle Delta Masterplan Supplementary document. I also attended the Q&A session on 1st March 2021.</p> <p>Whilst I believe there are some very good points to the plan, I believe it lacks ambition with regard to high quality public and natural spaces. Given the density of people that will live in this area the two parks proposed, whilst welcome, are totally insufficient to service such a high density local population. The continuous open route along the Wandle is most welcome but 3m width is far too narrow for this portion of the trail where the density of housing will be massively more than further upstream. This development is a once in a century opportunity to shape this area for the benefit of current and future residents with a more generous provision of, high quality, public park space. The proposed parks on the island and by the Thames are far too small. The Thames waterfront park could be extended south, at the same width, along the Wandle riverside to Armoury Way providing significant natural wildlife habitats and public recreation space to the many new residents as well as existing residents and visitors.</p>	<p>Public and natural spaces – comments noted. Section 5.3 provides extensive guidance to provide a framework for realising the strong vision for public realm and landscape. The level of provision illustrated responds to the potential development capacity envisaged.</p>	<p>N/A</p>

		<p>The pandemic has shown how valuable large public parks are to our health and wellbeing. Wandsworth Park is used intensively even in winter and in summer can be difficult to find an piece of grass to kick a ball because of the huge number of people sitting in almost every area. By contrast the so-called public spaces between the flats in the Osiers development are virtually devoid of people because they are designed to deter people from 'loitering' and only the riverside walk is busy. The proposed 3m width along the Wandle will be far too narrow for the volume of pedestrian and cycling traffic that will use the route, nevermind the people wanting to sit outside and enjoy the area.</p> <p>I believe building 1600 properties in this area is excessive. The plan does not include any schools, or public leisure centres or additional train capacity and given the number of people in this area and existing Osiers development the provision of parks is far too small.</p> <p>At the Q&A event, the consultants said there were mixed messages about high rise or low rise. Having spoken to several friends and neighbours in the area I believe the messages are quite clear -what people ideally want is lower rise and lower density development but if a large number of properties must be fitted in a given area of land then people would rather they building were taller leaving room for more public open space.</p> <p>I have spent a lot of time in Shanghai where they have nice parks but because they serve so many people in high rise blocks residents much keep to the paths and look at the grass. There is no space for sports or picnics. We do not want over development to do this to our wonderful parks. Trees, parks and open spaces are what makes London one of the world's best cities to live in, we should be looking to enhance that not simply minimise the destruction. As a council you have a once in a lifetime opportunity to create a truly positive legacy, in the same way that the councillors who</p>		
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		created Wandsworth, Battersea and King George's park did. Please don't miss this chance to do something great for your constituents, your children and your city.		
35.0	Quod on behalf of Legal and General Property Limited	<p>Background</p> <p>L&G acquired both the B&Q, Smugglers Way and Homebase, Swandon Way sites in 2019. This followed a grant of planning permission being obtained for the redevelopment of Homebase in August 2018, and B&Q in March 2019.</p> <p>Following the acquisitions, L&G undertook revisions to the two extant planning permissions to ensure that (1) the developments are deliverable; (2) incorporate design improvements; (3) the housing offer meets its Build to Rent model; and (4) improvements to on-site residential amenities can be achieved.</p> <p>The amendments to B&Q were approved at Wandsworth’s planning committee in April 2020, and the decision notice is due imminently. The amendments to the Homebase site were approved at planning committee in December 2020, the decision notice is yet to be issued.</p> <p>L&G owning both sites creates a beneficial synergy to be delivered across both sites. This synergy creates a better urban solution; improves permeability between the two sites; creates a coherent sense of place for Wandsworth; and brings about wider regeneration benefits. Across the two sites, L&G will deliver homes that can offer the following for Wandsworth Council:</p> <p>L&G will deliver homes that can offer the following for Wandsworth Council:</p> <ul style="list-style-type: none"> • Stable Community – secure long-term tenancies, no vacant homes, high-quality in-house services/facilities, social integration across the sites. • Broad household profile – e.g. young professionals, squeezed middle/aspirational, downsizers over 60+ no mortgage. 	Noted	N/A

		<ul style="list-style-type: none"> • Proposed Homes will significantly boost supply of high quality private rented accommodation in the borough and diversify the existing housing stock composition. • Variety of affordable housing proposed from existing council tenants wishing to downsize to low-cost home ownership. Both key council priorities. • Build to Rent homes will allow those living in poor quality private rented homes the opportunity to move into a high quality, secure long-term tenancy. • Affordable housing units to be spread across both sites ensuring mixed and balanced communities. 		
35.1	Quod on behalf of Legal and General Property Limited	<p>Wandle Delta Masterplan SPD</p> <p>L&G welcomes the approach taken by Wandsworth Council to add further guidance on how the Wandle Delta can be transformed into a major asset for the existing and new Wandsworth Town community.</p> <p>Whilst the SPD must remain in conformity with the Wandsworth / London Plan, its vision and delivery framework will tie several important sites together. The B&Q and Homebase sites benefit from existing planning permissions for residential-led mixed use developments and are therefore considered to play a key role in being a catalyst for housing and economic growth within the immediate Wandle Delta area, and borough.</p> <p>Wandsworth’s new draft Local Plan also recognises this opportunity. It identifies the Wandle Delta as a Borough Investment and Growth Area of low sensitivity but with a high probability of change and development capacity. It allocates the Wandle Delta as a tall building opportunity area.</p>	Noted	N/A
35.2	Quod on behalf of Legal and General Property Limited	<p>Public Benefits</p> <p>The initial workshops undertaken by the Council indicate a broad agreement that development within the Wandle Delta should help deliver a significant range of public benefits, many of which will be delivered on site at Homebase and B&Q. We summarise these benefits below:</p>	Noted	N/A

		<ul style="list-style-type: none"> ▪ Movement: Support for the creation of a permeable street network and the focus on walking and cycling. The importance of crossings to overcome severance caused by Swandon Way/Armoury Way. Ongoing enhancements to the existing station access through the creation of a new northern entrance at Wandsworth Town. ▪ Uses: Positivity around the creation of a mixed-use neighbourhood with the need for flexibility around uses (particularly at ground floor), and a desire to see increased business floorspace and/or managed workspace including affordable incubation space for new businesses. Housing proposals are expected to deliver a policy compliant level of affordable housing. ▪ Obligations: Development will be expected to contribute to Mayoral and Wandsworth Community Infrastructure Levy. Wandsworth Council will seek s.106 obligations towards strategic transport improvements, affordable workspace, employment and training initiatives and arts and culture where these meet the necessary tests. 		
35.3	<p>Quod on behalf of Legal and General Property Limited</p>	<p>Conformity with the development plan</p> <p>L&G welcomes the approach taken by Wandsworth Council to prepare the Wandle Delta SPD alongside the emerging Local Plan to add further guidance on how the Wandle Delta can be transformed into a major asset for the existing and new Wandsworth Town community.</p> <p>The Government’s guidance on plan making confirms that supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development.</p> <p>It should be noted that following the adoption of the London Plan by the Mayor of London on 2nd March 2021, reference within the Wandle Delta SPD to the “Draft New London Plan” and/or “Intend to Publish draft of the New London Plan” should be removed and updated to state “The London Plan (2021)” or similar.</p>	Noted	N/A

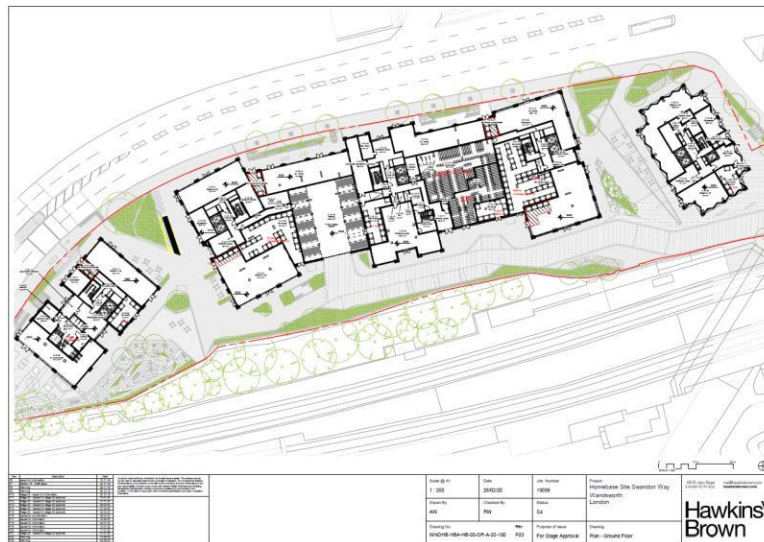
		<p>We note that the Council are proposing both sites as locations which present opportunities for tall building clusters and landmarks (B&Q) and opportunities for tall buildings within town centres and along strategic routes (Homebase) within the regulation 18 local plan. This SPD would be expected to conform to this policy approach.</p>		
<p>35.6</p>	<p>Quod on behalf of Legal and General Property Limited</p>	<p>Recommendations</p> <p>Site Allocation – Swandon Way Cluster</p> <p>L&G support the allocation of both the Homebase (Site 17) and B&Q (Site 18) sites within the draft Wandle Delta SPG, recognised collectively within the SPG as Cluster No.6, “Swandon Way Cluster”. The SPG recognises the ability of the Swandon Way Cluster to deliver high density development incorporating new homes and economic uses. This is consistent with the site allocation and aspirations contained within the Wandsworth Reg 18 Local Plan, and the inclusion within the SPG is welcomed.</p> <p>Figure 48 Consented proposals for Swandon Way sites, Page 96 which introduces the Swandon Way Cluster requires updating following the approval of both the Homebase and B&Q Section 73 (“S73”) planning applications.</p> <p>The amendments to B&Q (ref. 2019/4583) were approved at Wandsworth’s planning committee in April 2020, and the decision notice is due imminently. The amendments to the Homebase site (ref. 2020/0011) were approved at planning committee in December 2020, the decision notice is yet to be issued.</p> <p>Following these planning approvals, the ‘Permitted Capacities’ detailed as part of Figure 48 are therefore required to be updated, and should read as follows:</p> <p><i>Permitted Capacities</i></p> <ul style="list-style-type: none"> • - 860 1,034 homes • - 6,754 1,640 sqm (GIA) offices (B1) 	<p>Comments noted.</p> <p>Figure 49 – updated capacities as set out</p> <p>Update 5.9.27</p>	<p>Figure 49 – update capacities as follows:</p> <p>Permitted Capacities</p> <ul style="list-style-type: none"> • 860 1,034 homes • - 6,754 1,640 sqm (GIA) offices (B1) • 2,745 2,713 sqm (GIA) flexible retail

- 2,745 2,713 sqm (GIA) flexible retail commercial (B1/A1-A4 and D1-D2)
- 164 148 sqm (GIA) community space (D1)
- 2,714 sqm (GIA) residential facilities

The development footprint of the Homebase site was also amended as part of the S73 application (ref. 2020/0011). **Figure 48 Consented proposals for Swandon Way sites** should therefore be updated to reflect the correct building footprint which is approved by the S73 application. This is shown in Figure 1.1 (Homebase Development Footprint) below.

Figures throughout the SPD where the Homebase site is shown should also be updated to ensure conformity with the consented proposals within the Swandon Way Cluster.

Figure 1.1 – Homebase Development Footprint



**comm
ercial
(B1/A
1-A4
and
D1-
D2)**

- **164
148
sqm
(GIA)** comm
unity
space
(D1)
- **2,714
sqm
(GIA)** reside
ntial
faciliti
es

Update
Homebase
development
footprint on
all
“proposed”
frameworks

		<p>Paragraph 5.9.26 lists development principles that the existing planning permissions across the sites have sought to achieve; however, the wording of Paragraph 5.9.26 should be revised to state that proposals “should” rather than “must” incorporate the principles, to allow for sufficient flexibility and ensure the requirements are not restrictive to development.</p> <p>Paragraph 5.9.27 positively notes that the Homebase and B&Q sites both have planning consent; however, the text setting out the detail of the planning consents requires updating to reflect the quantum of development approved by the S73 planning applications. The text should be amended to read the following:</p> <p><i>The former B&Q site is currently under construction and once delivered will be a mixed-use scheme, including 517 554 residential units, 5,098 1,054 sqm B1 and 2,745 1,960 sqm flexible B1/A1/A2/A3/A4/D1/D2, and 2,548 sqm residential facilities with associated landscaping and parking. The Homebase site has planning permission for a mixed use scheme, including 343 480 residential units, 579 753 sqm GIA of retail (A1/A2/A3), 164 148 sqm community use (D1), and 1,647 586 sqm studio/office (B1) and 166 sqm residential facilities with associated parking, play space and public realm improvements.</i></p> <p>L&G support the inclusion of Paragraph 5.9.28 which states the Homebase and B&Q sites are to be delivered in the “0-5 year period”. The B&Q and Homebase retail warehouses have both been demolished, and construction on each site is expected to commence circa Q2/Q3 2021.</p>		<p>Para 5.9.26 – update to replace must with <u>should</u></p> <p>5.9.27: Amend as follows:</p> <p>The former B&Q site is currently under construction and once delivered will be a mixed-use scheme, including 517 <u>554</u> residential units, 5,098 <u>1,054</u> sqm B1 and 2,745 <u>1,960</u> sqm flexible B1/A1/A2/A3/A4/D1/D2, and 2,548</p>
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				<p>sqm residential facilities with associated landscaping and parking. The Homebase site has planning permission for <u>a</u> mixed use scheme, including 343 <u>480</u> residential units, 579 <u>753</u> sqm GIA of retail (A1/A2/A3), 164 <u>148</u> sqm community use (D1), <u>and</u> <u>1,647-586</u> sqm studio/office (B1) <u>and</u> <u>166</u> <u>sqm residential facilities</u> with</p>
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				<p>associated parking, play space and public realm improvements</p> <p>Amend Para 5.9.28 to read: <u>Construction on the B&Q and Homebase expected to commence in 2021 and be delivered in the 0-5 year period.</u></p>
<p>35.7</p>	<p>Quod on behalf of Legal and General Property Limited</p>	<p>Recommendations</p> <p>Other</p> <p>Figure 11 (Ground Floor Uses) recognises the previous retail warehouse use of the Homebase and B&Q sites; however Figure 11 is considered outdated in this regard. As previously stated, both retail warehouses have been demolished, and L&G propose the two sites are recognised within Figure 11 as ‘Development Sites’, which should be introduced and included within the land use key.</p>	<p>Figure 11 and 35 (now 36) – add note to key that B&Q and Homebase sites are now demolished and under development</p> <p>Captions have now been added to Figures 35 and 36, noting the dates and</p>	<p>Figure 11 and 36 – add note to key: <u>“Homebase and B&Q have been demolished since the preparation of this</u></p>

	<p>Figure 35 (Existing Building Heights) and Figure 36 (Planning Consents) are not comparable drawings and therefore do not offer the reader an easy comparison. The retail warehouses are no longer standing (Figure 35), and it would be appropriate to apply building heights to the consented and built out developments in the Wandle Delta including Homebase and B&Q, as well as Osiers Road and the Ram Brewery (Figure 36). The context to the Wandle Delta clearly comprises a number of significant developments which are not accurately conveyed within the SPD. It also excludes the Council’s Feasibility Report for the Town Hall site which indicates the scope for a 16-storey building.</p> <p>L&G’s sites benefit from planning permission for residential buildings ranging from 8 to 17 storeys (Homebase, Site 17), and 8 to 15 storeys (B&Q, Site 18). It would seem appropriate to make reference to this in the SPD – and reference should be included within the Swandon Way Cluster allocation. Figure 36 (Planning Consents) should be updated to show the accurate planning consent for the Homebase site to reflect its approved development footprint.</p> <p>Paragraph 5.6.4 refers to the Emerging Urban Design Study (2020). This document (Fig.12) identifies the Wandle Delta as having a low level of sensitivity, highest probability of change and highest capacity for development. The study identifies the Wandle Delta as an opportunity for tall building clusters, landmarks and tall buildings within town centres and along strategic routes (Fig.15: Tall buildings opportunity map). Character Area ‘G1 Wandsworth Town and Riverside’ notes that towers have recently become a feature of the skyline, with towers up to 27 storeys; that the area is undergoing substantial regeneration, and that landmarks at key junctions are important to the legibility and framework of the town.</p> <p>Within the Urban Design Study, Fig.222: G1 Wandsworth Town and Riverside sensitivity plan notes that sub area (d) (Wandle Delta) is a planned area of change with a low sensitivity to change. New development should positively enhance</p>	<p>the buildings which have since been demolished.</p> <p>Add further reference to existing consents in section 5.9.</p> <p>Section 5.6 has been reviewed to clarify that the final UDS will be aligned with the SPD and will be used as evidence to inform the emerging Local Plan.</p>	<p><u>baseline plan and are now under development</u> ” Additional para after: 5.9.27 <u>“These schemes range from 8 to 17 storeys on the former Homebase site, and 8 to 15 storeys on the former B&Q site.</u></p>
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		<p>character. It also notes that there is a lack of clear, legible routes from the town centre, including along Swandon Way, to the River Thames and Wandle.</p> <p>The Wandle Delta SPD does not currently refer to any these conclusions within the Urban Design Study and it appears that the text used at Paragraph 5.6.4, 5.6.12, 5.6.13 requires revision/updating.</p> <p>Paragraph 5.11.4 should recognise that it may be appropriate to balance the infrastructure requirements set out in section 5.11 with the on-site requirements required by the site-specific guidance within the SPD, certainly in the case of non-site specific tariff requirements such as education, arts and culture and community uses.</p> <p>On behalf of L&G, Quod reserves the right to add to or amend these representations. This may be required where the Council issues new guidance or there is a change in policy at a local, regional or national level.</p>		
36.1	Thomas Lyсков (Individual)	<p>The general idea to develop the Wandsworth Delta is a positive one, however upon reading the introduction and specifically section '1.5 Engagement and Consultation', its clear the two pop up events were token gestures to say that the plans were being worked on in conjunction with the local community. 100 people's responded is not a valid representation of the communities views on the matter, compared with the 15 meetings that took place internally. Extra effort should have been made to alert the residents of Sudlow Road of these plans during this time, to allow us to have our say from the outset.</p> <p>Everything seems factually correct. The one area I would highlight would be point 2.2.1.7 - there is indeed very little greenery. Its common knowledge that the area has a reputation of being very industrial and a bit of a 'concrete jungle' - so allocating special focus to this would be advised.</p> <p>Section '3.6.8 Residential' states 'The SPD seeks consider the changing trends within the residential sector. Currently, there is limited data available to highlight what these are. However, it is likely that demand from consumers will move towards improved</p>	<p>Comments noted - See 9.1 in relation to Sudlow Road aspects.</p> <p>Additional explanation should be added District Heat Networks.</p>	<p>See 9.1.</p> <p>Add new para 5.7.15: <u>A District Heat Network is a distribution system of insulated pipes that takes heat from a central source and delivers it to</u></p>

	<p>amenities and private outside space.' With this in mind, it is essential that the needs of existing residents is considered. In the section previous (3.6.7), it also suggests that home working may in some cases be permanent, enhancing the importance of residents having access to private outdoor space.</p> <p>The vision statement is good</p> <p>Objectives state that it is putting People first. If this is the case, why have Sudlow Road residents not been considered? There are very few residential areas which are directly impacted by the plan so it should be easy for residents of these pockets to be actively consulted with.</p> <p>Additionally, is states that it wishes to 'improve health and wellbeing for people living, working and visiting the area', therefore it would be much appreciated if Sudlow Road's residents needs were considered.</p> <p>'Council will pursue a minimum approach to car parking with a view to supporting sustainable movement patterns'. Sudlow Road is already encountering difficulties with car parking due to the developments on Osiers Road, Clyde House etc which do not have parking spaces for the 100's of residents. The plan does not include parking spaces due to the 'sustainable movement patterns' and the impact on Sudlow Road with regards to parking will be catastrophic if serious thought is not given to this aspect.</p> <p>Residents of Sudlow Road are requesting that the plans allow a "transition space" between Sudlow Road and the Frogmore Complex. Green space and biodiversity is clearly a key feature throughout this proposal and should be a consideration for existing residents, not just new ones.</p> <p>Any 'back to back' plans between the two areas will be strongly opposed by the residents and this suggestion can alleviate opposition to the current proposed plans and the inevitable disruption to our lives that this redevelopment will cause. Allowing residents the opportunity to gain access to private green space, which is in line many of the proposals set forth in this plan, would demonstrate real-world willingness by</p>		<p><u>a number of buildings. The Mayor aims to increase the proportion of energy from decentralised sources. District heating networks connecting low to zero carbon and waste energy sources to consumers are a key element part of these ambitions.</u></p>
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	<p>the council to meet their 'green space' targets and put the well-being of existing residents above that of (what will already likely be extensive) profits.</p> <p>'Lower rise types such as terraced housing is likely to be appropriate adjacent to the existing context at Sudlow Road.' Appreciate that lower rise housing here has been acknowledged, but there still needs to be clarity around how this will impact the 'right to light' for Sudlow Road residents as the diagrams suggest a 'back to back' approach as well as looking like it will be cramped for all residents.</p> <p>Looks good</p> <p>As stated, the proposal adjacent to Sudlow Road is indeed sensitive, therefore its encouraged that the voices of residents are heard.</p> <p>As such, the opportunity for residents to acquire some land for the purpose of creating green space or gardens would be welcomed.</p> <p>I strongly support the environmental and sustainability plans.</p> <p>The current setup for residents of Sudlow Road would not meet the plans outlined here should the houses here be be built today. As such, a parcel of land being allocated at the rear of the properties is being proposed by the residents, to remain in keeping with the sustainability plans of the area.</p> <p>The proposed numbers sound very high but appreciate the need for additional housing.</p> <p>'development proposals must demonstrate how adjacent sites could be progressed as subsequent phases, without compromising the overall aspirations for the cluster or masterplan area.' In relation to the Frogmore complex, would this mean that adjacent sites (Sudlow Road in this case) would need be considered for ways in which the area can be improved?</p> <p>If so, the thoughts of the residents should be considered, which makes it even more concerning that they have not been. Who is a developer to decide what is best for people that may have lived here for decades?</p>		
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		<p>The Frogmore complex development is of highest importance to the residents of Sudlow Road. The concerns we have for this include:</p> <ul style="list-style-type: none"> - Overcrowding in the area - Loss of light - Lack of a biodiversity plan for the existing residents - Lack of parking - Years worth of disruption to the area <p>Additionally, what does 'Potential incorporation of a district heat network' mean?</p>		
37.1	Planware Ltd on behalf of McDonalds Restaurants Ltd	<p>Please take this letter as a formal objection to the proposed masterplan aspirations outlined in the Draft Wandle Delta Supplementary Planning Document for the Wandsworth Bridge Cluster.</p> <p>The proposal removes McDonald’s presence from this location. This is one of the most successful McDonald’s restaurants in the UK and employs over 100 people.</p> <p>Whilst we acknowledge your aspirations for the wider area we would welcome the opportunity to meet with you to discuss the retention of our store.</p>	<p>Noted – additional wording suggested to acknowledge the need for a coordinated approach.</p> <p><u>The contents of the SPD do not constitute any development proposals but provides guidance if and when a landowner wishes to consider the redevelopment of their site.</u></p>	<p>Add additional paragraph 5.9.22:</p> <p><u>The Council will work with existing landowners and businesses to consider the overall approach to the enhancement of this area.</u></p>
38.1	Giles Miller (Individual)	<p>This cannot really be called consultation. Residents of Sudlow Road were completely unaware of this until we were advised by someone living a long way from Sudlow</p>	<p>Comments noted – please see response to 9.1.</p>	<p>See 9.1</p>

		<p>Road. Surely you could have made more of an effort to contact residents so directly affected?</p> <p>Green space is really important. Please consider garden space for the residents of Sudlow Road that back onto the Frogmore development. We have in the past been told that the land was essential for the depot. It looks like the plans have changed, so please also afford us the opportunity to have a garden.</p> <p>If the council is looking to sell off the land where the technical services are currently house, it would be right to offer the residents some form of the first option on a reasonable space to allow us to also benefit from green space.</p> <p>"any development should prioritise the provision of high quality private and public outdoor space of different types....there is limited data available to highlight what these are.</p> <p>The full consensus from existing residents of Sudlow Road is this is a key necessity from us. We expect the council to recognise existing residents' needs within your plans. Here</p> <p>is an opportunity for Sudlow Road tenants who have had to endure the workings of the Councils' technical services fort all these years , to allow us to build our own private gardens to the rear of Sudlow Road. This will make a great difference to our lives, our children's lives and our tolerance of future developments.</p> <p>Please include some reference in the vision to existing residents needs and wishes ahead of maximum development - we have been surrounded with development after development, have lost light due to the Osiers Road developments. Here on our doorstep, we are once again threatened. Please allow us and you to consider the opportunity for us to create our own gardens were given how much will impact us negatively during the extensive building process, loss of privacy as we become over-looked, with reduced light into our properties, and reduced level of security as we have benefitted from that of the councils' land, and open sky views. This will require some serious consideration.</p> <p>We welcome your contextual approach which considers the setting of townscape assets and existing character. Sudlow Road is recognised as a charming street</p>		
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	<p>full of character. We look forward to how you can compliment this - again, offering us the land to build gardens feels like a consideration. Another consideration would possibly be to offer shared space behind our properties that could be used by all residents on either side of the road.</p> <p>Council will pursue a minimum approach to car parking with a view to supporting sustainable movement patterns".</p> <p>Sudlow Road has already suffered difficulties with car parking due to the developments on Osiers Road, Clyde House etc which do not have parking spaces for the 100's of residents. The plan does not include parking spaces due to the 'sustainable movement patterns/' It must be realised that the impact on Sudlow Road with parking will / be uncontrollable if serious thought is not given to this aspect. Please ensure that the plans allow a "transition space" between Sudlow Road and the Frogmore Complex. Consider green space, biodiversity objectives for all residents. Currently it appears that another row of properties will be build immediately behind Sudlow Road and this will be contested by all residents in the street if pushed forward.</p> <p>Seriously concerned about the privacy, loss of light and urban impact which will be compromised by this development.</p> <p>We appreciate consideration to the right of light - with mews houses and a gradient of higher rise. The transition area and opportunity for us to have land to our own private gardens to develop ourselves would make the development that much easier to accept.</p> <p>Multi-use of the land is welcomed</p> <p>Please consider allowing us the opportunity to acquire space behind Sudlow Road to create green gardens. This will help provide a buffer zone before the new development. Currently it appears that the new builds will be immediately on top of our properties. 2-3 storey builds that close to us may as well be tower blocks and do not offer respectful scaling of height before the higher blocks close to the middle of the Frogmore development.</p>		
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	<p>Good news that consideration is being given to the environment and sustainability. Sudlow Road is keen to add to this biodiversity with the option to buy green land immediately behind our properties.</p> <p>Capacity estimates sound extremely high but I recognise the need for new housing. I, and fellow residents on Sudlow Road, would like consideration for a stretch of land to the east of Sudlow Road (ie. land currently owned by Wandsworth Depot, running the length of our residential street) to be blocked out as a transitional space between Sudlow Road and the development, to be included within this masterplan please.</p> <p>We would like to engage about acquiring the land to build our own gardens between the back of Sudlow Road and the redevelopment at Frogmore. The plans show almost back-to-back housing onto Sudlow Road properties which do not have gardens to the rear. If purchase by Sudlow Road residents is not possible, provision should be made to include a buffer zone so that there is some green land between Sudlow Road and the redevelopment, whether that be gardens to the new row of properties or preferably the addition of a common green area as a buffer zone.</p> <p>The following concerns are relevant for houses on Sudlow Road:</p> <ol style="list-style-type: none"> 1. Loss of light 2. Back-to-back housing? 3. No biodiversity plans for the residents of Sudlow road 4. Massive & lengthy disruptions expected <p>The PD sets out how the Council will ensure new development contributes to a “safer, healthier and more prosperous Wandsworth and will be a material consideration in the assessment of planning applications”.</p> <p>We hope you will therefore listen to residents who are so heavily impacted so we may work together in a positive manner to improve all of our living standards, old and new. Please do engage with us and hear our concerns, particularly in relation to Sudlow Road.</p>		
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39.1	<p>Carolyn McMillan (Individual)</p>	<p>There is already excess and overbearing building on the western side of Wandle at this point. I'm totally opposed to yet more flats being built on the eastern side, leaving only a narrow built up walkway by the river.</p>	<p>Noted – please refer to section 5.3 which outlines our proposed approach to public realm and landscape which is a key dimension of the proposals.</p>	N/A
40.1	<p>Federica Medina (Individual)</p>	<p>I am the owner of a house in Sudlow road and I was surprised not to have heard about the development in a more official way, it was other residents who encouraged me to have a look at the proposal.</p> <p>I am concerned as Sudlow road is such a lovely quiet residential street, with a strong sense of community, quite unique in London, the view from my house has already dramatically changed with the development in Osiers road and I don't want to feel surrounded by high raise buildings with little character and high density which will take away from the atmosphere of the road and the safety of having very little transit. As previously stated I worry about the high raise building and I hope that the council would keep in consideration the biodiversity along the river wander and the necessity of green space for our community in an area which seems to be developing at a high speed, with a density which is too high.</p> <p>I like the fact that the plan is meant to put people first. I hope that existing residents' needs will be kept into account.</p> <p>I feel there is little information about the transition from old to new.</p> <p>I worry about more traffic going through frog more and consequentially Sudlow Road, I'd like to understand better what are new routes proposed.</p> <p>I like the idea of more green spaces, playing roads, and play grounds; it surprised me to see a line of terrace houses designed to be built pretty much on the back wall of Sudlow Road houses, obviously this is cause of great concern as already we don't have a garden and at least the depot parking lot was giving us some light and openness which is very important to the wellbeing of the residents.</p>	<p>Comments noted – please see response to comment 9.1.</p> <p>The document makes reference to landscape, biodiversity and environmental requirements and considerations (see chapter 5).</p> <p>More detailed schemes will consider the approach to building heights as part of future planning applications.</p>	N/A

	<p>Looking at the plan I do not think it is a good idea to build a line of terrace houses so close to the back wall of Sudlow road.</p> <p>Looking at the Frogmore development i worry that the plan is too dense, although I believe there is an opportunity to create a balanced new development with green spaces and regenerate the area around the river wandle .</p> <p>To keep a smooth transition from the old urban planning to the new development I hope the low raise houses in Sudlow road will be kept into consideration, as building too close would compromise the light and the privacy that the residents have now.</p> <p>I am glad to see there is attention to the environment as I strongly believe it is essential to any new development to commit to use of sustainable energy and build with an eye on the surroundings. I hope there will be evidence on taking a strong eco approach on the fuelling of the new buildings.</p> <p>I look at the plan and the whole development seems well distributed, although it would be useful to have a three dimensional view to really understand the impact of the height of the new buildings compared to the old ones; I also note that the proposed terrace of houses on the frogmore development seems somehow squashed against the back of Sudlow road; I think to preserve the light and the privacy of such terrace it would be beneficial to give the opportunity to have a garden.</p> <p>As I previously mentioned the terrace right next to the Sudlow road houses seems extremely close and I worry about the lack of light and privacy such building would impose. As owner of a house in Sudlow road I would welcome the opportunity to buy a small portion of the depot to create an outdoor garden and the possibility to have a green strip to create a natural barrier to being overlooked and have natural light coming in.</p> <p>The frogmore depot was a wide space which had no noise outside of working hours and very little generally, i worry that the residential development would result in more noise and vehicular traffic.</p> <p>In addition to my comments outlined in the previous sections I also worry about the area being too densely populated compared to the amount of public transport</p>		
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		available; Wandsworth town is already too busy and on peak times it is often impossible to board on a train towards central London.		
41.1	David Mills (Individual) By email.	<p>I have read with interest the Wandle Delta SPD. I have a comment, however I could not see the appropriate place to make it in the consultation form, so I thought it easier if I email yourself directly.</p> <p>I have always thought that the weir to the south of the Wandle Delta would make an ideal location for a micro hydro-electric scheme. Specifically something like an Archimedes Screw. Please see my comments below. It is something I have only a passing knowledge of, but please do not hesitate to contact me if you would like to discuss further.</p> <p>Wandle Delta Archimedes Screw</p> <p>Illustrative photo</p> <p>Location</p> <p>The area around the weir to the South of the Wandle delta would seem an ideal location for a small hydro project:</p> <ul style="list-style-type: none"> • Weir is already in place, creating the drop. • Disused land adjacent • Close to electricity infrastructure. <p>Archimedes Screw</p> <ul style="list-style-type: none"> • Suitable for small scale installation • Fish and environmentally friendly • Low maintenance and cost 	Comments noted – this would need to be considered and discussed as part of the broader management of the Wandle. Para 5.7.9 is a key consideration in relation to the potential impact on species.	N/A

		<ul style="list-style-type: none"> • Low impact (particularly noise) <p>Benefits</p> <ul style="list-style-type: none"> • An exciting project to improve the green credentials of the borough. • Extra revenue for Wandsworth council. • Local schools involvement (can visit, monitor power production in real time online, watch river reaction and power reaction to seasons, rain etc). <p>Finance</p> <p>Given the low cost of installation, I would expect that it could be debt funded. Possibly even by a local bond issue, further letting the local community 'buy-in' to the project.</p> <p>It would be operated and managed separately from the council, so no council time would need to be spent on the project. However the council could keep 100% equity ownership, taking earnings once debt was repaid (c. 5 to 10 years payback).</p> <p>Feasibility Study</p> <p>There are a number of UK companies which install Archimedes screws. I would expect they would be willing to arrange a preliminary visit / feasibility inspection without charge.</p>		
42.1	David Mills (Individual) Consultation Portal.	How about a micro hydroelectric project at the weir (Archimedes Screw for example)? How about a micro hydroelectric installation at the weir. For example the location would seem ideally suited to an Arhcimedes screw.	See response to comment 42.0	N/A
43.1	Marta O'Connor (Individual)	I am a Sudlow road resident for 12 years, I have two kids in local primary and secondary schools and I care a lot about the area where I live. I look after the local area and I would expect that the commitment is reciprocal. However, I need to say	Comments noted - See response to comment 9.1	N/A

	<p>that the proposal outlined here was not proactively shared with the resident. As a Sudlow Road resident - I am one of the few directly impacted residents throughout the entire subject area and I wonder why the pop-up events have not been advertised to the residents in the road? We are just a few but really involved citizens.</p> <p>Luckily i was able to join the webinar on the 9th and I hope the voices of the residents will be heard going forward.</p> <p>Can I ask to give more attention to the historic and heritage assets? As a Sudlow Road resident, I am really concerned about the privacy of the families living in the road. The terraced houses on the east side of Sudlow Road currently have very limited outside space. As Sudlow Road residents we have previously enquired about the purchase of land from the council and would be willing to engage in discussions again regarding this matter.</p> <p>At this stage, the wider development of the Frogmore complex is a concern for light and privacy. I don't see any evidence that the concerns of the residents have been addressed or taken on board. I think it's important that our voices are heard.</p> <p>I'm not clear how there could be a consideration for tall buildings (e.g. five storeys) for the Frogmore complex as they will overshadow the Wandle and not take in consideration the implications for existing residents like Sudlow road residents. I believe further considerations need to be given to this matter.</p> <p>As the vision is set out to "be a place that puts people first" I think that existing residents should be at the core of the vision and should be listened to. AS mentioned, Sudlow road residents are concerned about the Frogmore complex development and how it will impact the quality of life of existing residents.</p> <p>There are very few residential areas which are directly impacted by the plan and I believe that we should have been consulted or at least be consulted at this stage.</p>		
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		<p>As the new developments are expected to “knit into its surrounding neighbourhoods” – It's important to detail the interaction, the space and the green areas planned for the Frogmore complex and the impact with the existing residential elements of the delta (Sudlow road).</p> <p>I don't see any public open space or transition space between the rear of Sudlow Road terrace and the proposed new terrace within the Frogmore complex. This is a major area of concern as it will impact the quality of life and well being of the Sudlow road residents depriving them of light, privacy and communal areas. Please advice as, in my opinion, the proposal, as it stands, doesn't deliver against the project's vision which is very important to everyone involved.</p> <p>From the webinar of the 9th of March I understand that the proposed terrace to the east of Sudlow Road could be either townhouses or mews. As previously mentioned, It is critical that adequate space between such development and the current Sudlow road houses is considered. Sudlow road residents have already expressed in the past their interest in creating private garden space and I believe this option should be included and considered</p> <p>As existing Sudlow road terrace houses are low rise, we would expect further details to be included on how the Frogmore cluster development doesn't impact the right to light for existing residents of this heritage asset.</p> <p>I understand that the Frogmore depot is owned by The London Borough of Wandsworth.</p> <p>A dialogue between the council and the Sudlow road residents has started regarding the potential for land to be purchased/awarded to the rear of the terrace in advance of the site going to tender for development. This dialogue / approach would not only show a 'caring and people first' side of the proposal but would also develop a flawless transition between the old and the new by creating a natural green/garden space</p>		
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		<p>between the existing terrace the proposed one. It's important for the council to actively engage in this dialogue.</p> <p>I look forward to hearing back from the council on how they are planning to engage with Sudlow residents to ensure that their needs are met and voices listened to.</p> <p>As Sudlow Road residents we are organised as one team / one voice and we welcome the opportunity to engage with the council as soon as possible!</p>		
44.1	Ross O'Connor (Individual)	<p>I am a Sudlow road resident for 12 years, I have two kids in local primary and secondary schools and I care a lot about the area where I live. I look after the local area and I would expect that the commitment is reciprocal. However, I need to say that the proposal outlined here was not proactively shared with the resident. As a Sudlow Road resident - I am one of the few directly impacted residents throughout the entire subject area and I wonder why the pop-up events have not been advertised to the residents in the road? We are just a few but really involved citizens.</p> <p>Luckily i was able to join the webinar on the 9th and I hope the voices of the residents will be heard going forward.</p> <p>Can I ask to give more attention to the historic and heritage assets? As a Sudlow Road resident, I am really concerned about the privacy of the families living in the road. The terraced houses on the east side of Sudlow Road currently have very limited outside space. As Sudlow Road residents we have previously enquired about the purchase of land from the council and would be willing to engage in discussions again regarding this matter.</p> <p>At this stage, the wider development of the Frogmore complex is a concern for light and privacy. I don't see any evidence that the concerns of the residents have been addressed or taken on board. I think it's important that our voices are heard.</p> <p>I'm not clear how there could be a consideration for tall buildings (e.g. five storeys) for the Frogmore complex as they will overshadow the Wandle and not take in consideration the implications for existing residents like Sudlow road residents. I believe further considerations need to be given to this matter.</p> <p>As the vision is set out to "be a place that puts people first" I think that existing residents should be at the core of the vision and should be listened to. AS mentioned,</p>	Comments noted - See response to comment 9.1	N/A

	<p>Sudlow road residents are concerned about the Frogmore complex development and how it will impact the quality of life of existing residents. There are very few residential areas which are directly impacted by the plan and I believe that we should have been consulted or at least be consulted at this stage.</p> <p>As the new developments are expected to “knit into its surrounding neighbourhoods” – It's important to detail the interaction, the space and the green areas planned for the Frogmore complex and the impact with the existing residential elements of the delta (Sudlow road).</p> <p>I don't see any public open space or transition space between the rear of Sudlow Road terrace and the proposed new terrace within the Frogmore complex. This is a major area of concern as it will impact the quality of life and well being of the Sudlow road residents depriving them of light, privacy and communal areas. Please advice as, in my opinion, the proposal, as it stands, doesn't deliver against the project's vision which is very important to everyone involved.</p> <p>From the webinar of the 9th of March I understand that the proposed terrace to the east of Sudlow Road could be either townhouses or mews. As previously mentioned, It is critical that adequate space between such development and the current Sudlow road houses is considered. Sudlow road residents have already expressed in the past their interest in creating private garden space and I believe this option should be included and considered</p> <p>As existing Sudlow road terrace houses are low rise, we would expect further details to be included on how the Frogmore cluster development doesn't impact the right to light for existing residents of this heritage asset.</p> <p>I understand that the Frogmore depot is owned by The London Borough of Wandsworth.</p> <p>A dialogue between the council and the Sudlow road residents has started regarding the potential for land to be purchased/awarded to the rear of the terrace in advance of the site going to tender for development. This dialogue / approach would not only show a 'caring and people first' side of the proposal but would also develop a flawless transition between the old and the new by creating a natural green/garden space</p>		
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		<p>between the existing terrace the proposed one. It's important for the council to actively engage in this dialogue.</p> <p>As long term residents of this road we are looking for support in this development as a way of making the redeveloped space work for all concerned not just the profit of short term developers. This is a one in a generation opportunity to make the right decisions to support a diverse area and community. Let's work on this together.</p> <p>I look forward to hearing back from the council on how they are planning to engage with Sudlow residents to ensure that their needs are met and voices listened to.</p> <p>As Sudlow Road residents we are organised as one team / one voice and we welcome the opportunity to engage with the council as soon as possible! Thank you</p>		
45.1	Strutt and Parker on behalf of The Original Tour/RATPDev	<p>TOT/RATPDev supports the intention to provide a masterplan SPD to encourage and guide development in this locality, given the significant potential to contribute significantly to the development needs of the borough in a central and sustainable location. It is a mixed use area with potential for significant regeneration and change, which an SPD could help to deliver.</p> <p>TOT/RATPDev welcome the opportunity to constructively comment on the draft SPD, and indeed welcome the inclusion of the Wandsworth Bus Garage ('WBG') site, and recognition of the important role it could play in the regeneration of the area. However, we highlight a number of points of concern within the detail, and recommend alterations accordingly.</p> <p>We have previously engaged with the masterplan process through attendance at the stakeholder workshop session held in August 2020, and through discussions with the Council's consultants. TOT/RATPDev remains keen to continue a dialogue with both London Borough of Wandsworth ('LBW') and its consultants to ensure that the planning policy documents are consistent, accord with national planning policy, and provide the right strategy for the Wandle Delta area and specific sites.</p>	Noted	N/A
45.2	Strutt and Parker on	BACKGROUND	Comments noted	N/A

	<p>behalf of The Original Tour/RATPD ev</p>	<p>Land Ownership</p> <p>TOT is a bus operator and a subsidiary of RATPDev, a transportation company based in France but operating across Europe and beyond. TOT operates its Central London sightseeing tours from WBG.</p> <p>The Covid-19 pandemic has had significant implications on the operations at WBG given the change in tourist activities over the last year. Therefore, TOT and RATPDev are in the process of reviewing the operation at WBG, and are considering options for the site. However, given the central location, the bus garage provides an opportunity for the relocation of other potential RATPDev bus services, or indeed for the withdrawal of the transport use, potentially freeing up the site for mixed use development.</p> <p>Grade II Listing</p> <p>WBG is grade II listed, and the Historic England listing is included at Appendix 1 for reference. As identified on the Historic England website:</p> <p><i>‘The Details section within the List entry Description describes the asset's form, materials, development, style, design and layout, as relevant to that type of building, monument or landscape. It is not an exhaustive description, but a summary of the main features of the building or site....</i></p> <p><i>‘The description may be a useful starting point for understanding the claims to special interest, but it will not be the last word. Originally, list entries were brief and intended to help with identification. In recent decades, particularly since the start of post-war listing, greater efforts have been made to explain the history of a building and to outline its claims to special interest’. (our emphasis)</i></p>		
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	<p>The building was first listed in 1983. Whilst listings do not provide detailed assessments of listed buildings, given the above it is clear that broadly speaking, the listing would highlight the main physical features of the building to which its special historic interest relates. In that respect it is salient that the ‘Details’ element of the listing focusses on materials, fenestration, and detailed architectural details on the eastern and northern elevations. There is recognition that the entrance (southern) elevation has been altered. Significantly, there is no mention of the roof form or roof materials.</p> <p>Existing Site Allocation</p> <p>The site is allocated in the Wandsworth Local Plan (Site Specific Allocations Document 2016), potentially for a mixed use development with residential use if a suitable alternative bus garage site could be provided. Alternatively, if the bus garage use remains unaffected, some residential development may be considered appropriate at the upper levels. The site allocation infers that the addition of new build floorspace would be acceptable in conjunction with the re-instatement of the south elevation potentially to its original position (circa 8 metres towards Marl Road). To finance this, a roof extension would be appropriate if ‘limited to perhaps 2 storeys of accommodation’. The site allocation also sets out other design principles.</p> <p>London Borough of Wandsworth Aspirations</p> <p>Before setting out our proposed alterations to site allocation WT17, it is important to highlight the LBW aspirations for the WBG site and the surrounding area. As indicated in the consultation document, <i>‘The Wandle Delta will be a place that puts people first - strengthened as a mixed urban neighbourhood, a focus for living and working, and a local destination for visitors’</i> (4.1.2).</p>		
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		<p>It is clear from the draft WDMSPD document that significant change is proposed within the Wandle Delta Area, with a focus on residential-led mixed use development. It is clear that the strategy for the area seeks to move away from the domination of vehicles within the area (2.2.9). Within the Urban Design Study (2020), the site is identified within character area G1 Wandsworth Town and Riverside. Within this character area, WBG is highlighted as a ‘valued feature.’ At the same time, the ‘negative qualities’ of this area include the:</p> <p><i>‘Dominance of large industrial buildings is unwelcome, including palisade fencing, blank façades and the presence of heavy good vehicles/waste trucks with smell, noise and pollution. These combine to make a harsh pedestrian environment and poor legibility...’</i></p> <p>It is clear from reviewing the Council’s documents that the Council’s ambitions seeks the removal of the existing transport use to provide for other uses, and for a high degree of change to the bus garage itself and the immediate surrounds. Indeed, Figures 25, 29 and 30 of the draft WDMSPD shows a proposed major green space/urban space/local play space within the existing forecourt area of the garage.</p> <p>Figure 33 of the draft WDMSPD shows the entire perimeter of WBG as ‘indicative ground floor frontages’, and the supporting text at 5.4.9 and 5.9.19 reinforces this. Presently the building features blank frontages to the north, east and west elevations (with the exception of some minor side doors) at ground floor level, with the bus entrances to the south elevation.</p> <p>Figure 34 of the draft WDMSPD shows leisure/workspace as the ‘indicative land use character’ for WBG. As indicated in the existing and emerging site allocations, the principle of incorporating residential use at the site is also established.</p>		
45.3	Strutt and Parker on	POTENTIAL MIXED USE REDEVELOPMENT OF WANDSWORTH BUS GARAGE	Comments and information noted.	N/A

	<p>behalf of The Original Tour/RATPD ev</p>	<p>We enclose with these representations an Outline Development Proposals document produced by TP Bennett on behalf of TOT/RATPDev.</p> <p>The study assessed the development opportunity based on a two phase process – firstly, it assumes an initial reduction in the scale of the bus operation, and a reduction in buildings used for that purpose. A second phase then considered the withdrawal of all of the bus garage operations from the site, enabling the repurpose the building into a new use.</p> <p>This initial design approach has sought to largely follow the design principles set out in the adopted and emerging planning policy context, to enable residential development as part of the phased withdrawal of the transportation use. However, it is important to highlight that this is only one potential design solution, and there are various potential architectural approaches could be adopted.</p> <p>Given the rapidly evolving implications of the Covid-19 pandemic on the existing bus operations, TOT/RATPDev has since indicated that its preference would be for either the retention of the garage in its entirety, for use by either TOT/RATPDev (potentially with some residential floorspace above the western part of the site, in accordance with the existing allocation), or the sale of the site to provide mixed use redevelopment in one phase. This latter scenario would in our view widen the potential development opportunities as the bus garage use presents physical constraints to development opportunities.</p>		
<p>45.4</p>	<p>Strutt and Parker on behalf of The Original Tour/RATPD ev</p>	<p>PLANNING POLICY CONTEXT National Planning Policy Framework (2019) Sustainable Development</p> <p>The purpose of the planning system is to contribute to the achievement of sustainable development (Paragraph 7). Paragraph 11 sets out that for plan-making, the application of the presumption in favour of sustainable development means that:</p>	<p>Comments noted – including the reference to separate Local Plan representations.</p>	<p>N/A</p>

	<p><i>'a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;</i></p> <p><i>b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas...'</i> (our emphasis).</p> <p>Efficient Use of Land</p> <p>Paragraph 117 sets out the requirement for planning policies to promote an effective use of land in meeting the need for homes and other uses. Paragraph 118 goes on to state that planning policies should (inter alia) <i>encourage multiple benefits from both urban and rural land, including through mixed use schemes...</i>; and <i>support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively</i>' (our emphasis).</p> <p>Heritage</p> <p>Section 16 of the NPPF provides the policy framework for heritage assets. Paragraph 185 states:</p> <p><i>'Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:</i></p> <p><i>a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;</i></p> <p><i>b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;</i></p>		
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		<p><i>c) the desirability of new development making a positive contribution to local character and distinctiveness; and</i></p> <p><i>d) opportunities to draw on the contribution made by the historic environment to the character of a place.'</i> (our emphasis).</p> <p>The NPPF provides a robust policy context for considering the potential impacts of development proposals on heritage assets in the decision-making process. In particular:</p> <ul style="list-style-type: none"> • • Paragraph 189 states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. (our emphasis). • • Paragraph 190 states that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal. (our emphasis). • • Paragraph 192 states that in determining applications, local planning authorities should take account of: <ul style="list-style-type: none"> a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to 		
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		<p>viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities</p> <p>including their economic vitality; and c) the desirability of new development making a positive contribution to local character and</p> <p>distinctiveness.' (our emphasis). Paragraphs 193 to 196 then provide a detailed framework for considering the potential impacts of a development on</p> <p>heritage assets through the decision-making process.</p> <p>New London Plan (2021)</p> <p>Optimisation of Previously Developed Land for Housing</p> <p>Policy H1 of the New London Plan states that to ensure that ten-year housing targets are achieved, boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans, especially on sources of capacity including (inter alia):</p> <p><i>a) 'sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary; and</i></p> <p><i>c) housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses.'</i> In this respect, WBG site is</p>		
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		<p>around 200m from Wandsworth Town Station, and 600m from Wandsworth Town Centre, it</p> <p>has a PTAL of 4, and comprises low-density transport infrastructure land.</p> <p>Tall Buildings</p> <p>Policy D9 of the New London Plan states that Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. Any such locations and appropriate tall building heights should be identified on maps in Development Plans.</p> <p>Heritage</p> <p>Policy HC1 of the New London Plan states that:</p> <p><i>'B) Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by:</i></p> <ol style="list-style-type: none"> <i>1) setting out a clear vision that recognises and embeds the role of heritage in place-making</i> <i>2) utilising the heritage significance of a site or area in the planning and design process</i> <i>3) integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place</i> <i>4) delivering positive benefits that conserve and enhance the historic environment, as</i> 		
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		<p><i>well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.</i></p> <p><i>C Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.’ (our emphasis).</i></p> <p>Local Plan Review</p> <p>On behalf of TOT/RATPDev, a consultation response was provided to the draft Wandsworth Local Plan Review (Regulation 18) consultation on 1 March 2021. The draft document sought to amend the site allocation for the WBG (Site WT17). On behalf of TOT/RATPDev, a number of amendments were proposed as part of the consultation response – given that both the draft revised site allocation and WDMSPD are interlinked, many of the themes explored within the two letters of Representation are consistent.</p>		
45.6	Strutt and Parker on behalf of The Original Tour/RATPDev	<p>For instance, it is not assumed that the entirety of the other proposed ‘urban blocks’ would be developed covering their entire footprints, due to the need to provide an appropriate scheme in terms of scale character and townscape, and enabling a functional development, and nor should they be - those matters would of course be considered at the detailed design stage. The same approach should be applied to the WBG site.</p> <p>Proposed Alteration 9 (Figures 40, 41, 46 and 49)</p>	Comments noted. The urban block delineation is flexible but it is important to explicitly illustrate the listed building, and the potential enhanced space.	N/a

		<p>It is proposed that the 'Urban Block' delineation be extended to cover the entirety of the WBG plot, noting that any proposed development would be subject to detailed heritage and design considerations.</p> <p>Proposed Alteration 10 (Figures 40, 41, 46 and 49)</p> <p>These Representations set out a series of proposed alterations, some of which would need to be reflected visually within the figures in the WDMSPD. Proposed alterations to Figure 41 (but which would also relate to Figures 40, 46 and 49) are included at Appendix 3 of this letter of representation.</p>		
46.1	John Pahl (Individual)	<p>Generally supportive, in particular the key messages of Figure 4 and the comments relating to:</p> <ul style="list-style-type: none"> - the Wandle - Biodiversity - Movement - Uses - height and massing <p>Generally support, in particular note the environmental importance of the River Wandle</p> <p>Agree with comment of lack of green space in study area. This has been noticeable in the last year when both Wandsworth Park and the Thames Path have seen high densities because of the lack of alternative green space. This will get worse if there continues to be additional developments without providing additional green space</p> <p>Strongly agree with statements relating to limited space for pedestrians and cyclists. Wandsworth seems car obsessed and it harms local environments that there are so many deterrents to walking and cycling.</p>	<p>Comments noted.</p> <p>Air quality – please see response to comment 7.1</p> <p>Regarding pedestrian and movement, please refer to sections 5.2 and 5.3 of the document which set the context for more detailed design of streets and spaces.</p> <p>See response to comment 4.4 regarding leisure uses of water ways.</p>	N/A

		<p>Strongly support expanding the cycle routes available.</p> <p>The new public space between the Ram Brewery and Southside should be implemented as soon as possible and pedestrian and cycling access made towards the Wandle delta area.</p> <p>The safeguarded wharves are important parts of the River Thames management and should be protected unless converted for other river related usage e.g. boating.</p> <p>As noted above, agree with impact of COVID on recognition of green space and need to increase it within Wandsworth. The Wandle delta would be an idea place to create new parks and green spaces.</p> <p>Another lesson of COVID has been the need to switch to non-car modes of transport as being healthier, more environmentally supportive, often quicker and more human scale, supporting communities rather than dividing them.</p> <p>I couldn't see any reference to air quality and that is an important factor to consider. Whenever I cross Swandon Way I'm always struck by the horrid and high levels of pollution from the endless stream of vehicles. Wandsworth should be prioritising other forms of transport, including walking, cycling, public transport and also micro-vehicles.</p> <p>It could also be useful to undertake a diversity impact analysis to make sure that there isn't bias in the process towards car transport over cycling and use of micro-vehicles such as eScooters as the demographics of the two communities is likely to be different.</p>		
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		<p>Use of micro-vehicles should be encouraged and Wandsworth opposition to even trials ended</p> <p>Support the vision statement: hope it gets implemented!</p> <p>Support the objectives: hope it gets implemented!</p> <p>Generally supportive, though I have an issue with the term "pedestrian priority". One problem I've found as a cyclist is that you get the impression of being unwanted wherever you go:</p> <ul style="list-style-type: none"> - pathways seem to be managed by walkers who hate cyclists - roads seemed to be managed by drivers who hate cyclists <p>The phrase "pedestrian priority" actually makes sharing pathways harder as it means there is no mitigation to the sharing required from the pedestrian side, leading to frustration from cyclists when walkers act without thinking of other users of the pathways. An example would be walking in a group that crosses a pathway without room for faster users to get past. It would be better if there were <i>*some*</i> need for walkers to take account that the space is shared, for example with guidelines such as:</p> <p>"Walkers should be aware of other users of the pathway and leave space for faster users to pass. Cyclists and micro-vehicle users must move slowly and with care when passing walkers."</p> <p>Note use of "should" and "must" in these guidelines.</p> <p>Preferably there should be separate sections of pathway. In Copenhagen and places like that that don't hate cyclists there are clear cycle priority parts of the pathways and clear pedestrian priority parts of the pathways.</p>		
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		<p>Having dedicated space to cyclists is also preferable on the roads where just having a painted edge is not helpful. I find CS8 scary dangerous as vehicles cut into the cycle route and pass very close. Hence it would be better to have cycle routes separated from roads used by vehicles.</p> <p>Section 5.2.16 references a north access to Wandsworth Town Station. Note that another alternative that could be considered is an entrance towards the north-west with bridge over Swandon way towards Riverside Quarter. At the moment there is a long walk round to the east end (currently south) of the station. Direct access to Platform 4 from a bridge over Swandon way to RSQ would reduce walk times significantly. However it is noted that this access requires consultation with National Rail.</p> <p>The closing of Old York Road to vehicles during lockdown was a revelation - how much more pleasant! This should happen again, pedestrianised all the way along with a cycle priority cycle route along the centre of the road.</p> <p>Cycling between the Wandle delta and Southside is very difficult. The best solution would be a bridge over Swandon Way with gradual incline that would allow cyclists and low-mobility users to travel unrestricted by A3 vehicles.</p> <p>Strongly support converting Feathers Wharf to a park. My main concern is that it seems limited to only part of the area and some seems to identified as residential buildings. I have the following concerns:</p> <ul style="list-style-type: none"> - there is very limited green space in this area and all of Feathers Wharf is needed to balance the area - there is a danger that the residential building will be expanded, development creep, leading to reduction in resulting park space. The best approach would be to just identify it all as park - being close to the waste site isn't that pleasant a place anyhow for residential 		
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	<p>property</p> <p>For the Wandle area, I have concerns about developments too close to the river and would prefer Condition B over Condition A and Condition A over Condition C.</p> <p>I support the development of additional public spaces including railway arches and urban squares.</p> <p>While I fully support the development of play areas, I would suggest they are kept away from the Wandle river. There is a play area in Riverside Quarter by the Wandle and the result is there three barriers between the play area and the river. This results in loss of rare river frontage and adds to parent's stress.</p> <p>Figure 34 seems a good summary of objectives for land use</p> <p>Wandsworth has been harmed by an excess of tall buildings and the developments should avoid that mistake by restricting the height of new buildings. This not only makes everything more human scale, but also mitigates against the problems of excessively high population density - e.g. on crowding at Wandsworth Town and lack of green spaces. Already some developments at Riverside Quarter exceed government guidelines on maximum densities</p> <p>The future must be quality not quantity: we want people to <i>*want*</i> to come to Wandsworth because of the culture and atmosphere, green spaces, cycle friendly transport, atmospheric streets with good restaurants, not because the shoe-box flat in a high-rise tower is slightly cheaper.</p> <p>The focus on "Professional, scientific and technical activities" is a good one but that is only feasible if Wandsworth focusses on the points in the paragraph above. Those professions have choices and alternatives and Wandsworth must become more</p>		
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		<p>attractive a location to encourage them to move here</p> <p>The safeguarded wharves are important parts of the River Thames management and should be protected unless converted for other river related usage e.g. boating.</p> <p>The Wandle is an example of the wonderful chalk streams of England which are a global resource and should be protected!</p> <p>There should be greater access and walking / cycling routes along the Wandle</p> <p>Strongly support placing limits on lighting along the river to maintain a dark environment to support the local ecology and environment, including wildlife such as bats.</p> <p>Another motivation to maintain a dark environment is to provide citizens of Wandsworth with the ability to see the night's sky. This is one of the nature's great wonders and can be killed by excess use of street lights. See these links: https://britastro.org/dark-skies/cfds_issues.php?topic=about https://www.nightblight.cpre.org.uk/</p> <p>Generally supportive but as noted previously have concerns about building within Falcon Wharf which would be better as being used for a park</p> <p>It would be good if all the area currently used by the Tideway tunnel were to become a public park</p> <p>Important to have multiple bridges for pedestrians and cyclists to cross Armoury Way / Swandon Way to avoid funnelling traffic into bottlenecks and also putting additional barriers into take up of non-vehicular forms of transport</p>		
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		<p>It's noted that UK Power Networks / EDF Energy operate in a number of buildings on the Wandle delta. The biggest eyesore is the one on the island in middle of the Wandle. It would be preferable if the energy companies move whatever that building is used for to another location and that land be made available to be park land, as part of the Wandle Delta green corridor.</p> <p>As noted previously, think that *all* of Feather's Wharf should be a park.</p> <p>As noted previously, should be easy methods for pedestrians and cyclists to cross Swandons Way at multiple points</p> <p>As noted previously need to have better and more frequent options for pedestrians and cyclists to safely and easily cross Swandon's way, such as bridges with inclined slopes.</p> <p>Opening up additional entrances to Wandsworth Town would be a good idea given the large number of residents to the north, and other accesses should be considered. In particular, access to the station from the RSQ site should be improved.</p> <p>Old York Road should be pedestrianised with cycle routes down its centre.</p> <p>As noted previously need to have better and more frequent options for pedestrians and cyclists to safely and easily cross Swandon's way, such as bridges with inclined slopes.</p> <p>Opening up additional entrances to Wandsworth Town would be a good idea given the large number of residents to the north, and other accesses should be considered. In particular, access to the station from the RSQ site should be improved.</p>		
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		Pier Wharf. Note there is currently no access to the River Thames from Wandsworth for recreational sports such as boating. It would be difficult to add this to (say) Falcon Wharf without harming its potential as a park and it doesn't have suitable transport access. However Pier Wharf would not have that problem and this might be an opportunity for a providing such facilities including rowing, sailing, kayaking etc.		
47.1	Paul Phillips (Individual)	I live in Sudlow Road and have been informed by neighbours that it is proposed to redevelop the Frogmore complex and the Shurguard storage facility. I assume plans are at an early stage and that is why local residents have not been invited to comment? As you are aware, Sudlow Road is sandwiched between the two sites identified for redevelopment and, therefore, local residents would want to be involved.	Comments noted - See response to comment 9.1	N/A
48.1	Port of London Authority	<p>Thank you for consulting the Port of London Authority (PLA) on the Wandle Delta Masterplan Supplementary Planning Document (SPD), which aims to guide the physical aspect of future changes in the SPD area and bring about a series of high quality developments that will contribute to a wider, cohesive vision for Central Wandsworth and the Wandle Delta. I have now had the opportunity to review the draft SPD and have the following comments to make.</p> <p>For information, the PLA is the Statutory Harbour Authority for the Tidal Thames between Teddington and the Thames Estuary. Its statutory functions include responsibility for conservancy, dredging, maintaining the public navigation and controlling vessel movements and its consent is required for the carrying out of all works and dredging in the river and the provision of moorings. The PLA's functions also include for promotion of the use of the river as an important strategic transport corridor to London. The PLA's Vision for the Tidal Thames (2016) (the "Thames Vision") must be considered as part of the new Local Plan. The Thames Vision is the framework for the development of the Tidal Thames between now and 2035 and was developed with a range of stakeholders (http://www.pla.co.uk/About-Us/The-Thames-Vision). The Vision sets six goals for the long-term future of the Tideway: more trade and more jobs associated with the River Thames; improved use of the</p>	Noted	N/A

		River for the transportation of freight and passengers; greater participation in sport and recreation; an improved environment and river heritage and; more people enjoying the Thames and its banks.		
48.2	Port of London Authority	<p>Existing Context</p> <p>The PLA support the references in section in 3.5.5 and figure 20 (planning designations) which highlights that the SPD area includes two safeguarded wharf sites at Pier Wharf and Smugglers Way. In order to be consistent throughout various images in the SPD, in the existing context section, it is considered that figure 11 (Ground Floor uses) is amended to highlight the safeguarded Pier Wharf in the north east corner of the SPD as an industrial use.</p> <p>In addition, under the Local Planning Policy section, whilst it is welcomed that the SPD includes a reference to policy D13 (Agent of Change) of the 2021 London Plan which states that the responsibility for mitigating impacts from existing noise and other nuisance generating activities is placed on the proposed new noise- sensitive development, which is particularly relevant here due to the location of the two safeguarded wharves, it is considered that this section gives specific reference to policy SI15 (Water Transport) of the London Plan, to further highlight the importance of the wharves in the SPD and their safeguarded status. In addition, given the amount of waterspace situated within the SPD area, it is considered that policies, SI16 (Waterways – use and enjoyment) and SI17 (Protecting and enhancing London’s waterways) are also highlighted in this section.</p>	<p>Amend Figure 11 to highlight Pier Wharf as an industrial use</p> <p>Add reference to additional Wharf-related policies.</p>	<p>Amend Figure 11 to highlight Pier Wharf as an industrial use</p> <p>New para 3.3.6:</p> <p><u>In addition, proposals, policy SI15 (Water Transport), SI16 (Waterways – use and enjoyment) and SI17 (Protecting and enhancing London’s waterways) are also relevant</u></p>

				<u>policies for the SPD.</u>
48.3	Port of London Authority	<p>Vision and Strategic Objectives</p> <p>Broadly support paragraph 4.1.5 of the proposed vision, which states that Thames and the Wandle will be a key focus for placemaking in the area, with continuous riverside paths, and spaces along the way for nature, play and leisure. Also support paragraph 4.1.6 which gives specific reference to continued presence of the areas safeguarded wharves which play a vital role in maintaining river access for freight.</p> <p>With regard to the placemaking strategic objective. Whilst the PLA broadly support the various bullet points, including the aim to achieve biodiversity and habitat improvements to the River Wandle and River Thames, a part of the bullet point on the proposed <i>“Activation of the area through a sequence of varied public spaces and green spaces which bring the River Wandle to life and enhance the coherence of the Thames Path”</i> it is considered that there must also be a specific reference on the promotion and enhancement of activity on the River Wandle itself as part of the SPD. This would align with policy SI16 of the London Plan which states that development proposals should protect and enhance, where possible, water-related cultural, educational and community facilities and events, and support and promote new facilities, particularly where these are off-line from main navigation routes. This would also be supported by the PLA’s Thames Vision which includes the aim to see greater participation in sports and recreation on and alongside the water and includes this area of as part of a recommended sport opportunity zone. The potential for increased activity on the River Wandle itself should therefore be highlighted and promoted within the SPD including under the strategic objectives.</p> <p>Under the Smart Growth objective, support the aim to continue to safeguard the existing wharf sites and to consider opportunities for intensification and buffering to enhance the setting of the area without constraining future operations or capacity. In</p>	Amend activation bullet point as proposed.	<p>Amend 4.2.2:</p> <p>“Activation of the area through a sequence of varied public spaces and green spaces which bring the River Wandle to life <u>through the promotion and enhancement of activity on the River Wandle</u> and enhance the coherence of the Thames Path</p> <p>Para 5.5.14</p> <p>Additional sentence:</p>

		<p>addition the reference to the safeguarded wharves in the land use context section (paragraph 5.5.14) and the need to continue to safeguard these sites is also supported. To make this stronger it is recommended that the SPD includes a specific reference to the recent update to the Ministerial Directions issued by the Secretary of State on February 2021 which includes for the continued safeguarding of these wharves. In addition the SPD should specifically promote the maximisation of use of these sites for waterborne freight cargo handling as well as just to continue to safeguard them.</p> <p>Under the People First objective, whilst the PLA broadly supports the objective it is considered that there should also be a specific reference to the promotion of recreational opportunities, particularly for riverside areas on the River Wandle itself. As part of the PLA's Thames Vision the River Wandle / Bell Lane Creek area was highlighted as a potential residential mooring opportunity zone, particularly given its location away from the main navigational routes of the Thames. Across the tidal Thames the PLA considers that there is potential for additional moorings in appropriate locations, particularly for visitor moorings, and this potential should be reflected in the SPD.</p>		<p><u>“The SPD recognises the importance of the continued safeguarding of wharves in line with recent Ministerial Directions (February 2021) and supports the maximisation of these sites for waterborne freight cargo handling.”</u></p>
48.4	<p>Port of London Authority</p>	<p>Planning, Design and Delivery Guidance:</p> <p>- Movement</p> <p>Support the reference in paragraph 5.2.3 to the enhancement of the Thames Path and improved local Connections to the riverside. Also support the reference in figure 22 (Figure 22 Connections to wider area) to the nearby riverbus services at Wandsworth Riverside Quarter and the reference in paragraph 5.2.18 that proposals must demonstrate how they will enhance local walking and cycling connections towards</p>	<p>Comments noted</p> <p>Make additional reference to safety and management as set out.</p> <p>Re. Ministerial Direction statement, see responses to 48.3</p>	<p>Add new para 5.3.34:</p> <p><u>Proposals for improvements to riverside areas should make reference to</u></p>

		<p>public transport hubs including to/from the pier. It is noted in paragraph 5.2.19 that at this stage, there are no current plans for the promotion of an additional river bus stop in this area.</p> <p>With regard to the proposed pedestrian / cycle bridge connection between the Frogmore and Hunts Trucks site, and the potential for a further bridge connection between Frogmore and Causeway Island. To confirm the PLA must be consulted at an early stage on any proposed crossing that takes place within the PLA’s navigational jurisdiction, which extends to Bell Lane Creek.</p> <p>- Public realm and landscape</p> <p>In principle support the proposals for the Wandle Trail in section 5.3.9, which states that proposals for sites adjacent to the River Wandle will be required to realise a longstanding ambition to enhance the Wandle Trail which runs through the western portion of the SPD area, and beyond towards the south of the Borough. As part of this it is noted in section 5.3.18 that the proposed Causeway Island Park has the potential to be a popular ‘island’ space and will perform a key function as a local amenity space, with the potential for a low scale mixed use building or community pavilion. It is considered that the SPD consider the potential for a river related recreational use here, that will help to further ‘activate’ the river itself and assist in achieving an active frontage to the riverside.</p> <p>With regard to the proposals for Feathers Wharf park, as noted in the PLA’s response to the London Borough of Wandsworth’s Local Plan regulation 18 consultation, (dated 1 March 2021), It is important to note that there has been previous interest at this site for operations related to waterborne freight cargo handling and this and/or other river-related uses must also be considered and promoted as a potential use for this area.</p>	<p>Make additional reference to Estuary Edges guidance in section 5.3</p> <p>Add reference to use of tidal Thames as part of the supply chain in section 5.7.</p>	<p><u>the Estuary Edges guidance co-ordinated by the Thames Estuary Partnership and make provision of appropriate Riparian Life Saving Equipment in line with the Port of London Authority’s guidance for development on and alongside the Tidal Thames. Early engagement should be undertaken with the PLA in relation to any works</u></p>
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	<p>As part of the proposed improvements to any riverside areas and boundary treatments within the SPD, it is considered that reference is made to the need to consider the Estuary Edges guidance co-ordinated by the Thames Estuary Partnership which contains guidance on features that support wildlife and improve access when reconstructing or refurbishing the banks of the estuary (https://www.estuaryedges.co.uk). In addition, as part of any new or enhanced riverside walkways and public realm areas there must be a reference within the SPD on the need for appropriate Riparian Life Saving Equipment (such as life buoys, grab chains and escape ladders) and appropriate suicide prevention measures provided, in line with the PLA’s guidance for development on and alongside the Tidal Thames (http://pla.co.uk/Safety/Water-Safety/Water- Safety).</p> <p>With regard to paragraph 5.3.31 on management and maintenance, it is considered that reference is given to the requirement that any works proposed in, on or over the Tidal Thames also requires a River Works Licence with the PLA in addition to any other required consents.</p> <p>- Land use and Activities</p> <p>As noted above, the PLA broadly supports paragraph 5.5.14 on the SPD’s safeguarded wharves but consider specific reference should be given to the fact that the wharves are safeguarded by Ministerial Direction supported by London Plan policy. In addition, specific reference should be made in this section to the Agent of Change principle and the need for all developments located in close proximity to these wharves, which can operate for up to 24 hours a day in line with the tides are designed to minimise the potential for conflicts of use and disturbance. As part of this it is considered that early contact is made with the PLA to ensure that any required assessments (such as noise, vibration and air quality assessments) submitted as part of any future planning application fully take into consideration the potential impacts that prospective new users of a development may experience due to the operations at adjacent wharves, to</p>		<p><u>which might require a River Works License or other consents.</u></p> <p>Additional sentence at end of para 5.7.19:</p> <p><u>Proposals which incorporate the reconstruction or enhancement of the river edge of the Thames should make reference to the Estuary Edges guidance.</u></p> <p>Additional sentence at</p>
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		<p>ensure they are designed appropriately and any required mitigation measures fully set out.</p> <p>Under the cultural uses section, in paragraph 5.5.42 it is noted that flexible spaces are promoted and should present opportunities for external events and public- facing activities to promote the Wandle Delta as a destination for residents of the wider area. It is considered that this section is expanded to include reference to the promotion of the opportunity to incorporate river-related uses within the SPD area, particularly in the River Wandle area, which would help to promote the area as a destination for the local and wider community and be in line with policy SI16 of the London Plan.</p> <p>- Height, Scale and Massing</p> <p>Support the reference on the need for all development proposals to provide an assessment of their impact on any sensitive assets or features including on ecological habitats including waterbodies and that the safeguarded wharves, Bell Lane Creek and River Wandle are highlighted as specific elements that must be taken into account as part of the design of tall buildings.</p> <p>- Environment and Sustainability</p> <p>As noted above, As part of the proposed improvements to any riverside areas and boundary treatments within the SPD, it is considered that reference is made to the need to consider the Estuary Edges guidance on reconstructing or refurbishing the banks of the tidal Thames.</p> <p>With regard to reference to the proposed bridge connection at Bell Lane Creek in paragraph 5.7.9 and the potential for these to impact on the biodiversity of the or the</p>	<p>end of para 5.7.20: <u>Through the Construction Environment Management Plan (CEMP), proposals should consider the use of the tidal Thames through the supply chain as part of the construction stage.</u></p> <p>Amend 5.7.9:</p> <p>The Council will undertake early engagement with the River Wandle Catchment Partnership <u>and the Port</u></p>
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		<p>River Wandle, as noted above the PLA must also be consulted at an early stage on proposals here that are situated within the PLA’s navigational jurisdiction.</p> <p>With regard to lighting, support the reference in section 5.7.10 on the need for all proposals including public realm areas to maintain a dark environment along river corridor with appropriate specification of lighting during construction and operational stages. This is essential in order to ensure there are no negative effects on river ecology.</p> <p>Within the environment and sustainability sections, considering that there are two safeguarded wharves located in close proximity to a number of potential future development sites within this SPD, it is recommended that a specific reference is included in the SPD on the need for developments, within documents such as the Construction Environment Management Plan (CEMP) to robustly consider the use of the tidal Thames through the supply chain as part of the construction stage. This would be in line with policy S115 of the London Plan which states that development proposals close to navigable waterways should maximise water transport for bulk materials during demolition and construction phases and would help to reduce congestion and improve air quality across the wider SPD area.</p>		<p><u>of London Authority, if the proposal is within the PLA’s navigational jurisdiction.</u></p>
48.5	<p>Port of London Authority</p>	<p>Guidance for Key Clusters:</p> <ul style="list-style-type: none"> - Feathers Wharf / Smugglers Way Cluster <p>Welcome consideration on the need to consider potential impacts on the adjacent safeguarded wharf, in terms of the ongoing operational requirements including movement of freight, waste and aggregates and the need for detailed design work to be undertaken to ensure that there is appropriate buffering and orientation of the residential units away from the wharf. The PLA would welcome early discussion on the proposals when appropriate. In addition, as noted above it is considered that any</p>	<p>Update references to river related activities on Feathers Wharf, and consideration of impact on Pier Wharf.</p>	<p>5.9.13 – first bullet point:</p> <p>Longer term residential-led use <u>with potential for river-related uses</u></p>

		<p>proposed development on the feathers wharf site should also consider river-related uses including to/from the river Thames and also via the River Wandle.</p> <p>- Wandsworth Bridge Cluster</p> <p>Consider that the principles section of this cluster is amended to, as with the Feathers Wharf / Smugglers Way Cluster, specific reference is given on the need to consider potential impacts on the adjacent safeguarded Pier Wharf.</p>		<p>Additional bullet point 5.9.19: <u>Potential impacts on the adjacent safeguarded Pier Wharf must be considered</u></p>
48.6	Port of London Authority	<p>Long Term Opportunities</p> <p>In line with the current draft Local Plan, it is noted that long-term proposals are included here with regard to the future of the areas safeguarded wharves, including for the potential for Pier Wharf to be redeveloped with operational wharf uses at ground floor, with the development of alternative uses, including residential above. To confirm the PLA must be involved in any such discussions involving any potential development at the safeguarded wharves here at an early stage. In line with London Plan policy SI15 development proposals that include the provision of a water freight use, with other land uses above or alongside must ensure that the development is designed so that there are no conflicts of use and that the freight handling capacity of the wharf, is not reduced, including to ensure that there is appropriate flexibility for a range of potential wharf operators to ensure the safeguarded wharves are protected, enhanced and continue to be viable over the long term.</p>	Additional reference to involvement of PLA in section 5.10.	<p>At end of 5.10.1, additional sentence:</p> <p><u>Any discussions regarding development of alternative uses on safeguarded wharf sites should involve the PLA at an early stage.</u></p>
48.7	Port of London Authority	Planning Obligations	Noted	N/A

		<p>Noted that the developer contributions within the Wandle Delta should conform to those set out in the adopted version of the Wandsworth Planning Obligations SPD, and Public realm enhancements, and specific reference is given on provision of a riverside path under the key contributions section which is welcomed.</p> <p>It is also noted that the council are considering in paragraph 5.11.5 the preparation of an area-wide arts and culture strategy for the Wandle Delta area and the PLA request to be consulted on this strategy at the appropriate time.</p>		
49.1	Alex Ryan (Individual)	<p>I don't think the vision matches the height of the buildings being proposed. The height is too tall and will make the area oppressive.</p> <p>I don't think the objectives match the height of the buildings being proposed. The height is too tall and will make the area oppressive.</p> <p>Not enough open space</p> <p>Block structures are too big and tall for the area</p> <p>The buildings all seem to tall for the surrounding area.</p>	Comments noted – the document seeks to provide a rationale for the proposed approach.	N/A
50.1	Elizabeth Santos (Individual)	<p>Poor engagement.</p> <p>You reference the project commencing with baseline research Autumn 2019 to include local community and key stakeholders’ views of issues and opportunities through an engagement period in February 2020.</p> <p>However I live on Sudlow Road, a residential street that is most probably THE most impacted by this project, was not made aware of any of these plans. It was only a chance comment by a friend of a resident of the street who notified us of these plans, in Feb 2021 - well over a year after you started researching. We are a unified and close knit community on Sudlow Road and all equally shocked by the lack of communication.</p>	<p>Comments noted.</p> <p>Regarding Sudlow Road, see the response to comment 9.1.</p>	See response to 9.1

		<p>I have since attended a webinar which was both useful and extremely insightful and hopeful that we may now be included within future plans and consideration.</p> <p>Land use mentions compared with the surrounding context the study area has relatively little green space, planting and trees.</p> <p>We agree. And as an isolated street of charming houses, none of us have gardens to the rear where the development would begin.</p> <p>We asked the council a few years ago if we could each buy some of the land from The Wandsworth Depot so that we may build our own individual gardens. The council said they needed the land for their vehicles. As the council now appears to be selling this land for development, we would like to open this case again.</p> <p>You note "any development should prioritise provision of high quality private and public outdoor space of different types....there is limited data available to highlight what these are. However, it is likely that demand from consumers will move towards improved amenities and private outside space."</p> <p>The data from existing residents is this is a key necessity from us. We expect you to recognise existing residents within your plans. Here is an opportunity for us to build our own private gardens to the rear of Sudlow Road. This will make a great difference to our lives and our tolerance of future developments.</p> <p>We welcome the statement that puts people first and the future sounds promising. We anticipate this will certainly consider existing residents ahead of maximum development - again, I reference the opportunity for us to create our own gardens given how much we will be impacted negatively during the extensive building process, loss of privacy as we become onlooked, reduced light, security as we have benefitted from that of the councils' land, and open sky views.</p> <p>We welcome your contextual approach which considers the setting of townscape assets and existing character. Sudlow Road is recognised as a charming street full of character. We look forward to how you can compliment this - Again, offering us the land to build gardens feels like a consideration.</p> <p>"Council will pursue a minimum approach to car parking with a view to supporting sustainable movement patterns".</p>		
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	<p>Will this affect our current resident's parking? Whilst I welcome a green approach, I worry we will battle to park on our street in the future?</p> <p>I appreciate the consideration to public open space provision and playspace, and essential for Sudlow Road that proposals will also be required to provide appropriate private amenity space in line with adopted policies.</p> <p>This will help us greatly if you are to allow a "transition space" between Sudlow Road and the Frogmore Complex.</p> <p>Please please please kindly consider that the privacy we have enjoyed in our homes on Sudlow Road will become completely compromised by this development.</p> <p>We appreciate consideration to right of light - with mews houses and a gradient of higher rise elsewhere.</p> <p>Again, the transition area and opportunity for us to have land to our own private gardens to develop ourselves would make the development that much easier to accept.</p> <p>Great that it is so varied</p> <p>Appreciate Sudlow Road being recognised as a sensitive key area for careful moderation of building height strategy. Thank you. Please be aware we do not have gardens so any development cannot be flush to our properties without detrimental impact to our properties too. Thank you.</p> <p>Fabulous such consideration is being given to environment and sustainability. Sudlow Road is keen to add to this biodiversity with the option of green land (and hopefully the opportunity to acquire land so that we may build our own gardens as discussed) immediately behind our properties. We want to make it private gardens so that we can feel secure.</p> <p>Capacity estimates sound extremely high but I recognise the need for new housing. I, and fellow residents on Sudlow Road, would like consideration for a stretch of land to the east of Sudlow Road (ie. land currently owned by Wandsworth Depot, running the length of our residential street) to be blocked out as a transitional space between Sudlow Road and the development, to be included within this masterplan please.</p>		
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		<p>You state the largest land parcel is the Frogmore depot which is currently used as Council offices and depot services. This is the area directly behind Sudlow Road and a small area we would therefore like to engage with about acquiring the land to build our own gardens.</p> <p>However there appears to be no consideration on the list of "constraints" to the residents of Sudlow Road. Is it therefore the private owners of this area we need to speak to about acquiring the land?</p> <p>Worrying your plans show almost back-to-back housing onto Sudlow Road properties which do not have gardens to the rear.</p> <p>You state the largest land parcel is the Frogmore depot which is currently used as Council offices and depot services. This is the area directly behind Sudlow Road and a small area we would therefore like to engage with about acquiring the land to build our own gardens.</p> <p>However there appears to be no consideration on the list of "constraints" to the residents of Sudlow Road. Is it therefore the private owners of this area we need to speak to about acquiring the land?</p> <p>Worrying your plans show almost back-to-back housing onto Sudlow Road properties which do not have gardens to the rear.</p> <p>I am enthused that the adopted SPD sets out how the Council will ensure new development contributes to a “safer, healthier and more prosperous Wandsworth and will be a material consideration in the assessment of planning applications”.</p> <p>We hope you will therefore listen to us residents who are so heavily impacted so we may work together in a positive manner to improve all of our living standards, old and new. Thank you.</p>		
51.1	<p>Jorge Manuel Guerreiro Santos (Individual)</p>	<p>These plans and how this will affect Sudlow Road should have been consulted with the residents much earlier. I believe the process has been going on for 2 years now and we've only just found out about this.</p> <p>GREEN SPACE!! Please consider garden space for the residents of Sudlow Road that back onto the development. We have in the past been told that the land was essential - if the plans have changed, please also afford us the opportunity to have a garden.</p>	<p>Comments noted.</p> <p>Regarding Sudlow Road, see the response to comment 9.1.</p>	<p>See response to 9.1</p>

		<p>If the council is looking to sell off the land where the technical services are currently house, it would be right to offer the residents some form of the first option on a reasonable space to allow us to also benefit from green space. Talking Biodiversity to benefit existing landowners too, "any development should prioritise the provision of high quality private and public outdoor space of different types....there is limited data available to highlight what these are.</p> <p>The full consensus from existing residents is this is a key necessity from us. We expect the council to recognise existing residents' needs within your plans. Here is an opportunity for Sudlow Road tenants who have had to endure the workings of the Councils' technical services for all these years, to allow us to build our own private gardens to the rear of Sudlow Road. This will make a great difference to our lives, our children's lives and our tolerance of future developments.</p> <p>Please ensure that you will consider existing residents need and wishes ahead of maximum development - we have been surrounded with development after development, have lost light due to not the Osiers Road developments. Here on our doorstep, we are once again threatened. Please allow us and you to consider the opportunity for us to create our own gardens were given how much will impact us negatively during the extensive building process, loss of privacy as we become overlooked, with reduced light into our properties, and reduced level of security as we have benefitted from that of the councils' land, and open sky views. This will require some serious consideration. Not only the loss of light, the massive disruption to our lives and your goals of creating bio-diversity spaces. There is an opportunity for a mutual compromise.</p> <p>We welcome your contextual approach which considers the setting of townscape assets and existing character. Sudlow Road is recognised as a charming street</p>		
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		<p>full of character. We look forward to how you can compliment this - Again, offering us the land to build gardens feels like a consideration. Council will pursue a minimum approach to car parking with a view to supporting sustainable movement patterns".</p> <p>Sudlow Road has already suffered difficulties with car parking due to the developments on Osiers Road, Clyde House etc which do not have parking spaces for the 100's of residents. The plan does not include parking spaces due to the 'sustainable movement patterns/' It must be realised that the impact on Sudlow Road with parking will / be uncontrollable if serious thought is not given to this aspect. Please ensure that the plans allow a "transition space" between Sudlow Road and the Frogmore Complex. Consider green space, biodiversity objectives for all residents and also the fact that we will oppose any back-to-back plans. We need our space, please. Seriously concerned about the privacy, loss of light and urban impact which will be compromised by this development.</p> <p>We appreciate consideration to the right of light - with mews houses and a gradient of higher rise. The transition area and opportunity for us to have land to our own private gardens to develop ourselves would make the development that much easier to accept.</p> <p>Multi-use of the land is welcomed have mentioned thsi previously, but plesae consider our privacy, the invasion of space light and general well-being. The development must not encroach on our space. Allow space and please consider allowing us the opportunity to acquire space to create green gardens.</p> <p>Good news that consideration is being given to the environment and sustainability.</p> <p>Sudlow Road is keen to add to this biodiversity with the option of green land. Alos allow the residents of Sudlow Road to benefit from the biodiversity objectives the development is set out to create. Please also consider our privacy in the plans.</p>		
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		<p>Capacity estimates sound extremely high but I recognise the need for new housing. I, and fellow residents on Sudlow Road, would like consideration for a stretch of land to the east of Sudlow Road (ie. land currently owned by Wandsworth Depot, running the length of our residential street) to be blocked out as a transitional space between Sudlow Road and the development, to be included within this masterplan please.</p> <p>Frogmore depot is the area directly behind Sudlow Road and a small area we would therefore like to engage with about acquiring the land to build our own gardens. However there appears to be no consideration on the list of "constraints" to the residents of Sudlow Road.</p> <p>The plans show almost back-to-back housing onto Sudlow Road properties which do not have gardens to the rear.</p> <p>Concerns</p> <ol style="list-style-type: none"> 1. Loss of light 2. Back-to-back housing? 3. No biodiversity plans for the residents of Sudlow road 4. Massive & lengthy disruptions expected <p>The PD sets out how the Council will ensure new development contributes to a “safer, healthier and more prosperous Wandsworth and will be a material consideration in the assessment of planning applications”.</p> <p>We hope you will therefore listen to us residents who are so heavily impacted so we may work together in a positive manner to improve all of our living standards, old and new. Please please hear us out!</p>		
52.1	Zack Santos (Individual)	<p>I live on Sudlow Road, do not drive, so walk or take public transport everywhere. Yet I was not aware of any of these plans ahead of someone mentioning it in passing to someone who lives on our street a month or so ago.</p> <p>Worrying for such big plans that will have a huge impact on me and our home. Agree with need for additional green space in the study area. But more importantly, as a resident of Sudlow Road, significantly sized green space would be required, as none</p>	<p>Comments noted.</p> <p>Regarding Sudlow Road, see the response to comment 9.1.</p>	<p>See response to 9.1</p>

	<p>of us have gardens at the back. Current plans do not seem to take this into account. Also, we collectively asked the council years ago if we could please purchase some of the The Depot's land so we could build gardens at the back. At the time they needed the land. Now is our opportunity to add to the greenery.</p> <p>Demand from current residents is certainly more green space attached to our houses, to also act as a buffer zone between us and any new development.</p> <p>Please consider existing residents also in your plans. We need the opportunity to build our own gardens from some of the land taken from The Depot, as we previously asked.</p> <p>This development is going to impact our lives and homes massively:-</p> <p>Privacy - we will be onlooked</p> <p>Security - we currently benefit from locked gate into The Depot and security cameras.</p> <p>POLLution - Hideous noise pollution and dust pollution throughout the building. And whose to say impact on noise pollution with densely populated housing in future.</p> <p>Loss of light - even if houses are tiered, our skyline will be interrupted.</p> <p>Sudlow Road is a charming street. Please do not ruin this charm and rather use the opportunity to add to it.</p> <p>Will all this housing mean we will battle to park on our own street in the future? It's already a bit of a headache.</p> <p>Please consider whilst we are keen to have the opportunity to build our own gardens, we also wish to be mindful of security and would NOT want to back up onto a new communal garden without either high security measures - or unless we backed up on to the back gardens of low level mews houses running adjacent to us. The latter would probably make most sense.</p> <p>Please kindly consider our privacy. However good and necessary the plans are, our views, light and privacy are going to be compromised with this development. Even with tiered housing. My room is on the top floor with a roof terrace. I'm afraid my privacy is going to be bulldozed.</p> <p>Variety is good</p>		
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		<p>Please ensure all housing behind us - The Depot area - is kept low. Our houses are already quite dark and we've suffered loss of light/skyscape in our kitchen from high-rise in Osier Road. It's devastating to think our house will become even darker. This is fantastic that environment is being considered. As well as biodiversity. Here our wishes merge - we very much want the opportunity to build gardens too!</p> <p>New development is running way too close to Sudlow Road - we do not have any gardens. As terraced houses, this would expose a third wall dangerously close to your developments.</p> <p>We would like therefore to strongly suggest we are allowed the stretch of land to the east of Sudlow Road so we may build our gardens, that will also double up as a transitional space between our houses and the new plans.</p> <p>This large area of Frogmore Depot is directly behind our house - and therefore we would like to speak about acquiring some of the area to build our own gardens - also acting as a buffer to any development.</p> <p>The site is obviously worth a fortune in future revenue to any developer and the portion of land we feel we should be allocated a small gesture in comparison. This is our HOMES and lives and working from home could be unbearable with proposed plans. Done well, it could be fabulous for all.</p> <p>To please consider not just future residents, but current ones. We have lived on Sudlow Road for 14 years, love the street, and we are a strong community who only want to make the area better. We will be hugely inconvenienced by these plans and whilst we welcome positive change, it is necessary for it to be positive for us too please. Thank you.</p>		
53.1	Phil Sellick (Individual)	Fully supported	Noted	N/A
54.1	Russel Smith (Individual)	<p>I am the owner of xx Sudlow Road, which is one of the few residential streets that will be directly impacted by this develop.</p> <p>I have only been made aware of this development recently, and was surprised to learn this development was taking place. My neighbours in Sudlow Rd say the same thing,</p>	<p>Comments noted.</p> <p>Regarding Sudlow Road, see the response to comment 9.1.</p>	See response to 9.1

		<p>The council has been very poor at making our street aware of the development, especially in light of the very real impact this development will have on our street. In keeping with the concept of creating green space and biodiversity, we believe that the council should be giving the owners of Sudlow road the opportunity to buy some of the land behind our houses to create garden space.</p> <p>We have tried to do this in the past only to be told by the council the land was not for sale and the car park was essential for the offices at the depot.</p> <p>Biodiversity should also apply to existing residents.</p> <p>We expect the council to recognise existing residents' needs within your plans.</p> <p>Its an opportunity for the owners of houses in Sudlow Road, who have had to endure the workings of the Councils' technical services for all these years , to allow us to build our own private gardens to the rear of Sudlow Road.</p> <p>This will make a great difference to our lives, our children's lives and our tolerance for the disruption of having a construction site directly behind our houses for a year or two.</p> <p>The residents needs, including those of us who live in Sudlow Rd, should be considered and be equal to the needs to the developers.</p> <p>We also have a right to light and privacy at the rear of our houses, and are concerned that if we are not given the opportunity to acquire some land for gardens to the rear of our properties, the rights or light and privacy are being taken away and the development will also have a negative impact on the value of our properties.</p> <p>The character of Sudlow Road needs to be maintained and enhanced. We believe this is achieved by creating some green space through gardens to the rear of our properties and the new development.</p> <p>We welcome the cycle routes and paths to allow access through to the station.</p> <p>We have a concern that Sudlow Road, with its on street parking, will become highly sought after due to the limited parking space within the development. This will increase traffic flow as people look for parking, thereby changing the character of what is a quiet one way residential street.</p> <p>We would propose only allowing residents of sudlow road to park in sudlow road.</p>		
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	<p>Please ensure that the plans allow a "transition space" between Sudlow Road and the Frogmore Complex.</p> <p>Consider green space, biodiversity objectives for all existing residents and not just the residents of the new develop.</p> <p>Please also the fact that we the residents of Sudlow Rd will oppose any back-to-back plans at the rear of our properties.</p> <p>Seriously concerned about the privacy, loss of light and urban impact on Sudlow Road which will be compromised by this development.</p> <p>Please consider the residents of Sudlow Road and the impact on our privacy, the invasion of space light and our loss of light by high rise buildings on the Frogmore part of the development.</p> <p>Allow space and please consider allowing us the opportunity to acquire space to create green gardens by acquiring land behind our houses on the Frogmore part of the development.</p> <p>I, and fellow residents on Sudlow Road, would like consideration for a stretch of land to the east of Sudlow Road (ie. land currently owned by Wandsworth Depot, running the length of our residential street) to be blocked out as a transitional space between Sudlow Road and the development, to be included within this masterplan please</p> <p>Frogmore depot is the area directly behind Sudlow Road and a small area we would therefore like to engage with about acquiring the land to build our own gardens. However there appears to be no consideration on the list of "constraints" to the residents of Sudlow Road.</p> <p>The plans show almost back-to-back 3 storey housing onto Sudlow Road properties which do not have gardens to the rear</p> <p>As an owner and resident of Sudlow Road, I have major concerns over:</p> <ol style="list-style-type: none"> 1. Loss of light and my right to light at the rear of my house. 2. Back-to-back housing or 3 stories high directly behind my house. 3. No biodiversity plans for the residents of Sudlow road 		
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		<p>4. Massive & lengthy disruptions expected while the development takes place. 5. the lack of prior engagement by the council on this development and its impact on Sudlow Road. The plans appear to be far advanced and we have only recently been made aware of them. We hope the council will therefore listen to us residents and owners of Sudlow Road. who are so heavily impacted so we may work together in a positive manner. We believe in active dialogue to find a solution that works for both parties. If our voice and views are ignored, we will seek legal advice and take necessary action. However we encourage the council to work with us proactively if at all possible.</p>		
55.1	<p>The South East Rivers Trust/The Wandle Trust</p>	<p>I write on behalf of the South East Rivers Trust, in response to the draft Wandle Delta Masterplan Supplementary Planning Document. As a key opportunity for improving and enhancing the Wandle, we welcome the opportunity to respond to the document at this draft stage.</p> <p>The South East Rivers Trust (SERT) is an environmental charity dedicated to the restoration and enhancement of rivers and their catchments. Our vision is to achieve healthy river ecosystems (for all) across the South East of England by delivering outstanding river ecosystem enhancement through science-based action, collaboration, education and engagement. We are the host for the Wandle Catchment Partnerships and facilitated the development of a Catchment Plan.</p> <p>The Wandle Catchment Plan has been compiled to provide a holistic strategy for restoring south London’s River Wandle to its former glory as one of the world’s most famous chalk streams. Chalk streams like the Wandle are a globally-rare and precious part of our cultural heritage, but many now suffer from human modification and other pressures including over- abstraction of water, sources of pollution including roads and sewage treatment works, and development.</p> <p>The Wandle is an extremely important local asset, highly valued by communities. In the 1960’s the Wandle was declared biologically dead but since then millions of</p>	Comments noted	N/A

		<p>pounds have been spent bringing the river back to life by improving water quality, enhancing habitats and removing barriers to species movement. The work to date has been a huge success and the river is now home to rare and protected species like brown trout, lamprey, European eels and kingfisher. As the Wandle Delta is a particularly sensitive area, the “way in” to the Wandle for many species, it is crucial that future development here does not hamper the continued improvement of the Wandle.</p> <p>We welcome the inclusion of extending the Wandle Trail through Feathers Wharf to reach the confluence with the Thames and to recognise this with a significant new public open space. It has been a longstanding wish of the local community and will be warmly received. We agree that it is an essential step in realising the importance of the River Wandle as a major environmental and place-making asset for the SPD area, as you say in the plan.</p> <p>However, although there is brief mention of creating new riverbank habitats and working with the Wandle Catchment Partnership and solely in regards to the Wandle Trail, we do not feel this adequately meets the partnerships ambitions for improving the river itself.</p> <p>We feel there are several main considerations and opportunities for any development, especially those that are river adjacent:</p>		
55.2	<p>The South East Rivers Trust/The Wandle Trust</p>	<p>Disturbance During Construction</p> <p>Fish and other aquatic species are particularly sensitive to noise and vibration. Developments adjacent to the river must have due investigation and mitigation for any construction impacts that could cause noise and vibration to ensure wildlife is not impacted during or after construction. These factors are particularly important due to</p>	<p>Comments noted – see section 5.7 of SPD. One of the site-by-site requirements is to produce and agree a Construction</p>	<p>N/a</p>

		<p>the very sensitive location of the site at the mouth of the Wandle. Developments should avoid creation of any barrier to species movement and migration in and out of the Wandle, importantly; this isn't just a physical barrier but can be caused through noise, chemicals, temperature or creating any unfavourable condition. Creating a barrier would be catastrophic and negatively impact upon all the restoration work carried out upstream to date so the importance of avoiding this kind of disturbance must be highlighted.</p>	<p>Environmental Management Plan.</p>	
55.3	<p>The South East Rivers Trust/The Wandle Trust</p>	<p>River Channel and Riparian Restoration</p> <p>While a lot of work has been carried out to improve the Wandle, there is still much to do. Wandsworth Council should push for developments along the Wandle corridor to fund further re-naturalising of the river itself as part of development as supported by London Plan Policy S117 and the Wandle Catchment Management Plan, not just implementation of public access.</p> <p>Figure 26 in the draft plan shows the indicative treatment of the Wandle under various conditions though there is no mention of where Conditions B and C may be implemented. We would urge that Condition C is only delivered as a last resort. Although, as the image shows, this technique was delivered as part of development of the Ram Brewery site, expectations for river restoration have changed significantly since then and restoration delivered within the SPD now should reflect current best practice at the time of delivery.</p> <p>The draft plan states that policy dictates a minimum of 6m setback from the river for development. We would recommend ideally requiring 30m for ecological functioning (as in Condition A) in all riverside development but acknowledge that this may not be feasible in such a built-up environment, in which case we recommend not less than 10 m be left between development and the river bank (more reflective of Condition B).</p>	<p>Comments noted – see response to Environment Agency which clarifies a minimum 8m setback from the Wandle and 3m walking/cycling footpath.</p>	<p>N/a</p>

		<p>The materials used for the riverside walk within that area should be carefully selected so that they facilitate ecological interactions across the riverbank buffer zone and do not present a barrier to wildlife.</p> <p>A healthier river makes for a more aesthetic and pleasing development and therefore the benefits of delivering or funding further river improvements are obvious. Any developers should be asked to engage with the Trust, as hosts of the Catchment Partnership, to discuss options for river restoration during the early stages of planning the development. Wandsworth Council can then lead the way in ensuring delivery of aspirational improvements for the river, which would otherwise be impossible without working in partnership with those developing the adjacent land.</p>		
55.4	The South East Rivers Trust/The Wandle Trust	<p>Surface Water</p> <p>It should be a condition of planning permission that any potential development throughout the borough, has less than greenfield runoff rates and that there is no discharge of surface water to the river.</p> <p>This is important given the urban nature of the catchment, as any surface water will be contaminated from urban activities, posing a pollution risk to the nearby watercourse.</p> <p>We would expect the council to promote a wide range of SuDS features including rain gardens and the implementation of permeable surface materials. A robust plan for maintaining these assets post development is also essential.</p>	Comments noted	N/A
55.5	The South East Rivers Trust/The Wandle Trust	<p>River Shading - Building Height and Bridges</p> <p>The Trust would not be in favour of any proposals that reduce sunlight availability to the river and therefore believe any river adjacent development should be restricted in height so as not to impose additional permanent shade to the river, significant or not. We appreciate that this has been reflected in section 5.6.15 of the SPD document</p>	Comments noted – precise massing would require detailed studies at planning application stage in response to the SPD guidance	N/A

		<p>however, it seems clear that suggested building heights in Figure 41 are not compatible with this and will need to be reduced.</p> <p>New footbridges over the Wandle (para 5.3.10, para 5.7.9) should be designed sympathetically to minimise the amount of river shading.</p>		
55.6	The South East Rivers Trust/The Wandle Trust	<p>Engaging Communities with the Wandle</p> <p>Any development adjacent to the river should face on to it rather than back away. This helps to foster a sense of ownership for the health of the river and develops a more engaged local community with the Wandle at its heart.</p> <p>We strongly support public use of the riverbank and engagement with the Wandle. However, this must be done sensitively so that it does not negatively impact on the river. We would welcome the inclusion of interpretation signs and community information about the river.</p> <p>A community art project to create a mosaic on the Thames river wall would raise the profile of the river through recognition of this Wandle Vista and allow the river to become a key focus for place making in the area, the need for which is highlighted in the draft plan’s vision and objectives.</p>	Comments noted	N/A
55.7	The South East Rivers Trust/The Wandle Trust	<p>Artificial Lighting</p> <p>The Trust expects to see no new light cast upon the river and the vegetation along its banks, to reduce the impact to wildlife from any new development. Lighting should be motion sensitive where possible and of a type and quality that does not impact wildlife including bats.</p> <p>Net Biodiversity Gain</p>	<p>Comments noted</p> <p>Biodiversity Gain statement to be provided in section 5.7</p>	<p>New para 5.7.13:</p> <p><u>Net Biodiversity Gain: Proposals should demonstrate how wider</u></p>

		The plan should explicitly recognise the need for a net gain in biodiversity within the place making objectives through the “biodiversity and habitat improvements” (para 4.2.2) and for the Wandle Trail (para 5.3.10). It should also ensure that where Net Biodiversity Gain is not possible within the confines of the site being developed, it should be offset through work elsewhere along the Wandle corridor.		<u>regional and local requirements for Net Biodiversity Gain can be accommodated – ideally onsite, or through work elsewhere along the Wandle corridor.</u>
55.8	The South East Rivers Trust/The Wandle Trust	<p>Concluding Remarks</p> <p>Given the unique nature of the Wandle, it is crucial the developments within the Wandle Delta help protect and enhance this asset for wildlife and communities.</p> <p>The Trust is happy to be consulted on any development within the Wandle Delta but asks that engagement is started as early as possible to ensure we can influence plans from the start in a more effective manner.</p> <p>Please consider carefully the recommendations we make to ensure that development and implementation of the draft Wandle Delta Masterplan Supplementary Planning Document provides the best outcomes for local people and wildlife along the Wandle.</p>	Comments noted	N/A
56.1	Sport England	Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of national, regional and local	Incorporate reference to Active Design Guidance.	New sentence at

	<p>policy as well as supporting local authorities in developing the evidence base for sport.</p> <p>Health and wellbeing – Active Design</p> <p>I note that the SPD references the creation of a permeable street network and a focus on walking and cycling – this is welcomed. I also note a focus on waymarking and creating legible connections in order to help improve health and wellbeing. Proposals to create an alternative low-traffic cycling route to Armoury Way are fully supported, as are the proposed new pedestrian and cycle bridges.</p> <p>Sport England believes the aims of this document would be further strengthened by specifically referencing Sport England's Active Design Guidance, with the recommendation that future design proposals follow its principles, which are broadly in line with principles outlined in this SPD.</p> <p>Sport England and Public Health England have refreshed our 'Active Design' guide which provides some really useful advice and case studies with clear reference to the NPPF to maximise the opportunities for design in physical activity. Sport England would commend this to you and suggest the concept of 'Active Design' be incorporated into policy and any new developments – please see website extract and link below:</p> <p>Active design</p> <p>We believe that being active should be an intrinsic part of everyone's daily life – and the design of where we live and work plays a vital role in keeping us active. Good design should contribute positively to making places better for people and create environments that make the active choice the easy choice for people and communities.</p> <p>That's why Sport England, in partnership with Public Health England, has produced the Active Design Guidance. This guidance builds on the original Active Design (2007)</p>		<p>the end of para 5.3.3:</p> <p><u>“Proposals should also seek to incorporate Sport England’s Active Design Guidance.”</u></p>
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		<p>objectives of improving accessibility, enhancing amenity and increasing awareness, and sets out the Ten Principles of Active Design.</p> <p>Ten principles The ten principles have been developed to inspire and inform the layout of cities, towns, villages, neighbourhoods, buildings, streets and open spaces, to promote sport and active lifestyles.</p> <p>The guide features an innovative set of guidelines to get more people moving through suitable design and layout. It includes a series of case studies setting out practical real-life examples of the principles in action to encourage planners, urban designers, developers and health professionals to create the right environment to help people get more active, more often.</p> <p>The Active Design Principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design.</p> <p>Active Design has been produced in partnership with David Lock Associates, specialists in town planning and urban design.</p> <p>http://sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design</p>		
57.1	David Terrill / Sharon Quill (Individuals)	<p>Overall, we are in favour of the basic principles that will guide the Frogmore developments. However, we have two concerns which we would wish to raise. The first and most obvious is please minimise the height of buildings. Having had a significant chunk of the sky taken away as a result of the developments on the other side of the rail tracks, we really have had our fill of that for a while. Let Sudlow Road set the tone and, as far as possible set a maximum limit of 5 stories in the area up to the creek. Our second concern is traffic. Sudlow is a secluded road - and traffic is minimal. Please do not change that. We would hate to see the road being used as a cut-through. On a separate note, you have an opportunity to do a lot of good with</p>	<p>Comments noted.</p> <p>Regarding Sudlow Road, see the response to comment 9.1.</p>	<p>See response to 9.1</p>

		<p>this development. From being hidden by industrial buildings and gasworks, It would be brilliant to see the Wandle becoming a star in the borough. We wish you the best of luck with the project.</p>		
58.1	TfL – Commercial Development	<p><i>Please note that our representations below are the views of the TfL CD planning team in its capacity as a landowner in the borough only and are separate from any representations that may be made by TfL in its statutory planning role and / or as the strategic transport authority for London. Our colleagues in TfL Spatial Planning have provided a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.</i></p> <p>TfL CD have engaged through the Local Plan preparation process and have submitted the following representations:</p> <ul style="list-style-type: none"> • – Wandsworth Local Plan Employment and Industry Review • – Wandsworth Local Plan Issues and Options (December 2018) • – Wandsworth Call for Sites (March 2019) • – Wandsworth Local Plan Pre-Publication Regulation 18 (February 2021) <p>5.10 Long-Term Opportunities: Peninsularisation of Wandsworth Bridge Roundabout</p> <p>TfL possess the freehold ownership of the Wandsworth Bridge Roundabout and have previously promoted the site for redevelopment via the Wandsworth Borough Council’s Call for Sites (March 2019). In addition, TfL CD continue to support the allocation of Wandsworth Bridge Roundabout for <i>“Mixed use development including residential and economic uses with elevated active travel routes connecting the site to neighbouring development”</i> as cited within the Wandsworth Local Plan Pre-Publication Regulation 18.</p>	Comments noted	N/A

		<p>TfL CD support Wandsworth Borough Council’s long-term strategic intentions to ‘peninsularise’ Wandsworth Bridge Roundabout and enable redevelopment of the existing site. Equally, as noted within paragraphs 5.10.8 and 5.10.9, TfL CD acknowledge that the prospective redevelopment of Wandsworth Bridge Roundabout would be required to accord with the adjacent “<i>development sites identified in the Wandsworth Bridge Road cluster</i>” and “<i>that any such proposals would need to be coordinated with a broader strategy of sustainable modal shift towards walking, cycling and public transport</i>”.</p> <p>Given that the ‘peninsularisation’ of Wandsworth Bridge Roundabout is considered to be a long-term opportunity, TfL CD remain keen to collaborate with Wandsworth Borough Council in order to explore the potential for redevelopment at Wandsworth Bridge Roundabout.</p> <p>For further information, please see TfL CD’s representation to the Wandsworth Local Plan Pre- Publication Regulation 18 (16th February 2021).</p> <p>Concluding Remarks</p> <p>We hope that these representations are helpful but if you need any further information or would like to discuss any of the issues raised in our representations, please do not hesitate to contact me. We look forward to being kept up to date with your programme going forwards.</p>		
59.1	TfL – City Planning	<p><i>Please note that these comments represent the views of Transport for London (TfL) officers 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. The comments are made from TfL’s role as a transport operator and highway authority in the area. These comments do not necessarily represent the views of the</i></p>	<p>Strengthen reference to key regional and local transport policies.</p>	<p>New para 5.2.3: “Proposals should seek to embrace key modal shift targets</p>

	<p><i>Greater London Authority (GLA). A separate response has been prepared by TfL CD Planning (Property) to reflect TfL's interests as a landowner and potential developer.</i></p> <p>Thank you for giving Transport for London (TfL) the opportunity to comment on the Wandle Delta Masterplan SPD.</p> <p>The Mayor first published his draft new London Plan for consultation on 1 December 2017. Following examination, the Panel's report, including recommendations, was issued to the Mayor on 8 October 2019 and the Intend to Publish version of the London Plan was published on the 17 December 2019. The Publication London Plan was then prepared to address the Secretary of State's directions of the 13 March 2020 and 10 December 2020 in his response to the Intend to Publish Plan. The final version of the new London Plan was published on 2 March 2021, and now forms part of Wandsworth's Development Plan.</p> <p>SPD policies should be developed in line with relevant London Plan policy and TfL's aims as set out in the Mayor's Transport Strategy (MTS). In particular, it is important that local plans support the Healthy Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network.</p> <p>In this context, we welcome the application of Placemaking, Smart Growth and People First principles. In particular, we support the need to secure sustainable patterns of movement, promote active travel and enhance public transport access and capacity. However, for consistency with the Local Plan it would be useful to encourage application of the Healthy Streets Approach and to confirm the need to manage traffic. The SPD should include policies and measures to ensure that all development contributes towards achievement of the mode split targets set in the Mayor's Transport Strategy and Wandsworth's Local Implementation Plan, as well as the</p>		<p>in the Mayor's Transport Strategy and Wandsworth's Local Implementation Plan."</p>
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		Vision Zero road safety objective. Car free development should be required for all sites in areas of PTAL 4 – 6 in line with the London Plan.		
59.2	TfL – City Planning	<p>Section 5.2 Movement Figures 22 and 23</p> <p>We welcome proposed improvements to walking and cycling, and the intention to work closely with TfL in integrating transport improvements with proposals for Wandsworth gyratory and enhancements to Wandsworth High Street. Planning obligations, CIL contributions and parcels of land may be required to deliver these projects.</p> <p>In paragraph 5.2.21, TfL welcomes the approach to car parking which seeks to minimise provision, although this could be better phrased to state more clearly that car free development is required on sites with a PTAL 4 – 6 and that car parking on all sites within the Wandle Delta Masterplan area will be minimised in line with the London Plan. Car free development will be important to mitigate the impact of development on the road network, coupled with changes to the gyratory.</p> <p>In paragraph 5.2.16 there is reference to a new northern entrance to Wandsworth Town station. If the creation of a new entrance requires changes to the road layout, buses should not be negatively impacted.</p> <p>It would be helpful if figure 23 also illustrated key bus routes to provide a more complete picture of the movement framework.</p>	<p>Amend 5.2.21 (now Para 5.2.26) to clarify the ambition is “car free” development in areas of high PTAL.</p> <p>Figure 23 would become illegible if more information was added. Bus routes are included in the baseline report appendix.</p>	<p>Add a sentence to the end of 5.2.26. “Car free development should be considered for sites with a PTAL 4-6.”</p>
59.3	TfL – City Planning	<p>Section 5.3 Public Realm and Landscape</p> <p>In the Streets section (5.3.4 – 5.3.6), TfL welcomes the greater priority given to sustainable modes, close working with TfL on the gyratory and Wandsworth High Street and the intention to develop a series of pedestrian priority streets. As noted, pedestrian crossing locations are only indicative at this stage. This section would be the ideal place to reference the Healthy Streets Approach which should be adopted widely across the Masterplan area.</p>	<p>Add reference to Healthy Streets approach</p>	<p>Amend 5.3.5: “... As set out in the movement section, there is a clear aspiration</p>

				to place greater priority on sustainable modes of transport, led by walking and cycling, <u>embracing the Healthy Streets Approach</u> ".
59.4	TfL – City Planning	<p>Section 5.9.19 – 5.9.22 Wandsworth Bridge Cluster</p> <p>The Wandsworth Bus Garage should be retained as the site performs an important role in supporting TfL bus services as well as providing a base for commercial bus operations. Any redevelopment would need to at least retain existing vehicle capacity and provide for future growth, including plans for electrification of the bus fleet.</p>	Add reference to TfL in relation to this site	<p>5.9.19 – 5th bullet:</p> <p>“Subject to ongoing operation of the current occupier, <u>and discussions with TfL,</u> proposals to rejuvenate the bus garage for leisure or flexible</p>

				workspace will be considered.
59.5	TfL – City Planning	<p>Section 5.10 Peninsularisation of Wandsworth Bridge</p> <p>TfL owns the freehold of the Wandsworth Roundabout site. We welcome the intention to work closely with TfL to consider opportunities for the site. As stated, this will need to be subject to detailed assessment work. Further comments are provided in a separate response from TfL Commercial Development.</p>	Comments noted	N/A
59.6	TfL – City Planning	<p>Section 5.11.4 -5.11.5 Section 106 Priorities</p> <p>In addition to improvements to Wandsworth Town station, the ‘Improvements to Strategic Transport’ section should include contributions (land, financial or physical works) towards Wandsworth gyratory as well as improved bus services, bus infrastructure and measures to support active travel.</p>	Agreed – add wording.	<p>Para 5.11.5, amend third bullet: “Improvements to strategic transport, including improvements to Wandsworth Town railway station <u>and contributions (land, financial or physical works) towards Wandsworth gyratory as well as</u>”</p>

				<u>improved bus services, bus infrastructure and measures to support active travel.”</u>
60.1	Thamesbank	<p>INTRODUCTION Thamesbank (founded 1995), director, Mission Statement above. Working River knowledge of the River Thames communities from Hampton to Faversham My family have been connected to the River Thames & River Wandle since 1800’s. Thames Living River Exhibition OXO Tower 2000/ Survey. GLA’s Thames’ & Waterways Steering Group elected member (rtrd) River Thames Society, Vice Chair responsible for Thames Tideway (rtrd) More recently & present working on the UN SDG No 6 for Water across the Thames Catchment, and other Rivers in the UK.</p> <p>WANDLE DELTA MASTERPLAN SPD Thanks to the Wandsworth Brightside magazine, Thamesbank was alerted to this Wandle Delta Masterplan consultation. However when I called around the River Communities, it appeared that no-one had been aware of this important plan or been involved in any part of the process. These groups included the West London River Group, the Thames Strategy and the River Thames Society to name a few of the one’s involved in this key River Site. Some have put a hurried response to you, but we have great concern about the lack of effective River Stakeholders involved.</p> <p>RIVER THAMES & RIVER WANDLE DELTA SITE & CONTEXT</p>	<p>Comments noted – please see response to comment 4.0 to make greater reference to river potential</p>	<p>See response to comment 4.0</p>

		<p>This is an important site of Strategic Significance to the River Thames and beyond for London</p> <p>The River Thames and its tributary River Wandle are in themselves strategically important to the Wandle Valley with a vast amount of heritage linked to them – marine and otherwise – up and down the Thames and up & down the Wandle.</p> <p>THE APPROACH TO THIS WHOLE DEVELOPMENT IS WRONG & HAS FAILED ITS POTENTIAL</p> <p>It has not reached its full potential by failing to maximise and prioritise the needs of both Rivers in their key functions.</p> <p>It is therefore only half of what still could be done to complete the plan, and, as it stands now can never do justice to either the Great Heritage of Central Wandsworth or to the two magnificent Rivers that have served this town for hundreds of years.</p> <p>The Wandle Delta is a ‘once in a generation’ (quote Cllr John Locker) opportunity to make the most of a vast amount of already encroached “bluefield” (not “brownfield”) River land - the Delta - and all its industrial sites and waterways which have brought wealth and business to Wandsworth creating a very valuable community to lead us now into the next 10, 20, 30 years as the climate changes around us in many extreme ways.</p> <p>The plan and idea to realise the Delta’s potential is good, but has completely missed the opportunity to maximise the potential of the area and needs to go back to the drawing board before it is too late.</p> <p>The Plan has been looked at from the wrong end of the telescope and from a land based perspective.</p> <p>The approach needs to be reversed and seen from a River perspective first.</p> <p>This is a Golden Opportunity which needs to prioritise the Rivers by opening up the Wandle, removing much of the concrete & culvert leading up to the Town Hall & Centre in all its historic glory. Of course this will cost and not be easy ... but needs to</p>		
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		<p>be out for consultation bringing Wandsworth together for their future in a very exciting project. With the view of the River Wandle flowing from the Town Centre to the River Thames. And then from Wandsworth Town Centre being able to walk cycle or canoe up the Wandle River ... opening up a transport route from Wandsworth hinterland to the Thames. This is a once in a lifetime opportunity!</p> <p>[I have many photos of boathouses and boating on the Wandle in the 1930s showing the River's importance of River recreation. I have canoed down it and through the Tunnel].</p> <p>GOOD GROWTH The NPPF states “ Good Growth is not about supporting growth at any cost, which far too long has been the priority ... but genuinely affordable homes and greener more inclusive and safer city that supports the health and well being of all”.</p> <p>THESE FIVE KEY FUNCTIONS OF A RIVER MUST BE ADDRESSED IN ANY DELTA RIVER PLAN:</p> <ul style="list-style-type: none"> - Water supply and drainage; - Landscape - An open space and ecological corridor - A transport artery <p>A recreational, leisure and tourist facility</p>		
60.2	Thamesbank	<p>Water supply and drainage Thamesbank welcomes and supports your IWRM plans with Blue-Green Infrastructure. This will help policy to be Carbon neutral by 2030 & Zero by 2050. We would like to suggest that ALL development aims at Carbon Zero rather than neutral in principle in order to reach this figure as soon as possible.</p>	Comments noted- the SPD acknowledges that a comprehensive approach to drainage and water management is required.	N/A

		<p><u>Urban Blue Greening of Roads Pavements and hard surfaces, and carparks.</u> Also you say roads need to be permeable through the site, but we suggest that ALL roadways and pavements are routinely laid down as permeable to attenuate rain water preventing it going into sewers. We have had discussions with your road works and they are tied up in contracts now so cant put permeable road surfaces down. They are also misinformed saying that it is not possible. Our team also knows these Wandsworth side roads and says the ground beneath is ideal.</p> <p><u>Disconnect down drainpipes – REDUCES PEAK FLOW AND STOPS FLOODING</u> In addition to your excellent measures so far, we suggest that the Council introduces disconnecting all the down pipes in the SPD and ALL NEW BUILD (a street at a time in rest of town) – into rainbutts, gardens, trees etc , would reduce the Peak Flow of a heavy rain storm. By commencing this important flood reduction now elsewhere will enable the Wandle Delta projects to be ahead in protecting water and flooding ... and drought. This will be increasingly important in all NEW BUILD higher up away from the River to stop water going into the drains and sewers causing flooding.</p>		
60.3	Thamesbank	<p>Riverscape & Landscape It is essential that all tall buildings are kept well back from the edge of the Rivers to allow open space and views from the centre of Wandsworth, creating vistas that make people, who have always lived in Wandsworth want to be down by the River and not feel pushed out by expensive tall blocks of flats that are like canyons and which take away the feeling of being out and near the water.</p> <p>The shocking Wandsworth residential blocks of treeless barren Riverscape from Wandsworth Bridge downstream is dead, souless & “scary” with no boats and few people on the side walks. Boaters rush through here apologising to their passengers</p>	Comments noted – the SPD provides guidance in relation to massing and relationship with the river corridor	N/A

		<p>as everyone longs to move into thriving lively part of the River. Everyone dreads that reach. This is a Wandsworth Reach – NOT TO BE REPEATED.</p> <p>It is essential that the new Wandle Delta River Village is fully alive with boats people & low rise buildings copying best practice from other successful thriving Rivr Village hubs.</p> <p><u>London Plan Policy D9 C</u> “Development proposals should address the following impacts: f. “Building near the River Thames and part of the TPA should protect and enhance the open quality of the River and Riverside Public Realm, including views & NOT contribute to a CANYON effect along the River” (bolding added).</p>		
62.4	Thamesbank	<p>An open space and ecological corridor</p> <p>Thamesbank supports most of your SPD Biodiversity policies, however we are concerned that with so much increased footfall along the edge of the Rivers and River Trails, the negative impact of too many people has already affected the Thames Path along from Putney to Hammersmith Bridge as it is over crowded because of Lockdown. This will affect the bird population – especially with a growing population needing more space.</p> <p><u>Tranquil & Quiet Areas - Biodiversity</u></p> <p>In light of this possible crowding we would like to suggest a recommendation of the original Strategic Planning Guidance for the River Thames (still excellent policies) that led to the Blue Ribbon Network in the first London Plan: “in seeking to develop the recreational potential of the River and improve accessibility, its importance along many stretches as a place of quiet and tranquil enjoyment should not be overlooked” (RPG3B9B 1996).</p> <p>Feathers Wharf</p> <p>We would like to suggest that this is possibly appropriate on Feathers Wharf which is owned by Wandsworth and where the EA insisted on a 6 metre strip of land here to protect the wild life back in 2015.</p>	<p>Comments noted – the SPD sets a framework for biodiversity considerations including the management of the Wandle – reference to management will be strengthened.</p> <p>Feathers Wharf – the footprint of development has been reduced considerably to enable a space to be created adjacent to the Thames Path at the confluence with the Wandle Trail. It is likely this space (alongside Bell</p>	<p>Para 5.3.12, bullet 1 – amend as follows:</p> <p>Biodiversity benefits: enhancement of the river edge through naturalisation techniques to enhance biodiversity value of the Wandle including the creation of</p>

		<p>This whole area we would like to suggest is kept for Re- wilding as well as the Island C ... in the middle.</p>	<p>Lane Creek) would be needed as public open space in response to the level of development envisaged. Opportunities for biodiversity are encouraged within the SPD.</p>	<p>new habitats (see sections 5.10 and 5.12) which limit human access, <u>alongside an integrated approach to management</u></p>
60.5	Thamesbank	<p>The Wandsworth Council is responsible for the River Thames up to the midline. The River Thames is a site of Strategic Significance & Importance to London and the River Wandle is of Local Significance & importance. How much money does Wandsworth spend on the River annually and for what? Do we give any Council Tax to the River ... we could if not. When was the last assesement and inventory of all that is lacking on the Rivers for this & the next generation to come? How many children know the River is there for their activity? Who do you go to for help for this crucial information? The council has sport and amenity facility assessment – why is the River assessment ignored? Has Wandsworth council considered the need to address the River economy and how much it could boost the council income? Has there been a financial assessment – (Londoners used to pay £9 a year for the River Lea, until quite recently) All National, Royal and Regional Parks have an income, but the Thames with all its history & Heritge has no income although there are 4 World Heritage Sites along the River. Everyone gains from the River but who puts money back or into it – virtually no one.</p>	<p>Comments norted - wider funding of the Thames is beyond the scope of the SPD. Re. access and use of river - see response to comment 4.0</p>	<p>See response to comment 4.0</p>

		<p>There as a growing shortage of marine facilities and services along the River Thames – especially in new developments when a full and proper assessment hasn’t been done for some time.</p> <p>There is growing concern that young people are not being introduced to the River and Waterways at a young age, and now the Lighter and Watermen are saying that they are missing a whole generation of youngsters to become pilots and help manage the boats on the River, which are now increasing with ferries & freight.</p> <p>It is vital that the Wandsworth Delta addresses this serious omission of enough young people learning how to navigate the waters and Thames safely – the inlet is an ideal place for young people to learn – going back and forth to Putney Embankment would be quite a good trip to start to gain boating knowledge. Rowing Eights a Fours etc do NOT teach a person how to cope with ropes in and individual way – there is no exploring – just rowing up & down.</p> <p>Young people are energetic and strong and we are a sea-faring nation so it is vital that young people can spend time playing safely on the water in the Wandle Delta so that they can be active - rowing boats etc and away from “screens ” and drugs – reducing crime.</p> <p>The Delta Village Hub could set the example for other developments (there are a number on the Thames at the moment) and grow a great team of young mariners to compete along the River with other mariners up and down stream & for the Great River Race etc. The Wandle Delta could be the first to lead on this.</p> <p>We are discussing this with the RYA.</p> <p>- Has there been a full assessment and inventory of the River Thames’ facilities in the local reaches of the River, and will they meet the needs, now and in the future of the local community – particularly young people – to all the River- related activities which will be needed around the Wandle Delta and its hinterland for the increasing population of years to come.</p>		
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		<p>- Has there been a similar assessment and inventory of the River Wandle?</p> <p>- How does the Wandle Delta relate to all the other developments along the Thames (this will be needed for the EIA)</p> <p>What is needed to ensure that the Delta plays its part in the future of the Thames marine facilities and services?</p> <p>There were no questions in the consultation that helped a resident decide how they might like to enjoy the River itself and any activity</p> <p>The NPPF clearly says as - a high priority in National Government - about Open Spaces “that Plans should reflect the needs and priorities of the local community – based on “robust and current assessments of the Open Space, sport & recreational facilities”</p>		
60.6	Thamesbank	<p>Rivers as a transport artery for London</p> <p>Apart from the two Saveguarded Wharves, required by the PLA, and the mention of the River bus 700metres upstream of the Delta, the great potential to maximise the Thames as Transport Artery - this very important River function has been completely ignored in the whole of the SPD.</p> <p>Transport along the Rivers is the reason Wandsworth is here today and if we do nothing about this development who is going to ensure the Rivers are here for the next pilots or sea captains.</p> <p>There are documents and reports all written to show their aren't enough marine facilities and the new developments do not address this serious lack and take the easier way out ...</p> <p>Wandsworth Council needs to make plans for 10 & 15 & 20 years ahead when local transport along the River is seen as the environmental norm – like Electric cars.</p> <p>Tony Arbour, Con. AM has written a leading paper saying the BRN is the heart of London , and addressing why residential housing is killing the River and facilities are being ignored he says: ” several million people regularly take part in angling and boating; there is clearly a public desire for access to the water.</p>	See response to comment 4.0	See response to comment 4.0

		<p>The growing demand for environmentally friendly forms of Transport should equally increase demand for access''</p> <p>There are many London Plan policies promoting the River and sustainable River transport as well as river related activities & vital services need to support this key function.</p> <p>Why has Wandsworth ignored all the River and marine facilities required in the London Plan and just stuck to the important but NOT ON RIVER trail and path ? Walking along a path by the River does not excite many children they need proper more energetic water related boating activity where they can learn a new skill.</p> <p>Small Water Taxis and moorings – residential and visitors- and dinghy parks and boat workshops and boats need to be the number one reason the Delta River Village is buzzing with people like Putney, Richmond, Greenwich, Brentford etc. If boats are welcomed, people and children will come and learn boating skills.</p> <p>There needs to be a quayside so anyone can drop in from the Thames on a “tide hop” – catch the tide up or down ... have some lunch waiting till the tide turns and then going back. The River is there to transport us all into another world exploring – it is wonderful and the Wandle Delta River Village Quayside could be one of the makings of this new development.</p> <p>So many times I’ve met young lads with expensive bikes and they all say “how much and can I go on the River?” They are thrilled when I explain what they have to do to learn about the River. Kids want to use the River, but they don’t even know that it is there or can use it</p>		
60.7	Thamesbank	<p>THE OBJECTIVES of the SPD</p> <p>Thamesbank has gone through the various Visions and Objectives in this document and it is clear that the two Rivers the Wandle and the Thames are not prioritised and their strategically significantly importance to Wandsworth and London as “our finest natural asset”.</p>	See response to comment 48.3	See response to comment 48.3

	<p>And the lack of maximising the key functions of the Rivers – particularly the marine and boating services, slipways, jetties etc – the needs of the Transport , Recreation and Leisure & Tourism in this unique opportunity to celebrate the great potential of this Delta... has quite simply not been honoured and given justice to the great global standing that they – the Thames in particular - have been deemed to have by this present and previous governments.</p> <p>A NEW SUGGESTED FIRST OBJECTIVE : to prioritise the Rivers Wandle and Thames in the Wandle Delta Masterplan SPD ... and applied to Climate Change using the UN 17 Sustainable Development Goals.</p> <p>Lord Deben, then Rt Hon John Gummer MP (CON), Secretary of State for the Environment, wrote as Preface to the Strategic Planning Guidance for the River Thames:</p> <p>“The overriding objective of this Planning Guidance is to restore the Thames, the physical heart of London, to its rightful place at the heart of the capital’s consciousness. It recognises the vulnerability of the Thames to inappropriate and insensitive development, and the many conflicting pressures which lay claim to the River’s rich variety of resources. It offers innovative approaches to counter these concerns”.</p> <p>Thamesbank supports the many key policies in the London Plan 2021 which have been pointed out by the PLA and others and also the PLA’s Vision for the River Thames having worked with the PLA at its creation in 2015. It is important that Wandsworth takes note of a number of crucial policies in this valuable document, as well as the London Plan - prioritising the River Thames in the Wandle Delta Masterplan.</p>		
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		Thamesbank along with many others will be more than willing to help with the next steps of the Wandle Delta Masterplan SPD. We have a great deal of local River Thames data which may be of help.		
61.1	Thames Water (Savills)	<p>As you will be aware, Thames Water Utilities Ltd (Thames Water) are the statutory water and sewerage undertaker for the Borough and are hence a “specific consultation body” in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments on the consultation document in relation to water and sewerage infrastructure:</p> <p>Water and Wastewater/Sewerage Infrastructure</p> <p>Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of water supply and sewerage/wastewater treatment infrastructure.</p> <p>Water and wastewater infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.</p> <p>A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), February 2019, states: “Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...”</p>	Comments noted – included suggested text in relation to Local Plan policy which is dealt with separately to the SPD.	<p>Add new bullet on Water supply/waste water infrastructure in 5.11.5:</p> <p><u>“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary</u></p>

	<p>Paragraph 28 relates to non-strategic policies and states: “Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...”</p> <p>Paragraph 26 of the revised NPPF goes on to state: “<i>Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary...</i>”</p> <p>The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that “<i>Adequate water and wastewater infrastructure is needed to support sustainable development</i>” (Paragraph: 001, Reference ID: 34-001- 20140306).</p> <p>Policy SI5 of the new London Plan relates to water and wastewater infrastructure and supports the provision of such infrastructure to service development.</p> <p>It is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. The new Local Plan should therefore seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to underestimate the time required to deliver necessary infrastructure. For example: local</p>	<p><u>infrastructure upgrades.”</u> <u>“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/wastewater company as early as possible to discuss their development proposals and intended delivery</u></p>
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	<p>network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years.</p> <p>The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water’s asset plans and from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling.</p> <p>As from 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections has changed. The changes mean that more of Thames Water’s charges will be fixed and published, rather than provided on application, enabling you to estimate your costs without needing to contact us. The services affected include new water connections, lateral drain connections, water mains and sewers (requisitions), traffic management costs, income offsetting and infrastructure charges.</p> <p>Information on how off site network reinforcement is funded can be found here https://developers.thameswater.co.uk/New-connection-charging</p> <p>Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:</p> <ul style="list-style-type: none"> • The developments demand for water supply and network infrastructure both on and off site; • The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and 	<p><u>programme to assist with identifying any potential water and wastewater network reinforcement requirements . Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of</u></p>
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	<ul style="list-style-type: none"> • The surface water drainage requirements and flood risk of the development both on and off site and can it be met. <p>Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water’s free pre planning service are available at: https://www.thameswater.co.uk/preplanning</p> <p>In light of the above comments and Government guidance we consider that the New Local Plan should include the following additional text to support Policy LP23:</p> <p>PROPOSED WATER SUPPLY/WASTEWATER INFRASTRUCTURE TEXT:</p> <p><i>“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”</i></p> <p><i>“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”</i></p>		<p><u>the relevant phase of development</u> <u>”</u></p>
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61.2	Thames Water (Savills)	<p>Comments on Site Allocations</p> <p>The information contained within the SPD will be of significant value to Thames Water as we prepare for the provision of future infrastructure.</p> <p>The attached table provides Thames Water’s site specific comments from desktop assessments on water, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed development sites, but more detailed modelling may be required to refine the requirements.</p>	Comments noted	N/A
61.3	Thames Water (Savills)	<p>Waste Water</p> <p>In general, there are no capacity concerns for any sites, however we do have flooding concerns on Old York Road. This is mentioned in the site response, but it is preferable for the Ferrier St Cluster and Hunts Trucks/Gasholder Cluster to connect into the foul network along Swandon Way rather than Old York Rd or Armoury Way.</p> <p>Surface water on all sites is expected to follow the London Plan policy 5.13 with discharge to the rivers or into the surface water sewers at greenfield rates. The draft SPD includes support for SuDS, which we also support. There is the potential for further construction of the surface water network or conveyance of storm water overland through SuDS and disconnection of Surface Water from the combined sewers.</p> <p>Access to the Tideway tunnel and storm overflows needs to be protected on two sites (Frogmore and Wandsworth Bridge).</p> <p>It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning</p>		<p>Additional bullet point for site guidance on Ferrier Street / Gasholder cluster (5.9.10 / 5.9.23):</p> <p><u>“Waste water management requires detailed consideration in liaison with Thames Water but is likely to be preferable</u></p>

		<p>condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution.</p>	<p><u>along Swandon Way rather than Old York Road or Armoury Way</u></p> <p>Amend Frogmore site bullet point (5.9.6):</p> <p>Provision of open space to the south of Bell Lane Creek allowing maintenance access in relation to Thames Tideway maintenance requirements via Dormay Street <u>(exact location to be agreed in</u></p>
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				<p><u>liaison with Thames Water).</u></p> <p>Para 5.9.19 (Wandsworth Bridge cluster) – new bullet:</p> <p><u>Maintain access to the storm overflows</u></p>
61.4	<p>Thames Water (Savills)</p>	<p>Clean Water</p> <p>There is concern about capacity to serve these developments. More information is required and we would encourage early engagement to understand times scales for delivery.</p> <p>We recommend Developers contact Thames Water to discuss their development proposals by using our pre app service (link below) https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity</p>		<p>New para 5.7.20. under “Other sustainability and environmental Priorities” (section 5.7) heading:</p> <p><u>Developers should engage in early discussion</u></p>

				<p><u>with Thames Water in relation to clean water supply, foul water drainage, access to the Tideway infrastructure and protection of Tideway assets where applicable”</u></p>
<p>62.1</p>	<p>Thames Water / Tideway Tunnel (Savills)</p>	<p>In summary we support the SPD but changes are required in the Dormay Street area adjacent to Bell Lane Creek to ensure that the masterplan aligns with our operational requirements.</p> <p>As a key principle, proposed development must not be allowed unless it can be demonstrated that the development would not adversely affect the construction of the Thames Tideway Tunnel and/or the operational and maintenance works and access required over the lifetime of the Thames Tideway Tunnel infrastructure. We welcome the reference to Tideway at 2.2.11, 3.5.6, 5.96. and 5.9.8 of the SPD but would request that the need to protect the Tideway assets and their access is highlighted within the SPD.</p> <p>Background</p>	<p>Comments noted – please see response to 61.4</p>	<p>Please see response to comment 61.4</p>

		<p>Bazalgette Tunnel Limited (trading as Tideway) is the company delivering the construction of the £4.3bn Thames Tideway Tunnel. The Tunnel is being implemented under a Development Consent Order enacted on 3rd September 2014 and which came into force on 24th September 2014. Construction of the project is anticipated to be completed in 2025.</p> <p>London’s sewer system carries both foul sewage and surface water, largely making use of the hidden culverted rivers. The original Bazalgette sewage system, built more than 150 years ago, intercepted the old rivers at various points across London – notably along London’s embankments (newly built to accommodate them) and diverted combined sewage outflows to the main sewage treatment works downstream to the east of London. The development of the city has inevitably increased the quantity of sewage in the system beyond anything that might have been envisaged 150 years ago. The Thames Tideway Tunnel is a 25km ‘super sewer’ under the Thames, with a 7.2m internal diameter, to intercept spills and to hold storm discharges in the tunnel until it can be emptied and treated by Beckton Sewage Treatment Works. This will improve the quality of the River Thames and its environment.</p> <p>Some of the land acquired temporarily or permanently for the purposes of constructing the tunnel will ultimately be available for development, and this will include areas of public realm. Areas within these sites will be retained by Thames Water as operational land for access and operation and maintenance throughout the lifetime of the infrastructure. This land will continue to be subject to the safeguarding included in the Article 52 of the DCO.</p>		
62.2	<p>Thames Water / Tideway Tunnel (Savills)</p>	<p>NPPF</p> <p>The National Planning Policy Framework (NPPF) sets out that the purpose of the planning system is to contribute to the achievement of sustainable development (paragraph 7). The NPPF sets out the contribution that should be made by Plans</p>	Comments noted	N/A

		<p>(paragraph 15) and sets out that Plans should be ‘sound’. Paragraph 35 sets out that Plans are sound if they are positively prepared, justified, effective and consistent with national policy.</p> <p>The land controlled by Thames Water at Dormay Street comprises brownfield land in a highly sustainable location. This is generally suitable land for development as set out in paragraph 117 of the NPPF which requires policies to make as much use as possible of previously-developed or ‘brownfield’ land. Paragraph 118 states that planning policies and decisions should “encourage multiple benefits from both urban and rural land, including through mixed use schemes” and “give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs.”</p>		
62.3	<p>Thames Water / Tideway Tunnel (Savills)</p>	<p>Thames Water land at Dormay Street</p> <p>The key area of relevance to Thames Water is the Frogmore Cluster. This comprises brownfield land within a sustainable location and is therefore an appropriate location for development according to the NPPF (see above). It is important that the SPD maximises the use of this brownfield land.</p> <p>Tideway’s development at Dormay Street will intercept flows from the Frogmore Storm Relief – Bell Lane Creek Combined Sewer Outflow (CSO) and enable the construction of the Frogmore connection tunnel. The works will convey the flows from the existing pipework beneath the Frogmore Complex to the main tunnel via the Frogmore connection tunnel. A CSO interception chamber, hydraulic structures (including chambers, culverts and pipes), ventilation structures and an electrical and control kiosk are under construction. The CSO shaft is approximately 24m deep.</p> <p>The land related to the Tideway project is the shaded area on the plan below:</p>	Comments noted	N/A

<p>62.4</p>	<p>Thames Water / Tideway Tunnel (Savills)</p>	<p>Spatial Masterplan</p> <p>The blue and green shaded areas are where the subterranean constructions and above ground kiosk (to the west of the shaft and bollards) will be located. Some or all of the balance of the Areas 2 and 3 will be required for Operation and Maintenance purposes. We attach plan 2520-TDWAY-DRMST-150-TZ-DR- 700001 P02 which shows the permanent works that will be delivered by Tideway.</p> <p>Once the project is operational, it is anticipated that Thames Water personnel would visit the site approximately every three to six months to inspect and carry out maintenance of the electrical control, ventilation and below-ground equipment. This</p>	<p>Comments noted – 5.9.6 acknowledges the need for maintenance access.</p>	<p>An additional principle added to 5.9.6 Frogmore Cluster: <u>“Proposals subject to review with Thames Water</u></p>

	<p>would likely involve a visit by personnel in a small van during normal working hours and may take several hours.</p> <p>It is planned that a major internal inspection of the tunnel system and underground structures would be required once every ten years. This process would likely involve a team of inspection staff and support crew and two mobile cranes to lower the team into the CSO drop shaft. The inspection and works would likely take three months and access will be required during that time for large vehicles and crane operations.</p> <p>Thames Water may also need to visit the site for unplanned maintenance or repairs, for example, in the event of a blockage or an equipment failure. Such a visit may require the use of mobile cranes and vans.</p> <p>In order to accommodate mobile cranes (which could need to access the bottom of a 24 m chamber) much of areas 2 and 3 will need to be kept clear of development. As maintenance visits should be irregular, areas 2 and 3 could be appropriate for open uses (such as storage or parking) which can be cleared at short notice (noting that emergency visits may be required). The area could be suitable for open space on the proviso that it can be closed at short notice and that certain areas would need to remain as hardstanding. Vehicular access to the site needs to be maintained at sufficient width for mobile cranes to access.</p> <p>The red area at the eastern end of Bell Lane Creek could accommodate some development as it will not be required for maintenance.</p> <p>Therefore the masterplan as shown in the SPD is not deliverable and does not make efficient use of available brownfield land as required by the NPPF. The 4-8 storey building adjacent to Bell Lane Creek conflicts with Tideway’s maintenance requirements. However, the Thames Water land that could be used for development (the red area on Plan 1) is preserved as open space.</p>		<p><u>“Thames Tideway”</u></p>
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We request that the masterplan is reconsidered in this area in order to extend the 3-5 storey building up towards Bell Lane Creek and increase the height of building in this area up to 8 storeys to reflect the waterside environment. In that case, it is doubtful whether the riverside walk along Bell Lane Creek will need to continue eastwards past the footbridge as it will not lead anywhere. Our suggested changes are shown indicatively on Plan 2.



Points A & B (dots on Plan 1) are the positions of the current temporary pedestrian bridge connecting the site offices and the Tideway construction site. They broadly align with the proposed bridge shown within the SPD (which is presumably indicative). These footbridge bearings could be left in situ for a replacement bridge to be

		<p>installed. Therefore this would be an appropriate location for a new crossing. Any new crossing must be designed and situated so as not to conflict with proposed public art installation at the intertidal terrace at Bell Lane Creek.</p> <p>If the masterplan is amended as suggested in Plan 2, then it may be preferable to move the footbridge further west. This would allow the footbridge to 'land' in an area of open space, rather than immediately adjacent to the building. This will need to be considered at the detailed design stage.</p>		
62.5	<p>Thames Water / Tideway Tunnel (Savills)</p>	<p>Land Use</p> <p>The emerging Local Plan stated that the Frogmore Cluster site allocation seeks to replace and intensify the existing quantity of industrial and office floorspace with light industrial and office workspace for cultural and creative industry SMEs alongside public realm improvements.</p> <p>The Thames Water land on which there is a reasonable prospect of development falls within Local Plan area WT5. In WT5, the emerging Local Plan seeks at least a 25% increase in the amount of industrial and office floorspace. This is broadly as set out in the SPD, which states at 5.5.23 in particular that “sites within the EUIA have capacity to provide intensified industrial uses, increased business floorspace and/or managed workspace for SME businesses. Residential use will also be appropriate in these areas, where this assists in developing more intensive economic uses and is compatible with the spatial objectives set out in the relevant area Spatial Strategy and/ or Site Allocation.”</p> <p>We generally support this approach. We welcome the potential for mixed use (including residential) development in the Frogmore Cluster that has been recognised in the emerging plan and SPD. This will improve the viability of development in this area. It is highly likely that to support viability, employment uses will require cross subsidy from residential uses.</p>	Comments noted	N/A

62.6	Thames Water / Tideway Tunnel (Savills)	<p>Public Realm</p> <p>A number of public realm improvements (e.g. riverside walks and bridges) are proposed across the SPD area. These are supported in principle but where they have a bearing on the Thames Water future operational site at Dormay Street, it is important to ensure that they can be delivered without adversely affecting the operation of the Thames Tideway Tunnel.</p> <p>Public realm improvements are likely to need to be funded by development in the wider Wandsworth policy area because development in the Frogmore Cluster itself is likely to be lower value (if it is already cross subsidising employment uses).</p> <p>As set out in the spatial masterplan section above, we doubt whether the Bell Lane Creek riverside walk needs to continue eastwards past the proposed footbridge.</p>	Comments noted – amendments set out in response to 62.4	See response to 62.4
62.7	Thames Water / Tideway Tunnel (Savills)	<p>Link with Local Plan</p> <p>It is understood that the SPD is intended to support the current Local Plan, therefore, the relationship with the new Local Plan and SPD should be clarified to ensure that it is robust, up to date, and correlates to the latest decision-making framework.</p>	Comments noted Section 3.4.2 has been reviewed to clarify the relationship between the SPD and emerging Local Plan.	N/a
62.8	Thames Water / Tideway Tunnel (Savills)	<p>Summary and Requested Changes</p> <p>Thames Water supports the SPD but changes are required in the Dormay Street area adjacent to Bell Lane Creek to ensure that the masterplan aligns with our operational requirements. The key changes are:</p>	Comments noted – see response to 62.4	See comment 62.4

		<ul style="list-style-type: none"> • - Retention of open space (shown by blue dot on Plan 2) to accommodate Thames Water operational requirements • - Suitable access being retained to Thames Water assets (noting requirement for mobile cranes) • - Opportunity for new building at eastern end of Bell Lane Creek (orange area on Plan 2) • - Reconsider juxtaposition of open space and Bell Lane Creek footbridge and need for riverside walk to continue east of footbridge 		
63.1	<p>Alexander Turner (Individual)</p>	<p>Communication with existing residents on the border of this new development has been substandard. The webinars were helpful</p> <p>Special consideration should be given to the Sudlow Road residents who will be directly impacted by this new development. Reconsidering the 2016 e-petition by residents who wanted to collectively purchase land behind their properties to allow themselves a small garden would be appreciated, and will greatly improve the mental health of the residents in question</p> <p>Tall buildings should not be permitted. Loss of light, pollution, privacy should be considered for existing residents of Sudlow Road</p> <p>As stated the Wandle Delta needs to put people first, and listen to existing residents</p> <p>Knit into its surrounding neighbourhoods - go the extra mile to improve the surrounding properties and blend them in with the new development. Gardens should back on to other gardens / green spaces. Nobody wants old heritage buildings to be towered/peered over</p> <p>Allow sudlow road residents to purchase small gardens, and thus giving suitable transition space from existing buildings to the new development. We have one chance</p>	<p>Comments noted - See response to comment 9.1</p>	<p>See response to comment 9.1</p>

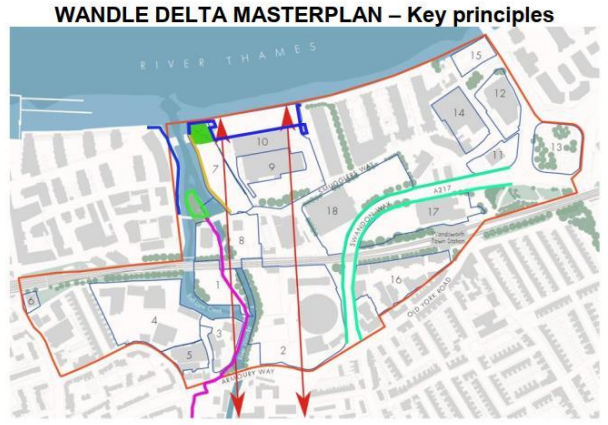
		<p>to get this project right, and enhance the area and the mental health benefits of everyone.</p> <p>It would be wonderful to see another mews or terrace and their gardens which would back onto "new gardens" that the Sudlow residents could purchase from the existing Frogmore Depot</p> <p>Transition from Low Rise Sudlow Road Housing to the new development needs careful consideration. Space, gardens and gradual increasing of height should be at the forefront of these considerations</p> <p>In consideration of the environment, allow the residents of Sudlow Road to increase the size of their gardens, by allowing them to purchase some land, this enhancing the biodiversity of the area, which in turn will greatly benefit the mental health of all the residents</p> <p>Before the site goes to tender, allow the residents of Sudlow Road to purchase some land behind their properties for garden use, which will keep the residents happy and supportive of the development, and also enhance the area due to the additional green space created. The area needed would be minimal compared to the area of the redevelopment. In terms of pricing it would be fair to assume the same price per square foot that is achieved with the rest of the site, therefore the council would be in the same financial position, only with the entire street of existing residents 'onside'</p> <p>engage the sudlow residents with the form of a Zoom call prior to the development being finalised. The residents can all dial in, we could appoint a chair person to represent us all, and hear our voices. Financially the council will be no worse off if they allow us to purchase land, but instead of having a group of irate residents they will have succeeded in getting them onside and will receive full backing for the rest of the development. This really isn't a big ask, its such a small piece of land we would</p>		
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		want, please listen and help in our quest for improved lifestyle's and the physical and mental health benefits that would ensue.		
64.1	Hossein Vakilian (Individual)	<p>I am extremely disappointed about the late notice of these plans which have been in works for a couple of years , and will affect me as a land owner on Sudlow Road. I believe it is important that if changes are being made, that adequate concern and thought is given to the environment, as well as ensuring sufficient green/garden outdoor space is left so that the residents of Sudlow Road are not facing tall obstructive blocks.</p> <p>As referred to in the planning document, it is important to ensure provision of high quality outdoor space. There is full alignment of the residents of Sudlow Road to achieve this. The Council has an obligation to recognise and ensure the plans are reflective of this important criteria. The optimal solution for the council and residents is to ensure a section of the area behind Sudlow road is maintained as an outdoor garden.</p> <p>As mentioned above, it is important that the plans reflect the need of the Sudlow Road residents and an outdoor garden space is maintained behind Sudlow Road. This is both positive for the residents and the environment. There have been numerous developments in our area and need to ensure these developments are not the continuous detriment of Sudlow Road.</p> <p>We are focused on maintaining the charm of Sudlow Road and as you mention the important of considering the townscape is important part of this project. Hence why important that the impact on Sudlow Road is fully considered.</p> <p>There has already been reduced parking space available in the area over the last few years and consideration must be given to this, as further reduction adversely impacts residents of Sudlow Road.</p> <p>It is vital that appropriate green/outdoor space is maintained between Frogmore Complex and Sudlow Road, to help ensure biodiversity and environmental objectives are achieved, as well as no determined to the Sudlow Road residents. Hence why an outdoor garden behind Sudlow Road must be reflected in the plans before council can consider granting approval.</p>	Comments noted - See response to comment 9.1	See response to comment 9.1


		<p>While the plans have considered the right of light, it is imperative that a outdoor garden behind Sudlow Road is included to ensure the quality of living for Sudlow Road residents is not impacted.</p> <p>The plans should ensure that Sudlow Road’s residents privacy, light and quality of living is not impacted by this development. Hence why the proposed outdoor garden would help address this issue.</p> <p>We welcome the consideration to the environment, but believe biodiversity is also important and hence why outdoor garden space is being suggested to address this.</p> <p>While recognising the important of new housing, we would like the council to consider the area to the directly to the east of Sudlow Road to be an outdoor garden (along the whole stretch of the road) for use by residents, and be part of the approval. We would like to consider potentially acquiring the land in Frogmore area directly behind Sudlow Road to convert into gardens.</p> <p>Issues to be considers include impact on quality of living for residents in Sudlow Road (loss of lights, tall towers), significant disruption and no biodiversity plans.</p> <p>We hope the council will take into consideration all these comments to ensure the residents of Sudlow Road are not adversely affected, and ensuring adequate changes are made to the plans before any approval is considered,</p>		
67.1	Benjamin Virgo (Individual)	<p>Looks excellent. As a resident, I support this. Well done Wandsworth Council, joining up Wandsworth Town and the river Thames is an excellent thing to do. I like the way it uses green space, trees and pedestrian flow</p> <p>Exactly the right areas to focus on. It is currently car dominated, hard to reach on foot and the old gas holders are a waste of prime space</p> <p>Looks excellent. As a resident, I support this. Well done Wandsworth Council, joining up Wandsworth Town and the river Thames is an excellent thing to do. I like the way it uses green space, trees and pedestrian flow</p>	Comments noted. The SPD provides a context for building heights and the waste / recycling facilities.	N/A


		<p>Good but would prefer if you built these a bit higher, as otherwise you are wasting prime space. I like the height of the highest building you have planned in Ram Brewery, for example.</p> <p>Good flows. Shame you can't move the waste transfer, as that would really open up the river and join up the Thames path. If not, also consider the flow of people east/west next to the waste transfer</p> <p>Positive. Maybe more bridges across the Wandle would be good too</p> <p>Positive. The sooner you remove these gasholders the better</p> <p>Suggest moving/removing the waste recycling from here. This is prime riverside location that should be enjoyed by residents and tourists alike</p>		
66.1	Wandle Valley Forum	<p>Wandle Valley Forum provides support and an independent voice for over 140 community groups, voluntary organisations and local businesses and for everyone who shares a passion for the Wandle. Many of our supporters are based in Wandsworth.</p> <p>We welcome the initiative of producing a Supplementary Planning Document (SPD) for the Wandle Delta. It is a neglected area of the Wandle Valley rich with opportunities for environmental improvements and increased public access and connectivity which will in turn provide economic opportunities that draw on the area's improving environmental quality. Strengthening the network of Wandle-related open spaces and the Wandle Trail are especially important for improving the quality of life and they provide the means to connect important areas of the Borough, including Wandsworth Town Centre and the Thames, and to support active travel and mental wellbeing.</p>	Comments noted	N/A


We identified the following principles as part of the earlier masterplanning process for the Wandle Delta:





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New Pocket Park
- 

Extension of Wandle Trail
- 

Enhancement of Wandle Trail
- 

Greening of Swandon Way "boulevard"
- 

New routes for Thames Path (including use of Feathers Wharf walkway)
- 

Enhancement of The Spit
- 

Waterfront Wandsworth - better links between Wandsworth town centre & Thames

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



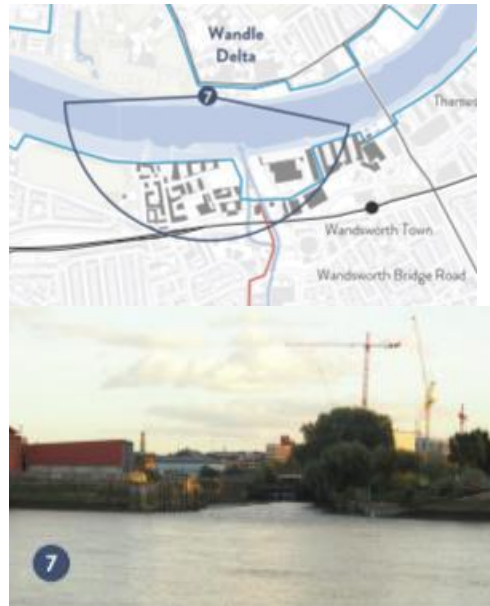
Wandle Valley Forum July 2020

We have assessed the draft SPD against these principles and also the priorities established for the Wandle Valley in the [Wandle Valley Forum Charter](#). We note that in the outcome of public engagement over the Masterplan the "most frequently made comment was to deliver the Wandle Trail" (paragraph 1.5.5) and the final SPD needs to reflect this strong public support. We have also made [representations](#) on the Area Strategy for Wandsworth Town in the draft Local Plan which covers the SPD area.

		<p>We welcome the strategic intentions of the SPD. If delivered they would have a transformational impact on the area. They give strong recognition to the many roles played by the Wandle in securing improvements. We warmly welcome the intention to address longstanding community ambitions for an extension of the Wandle Trail through Feathers Wharf to reach the confluence with the Thames and to recognise this with a significant new public open space. This can be delivered in the very short term.</p>		
66.2	Wandle Valley Forum	<p>We believe the SPD can be strengthened in the following ways (with examples of relevant paragraphs):</p> <ul style="list-style-type: none"> • Explicitly recognise the need for a net gain in biodiversity within the Placemaking objectives through the “biodiversity and habitat improvements” (para 4.2.2) and for the Wandle Trail (para 5.3.10) • Identify the Wandle Trail in Figures 22, 23 and 40 consistent with the commitment to make this “a focus for the whole area”, and include its route south of Armoury Way (para 5.2.3) • Require green margins to be provided along the Wandle as well as new paths • Secure a consistent approach to waymarking and identifying the Wandle Trail as part of the wider Wandle Valley Regional Park extending upstream to Sutton and Croydon as well as locally, and rationalise and remove the existing diverse and confusing collection of signs and route markers (para 5.3.10) • Require all new and existing routes along and across the river to be designed and surfaced to minimise conflict between different users, especially between those on bike and on foot. For the Wandle Trail we commend the pedestrian priority and approach developed for towpaths by the Canal and River Trust • Establish high design expectations of any new bridges over the Wandle (para 5.3.10, para 5.7.9) • Support the extension of the Wandle Trail through Feathers Wharf to the confluence with the Thames independent from securing the high level walking 	<p>Biodiversity net gain – see response to comment 55.5</p> <p>Add annotation of Wandle Trail</p> <p>Section 3 sets a context for the detailed design of the Wandle Trail</p> <p>The Wayfinding guidance in 5.3.10 provides sufficient detail</p> <p>Add additional reference to pedestrian priority guidance in section 5.3</p> <p>Emphasise the need for high quality design of bridges in 5.3.10</p>	<p>Wandle Trail annotation – add to Figure 22 and 40</p> <p>Amend para 5.2.4: ... North-south connections along the River towards the Ram Quarter and town centre <u>and south of Armoury Way</u>, making this a focus for the whole area, with a network of east-west</p>

		<p>connection at Western Riverside Waste Transfer Station for the Thames Path to ensure they can be pursued separately</p> <ul style="list-style-type: none"> • Ensure the new “Feathers Wharf Park” is located at the confluence of the Wandle and the Thames and not further south – this would fail to achieve the primary objective of recognising the point where the Wandle and the Thames meet and completing the Wandle Trail (para 5.3.19) • Put more emphasis on the opportunities for enhancing The Spit as a critical point where Bell Lane Creek and the main river meet which provides compelling views of the confluence with the Thames from by the junction of the Wandle Trail and the Thames Path • Ensure significant uplift in all routes within the area, including Swandon Way, as assessed by the Healthy Streets Scorecard • Identify Wandle Valley Forum and Wandle Valley Regional Park Trust as key partners in enhancing the Wandle Trail as well as the River Wandle Catchment Partnership (which plays a less direct role in the Wandle Trail) (para 5.3.10) • Address the need for work on the Wandle to contribute to naturalising the way it functions as a water course, as supported by London Plan Policy SI17 and the Wandle Catchment Management Plan • Recognise the historic significance of the Wandle itself and its related weirs and other structures in the river whose heritage value should be considered when determining planning applications for their alteration or removal • Support development which creates more opportunities for local people to manage and run buildings as well as open spaces along the Wandle (para 5.3.31) • Recognise the Wandle Vista of the Wandle Delta, acknowledging it is physically located in Hammersmith and Fulham. There is a strong evidence base supporting identification of this Wandle Vista from the Wandle Vistas report prepared for Wandle Valley Regional Park Trust and Wandle Valley Forum with funding from the Living Wandle Landscape Partnership. This work has been 	<p>The indicative guidance highlights the northernmost location for Feathers Wharf.</p> <p>Make reference to enhancement of the Spit.</p> <p>Guidance provides a clear context for the enhancement of existing streets.</p> <p>Expand reference to Partners in 5.3.10.</p> <p>Positive reference made to river enhancements already included.</p> <p>Additional reference to heritage value in para 5.7.9</p> <p>Make reference to local involvement in para 5.3.31</p>	<p>linkages into the Trail.</p> <p>New para 5.3.8:</p> <p><u>All new and existing routes along and across the river should be designed to minimise conflict between different users, especially between those on bike and on foot. For the Wandle Trail, in line with pedestrian priority approach developed for towpaths</u></p>
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recognised with the RTPI’s Excellence in Plan Making Practice award and the Landscape Institute’s Award for Landscape Policy and Research.



- Require any new development in the Frogmore cluster to avoid shadowing of the Wandle or Bell Lane Creek which is likely to require a reduction in the proposals for up to 10 storey buildings adjacent to the river
- Address the relationship with the All London Green Grid SPD which isn’t mentioned and is retained as SPD as part of the new London Plan
- Recognise the potential contribution of neighbourhood planning to delivery of the SPD – there is active consideration being given to development of a neighbourhood plan including the SPD area

Make reference to Wandle Vista in section 5.6.

Additional reference to shadowing in section 5.6.

New para after 5.3.3 in relation to All London Green Grid SPG

Any proposals for Neighbourhood Plan preparation would need to be taken forward outside the SPD context.

by the Canal and River Trust.

Amend para 5.3.12: “New footbridges: As noted in section 5.2, opportunities exist for new, **high quality design** pedestrian bridge crossings which will create

2nd bullet, 5.3.12 – add additional sentence: **Opportunities to enhance the Spit should also be encouraged.**

				<p>Para 5.3.12 – expand:</p> <p>“The Council will work closely with developers and key partners including the River Wandle Catchment Partnership, <u>Wandle Valley Forum and Wandle Valley Regional Park Trust...</u></p> <p>Para 5.7.9 – additional sentence:</p> <p><u>Proposals should demonstrate consideration of the</u></p>
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				<p><u>historic significance of the river and any existing structures.</u></p> <p>Para 5.3.33 - amend:</p> <p>Ownership, management and maintenance Responsibilities, <u>including opportunities for the involvement of local people</u>, for new parks, streets and public realm will require early discussion as proposals emerge.</p>
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				<p>Additional bullet – para 5.6.17:</p> <p><u>Proposals should avoid overshadowing of rivers.</u></p> <p>New para 5.3.4:</p> <p><u>Proposals should make positive reference to the All London Green Grid SPG.</u></p>
67.1	Wandsworth Society	<p>We have read the Masterplan presentation prepared by your consultants which is a comprehensive document covering detailed aspects of the area under consideration.</p> <p>We find that some of the information could be considered superfluous, although probably to comply with the brief prepared by the Council, the consultants have taken an all-encompassing/embracing view.</p>	Comments noted.	N/a
67.2	Wandsworth Society	<p>Summary:</p> <p>1. The gross capacity estimate of 1650 new homes (possibly up to 3,000persons), 11,600m2 of light industrial and 21,000m2 offices is in excess of what we believe</p>	The overall quantum of development, scale and massing is considered to	Para 5.9.10 - Amend bullet point 3 of the principles to

		<p>could/should realistically be accommodated in the Masterplan Area without the area becoming overcrowded and potentially suffering from the highly congested and mostly concreted areas similar to those which appear overlooking Buckhold Road and parts of Riverside Quarter.</p> <p>2. The heights and densities of the buildings proposed are in excess of what the Society considers appropriate for the sites within the Masterplan area, as a transition area from the high density, high rise town centre to the riversides of both the River Thames and Wandle.</p> <p>3. We are pleased that emphasis has been placed on the necessity to provide the "Green Corridor" along the length of the Wandle and along the main East/West and North/South corridors of the individual blocks, however we are fearful that insufficient attention/emphasis will be paid to the open spaces between blocks to provide a more open feel than is evident in other recently built schemes in the wider vicinity.</p> <p>4. We are pleased that a significant quantum of light industrial accommodation is proposed but fear that the conflict between this type of user and the residential on levels above may prove impractical for both.</p> <p>5. We are very concerned that insufficient thought has been given to vehicular access, particularly to the gas holder and Hunt Trucks (Cluster 2) sites from Armoury Way. As and when the realignment of Armoury Way is undertaken, the two way flow of traffic which is proposed will not enable west flowing traffic to turn across the east flow without causing major disruption and delay. There does not appear to be sufficient road width to provide dedicated turning lanes. In addition vehicles leaving the site to join Armoury Way would need to be traffic light controlled to avoid major accident possibilities. An additional set of lights would mean a third set of traffic controls within approximately 750m from the Wandsworth Bridge Roundabout.</p>	<p>be appropriate as set out in the SPD.</p> <p>Proposals for movement will require detailed assessment of access impact and mitigation as detailed design proposals are developed.</p> <p>The 21,000 sqm of office quoted is for the entirety of the SPD area, with the illustrative example suggesting 6,500 sqm for the Frogmore Cluster. The increase in economic floorspace is based on the policy requirement developed in the Employment and Industry Document of the Local Plan, and is largely replacement of what is already accommodated on site, with the increase responding to an identified need (confirmed again in the</p>	<p>state that the type of employment floorspace coming forward should be flexible based on demand at the time of redevelopment.</p>
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		<p>6. The Pedestrian accesses across Armoury Way are insufficient to enable safe and easy routes at Grade to encourage pedestrian and cycle use along the Wandle Corridor from the town centre or from Old York Road and Wandsworth Town Station.</p> <p>7. The aspiration of providing 21,000m2 of offices on sites within Cluster 4 is totally unrealistic, for as the report sets out, the demand for large office based use has significantly declined recently, even more so since the onset of Covid. However, as importantly such demand is centred in other locations in the Borough (Vauxhall/Nine Elms and Battersea). Putney is no longer considered an "office location" following the loss of this type of employment space through PDR or the reallocation of former office sites to residential use. None of the other town centres in the Borough provide sufficient attraction to become major office centres.</p> <p>8. We are most encouraged to find that the northern portion of Feathers Wharf has been shown designated as open space, as has Causeway Island and land to the east of The Causeway. The sooner these can be implemented the better.</p> <p>9. We do not believe that sufficient thought has been given to vehicular access and egress to Cluster 1, the northern section of Cluster 2 or Cluster 4. As each of these Clusters, possibly with the exception of part of Cluster 4, will be predominately residential in use, domestic delivery requirements will be needed (food and on line deliveries). Each of these sites feeds onto either Swandon Way or Armoury Way which when combined with through traffic, which predominates, will impose an unacceptable burden. In addition buses use these routes with stops which will also constrain traffic flows in either direction.</p>	<p>most recent Employment Land and Premises Study, 2020). That notwithstanding, it is agreed that adding flexibility to the delivery of this space, subject to market demand, is appropriate.</p>	
67.3	Wandsworth Society	<p>Section 2 Existing Context</p> <p>2.2.10 This is an incorrect description as there is currently no significant industrial floor space in use.</p>	<p>Comments noted – minor factual amendment as</p>	<p>Para 2.2.10 – amend:</p>

		<p>2.2.14 Pleased to note the comment on careful consideration for height, scale and massing. See later comments (5.6.4 and 5.6.16)</p> <p>2.2.16 Pleased to note that the rivers are considered ecologically significant, with designations of Metropolitan and Borough importance. Strong guidance/direction needed to maximise opportunities that exist to protect and enhance the ecology of the rivers.</p> <p>2.2.17 Planting and green spaces should be used to enhance the area and encourage greater biodiversity.</p>	suggested in relation to uses.	The study area includes a number of different uses. The historically industrial area remains home to a significant amount of industrial floorspace, as well as some office space.
67.4	Wandsworth Society	<p>Section 3. Planning Policy Context.</p> <p>3.2.5 Clearly on the "wish list".</p> <p>3.3.4 Policy D13 we understand about noise but no mention is made of atmospheric pollution from roads and other sources.</p> <p>3.3.5 Pleased to see the policy for the delivery of industrial floor space but please see later comments (3.5.9 and 3.5.10).</p> <p>3.4.3 This refers to Core policy Local Plan Employment and Industry document(2018).</p> <p>3.5.7 Focal Point Designation. By definition there can only be ONE focal point, thus to seek homes/jobs/leisure facilities with public spaces as focal points is inconsequential. It would be expected that the sequential test would be applied as a matter of course, not necessary to embolden this as policy. We applaud the comment of replacing all commercial floor space on the site. Has an audit of what exists been undertaken?</p>	<p>Comments noted.</p> <p>Air quality – see response to comment 7.1</p> <p>An estimate of existing floorspace and capacity has been undertaken.</p> <p>Further speculation in relation to planning reforms is not appropriate in the SPD.</p>	N/A

	<p>Does a cleared site count as "existing floor space"? Policy IS3(tall buildings) would apply.</p> <p>3.5.8 Thames Policy Area protects and enhances the open quality of rivers and the riverside realm. Mixed uses in this area will be promoted.</p> <p>3.5.9 We note the designation of land to the south of the rail line as an Economic Use Intensification Area to protect employment uses for industrial and business floor space but from Figure 41 the far greater use is proposed for residential purposes.</p> <p>3.5.10 Land north of the rail line is within an Employment Protection Area. Thereport states that premises which provide "economic floor space" will be protected. Please advise of the definition of "economic floor space". We note that no net loss of commercial space will be permitted and that mixed commercial and residential uses can be successfully achieved on site. We note that residential use will be appropriate to assist non intensive economic uses. Again from Figure 41, the residential uses would dominate any commercial floor space be it "economic" or not.</p> <p>3.6.3. Pleased to note that there is a deficiency of green open space in the Delta Area which will be addressed in plans going forward. This remark is very much "over shadowed" by the quantum, extent and height of the buildings proposed in each of the Cluster areas.</p> <p>3.6.7 There has been a significant loss of employment space in recent years through the application of PDR for change of use to residential, which predates the pandemic.</p> <p>3.6.8 Improved amenities and outside space is required.</p> <p>3.7 Planning Reforms. Please explain into which category the Delta Area will fall if the suggested designations proposed in the Draft White Paper on Planning Reform are enacted without review.</p> <p>3.7.5 We are pleased to learn that design quality will be emphasised but this is very subjective. There are many examples of designs which are either inappropriate by height or massing, let alone materials used.</p>		
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<p>67.5</p>	<p>Wandsworth Society</p>	<p>Section 4 Vision and Objectives.</p> <p>4.1.2 People first is applaudable but many other matters must be taken into consideration with varying weights of importance attaching to them. To introduce a significant number of new residents to a relatively restricted area will impose significant burdens on the infrastructure. Can the road network cope? Can the educational facilities cope with the level of newpupils? Can local bus services cope with the increased passenger numbers for short local journeys? Can the overground train services cope with such a large number of extra passengers, as most will not be employed in the developments proposed? Is there sufficient capacity in the utilities for such intensive uses, taking into account those schemes already consented but not yet built?</p> <p>4.1.5 This is good vision, with the two rivers forming the key attributes for the "placemaking" connecting Old York Road, The Wandle corridor and King George's Park, contrasting the various elements which feature the historic nature of the area and the improved environment which will result from the opening up of the corridor.</p>	<p>Comments noted.</p> <p>Movement – see response to 11.1</p>	<p>N/A</p>
<p>67.6</p>	<p>Wandsworth Society</p>	<p>Section 5 Planning Design and delivery Guidance.</p> <p>5.1.3. Wandsworth Town Delivery Framework. Other proposed schemes in the town centre (eg the Town Hall intensification of use) have to be considered.</p> <p>5.1.4 The Society would wish to be represented in any forthcoming review.</p> <p>5.2.3 We are pleased to note that an early attempt will be made to complete the Thames Path over the Waste Transfer Station to Feathers Wharf. The Society has been pursuing this for many years. Could funds be available from the CIL?</p> <p>5.2.10 Does the Riverside Waste Authority have any duty to contribute funds to the reopening of the high level walk/cycleway.</p> <p>Figure 25 shows the northern part of Feathers Wharf as a new public park. Could this not be expedited in advance of any other works (buildings at the southern end)?</p>	<p>Comments noted</p> <p>No Council funds are currently allocated to the reopening of the high level walkway but this could be considered in future.</p> <p>Delivery timescales of Feathers Wharf to be reviewed.</p>	<p>N/A</p>

		<p>Figure 25 shows Bell Lane Creek and the Council site accessed by The Causeway as a new public park. As the area has been shown as deficient in green open space, could this not be brought forward during the first five years of the plan's implementation?</p> <p>5.3.7 Street trees. Tree planting is to be a key priority for the SPD area but sufficient ground areas with soil must be kept available to allow for root growth and watering until deemed unnecessary. Please, no more felling of trees(especially those with TPOs to accommodate developers requirements, Swandon Way refers!</p> <p>5.3.10 We are very pleased to see the aim of creating a riverside park.</p> <p>5.3.18 We are pleased to see this included but this should not be eroded.</p> <p>5.3.19. We are pleased to note this.</p> <p>5.4 Block Structures and typologies.</p> <p>5.4.1 Is such a highly structured site layout necessary, principally on Cluster 2? We are concerned that the grid system may be appropriate elsewhere but may not be appropriate in a suburban setting. If the desire is to maximise the footprints of the buildings, this is the way to achieve this result but it will not leave a legacy desired by many of those who are resident locally.</p> <p>5.4.2 This is totally inappropriate for industrial type uses which will require vehicle access for deliveries.</p> <p>5.4.4 Podia would be unusable for most commercial users where deliveries are required.</p> <p>5.5.1 The proposed mix of uses should not be permitted to decline as has been the case elsewhere, eg B&Q and Homebase sites Swandon Way.</p> <p>5.5.5 No significant food retail uses should be permitted outside the town centre core.</p> <p>5.5.8 We are pleased to see this comment.</p> <p>5.5.16 The Council should impose conditions in any consent to ensure that developers do not use the "unviable" excuse to avoid providing the "low cost accommodation".</p> <p>5.5.19 Buildings with commercial uses on ground and upper floors will need to be provided to attract the "clusters" of similar users. Design studios, creative workspaces and others which do not rely upon bulk deliveries could</p>	<p>Block structures are flexible, particularly in relation to cluster 2 which is likely to be influenced by the complexity of below ground conditions.</p> <p>Please note – para 5.5.26 encourages retention of existing businesses in the area.</p> <p>Approach to retail is consistent with Local Plan.</p> <p>The SPD defines criteria for tall buildings as drafted.</p> <p>Floorspaces identified are indicative and considered broadly viable. The Council will liaise with developers in relation to the provision of community facilities. Wording in relation to</p>	
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	<p>complement each other when clustered in a suitable building. Hoxton in central London is a good example of what can be created.</p> <p>5.5.20/21 We are very pleased to see this but where is the land going to be found to provide this! As Mark Twain said" buy land, they ain't making it anymore"!</p> <p>5.5.22 This is inconsistent, Causeway Island is shown as a new public park.</p> <p>5.5.23 Residential use should not be permitted to become the dominant use.</p> <p>5.5.25 There should be a requirement to provide affordable incubation space. What is the definition of affordable?</p> <p>5.5.28 We are pleased to see the definition of allocation, however stand alone industrial uses will need good service/access provision. No vehicle access is shown from Armoury Way.</p> <p>5.5.35 Industrial sites such as the gas works(Cluster 2), Frogmore depot(Cluster 4) and Panorama Antennas(Cluster 5) should be safeguarded for existing uses. It is inappropriate to state that this will only be the case where "space requirements allow". Each of these sites is shown as predominately to be used for residential purposes, by %age of content use. Existing employers should be safeguarded, not lost if "space requirements do not allow"!</p> <p>5.5.38 We agree with this statement/policy. This should be strengthened to "will not permit large scale retail uses outside the existing major shopping areas". We have in mind the possible changes envisaged in the new Planning White Paper.</p> <p>5.5.49 New off site education facilities should not be funded through CIL allocations.</p> <p>5.5.48 Infrastructure. It is suggested that health provision only will be made on site, education will be dealt with by expansion elsewhere. There is no mention of a requirement for the provision of accommodation for the elderly or infirm.</p> <p>5.6 Height scale and massing.</p> <p>5.6.4 Clusters of tall buildings should be entirely north of the rail line. Tall buildings are defined as more than 6 storeys. Pleased to see the guidance recommendation "tall buildings... providing high quality public realm along the riversides". We believe that all building plots along the riverside should be limited to four storeys, not just those immediately adjoining the green corridor. This would apply to Clusters 2 and 3.</p>	<p>use of site assembly is considered appropriate.</p>	
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	<p>5.6.10 What is the criteria of "sensitivity" to tall buildings?</p> <p>5.6.11 Suitability- a significant location e.g "gateway". Can there be more than one gateway? Does the last criteria cover the whole of the Delta Area Consultation?</p> <p>5.6.14 This is not sufficiently strong enough.</p> <p>5.6.16 Taller buildings to be focused north of the rail line. This cannot be so if the guide for the land to the south of the rail line is shown as up to 10 storeys on the eastern section of the gas works site (Cluster 2).</p> <p>5.7.12 Living roofs. Can this be strengthened to require green/brown/photovoltaicroofs.</p> <p>5.8 Illustrative Masterplan.</p> <p>Gross capacity is shown as: 1650 new homes 11,600m2 of light industrial 21,000m2 of offices</p> <p>We believe that the capacity envisaged is significantly in excess of what the Masterplan area can realistically contribute beneficially to the Wandsworth central area. The provision of the office content is already identified as unlikely but if included it will provide every excuse for a change to residential as being "unviable".</p> <p>The provision of the light industrial space is helpful but other than "high tech, design and similar uses" will be very unlikely to find suitable users. We note that compulsory powers may be used to piece sites together which is dismaying in the world today. The Panorama Antennas site(Cluster 1) is of particular concern. This occupier has provided many years of significant employment of a specialised and highly technical nature which should be retained in the Borough.</p> <p>5.8.8 We note the proposal to include space for community, health and education which could be totalling 6,800m2, we wonder who is likely to pay for such unremunerative spaces? Please define what is envisaged. Would this be a new school, community meeting areas, public gymnasia?</p>		
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		<p>5.8.10 Viability should not come into consideration. Developers will claim exemption from compliance through non viable schemes. This has been the case at Battersea Power Station where variations to the agreed Section 106 Agreement were accepted on non viable grounds among others.</p> <p>5.9.7 New forms of workspace will be preferable to existing activities, presumably only refers to the Council depot on Cluster 1. The land occupied by Panorama Antennae as a significant high value and long standing employer should be safeguarded. The last sentence states" it (The Council) may need to consider its statutory powers to assemble the site in its totality as set out in the SPD". This will sterilise any landholdings not in Council ownership for an indeterminate time period.</p> <p>5.9.16. We are very pleased to read the comment on the "pocket park" on Feathers Wharf. Could this not be implemented very much sooner than the timescale proposed of between 10 and 15 years?</p>		
67.7	Wandsworth Society	<p>Conclusions:</p> <ol style="list-style-type: none"> 1. We are encouraged to support the proposed overall Planning Review of the Delta Area which will hopefully provide a sufficiently robust framework for ongoing development which avoids piecemeal consideration of individual sites, however we are most concerned that the proposals provide a "developers charter" for an unnecessary intensification of urban renewal in an environmentally sensitive area which has been identified as being deficient in green open space. 2. The Society would seek to be invited to be represented in any forthcoming review. 3. We are very pleased that the Green Corridor is emphasised along the River Wandle as a route for pedestrians and cyclists and that additional parcels of land (Feathers Wharf and Causeway Island) will ultimately be allocated to further green spaces in an area which is deficient in green space at the present time. Part of this land may be adaptable for recreational use by boaters or similar outdoor leisure uses. 	<p>Comments noted.</p> <p>See responses above in relation to points identified.</p>	N/A

	<p>4. We are pleased to note that pedestrian and cycle ways are proposed both east/west and north/south through the Review Area and it is noted that increased provision of bridges across the Wandle are proposed to increase and encourage connectivity between various areas.</p> <p>5. We are pleased to note that a significant quantum of employment space for SMEs and similar is proposed, however we believe that the aspiration of 21,000m² of office space is totally misconceived.</p> <p>6. We understand that additional residential space in the Borough is required to satisfy the demands of the Emerging London Plan and subsequently the Proposed New Local Plan (up to 2035) but we question very strongly whether the type of accommodation proposed of predominately "high rise"(above 6 storeys) with very limited green ground floor areas, presuming vehicular access is to be provided, is appropriate for the Delta Area. This is a transition area between the town centre and the River Thames.</p> <p>7. We do not believe that the massing of buildings proposed, particularly on Cluster 2 would be conducive to a balanced environment where employment and residential uses co-exist.</p> <p>8. We are very disappointed that insufficient thought or weight appears to have been given to the question of vehicle servicing to the whole Delta Area. As and when the Armoury Way realignment takes place, it is proposed that vehicles will travel in both directions along Armoury Way, as currently with Swandon Way(to just south of the rail bridge), thus without traffic controls(lights) it will be impossible to gain vehicular access safely to the southern portion of the gasworks site without significant disruption and a great danger to safety. The current carriageway is of insufficient width to allow a safe turning lane. In addition buses will continue to use Armoury Way</p>		
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		<p>with passenger stops which will further impede traffic flows, let alone permit the safe joining of traffic flows.</p> <p>9. We are sceptical that employment generating users will be persuaded to occupy much of the allocated employment space, as other than showroom space required as the active frontage to Armoury Way much of the balance will be either at podium level which is difficult to service or in the centre of predominately residential use buildings. The daytime use of employment space requires deliveries, much by vehicles, which will create an environment seeking to be avoided. Also insufficient green areas are likely to be provided for the resident population.</p> <p>10. We do not believe that sufficient weight has been given to the provision of educational or other "social" facilities. If implemented, as proposed, the area could accommodate residentially up to an additional 3,000 persons together with an additional significant number of people in day time employment.</p> <p>11. We are disappointed to note that recourse could be made to compulsory purchase of sites. This method of urban renewal is considered totally inappropriate in current circumstances (5.9.7 refers).</p>		
68.0	West London River Group	<p>1. The West London River Group's members are riparian amenity societies and other community groups whose areas of interest are in or near the river Thames between Kew and Chelsea.</p> <p>2. We are surprised and disappointed that we have not been consulted. Further, to the best of our knowledge neither has the <i>Thames Strategy – Kew to Chelsea</i>, the relevant Joint Thames Strategy identified in the Mayor's London Plan 2021.</p> <p>3. The policies etc set out in the <i>Thames Strategy – Kew to Chelsea</i> are relevant, see specifically <i>Key Issues and Opportunities Wandle Delta</i>, pages 4.72 – 4.73.</p>	Comments noted	N/A

		4. The London Plan 2021 <i>Sustainable Infrastructure SI14 Waterways</i> sets out extensive recommendations and polices for the Blue Ribbon Network of which the Wandle delta and the River Wandle themselves are parts.		
68.1	West London River Group	5.1 The recreational use of the Wandle delta and the Wandle itself. The river and Bell Lane Creek should be used for boat access and recreational use wherever possible. We believe carefully managed residential boats will bring character, identity and safety to Bell Lane Creek and elsewhere, as they do on many other parts of the blue ribbon network. While it might be argued that kayaking would have an adverse impact on biodiversity and habitat creation we say compromise and management would minimise this.	Noted. See response to 4.3	N/A
68.2	West London River Group	5.2 The Western Riverside Transfer Station The waste transfer station is a vital asset not only for Wandsworth but other boroughs in its neighbourhood. There is an accepted and growing need not only for the assembling and disposal of waste but for its recycling. We should minimise the use of landfill sites and we should not be exporting waste abroad. Therefore the site needs expansion and investment. It requires not only the bulk transfer facility provided by the river, but easy access and space for the public for its reception, sorting, processing and disposal.	Noted.	N/A
68.3	West London River Group	5.3 The riverside national trail We urge the early completion of the trail across the delta as required by legislation. 6. We ask that these challenges will be more clearly set out and given greater emphasis	Noted. The document supports the completion of a continuous waterside trail.	N/A
69.0	Carter Jonas on behalf of Western Riverside Waste Authority	Introduction - Western Riverside Waste Authority (WRWA) WRWA was established in 1986 as an autonomous statutory local government body to undertake the waste disposal functions prescribed by the Local Government Act 1985 and the Waste Regulations and Disposal (Authorities) Order 1985. WRWA is responsible for managing the waste collected in the London Boroughs of	Noted.	N/a

		<p>Hammersmith and Fulham, Lambeth, Wandsworth and the Royal Borough of Kensington and Chelsea.</p> <p>WRWA is responsible for the reuse, recycling and recovery of energy from around 400,000 tonnes per annum of municipal waste collected by its constituent councils. WRWA minimises the impact of this essential public service by utilising its riparian transfer stations to transport the residual waste (that which cannot be reused or recycled) by river for treatment which removes around 100,000 HGV movements a year from London’s congested roads.</p> <p>WRWA owns two waste transfer stations, one at Cringle Dock, Battersea and the other at Smugglers Way, Wandsworth. Both sites are currently operated by Cory Environmental Ltd trading as Cory Riverside Energy. Both of the sites are ‘safeguarded wharfs’ within the current Wandsworth Development Plan. Cringle Dock is allocated for residential-led mixed use development above, within the Wandsworth Site Specific Allocations Document (adopted March 2016).</p> <p>We have submitted representations on behalf of the WRWA to the recent Local Plan Regulation 18 consultation in connection with the WRWA’s land ownership in the Borough at Cringle Dock and Smugglers Way.</p> <p>We provide our representations to the relevant sections of the draft Wandle Delta SPD below.</p>		
69.1	Carter Jonas on behalf of Western Riverside Waste Authority	<p>Figure 8 - Wandle Delta Sites</p> <p>Figure 8 of the draft SPD identifies current Local Plan site allocations and prospective site allocations within the draft Local Plan. It is confirmed that site allocations will be established formally in the Adopted Local Plan.</p>	<p>Comments noted.</p> <p>See response to 10.1 and 10.3.</p> <p>The SPD cannot extend the boundaries of the</p>	N/A

	<p>The Feather’s Wharf site (Site 7), Cory Environmental Materials Recycling Facility (Site 9) and the Western Riverside Waste Transfer Station site (Site 10) are all identified as site allocations in Figure 8.</p> <p>WRWA owns half of the Feather’s Wharf site (Site 7) that is identified as draft site allocation WT9 (in the emerging Local Plan) and included within the Feather’s Wharf/Smugglers Way Cluster and have a development agreement in place with Wandsworth Council that owns the other half of the site.</p> <p>WRWA also owns the Cory Environmental Materials Recycling Facility (Site 9 in the draft SPD) and the Western Riverside Waste Transfer Station site (Site 10 in the draft SPD) that are identified as site allocation WT11 in the draft Local Plan).</p> <p>In addition, WRWA owns the Household Waste and Recycling Centre (HWRC), which lies adjacent to the east boundary of SPD sites 9 and 10. The HWRC site is not currently identified as a proposed site allocation within the emerging local plan, and therefore is also not identified in Figure 8 of the draft SPD.</p> <p>The full extent of the WRWA’s land ownership is shown on the map at Appendix 1.</p> <p>The draft Local Plan proposes mixed use development of the Feather’s Wharf/Smugglers Way Cluster, and the proposed range of uses include residential, industrial and offices, with at least the full replacement of existing economic floorspace, together with the provision of a riverside walk and improvements to the Wandle riverbank.</p> <p>WRWA strongly supports the inclusion of the Feather’s Wharf site allocation (WT9) within the Feather’s Wharf/Smugglers Way Cluster and is fully committed to working with the other landowners within the cluster, to help bring forward the mixed-use redevelopment of the area.</p>	<p>site allocations – it can only supplement existing policy in the Local Plan.</p>	
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		<p>As identified above, WRWA owns the adjacent WRWTS site (draft site allocation WT11 and identified as sites 9 and 10 in Figure 8 of the draft SPD) and the HWRC site. The WRWTS site is allocated as a Safeguarded Wharf within the draft Local Plan. The WRWA considers that there is potential for the redevelopment of the site which is arranged perpendicular to the River Thames. The facility could be provided in a similar location with potential addition of residential uses above a waste facility, as was consented at Cringle Dock. This would offer opportunities to better address the Waterside Path and the Riverside West development to the east.</p> <p>It is considered that the HWRC site should also be allocated for mixed use development. It is immediately adjacent to the WRWTS (sites 9 and 10) and as identified above both sites are owned by WRWA. Together the sites offer an excellent opportunity to play a pivotal role in a more comprehensive redevelopment of the area, than that currently proposed. It is considered that these sites should also be included within the Feather's Wharf/Smugglers Way Cluster and it is not clear why they have they have been excluded from the cluster in the draft SPD.</p> <p>Whilst the wharf is safeguarded and WRWA has a statutory duty to provide waste disposal services for Wandsworth, the site has the potential to play a key part of the redevelopment of the cluster, whilst allowing the WRWA to fulfil its statutory duty. The waste facilities can be provided at an enclosed ground floor level with mixed use development (residential/employment uses) above. There is strong potential for WRWA to continue to fulfil its statutory duty to provide waste disposal services at the site and for the site to play an important role in the wider redevelopment of the area. In this respect, the existing waste disposal services will need to be safeguarded from surrounding development, should they not be brought forward for redevelopment in the shorter term. These are not mutually exclusive objectives. As highlighted above, this is exactly the approach that has been taken with the proposed redevelopment of the facility at Cringle Dock.</p>		
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		<p>If some of the current waste transfer activities on the site are relocated, it may provide even greater potential for the redevelopment of the site and open up further opportunities for the Cluster and SPD area.</p> <p>The development opportunities that the Wandle Delta WRWA sites provide (detailed above) should be fully recognised by the Council and therefore be identified in Figure 8 of the draft SPD.</p>		
69.2	Carter Jonas on behalf of Western Riverside Waste Authority	<p>Vision and Objectives</p> <p>The vision and objectives for the SPD are set out at Chapter 4 of the draft document. The vision of the Wandle Delta as <i>“a mixed urban neighbourhood, a focus for living and working, and a local destination for visitors”</i> is supported by the WRWA.</p> <p>The draft SPD acknowledges that the Wandle Delta Area will benefit from the continued presence of safeguarded wharves, which play a vital role in maintaining river access, particularly for waste management and recycling. As identified above, whilst the WRWTS site is allocated as a Safeguarded Wharf, the site has the potential to play a key part of the redevelopment of the Wandle Delta, whilst allowing the WRWA to fulfil its statutory duty. The waste facilities can be provided at an enclosed ground floor level with mixed use development (residential/employment uses) above. There is strong potential for WRWA to continue to fulfil its statutory duty to provide waste disposal services at the site and for the site to play an important role in the wider redevelopment of the area.</p> <p>The potential of the WRWA sites to assist in the mixed-use regeneration of the Wandle Delta whilst maintaining the function of the safeguarded wharf should be emphasised within the vision.</p>	Comments noted.	N/A
69.3	Carter Jonas on behalf of Western	Chapter 5: Planning and Design Guidance	Comments noted – see response to comment 10.3	N/A

	<p>Riverside Waste Authority</p>	<p>Chapter 5 of the draft SPD provides the planning and design guidance for the Wandle Delta area. Paragraph 5.1.2 acknowledges that status of the document as an SPD means that new or amended sites and policies cannot be introduced in the SPD. However, the SPD will inform the new Wandsworth Local Plan. WRWA has submitted representations to the recent Draft Local Plan Regulation 18 consultation in connection with its sites in the Borough and as identified above, consider that to fully realise the regeneration potential of the Wandle Delta SPD area, the HWRC site should also be allocated within the Local Plan and therefore identified accordingly within the draft SPD as a development site.</p> <p>Figures 24 and 25 of the draft SPD identify proposed new green space on the Feathers Wharf site and public realm running through the WRWTS site (sites 9 and 10). Whilst the importance of the vision of high quality public realm and landscaping in the SPD area is recognised and supported, WRWA considers that the full, potential and quality of the public realm and landscaping in the SPD area cannot be realised without considering the full WRWA land ownership in the area. As discussed above, the full WRWA land ownership should be allocated within the Local Plan and accordingly identified within the draft SPD. This will provide the greatest opportunity and flexibility for the comprehensive mixed use regeneration of the masterplan area and in turn allow for a high quality public realm and landscaping strategy to be developed. The proposed new green space that is identified on the Feathers Wharf site and public realm running through the WRWTS site (sites 7, 9 and 10), will only be possible if the full extent of the WRWA land ownership is taken into consideration in the wider masterplan proposals, therefore, this should be reiterated in the SPD.</p> <p>Six key cluster of sites across the Wandle Delta SPD area are identified in Figure 42 and guidance is provided at section 5.9 of the draft SPD. Feather’s Wharf and Smugglers Way is identified as key cluster 3. The gross capacity development estimates for the Feathers Wharf site are identified as:</p>		
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		<ul style="list-style-type: none"> • 141 homes (178 DPH); • 4-10 storeys; and • 1,600m² in flexible ground floor uses <p>including community space.</p> <p>WRWA supports the principle of proposed key cluster, but the adjacent WRWA owned land should be included within this key cluster and it is not clear why the sites have been excluded from the cluster.</p> <p>Together, the sites offer an excellent opportunity to play a pivotal role in a more comprehensive redevelopment of the area, than that currently proposed. Taking a more comprehensive development approach will also for a more integrated and permeable public realm and landscaping strategy for the whole SPD masterplan area.</p> <p>Section 5.10 and Figure 49 of the draft SPD identifies several sites that present potential longer-term opportunities. The WRWA’s HWRC site is identified as long term opportunity Site A. As discussed in detail above, WRWA considers that this site should be included as a site allocation in the emerging Local Plan and identified as such in the draft SPD. This site, along with the adjacent WRWA land can play a pivotal role in a more comprehensive redevelopment of the area, than that currently proposed. WRWA therefore, objects to the site being identified as a ‘longer-term opportunity’ and considers that it should be allocated as part of a shorter term masterplan development strategy.</p> <p>In summary, the WRWA supports the ambitions of the draft Wandle Delta SPD. It has a number of concerns and request that the Council consider these in formulating a revised version of the SPD which makes full use of the WRWA’s available land interests to achieve comprehensive regeneration within the Wandle Delta Masterplan area.</p>		
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70.1	<p>David Williams (Individual)</p>	<p>I strongly agree with the vision statement.</p> <p>Key thing for us is walking/cycling east west near river. Circumnavigating the WRWA is a bit dangerous today due to number of cars and lorries in action. Being able to bypass this along the riverside would be amazing.</p> <p>Riverside parks and making the wandle trail more accessible would be hugely popular with local families.</p> <p>Its important that height and scale are managed in this area. In our opinion there are already too many high rise buildings in the area so it would be great to keep the wandle delta smaller in scale.</p> <p>Looks good - particular the additional green spaces.</p> <p>The bold things the council should definitely consider are i) moving the WRWA underground and ii) an underground road tunnel from Wandsworth bridge to Tibbets corner. Most of the negative traffic impact in the borough is from vehicles navigating from the A3 to central/west London. If you were being really bold, a second tunnel from Tibbets Corner to the north side of Putney bridge would be great too!</p>	<p>Comments noted.</p> <p>The SPD supports the re-opening of a route over the WRWA, as well as the creation of new east-west routes for walking and cycling.</p>	N/A
71.1	<p>John-Rhys Williams (Individual)</p>	<p>Generally positive on this development. Some concern about density of the development regarding height of proposed buildiings and proximity to existing dwelligns.</p> <p>This can add to the existing locality. However close attention needs to be made to the eixsiting residential properties and they need to be incoporated into the propsoal and design. Most specifcially in terms of privacy, right to light and noise. Then also the visual impact tall buildings can have on the wider environment,</p> <p>The properties on Sudlow road to the west of the development will be greatly affected and need to be fully consulted. The opportunity for these properties to acquire a land buffer should be possible. This will allow for improvemetn of the existing housing stock in the area which is currently lacking in quality family homes</p>	<p>Comments noted.</p> <p>See response to 9.1 in relation to Sudlow Road.</p>	N/A

		with gardens. And also ensure those properties are protected in terms of privacy and right to light factors.		
72.0	Avison Young on behalf of Workspace	<p>This representation is made in relation to Morie Street Studios, 4-6 Morie Street, Wandsworth, London SW18 1SL, which is included within the draft Ferrier Street Cluster site allocation and the Ferrier Street Cluster as identified within the SPD.</p> <p>About Workspace</p> <p>Workspace PLC provides managed business accommodation for New and Growing Companies (NGCs) and Small and Medium Enterprises (SMEs) in London. It manages over 485,000 sqm of floorspace and owns and manages approximately 87 properties across more than 25 of Greater London’s Boroughs.</p> <p>Workspace PLC supports small businesses by providing standard Lease Terms that are flexible, do not require the services of a solicitor and support businesses as they grow. Workspace’s leases do not require significant deposits and/or guarantors that can be challenging and restrictive to young companies (three months’ rent normally required in advance as a deposit, and one month’s rent paid in advance).</p> <p>“Club Workspace”, designed for individuals and small businesses for collaborative and drop-in working, allows individuals/ small businesses to rent desks, meeting rooms or other breakout spaces and attend networking events depending on their needs.</p> <p>Central internal networking and a café/amenity space in all business centres is essential to allow for networking events and collaboration space, connecting customers and encouraging inter- trading, networking and promotion.</p>	Comments noted.	N/A
72.1	Avison Young on behalf of Workspace	Background	Comments noted – see response to 72.2	N/a

		<p>The Morie Street Studios site is located within the Ferrier Street Cluster site allocation, which carries forward the previous site allocation (ref 42C) from the adopted Local Plan: Employment and Industry Document, 2018.</p> <p>Proposals have been presented to Wandsworth officers for the redevelopment of the site for intensified office use on two occasions through the pre-application process (ref. WD\2019\ENQ\00829 and WD\2020\ENQ\00126). It should be noted that we intend to take forward the proposals as per pre-application ref. WD\2020\ENQ\00126.</p> <p>The key feedback from officers was that a taller element on the northern part of the site (approximately 12 storeys) was acceptable in principle.</p> <p>Further evidence provided within Representation on the Draft Local Plan: Pre-Publication Version, attached as an Appendix.</p>		
72.2	Avison Young on behalf of Workspace	<p>Building Heights</p> <p>Building Heights – pre-application advice for Morie Street Studios states that 12 storeys may be permissible given the emerging context. As such, Figures 41, 44, 45, 47 and 48 should therefore be updated to refer to indicative heights of 6-12 storeys, subject to further consideration of detailed design through the pre-application process. Indeed, in accordance with the relevant legislation and PPG, Supplementary Planning Documents (SPDs) cannot introduce new planning policies and as such, the SPD should state that taller buildings may be justified across the Masterplan on a case by case basis through detailed design considerations so as to ensure the SPD is appropriately flexible.</p>	The indicative height ranges included in the SPD are the result of a design-led approach. Any development proposal may wish to argue for greater heights, which would need to be supported through viability discussions.	N/A

	<p>We note that Figure 41 on page 82 provides indicative heights for future developments within the Masterplan Area with 6-8 storeys allocated for Morie Street Studios. This same indicative height is repeated within Figures 44, 45, 47 and 48.</p> <p>These indicative heights fall short of what officers considered to be acceptable when assessed in planning and design terms against the Development Plan. This is evidenced through their in- principle support of a 12-storey element in the northern part of the site (ref. WD\2020\ENQ\00126) through pre-application:</p> <p><i>“The tallest of the two blocks is proposed at 12 storeys. We are not uncomfortable with this height given the emerging context”</i> [Our emphasis added]</p> <p>Furthermore, the height ranges identified within Figure 41 are contrary to Paragraph 5.9.23 of the SPD which states: <i>“A taller element would be appropriate in the north-western corner of the site adjacent to the railway line.”</i> This potential height has not been reflected within the Figures considering the neighbouring emerging context is for 6 storeys thereby making the 6-8 storey indicative range the same height and not a taller element.</p> <p>A 12-storey element is therefore clearly considered an appropriate optimisation of the site to increase the economic and employment offer in accordance with the aims of the NPPF and London Plan. Furthermore, in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, (as amended) and Planning Practice Guidance, SPD cannot set out development control policies that would limit height as it cannot introduce development management policies.</p> <p>Figures 41, 44, 45, 47 and 48 should therefore be updated in reference to the site with indicative heights of 6-12 storeys in accordance with Paragraph 5.9.23 of the SPD, officers’ views within the pre-application written responses and the NPPF and London Plan.</p>		
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		<p>In addition, the SPD should state that taller buildings may be justified across the Masterplan on a case by case basis through detailed design considerations to ensure the SPD is appropriately flexible.</p>		
<p>74.3</p>	<p>Avison Young on behalf of Workspace</p>	<p>Transport and Movement</p> <p>Transport, Movement & Route through – there is no existing route through the site which is contrary to what is shown in the Masterplan. This needs to be corrected. Furthermore, as shown in Appendix I, the proposed route in its current location is not practical, deliverable and does not meet the Local Authority’s objectives to provide serviced office space for SMEs as it would mean that Workspace would be unable to provide a central amenity space, essential for a viable Business Centre. The route through should instead be relocated to the south of the site.</p> <p>a. Existing Route</p> <p>Figures 40 and 41 within the SPD identify a route through the Morie Street Studios site as an “<i>existing route.</i>” This is misleading and incorrect as there is no existing route through the site between Ferrier Street and Swandon Way.</p> <p>This “existing route” being shown on Figures 40 and 41 should therefore be removed as it is incorrect.</p> <p>b. Proposed Route</p> <p>Figure 23 of the SPD identifies a route through the site at grade as a “<i>key pedestrian priority connection.</i>” However, there is a significant surface level change where the site drops down to Swandon Way which means this route is unachievable and cannot be delivered as shown in the Masterplan.</p> <p>Indeed, whilst this reflects the aspirations of the adopted and draft site allocation, we have already submitted representations to remove this on the basis that a feasibility</p>	<p>Comment noted. The plans should be updated to remove the erroneous existing connection. The proposed route between Swandon Way and Ferrier Street remains an ambition for the Council.</p>	<p>Amend Figures 40 and 41 to remove ‘existing’ connection between Ferrier Street and Swandon Way.</p> <p>10th bullet point in 5.9.24 add a reference to <u>“the development of this site should enable east - west pedestrian /cycling movement allowing a link between Ferrier St and</u></p>

	<p>study has been prepared by our team that demonstrates a route through the centre of the site is not practical, deliverable and does not meet the Local Authority’s objectives to provide serviced office space for SMEs as it would mean that Workspace would be unable to provide a central amenity space, essential for a viable Business Centre.</p> <p>This study can be found in Appendix II (please note this also includes a study for a cycle bridge which is not relevant to this representation).</p> <p>In summary, due to the significant level changes between the site and Swandon Way at the centre and the north of the site, any link through the site will take up a disproportionate quantum of ground floorspace, would create a long ramp and a poor pedestrian environment, is not considered to be safe and secure and would have significant adverse impacts on both design and viability. There are also issues in relation to noise and security, leading to low quality routes with any potential options through the centre of the site.</p> <p>There is, however, the potential to provide a route to the south of the site, which could be more generous, offer a better public realm and would allow for the space to be animated by small SME units that provides natural surveillance.</p> <p>This represents the best option when considered in the round as demonstrated by the diagram included at Appendix III for the following reasons:</p> <ul style="list-style-type: none"> • It would provide a direct and gently-graded step-free route, with no ramps or stairs required and provides a safer onward route across Swandon Way, located away from the bend in the road close to the railway bridge over Swandon Way. • It would allow for windows to be provided along the southern elevation, to provide active frontages and a high quality, useable and generous public 		<p><u>Swandon Way.”</u></p>
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		<p>realm. In the event that the site to the south is redeveloped, a similar set-back could be required which would provide a much larger and high-quality area of public realm, that would not otherwise be possible to be delivered if the route is provided through the middle of the site.</p> <ul style="list-style-type: none"> • It would minimise the impacts upon Morie Street Studios’ ground floor layout by allowing one whole building to be provided instead of splitting the site into two buildings, which would mean that a viable Business Centre with central internal amenity and collaboration space could be delivered, which would otherwise not be possible with the route through as proposed in the Masterplan. • It could be designed to a high quality incorporating soft landscaping and street furniture. • It would be less disruptive to the building entrances and common facilities, resulting more <p>efficient cores and more high quality SME space.</p> <ul style="list-style-type: none"> • It would make best use of available natural daylight compared to other options, with minimal impact on the neighbouring boundary. • The configuration of the building and the adjacent ground floor units would promote natural surveillance. • Although the Metropolitan Police would prefer to see no new route through the site (as we ascertained through engagement with them), the southernmost route would be the most acceptable to them as it would be less likely to result in creating conditions which would encourage criminal activity. <p>It is therefore considered that the <i>key pedestrian priority connection</i> through the centre of the site within Figure 23 is removed so as to avoid precluding the future redevelopment of the site.</p>		
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72.4	<p>Avison Young on behalf of Workspace</p>	<p>Industrial Floorspace</p> <p>Industrial Floorspace – as noted within our representation submitted in response to the LBW Regulation 18 Draft Local Plan, the requirement to provide at least a 25% increase in the amount of industrial (use classes E/B2/B8/SG) and office (use class E) should be amended to be applicable across the allocation as a whole, and subject to viability, in order to be consistent with the London Plan (2021) and the NPPF.</p> <p>Paragraph 5.9.23 summarises the requirements of the Ferrier Street Cluster and Site Allocation including an uplift in industrial floorspace. It states:</p> <p><i>“Proposals must incorporate the following principles:</i></p> <ul style="list-style-type: none"> • <i>Mixed use development including residential and economic uses. Redevelopment of the site should provide at least a 25% increase in the existing amount of industrial and office floorspace in line with the EUIA designation.” [Our emphasis added]</i> <p>As noted within our representation for the Draft Regulation 18 Local Plan, the allocation and this subsequent SPD notes that redevelopment of the site should provide at least a 25% increase in the amount of industrial (use classes E/B2/B8/SG) and office (use class E). This requirement is not consistent with the London Plan (2021), which was updated following modifications proposed by the Secretary of State to remove a requirement to ensure “no net loss of industrial uses” on the basis that it may not be realistic and would therefore fail the “effective” test of soundness. On this</p>	<p>As a result of the Secretary of State's Directions, the requirement for 'no net loss' with respect to industrial floorspace capacity was removed; however the same Direction required the addition of a new paragraph (6.4.6) which states "Where possible, all Boroughs should seek to deliver intensified floorspace capacity in either existing and/or new appropriate locations supported by appropriate evidence", which was accepted by the Mayor of London. Wandsworth's Employment Land and Premises Study (ELPS) 2020 identifies a need for a net requirement of</p>	

		<p>basis, it is proposed that further flexibility is introduced to ensure the SPD is consistent with the London Plan and the NPPF.</p> <p>Paragraph 5.9.23 should therefore be updated to the following:</p> <p><i>“Proposals must incorporate the following principles:</i></p> <ul style="list-style-type: none"> • <i>Mixed use development including residential and economic uses. Redevelopment of the site should provide at least a seek to provide a target of 25% increase in the existing amount of industrial and office floorspace across the EUIA as a whole, in line with the EUIA designation where viable.”</i> <p>We look forward to reviewing further iterations of SPD as it progresses and thank you for the opportunity to provide comment.</p>	<p>8.6 ha of industrial land, which is derived from an identified need of 5.5 ha for core industrial uses, up to 2.1 ha of land for waste requirements, and 1 ha of land to meet the additional surplus land to enable efficient churn of occupiers. As such, successful industrial areas, such as within the Central Wandsworth Economic Use Intensification Area (EUIA), within which the Ferrier Street area is located, are identified within the Plan as holding the potential to realise this need. This is considered to be consistent with the NPPF's requirement, set out in paragraph 81, that planning policies should "set out a clear economic vision and strategy which positively and proactively</p>	
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			<p>encourages sustainable economic growth" and to "set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period", as well as the London Plan.</p> <p>The Wandle Delta Masterplan SPD takes a strategic approach to the realisation of the 25% uplift in economic floorspace required by the EUIA designation across those sites.</p>	
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