

3. Vision And Strategic Objectives

As outlined in the first two chapters of this response, our inescapable conclusion is that in the immortal words of the three New Labour councillors in the run-up to the May 2014 election, at which the one already in place was joined by his two co-runners, “The . . . regeneration ‘consultation’ was a farce” (Labour In Roehampton leaflet, early 2014).

We have seen how the same scenario plays out over and over. It is abundantly clear that WBC is determined to drive the regeneration through. The first iteration of the regeneration failed, and perhaps not entirely unconnectedly, a vigorous defence of the interests of the residents of the Estate was undertaken by the New Labour parliamentary candidate of the day, Stuart King, who went to not inconsiderable lengths to discover what residents really wanted. His report, based on his fieldwork, revealed broadly the same findings which were as much obscured as revealed by WBC’s own soundings twice during the second (current) iteration of the regeneration, to the extent that WBC drew up a paper, so grievous were his conclusions as regards the actually stated wishes of his would-be constituents in the Alton Estate; and as regards the methodological soundness and integrity of WBC’s opinion-finding techniques. Perhaps coincidentally, within the year, the first regeneration was dead in the water.

After his failure to become the Wandsworth MP, his place as candidate for the 2014 election was taken by Sheila Boswell, who showed none of his desire to move and shake the political landscape of the constituency. In this she was unfortunately joined by the New Labour councillor, later councillors, who spoke loudly up until May 2014, but on gaining the electoral success they so evidently craved, sadly and unaccountably (in both senses of the word) fell silent.

The job of the SPD is to translate the Masterplan into a series of benchmarks by which the proposals of developers may be measured, as compliant or not with the Local Plan, the Masterplan and other policy documents. Compliance with stated policies emanating from higher powers – Westminster and City Hall – as to the desired increase of housing density in Wandsworth as in other London boroughs is present even in its absence as a clearly articulated wholesale adoption of those policies. The Eric Pickles description of London social housing estates as “brownfield sites” for redevelopment is the most frank and derogatory condemnation of the living situation of hundreds of thousands of people across London – and the Alton Estate ‘regeneration’ is a clear putting into practice of this obnoxious policy.

Indeed, the SPD reflects Pickles’ proposition in many statements throughout its pages.

Denigration With No Factual basis

The SPD has many unpleasant things to say about the place that for many of us, is our chosen home. Even the statement “There is a generous amount of public realm and public open space” (paragraph 1.25) reads like an implied criticism, that generosity is actually over-generous and should be rationed more carefully.

Built Environment

An examination of the SPD area reveals a number of physical, environmental, social and market issues affecting the quality of the life of the people who live

there . . . concentration of problems . . . evidence [sic] suggests that the area is not working to its full potential (paragraph 2.1)

there are issues with the quality, layout and functionality of the public realm and spaces that limit its usability, pedestrian accessibility and that detract from the quality of buildings . . . areas . . . being openly accessible and deemed to be insecure and unsafe . . . Poorly defined spaces that . . . lack any positive active frontages . . . concealed inactive areas provide opportunities for anti-social behaviour . . . fragmented spaces and a series of obstacles to pedestrian, cycle and vehicle movement . . . open spaces lack facilities and amenities . . . the distribution, siting and density of vegetation in a number of locations detracts from the usability and historic openness of the spaces, and obscures important views through to heritage assets (all these in paragraph 2.4)

It is hard to argue with this kind of attack. The subjectivity is breath-taking, and the only evidence offered is Photograph 3, showing surface car parking, ramps and level changes in Danebury Avenue. One photograph to condemn the whole Alton West (and later, by extension, Alton East). The photographs 1 and 2 are wholly unexceptionable pictures of pleasant green open spaces. Perhaps they are pictured as evidence of 'over-generous' provision of that precious commodity ?

Photograph 1 – evidence that “open spaces lack facilities and amenities” ?



Photograph 2 – one of the “areas being openly accessible and deemed to be insecure and unsafe” ?



Paragraphs 2.6 to 2.8 are worth quoting in full:

A substantial number of residential and commercial buildings are however poorly sited and constructed, as well as falling considerably short of today's expectations and indeed the standards set in the London Housing Design Guide. The external and internal design has negative effects on residents and family living conditions. Issues such as unattractive and deteriorating stairwells, external walkways exposing residents to the elements, worn exteriors, front doors facing away from the street do not only negatively impact the lives of the residents living in the area, but also shape the perception of those who visit the area. (2.6)

Overall, a large number of existing homes within the site are at the end of their useful life and suitability to meet current and future housing needs. (2.7)

A combination of physical factors, including fundamental design flaws in the development layout, along with poorly sited and constructed residential buildings are contributing to the area's problems. The guidance in this SPD seeks to address these issues, whilst conserving and providing an appropriate response to the positive qualities of the site. (2.8)

This is way beyond subjective. This is in fact a simply enormous statement which left us speechless on first reading it.

It is no less than a full declaration of war on the 'built environment' we call home, and is a simple and clear exposition of the false charge laid against the Estate. Quite simply, the rest of the SPD is decoration and small detail beside this.

We had expected to find reference in the SPD, or failing that, in the 'Baseline' report, to a detailed body of structural survey carried out to substantiate this gross claim, but it is quite clear that such does not exist – if it did, it would be the jewel in the crown of the case for the prosecution. The paragraphs show nothing but disdain for us, for our homes, for our community.

Further “deteriorating stairwells” and “worn exteriors” are maintenance issues, something which was highlighted by the Twentieth Century Society in paragraph 2.5 and also by The Putney Society – *“The “outdated” maisonette blocks in this area (proposed for demolition in the POP), are also found in other parts of Alton West and East. Are these other areas of similar blocks likely to be recommended for demolition by the council, in due course? With proper maintenance (which has so obviously been lacking for too long), these blocks could provide quite sound residential accommodation”*. [Source: The Putney Society letter to Team Roehampton dated 9 April 2014].

“homes within the site are at the end of their useful life”: None of the buildings in this category is more than 60 years old, a relatively short span for brick-built construction. A significant proportion, possibly the majority, of the brick-built properties within the London postcode area is easily double this age, lacking even damp courses and cavity walls and yet there is no suggestion that these 'antiques' are past their sell-by date.

“substantial number of residential and commercial buildings are however poorly sited and constructed”: As to the siting of commercial buildings, this can only be a reference to the Danebury Avenue shopping parade. It should be pointed out that the proposed replacements are in exactly the same location.

"Poor quality entrances to blocks." - So modify them !

"Entries to stairwells or ground floor level units are not secured in every instance." - So secure those that lack them !

“Residential units frequently overlook refuse and service areas, external stairways and alleyways, and the presence of these concealed inactive areas provide opportunities for anti-social behaviour.” - This is only significant if there is actual and significant anti-social behaviour taking place rather than just the opportunity for it, which, yet again, remains to be shown.

“Many of the open spaces and parts of the public realm lack a clear role, function, definition and are underused.” – This is too vague to have any real meaning.

“Ramps, steps and bollards around the retail parade combine with fences and walls around parking areas to create fragmented spaces and a series of obstacles to pedestrian, cycle and vehicle movement (see Photograph 3).” - Photograph 3 shows the car park to the north of the retail parade. Having only two points of access to the car parking area increases its security. While there is some validity in the SPD comment, the Masterplan and SPD documents are vague about where the extra parking for existing and new residents would be found.

Luis Diaz, a Senior Lecturer in Architecture, comments on some of Team Roehampton's reasoning for the proposed demolition of housing units on the Alton Estate:

Team Roehampton's justification for demolition refers to design flaws, yet the blocks are fairly typical and normal for their time. That is to say, it is difficult to

believe that the problems they have are new or dramatic. The issue of orientation (“front doors facing away from the street and back gardens fronting on the Danebury Avenue”) can be taken two ways. It is true that quite often these blocks appear to face the wrong way, but orientation of housing blocks can be generated in various ways (for example, with respect to sunlight). I haven’t studied these particular blocks in detail but the key point here is that every housing unit and block has to compromise their orientation in some way, whether to light, sources of noise or location of entries. Every housing unit ever built can be criticised for poor orientation in one category or another, unless it is a bespoke stand-alone house. On its own, this particular orientation problem doesn’t seem sufficient to justify demolition.

The issue with the external walkways and exposure to elements is, quite frankly, nonsense. Using this reasoning we should be demolishing the whole of our Georgian and Victorian terrace landscape since access to them is in constant exposure to the elements. The critiques, as summarised in the Spot The Difference article, seem overly generalised. One might ask what specific evidence is there that the ‘poorly sited’ buildings contribute to the ‘area’s problems’? What exactly are these problems and how are they produced by a particular orientation? Can they be linked by evidence?

The “poor quality entrances to blocks, spaces not overlooked and residential units overlooking refuse and service areas’ can all be mitigated by design adjustments (screening, alteration or addition of new free-standing entrances, etc.) and from my point of view are insufficient to require demolition.

We should be questioning what is meant by “the perception of those who visit the area”. The suggestion is that the perception is negative, but what in particular makes it so? Is it the state of repair (which often is to do with poor maintenance), particular typology (are people offended or threatened by housing blocks?), or the character of the streetscape?

All in all, are the flaws that have been detected out of the ordinary as compared to those we would find in the majority of housing of similar construction and age? All housing ages and all forms of housing eventually fall short of changing (and hopefully improving) housing standards but we do not typically take demolition as the standard fix. Cases for demolition normally cite fundamental structural flaws but I’ve not noted any having been mentioned and would find it surprising given how typical the housing type and form of construction is for the period. It would be worth asking whether repair and design adjustments have been considered and costed and comparing this to the cost of demolition and new construction.

London has unfortunately accumulated a history of demolition in questionable circumstances – see for example, the Heygate Estate, Robin Hood Gardens, and the Aylesbury Estate, to mention just a few high profile cases. There are deeper

questions about gentrification and sustainability that need to be looked at very carefully in these cases.

And there are also imaginative and socially productive solutions for dealing with old housing stock that eschew demolition. One notable example is the work of Lacaton & Vassal who have developed a system for re-cladding and extending the tired tower blocks built in haste all over France (and Europe, for that matter). Their approach enlarges every flat and improves their environmental performance without requiring a single residence to leave their home while the work is carried out. Such solutions are inevitably complex but demolition is far too easy an answer and should always be questioned and challenged.

Luis Diaz, personal communication, January 2015

By extension, the Harbridge Avenue blocks proposed for demolition are similar, if not the same, in construction to those in Hersham Close, on the border of the Alton East and Alton West estates.

The Alton West 'regeneration' claims these Harbridge Avenue buildings to be sub-standard.

Support for change came from residents who favoured improved kitchen layouts, remedying issues with condensation and the fact that the toilets still had high-level cisterns.

We haven't been able to locate any references to structural defects or any other issues that would indicate anything more than a major refurbishment would be quite sufficient to remedy these shortcomings, most of which come about as a consequence of inadequate general maintenance. After all, how long does it take a competent plumber to install a low-level W.C suite; a day?

So what does all this mean for Alton East residents living in similar maisonette blocks? If you are one of this group - and there are nearly 350 of us - it may not be a concern for those who believe WBC will re-house them in replacement buildings at a similar rent and without any loss of amenity.

The Twentieth Century Society had this to say:

Among the buildings earmarked for removal are the Allbrook House slab block and the estate's library – both of which the Twentieth Century Society said it would seek to protect. Parts of the estate are already contained in the Alton Conservation Area, which includes grade I and grade II* listed 18th Century houses as well as 10 grade II-listed point blocks and five grade II* listed slab blocks.

The Twentieth Century Society said it supported the general aim of regenerating the estate, but believed WBC's approach was wrong. Case officer Clare Price said the majority of the estate's problems were due to neglect rather than its buildings: 'We think that a sensitive refurbishment that carefully conserves the heritage of the buildings on site should be enough to achieve what Wandsworth wants.'

Listing bid on cards to stop Alton Estate demolition, Jim Dunton, 27 October 2014, Architects Journal

The Putney Society had this to add:

“The Society played its part in the review, three years ago, of the Alton Estate conservation area. One conclusion of that review was that the boundary of the conservation area should be extended to take in Roehampton Library and Allbrook House above it, together with the green space and established trees between these buildings and Roehampton Lane. We believe that this view is shared by many in Roehampton. These buildings are, we consider, worthy of being added to the council's local list of buildings of architectural and historic interest: they are a distinctive composition enhancing the entrance to the Alton Estate at this point. If the five slab blocks adjoining Clarence Lane are worthy of being listed Grade II*, then the similarly detailed Allbrook House should be considered for listing by English Heritage. It is equally distinguished”.

Putney Society response to the Council regarding the regeneration, 19 September 2012

Green Space

Returning to the “generosity” of the public spaces and public realm: this is what makes the estate work. Unlike many later estates which were built with inadequate public realm and quickly became known as “concrete jungles,” for example, the Ferrier Estate in Kidbrooke, Greenwich, since demolished, the Alton Estate works despite its high population density. Consider the expense to the public purse of the Ferrier estate and contrast that with the economy of the Alton which for the cost of some extra green space has an indefinite life expectancy. Always provided that the will to maintain properly is there.

The wonderful thing about the green space on our Estate is that it works even when there is no-one on it. Just like a painting in an art gallery it works just by people looking at it; when they are walking past it, riding on a bus or watching from a balcony.

It should be highlighted that this “open space” is liked by residents of the Alton Estate. In Stuart King’s Putney Survey of 2008 two questions supported this, these being questions 6 and 7.

https://onedrive.live.com/view.aspx?resid=8D90ED9EB7AF0CB1!530&ithint=file%2cpdf&app=WordPdf&authkey=!AHIQ_N0N1DsCUg0

In 2010 there was the Social Audit by the Roehampton Ecumenical Church and again the open green spaces found favour with residents, as highlighted by the 74.8% as shown on page 20 of the report within Figure 6.

<http://www.roehamptonecumenical.org.uk/content/pages/documents/1297159995.pdf>

Therefore two surveys with residents and two positive results for the green open space.

Crime

As well as living in an ‘unsatisfactory’ built environment, WBC paints us as a criminal population:

The area experiences a range of public safety issues performing poorly in almost all the crime indicators recorded by the Metropolitan Police. There is a particularly high rate of ‘violence against the person’ and ‘criminal damage

incidents' in the Roehampton ward, compared with Wandsworth Borough as a whole.

These higher than average crime levels have a negative impact upon the quality of life of residents on the estate. One of the key drivers behind the SPD is to address this issue and make the Roehampton area a safer place. (Paragraph 2.9)

This paints a far worse picture than was portrayed in the Baseline report. The Baseline report stated that “The Metropolitan Police Service produces annual ward based crime indices for their entire service area. The area is also lower than Wandsworth and London when comparing theft and handling. These statistics show that there is a higher rate of Violence Against the Person in the Roehampton ward as compared with Wandsworth as a whole, although rates are similar to London”

Alton Baseline Report September 2013, p137

Table 17 has the figures and it can be seen that the figures, other than the two targeted by the Council, seem to compare not too unfavourable with the Met Police Area figures.

Table 17 - Crime Levels in the Roehampton ward (12 Months to May 2013)

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Offences per 1000 population	Roehampton	Wandsworth	Met Police Area
Burglary	12.4	12.9	12.7
Criminal Damage	10.6	7.2	8.1
Drugs Offences	4.5	4.2	7.0
Fraud or Forgery	3.7	3.7	4.6
Other Notifiable Offences	1.8	1.0	1.3
Robbery	4.8	4.5	4.5
Sexual Offences	1.6	1.1	1.2
Theft and Handling	31.8	44.2	43.6
Violence Against the Person	23.8	15.4	20.3

Source: Met Police 2013

What is concerning is that these figures are a snapshot as at a certain point in time, in this case 2013, with no comparative data to understand in what direction the figures are going. For instance, is there a year on year increase in improvement of figures?

According to the Environment, Culture and Community Safety Overview and Scrutiny Committee, 19th February, 2014, the Alton Estate seemed to be making large improvements with regards to crime levels. This is even commented upon in Paper No. 14-147 which states “The new Policing Model appears to be working well and delivering positive outcomes. There has been a significant reduction in reported crime within Roehampton when compared to the previous 12 months (January–December 2013). Additionally, detailed analysis of crime incidents on the Alton Estate (where the majority of crime has historically occurred) undertaken in August 2013 demonstrated that there had been a 30% reduction in crime (rolling year). These two sets of analysis indicate a

continued downward trend in reported crime. Reports of anti-social behaviour have also decreased slightly”.

WBC Paper Number 14-147

For the figures, refer to the Appendices 1 to 4 within Section 4 of the Environment, Culture and Community Safety Overview and Scrutiny Committee Wednesday, 19th February, 2014 7.30 p.m.

Further, Roehampton University has stated the safety of the area as being important to its students by stating:

The University of Roehampton is one of the safest in London. Despite its location in a densely populated area, Roehampton and its surroundings have been judged the safest in inner London by the independent Complete University Guide. In the Greater London as a whole, only one other institution had a lower crime rate in its local vicinity.

The statistics for Roehampton show only 18.3 reported offences per thousand people in the vicinity of the university, including all types of victims, not just students. The worst universities had figures of 36.65 offences per thousand, twice that found at Roehampton.

Dr Ghazwa Alwani-Starr, the University of Roehampton’s Director of Estates, who has overall responsibility for security, said: “Students and parents will be very reassured to know that at Roehampton, their sons and daughters are studying at inner London’s safest university.”

‘Crime Written’ – Alton Regeneration Watch at <http://www.altonwatch.org.uk/page5.html>

The reduction in the head count of police is topical, so much so this was highlighted by the Labour Councillors in one of their leaflets, Labour in Roehampton leaflet March 2014 section titled “Bring back the bobbies petition update”. Has this reduction in police numbers contributed to crime figures ? If reconfiguring the built environment can stop crime in its tracks, can we look forward to a need for less – not more – police should the regeneration as presently planned take place ?

Access to services

Extensive alterations, demolitions and reconfigurations have left Portswood Place suffering from a lack of focus. The retail parade is tired and many of the units have their shutters down in the day resulting in a lack of activity. A number of buildings turn their backs on the centre and are set in the context of underused surface car parking which detracts from the quality of the environment. There is a lack of the green space and planting that is characteristic of the wider area and a lack of good quality public gathering space. (Paragraph 2.12)

To the extent that the departures from the LCC Masterplan have given rise to the current state of Portswood Place, the blame can only be laid at the body which granted permission for these departures.

There are shops and services within the area which benefit existing residents, however the quality of the offer fails to cater for the daily convenience needs of

the catchment population. As such, the service centres are not fulfilling their roles as a Local Centre (Roehampton) and Important Local Parade (Portswood Place). The lack of suitable modern premises affects the level of services available and both areas are set within a poor quality environment which detracts from their attractiveness and appeal to local residents as places to shop and visit. This is evidenced by the fact that the units in Portswood Place are frequently closed. Both areas suffer from a lack of connectivity within and beyond the estate which compounds the issue. (Paragraph 2.13)

So shops in Portswood Place are often closed, and this is therefore construed backwards to mean that their architecture is at fault, and the reason for their lack of use? Put rather more logically, local demand for the goods and services offered by the retailers is lacking, so the supply falters in response. A social and economic reason for their apparent lack of success might run thus: those who work outside Roehampton find it easy to shop on their way back from work, lowering demand in local retail units, retailers respond not by charging lower prices to entice these consumers, and others who find it simple to shop outside the area for other reasons, but instead raise their prices to maximise return from their remaining small core of customers.

There are two putative reasons this common-sense explanation is ignored by WBC: first, any whiff of free market failure is anathema to those who embrace the dogma of 'you can't buck the market'; second, this is one of the flimsy arguments in the Masterplan and its latest manifestation, the SPD, to justify retrospectively an already-existing intention to force through the regeneration.

"The lack of suitable modern premises affects the level of services available and both areas are set within a poor quality environment which detracts from their attractiveness and appeal to local residents as places to shop and visit" is a ridiculous and trivial attempt to cloak economic factors (above) by explaining a lack of consumer demand by reference to the physical appearance of the shops.

Neither is it clear what the purpose is of the sentence "Both areas suffer from a lack of connectivity within and beyond the estate which compounds the issue". Even were this true, in what way actually can this deficiency have a material effect on the current retail offer?

A step change in the quality of the service offer in Roehampton Local Centre is required to meet the daily needs of residents, whilst providing access to higher order centres such as Putney and Kingston. A step change is also required in Portswood Place to ensure it fulfils its role in meeting daily needs whilst enhancing access to community facilities. (Paragraph 2.14)

Again, this is a restatement that market considerations are insufficient to induce retailers to do better than they have done to date. The 'first' regeneration plan envisaged the creation of a large food retailing outlet to meet this stated market failure problem. It would seem that no food retailer has proposed a new larger outlet in Roehampton (unless 'soft market testing' indicates otherwise: even so, it appears apparent that none of the major supermarkets is beating a path to the Alton Estate), but WBC seems to believe that it can make this happen by building. This is a classic supply-side attempt to create demand: to propound a solution of this nature, which flies in the face of WBC ideology, indicates an underlying contradiction – the apparent volte-face arises because there is a

deeper reason for these proposals, which is entirely consonant with the proposition 'the market is king'. It's just not necessarily the food retail market.

There are a number of community services, including children's and family services, youth services and citizens advice, but these are dispersed across the estate and there are issues with the quality and format of the accommodation.
(Paragraph 2.15)

Not being experts on, nor close to, the needs of more specialist service providers, we cannot contradict WBC's assertion that in general, healthcare and other community services are poorly served by the built environment in which they currently are located. We can only suppose that this opinion is based on an accurate sounding of the views of those providers

Oh, and by the way, the mention in the same paragraph that "there is only one GP surgery" is incorrect, there are two and they are listed in paragraph 1.29 as "Danebury Avenue Surgery" and "Alton Medical Practice".

Paragraph 2.16's "The services are dispersed and there is a lack of facilities that can provide holistic and integrated services, as well as gaps in provision (particularly relating to recreation, arts and culture)" was touched on at the Roehampton Partnership of 3rd December 2014 meeting, where it was mentioned that the replacement community centre would not have an outdoor playground. In conjunction with the loss of the outdoor space at the Dilton Gardens Youth Club and the Roehampton Youth Club does this mean that there will be no outdoor space at all for the community groups of the Alton Estate?

One wonders (also paragraph 2.16): What exactly are the "modern needs" which are not being met?

Moving on to paragraph 2.17's comment "The University also has facilities and accommodation within the SPD area, including Whitelands College and Mount Clare. There are opportunities to improve access to and the quality of these facilities/buildings, particularly where they impact adversely on the settings of significant heritage assets", one asks, for whom will this be of benefit? How will this benefit the existing community of the Alton Estate ?

Statements Without Evidential Underpinning

Tenure mix

The Council's dominant ownership levels and the associated inability for others to build homes in the majority of the Roehampton area, have resulted in a lack of new build developments and additions to the housing offer. Consequently, there is a lack of tenure diversity in the Roehampton area. (Paragraph 2.19)

Some further explanation of “tenant diversity” requires teasing out here. Should there have been more tenant diversity within Emerald Square and Queen Mary’s Place, built not so many years ago by having social rented homes located within their estate ? Or does this “diversity” only cut one way ?

Is it right to draw from this statement that we need buildings knocking down so that new ones may be erected with owners other than the Council, owners of the present ones ? “Tenure diversity” is not a function of architecture, but of ownership, and the manner in which ownership rights are exercised.

Currently 40% of the leaseholder units in the Roehampton area are privately owned by buy to let landlords and primarily let to students. This lack of tenure diversity has resulted in a prevalence of short term tenancies. (Paragraph 2.20)

This paragraph has no logic to it: Leaseholds have been bought by absentee landlords who let to students, which has led to many short term tenancies. Well, duh ! And in the previous paragraph, a lack of tenure diversity arose from WBC's dominant ownership levels; in this it arises from the Council having sold on to absentee landlords. Get your story straight.

Transport accessibility

The statement in paragraph 2.23 “There is ... no direct local route to Barnes Station” is such a ludicrously untrue statement, it throws the reliability of the rest of the document in which it finds itself into doubt. The #72 and #265 buses both run from within the Estate to Barnes Station. The #493 bus runs along Roehampton Lane, the edge of the SPD area, to within a few metres of the station. The #430 bus runs down Danebury Avenue to a point a few minutes’ walk from the station.

It’s hard to see that residents of an estate as big as the Alton, with 3,300 households, can experience “the sense of the estate being a cul-de-sac”.

Roehampton has excellent access to the primary and strategic road network through Roehampton Lane. However, during peak hours TfL prioritises traffic movement on the South Circular and, as a consequence, Roehampton Lane often experiences significant congestion and traffic queues for vehicles heading towards central London in the am peak and out of central London in the pm peak. (Paragraph 2.24)

Vehicle access through the estate is limited by two vehicle gates on Danebury Avenue and Highcliffe Drive. (Paragraph 2.25)

The stated congestion is essentially one of the funnel effect at each end of Roehampton Lane. 30,000 vehicles a day pass along the length of the road without significant difficulty. The problem at the Upper Richmond Road end is that the stretch of road beyond the traffic lights (which is itself a complicated 5-way junction) is too narrow to receive the number of approaching vehicles. Hence long tail-backs. The SPD correctly identifies the congestion cause at the South Circular end.

However, none of these congestion points is within the SPD area; their remedies lie outside the remit of this consultation; and their implementations lie in the hands of Transport for London, which claims to be unable even to afford to reroute the 22 bus on grounds of cost (source, Roehampton Voice issue #15).

The proposal to open the barriers at the western and northern boundaries of the Alton estate would be relevant, however (item 2.25). Doing this would increase the quantity of traffic trying to avoid the Roehampton Lane funnel points. The congestion cost of this would be a massive increase in vehicle movements at the Danebury Avenue junction, thereby requiring altered (longer) traffic light stages at the expense of the present smooth-running of this stretch of Roehampton Lane. Almost inevitably this would then require an additional set of lights at the Medfield Road junction. This is a major bus route and, as it is, buses emerging from Medfield Road and turning right have to force their way out across moving traffic flows. It is a common sight to see a couple of buses blocking the eastbound vehicle lane while they wait for the Danebury lights to change.

As to the proposition that either or both of the barriers should be opened, this is a massively unpopular proposition (qv).

The assertion of a "lack of direct and good quality pedestrian routes between the site and Roehampton Lane" contained within paragraph 2.26 falls short of reality: there are 3 roadways (Danebury, Kingsclere, Clarence) that have associated footpaths and then 5 additional pedestrian-only routes, making a grand total of 8 pedestrian accesses within stretch of Roehampton Lane that is 550 metres long. That some of them might not be considered "good quality" is attributable to lack of maintenance rather than deficiency in design.

The off-street pedestrian paths are of varying quality and attractiveness and, despite traffic calming measures, vehicle speeds along the central spine road of Danebury Avenue create an uncomfortable environment for pedestrians and cyclists. (Paragraph 2.27)

That the "The off-street pedestrian paths are of varying quality and attractiveness" is purely down to their maintenance (or lack of it). It does not take a regeneration to properly maintain footpaths and their immediate surrounds.

If it is the case that vehicle speeds along Danebury Avenue are excessive, the removal of the barrier at the end of it can only help to slow them by allowing enough through traffic to create traffic jams. Moreover, there is a heavy caveat to the paragraph, in that there is a 20mph speed limit consultation in progress in response to a petition.

Danebury Avenue is currently a 30mph zone, and a recent survey of traffic speed revealed an average vehicle speed of 24 mph (official Wandsworth Council statistics, provided to the Alton

Regeneration Watch website team in February 2015 – see <http://www.altonwatch.org.uk/page14.html>).

Yet again, the statement that pedestrians and cyclists find Danebury Avenue an “uncomfortable environment” is pure subjectivity. Some of do often walk or cycle up or down the Avenue, and have done so for a long time now. Our own subjective opinions are that it is not an “uncomfortable environment” – far less so than walking or cycling along, for example, Roehampton Lane, Clarence Drive or Priory Lane. So whose subjective opinion is more valid ?

Socio-economic challenges

There are high levels of deprivation within the SPD area in comparison to the wider context of Wandsworth. According to the Census, only 28% of households in the area are considered not to be deprived against any deprivation measure, compared to 50% across Wandsworth as a whole. (Paragraph 2.28)

Whilst 28% are not being deprived in any measure versus the Wandsworth figure of 50%, this is true on a standalone basis, though versus the London figure of 39% the 50% figure seems to be on the high side for a comparison.

When the basis for what “deprivation” is defined as and how this relates to the Alton Area there would seem be questions as to what they actually mean and how they will be tackled.

The “deprivation” levels are defined as (based on page 136 of the Baseline report) as:

1. Employment: any member of a household not a full-time student is either unemployed or long-term sick.

Paragraph 4.5 states that additional A1-5 and B1 floorspace will “generate approximately 200 new jobs for local residents” though how many of these “new jobs” will go to existing residents and not to students or to new residents that come into the Alton Estate?

2. Education: no person in the household has at least level 2 education, and no person aged 16-18 is a full-time student.

Why are the figures only compared to the Wandsworth percentages and not the London averages ? According to tables 10 and 11 of the Baseline report (page 133), both the “no qualification” and “Level 1 qualification” are below the London figures. Also, the “no qualification” has decreased from 26% (Table 11) to 16% (Table 10).

3. Health and disability: any person in the household has general health ‘bad or very bad’ or has a long term health problem.

Assuming this relates to Table 16 on page 137 of the Baseline report, then 1% of the count applies to the Alton Area, Wandsworth Borough and London and therefore is an irrelevant measure for the purposes of the Council’s justification of the regeneration.

In terms of a “long term health problem”, Table 16 does not seem to provide a statistic for this.

In the Alton Masterplan Report (page 14) it is mentioned that:

“The area also performs relatively poorly on health indicators. 14% of the area’s population have long-term health problems or disabilities which limit their day to day activity ‘a little or a lot’. This is above the Wandsworth average of 11%. This higher incidence of health problems potentially limits the ability of people in the area to access jobs, or participate in exercise or social activity, or access services or amenities. This also puts significant pressure on health and other community services. Anecdotal evidence from health practitioners in the area suggests that there are particular problems of mental health and physical inactivity which further contribute to the areas problems regarding the health and wellbeing of its residents”.

If the Alton figures are bad, then London’s need improving too. The figure for London is 14% too (Day-to-Day Activities Limited A Lot + Day-to-Day Activities Limited A Little), according to the figures in the Census report. Is it that the Alton performs “relatively poorly” (and so too London) or is it that Wandsworth’s figures are very good?

The Alton figures are on par with the London figures and in some cases are better.

4. Housing: Household’s accommodation is either overcrowded, with an occupancy rating -1 or less, or is in a shared dwelling, or has no central heating.

So, part of this answer is to demolish lots of 3 bedroom maisonettes and replace them with 1 to 2 bedroom apartments? There are around 250 properties which have three or four bedrooms and if these habitations are overcrowded, then how are they to be replaced ?

It is assumed that all the properties have central heating which means that housing must be overcrowded, leaving one to ask the question how the replacement buildings will bridge this gap when circa 250 properties which have three to four bedrooms are to be demolished? It does seem to make sense to demolish properties with more rooms unless they are to be replaced with properties with more rooms?

In short, whilst the SPD is highlighting various statistics in order to advance their arguments, they do not advance an accurate assessment of the situation, as they do not provide a fair comparison against comparable figures for Wandsworth Borough nor for the wider London. The figures on their own do not provide sufficient background as to the issues that these are representing. Additionally, there is no clear indication of how building-led urban regeneration is supposed to impact on these various deprivation measures.

Caveating all of the above, the problems outlined in this section, to the extent that they are real and not artefacts arising from poor use of statistics, are much better addressed by other than architectural ‘solutions’. It is not clearly demonstrated how the creation of new buildings at the cost of tens of millions of pounds on demolitions and rebuilding will alleviate socio-economic problems. There is an enormous bridge to build between opening a supermarket, or ‘incubator space’, and final output of improved socio-economic performance.

Property market and ownership patterns

Despite sitting within the higher value south west London market area with proximity to Richmond, Putney and Barnes, there is a clear disparity between the

values in the Roehampton area and its surrounding locations. The average property prices in the Roehampton area are considerably below London, the wider borough of Wandsworth, and other parts of the local area. This indicates a lack of demand from the market in this area, suggesting that it is not an area of choice for many potential owner-occupiers. These low prices also make the housing for sale particularly attractive to certain sections of the buying market. (Paragraph 2.32)

The Roehampton area presents a complex pattern of land-ownership with at least 11 different types of landowners. The vast majority of the Roehampton area's land is owned by the Council and has not been subject to development for the last fifty years. There has been a lack of opportunity to develop on the Alton Estate which has resulted in the area's housing stock, services and amenities not being significantly revitalised since the estate was built. (Paragraph 2.33)

The renaming of the Alton Estate as 'Roehampton' never looked sillier than here. The statement "there is a clear disparity between the values in the Roehampton area and its surrounding locations" can only possibly work if rephrased as "there is a clear disparity between the values in the Alton Estate and the rest of the Roehampton area".

The impact of regeneration will certainly be to push up average property prices on the Estate, as Egleton House (on the border of the SPD area (230 Roehampton Lane)) one-bedroom flats currently sell for a 'starting from' price of £335,000 (see Wandsworth Guardian 21st May, page 16 (electronic version)) so this matter of concern to WBC will certainly change.

It is not all clear what the point being made in paragraph 2.33 is. The complaint in section 2.19 was a lack of diversity of tenure; here it's an over-complex pattern of land-ownership – with WBC itself the almost overall land-owner. The theme here is not developed to demonstrate what bearing it has on anything, nor why the regeneration is an answer to the (unstated) problem(s) here.

Selling The Story

The language of the brochure

The Roehampton area will be transformed into a place of housing choice for a wide range of households, ranging from tenants who regard it as amongst the best locations in the borough, to owner-occupiers who see it as competing in the wider south west London markets. (Paragraph 3.2)

This paragraph, reading as it does like the purple prose of an advertising agency's marketing brochure for a property developer, is deeply inappropriate in what is a serious document, destined to change the lives of so many people.

A new generation of high quality homes will be delivered with existing sub-standard homes replaced and new homes added. Residential buildings will be of high quality and attractive design, well connected to the existing street layout, and built to contemporary standards to meet the needs of a wide range of residents. (Paragraph 3.3)

This is the vocabulary of denigration again: "sub-standard homes" will be removed. Which buildings? How many of them? Located where precisely? Judged to be sub-standard by what measurement criteria, applied by whom, when? The slur against the existing buildings is heightened by the straw-man creation of as yet unplanned, unbuilt, non-existent 'castles in the air'.

New and improved shops, community services and business spaces will revitalise the Local Centre, while community arts and culture will serve Roehampton residents and wider Roehampton neighbours. Space for small businesses to start will create new and continuing employment opportunities for local residents. Extended primary health care services, exercise space, spaces for independent non-profit community organisations, workshop and enterprise spaces and local retail services will also be delivered, with a focus on the well-being of the local community. (Paragraph 3.4)

Buildings for "[n]ew and improved shops, community services and business spaces" may well be built, but the extent to which the services carried out within them will be successful must depend on more important considerations, such as effective demand, funding and support from WBC, and the willingness and ability of businesses to (re)locate to the area. A philosophy of 'build it and the people will come' is admirable optimism, but arguably betrays an degree of entrepreneurial optimism beyond that which one would expect of a Council. Roehampton High Street has a surplus of vacant and under-used shops. If WBC is so good at getting retailing businesses going, how come nobody shops in what would otherwise be a pleasant shopping parade.

Existing green and open spaces will be refreshed and reinvigorated with a significant renovation of the landscape, as well as provision for a range of new outdoor activities and new access for residents. A network of new and improved streets, cycle paths and footpaths will connect the Roehampton area to its neighbours and surroundings. (Paragraph 3.5)

This is a commendable commitment, but cannot be integral to any regeneration. Work such as this should be business-as-usual.

The area will become a safe, attractive, high quality and mixed neighbourhood. The layout and design of development will draw on the positive aspects of the historic landscape and LCC masterplan, enhancing and better revealing heritage assets and the special qualities of the area. (Paragraph 3.6)

Can we stop perpetuating this myth of the mean streets of the Alton not being safe? Read these quotes from Roehampton's Holy Trinity Church's Social Audit of Roehampton of 2010 published in 2010: *"The surrounding environment of greenery and space and the general ambience of the area and the mutual regard of many of the people for one another."* And elsewhere it was observed ... *"The auditor was pleasantly surprised by the level of everyday, caring and courteous exchanges between people making their way through the estate..... several people walking from shops and bus stops, several children playing in small groups or older youths hanging around or riding bikes. More activity than seen on other high density estates at similar time of year during other walkabouts. Lots of evidence of people passing time of day and stopping to chat."*

Social Audit of Roehampton, 2010, at <http://www.roehamptonecumenical.org.uk/content/pages/documents/1287159295.pdf>

The objectives as stated

This grandiose set of objectives is announced:

The SPD sets out clear objectives for the area that are aimed at focusing intervention where it is most needed. The successful delivery of the vision is dependent upon achieving the strategic planning objectives, which are as follows:

- Create a more mixed and balanced community with new and improved high quality housing that will raise the living conditions and widen housing choice.
- Improve the quality of the retail, service and community facilities. Improve existing community buildings and create new facilities within existing Local Centre and Important Local Parade.
- Provide improved job and training opportunities for Roehampton residents.
- Adopt a place-making approach which protects, strengthens and repairs the special qualities of the estate through bespoke and sensitive intervention.
- Improve or replace poor quality buildings.
- Improve connections within the site and to the surrounding streets, centres, communities and open spaces.
- Upgrade existing and create new streets, public spaces and pedestrian links to make them more attractive, convenient and usable.
- Create a more attractive area with a high quality and active landscape by upgrading existing open spaces and creating new ones.
- Conserve and enhance existing heritage assets and their settings and better reveal the qualities of the estate. (all in Paragraph 3.8)

A recapitulation of previous points:

- A “more mixed and balanced community”: if WBC categorises the local population as almost all either students or (in a perfectly balanced euphemism for ‘poor people’) those who are ‘deprived against at least one deprivation measure’ (section 2.28), then the implication here is that the regeneration will bring in a better class of person into “new and improved high quality housing”.
- Again, the confusion between “facilities” and “buildings”. Putting up the latter doesn’t by a long chalk guarantee delivery of the former. Buildings need people, their skills, and ongoing resources to become facilities. Rather like the Alton Boys Club which WBC closed, several years ago in one of its many rounds of cuts – the building is there, still a specialised

building, but a facility ? Only a facility for pouring our council tax monies into the pockets of the property guardians who have been there for years now.

- Providing the “facilities” and “buildings” doesn’t necessarily lead to “improved job and training opportunities for Roehampton residents”, and these are, again, a business-as-usual requirement of the Council, to the extent that it is able.
- How a top-down, sweep-away-the-old process like the Alton Regeneration can be marketed as a “place-making approach” is a mystery to me. It would seem that this buzzword in planning is just too good to be allowed to pass unused.
- “Adopt a place making approach which protects strengthens and repairs the special qualities of the estate through bespoke and sensitive intervention”: the new builds for student accommodation on Roehampton Lane could not be described in these terms. The buildings practically extend to their back boundary leaving only a small area of unbuilt ground adjoining the Alton estate. In regard to the overall effect, they could not be described as an environment enhancement.
- The comment “Create a more mixed and balanced community” seems to have been text recycled from the earlier regeneration attempt. In the 2008 Labour survey “Stuart King’s Roehampton redevelopment Consultation” with regards to the comment “balanced community” this translated into the following: “And though the council says publicly it wants to help local people buy some of the new homes, in council committee reports it talks about creating a “balanced community” – political speak for getting more outsiders into Roehampton”. I’m not clear as to what makes this current “community” not “balanced” ? The SPD seems to indicate more expensive homes for outsiders coming into the community and potentially an increase in the student population. This term “balanced community” has been recycled from the previous regeneration attempt and fails to justify any real explanation as to what this is. This was even raised by a Roehampton Forum member at the 12th May 2015 with no satisfactory answer from Team Roehampton.
- Regarding the comment: “Improve or replace poor quality buildings”: which poor quality buildings are being improved, unless that’s Minstead Gardens? “Poor quality buildings” still needs to be appropriately explained, which the SPD has not done.

'Alton Estate' erased – without help of bulldozer and wrecking ball

'Alton Estate', Danebury Avenue' and 'Bull Green'

One of the first things we learned as children was where we lived. It's really handy if we got lost as we could tell a grown-up who could then help us get home. And it is a piece of information that remains pretty much relevant for the rest of our lives. By the time we get to an age we can't remember it, it's not a good sign. So, we did the test: where do we live?

We most of us answered with some reference to the Alton Estate? Well we were wrong

But not because we're 'past it'. We still live where we thought we did, but one way or the other, WBC would rather you didn't.

After 18 months of copious documentation passing as consultation with the Alton Area Masterplan, the latest iteration of the 'regeneration' has been subsumed into a document entitled the Roehampton SPD. To a degree that is fine as, after all, the Alton Estate is in Roehampton. But the Alton Estate is not the same as Roehampton (as residents of the more upmarket houses of the wider Roehampton area will probably quickly remind you).

Within the Roehampton SPD, **every** possible mention of the word "Alton" has been excised. Within 70 pages there are only 18 mentions of the word "Alton", and most of these relate to specific street or organisation names (such as 'Alton Road' or 'Alton Primary School') that can't easily be amended. However, the word 'Roehampton' appears no less than 248 times. Everything we thought was in the Alton Estate is now in Roehampton - it's official.

The first conflict that arises from this is to render the Roehampton SPD consultation almost meaningless. Much of what appears in the latest document is a condensation of the points dealt with in the previous Alton Area Masterplan documents. Though they may not have been points one agreed with, at least you knew what was being talked about. Calling everything Roehampton this or that has rendered much of the SPD considerably more than vague.

Examples: Paragraph 2.19 makes a point about the ownership of Estate property but presents it as a Roehampton-wide fact (which it isn't) and in 2.20 there is a statistic given that applies only to the Alton Estate but is given as a Roehampton percentage. And what are we to make of the crime statistics in section 2.9 that claim disproportionately high levels of crime that completely contradict the figure the Metropolitan Police offer (which presents us decidedly average amongst the Wandsworth districts)? Does the Council have a special set of statistics that justify our exceptionally high Alton criminality? We aren't told one way or the other. No, this piece of sleight of hand by the Council makes it extremely difficult for consultation respondents to counter any of the often dubious or inaccurate statements.

This leads to one answer to our question: Why? We have been perplexed as to the reason for this renaming. First answer is, it might be to confound the realistic comparison of statistics against other entities, when it is never clear whether the thing being compared is Roehampton *in sensu strictu*, or the Alton Estate.

Another, second, theory runs: if one was a local council trying to flog off a prime building site to a property developer, you'd be daft not to choose the most appealing name you could. Hence, out with the Alton, in with the Roehampton. Job done!

A third goes: This constitutes the symbolic laying to rest of the old Estate, its erasure and the Roehamptonisation of the area where it currently exists. It's hard to imagine a more fundamental act of aggression against the Estate and its residents – it is a fully-fledged symbolic annihilation of their home, a form of pre-war propaganda to justify an act of aggression against a vilified opponent.

There was an explanation offered by Ms. Janine Newton at a May meeting of the Roehampton Forum, that it was deliberately done in order to bring the SPD nomenclature into line with the range of other planning documents. Quite frankly, none of us present for her explanation understood it, especially given that all previous documents in the Masterplan publishing series retained the familiar names (see below). Nor does it explain the careful erasure of 'Bull Green' and its replacement by 'Downshire Fields' – this is not a pivotal name in the regeneration. It is however possible backing for our second theory (above).

Slowly Disappearing

In the **Baseline Report** which contains all the preparatory data used in the masterplanning process, there are 378 mentions of the word 'Alton' and 202 of 'Roehampton'.

The 378 'Alton' mentions include phrases like 'Alton Area' (174 times), 'Alton Estate' (35), 'Alton West' (98), 'Alton East' (13) and 'Alton Road' (1).

Of the 202 'Roehampton' mentions, around 35% are specific geographic place names ie. 'Roehampton Lane' (41), 'Roehampton High Street' (22), 'Roehampton University' (7), 'Roehampton Library' (5) etc.

In the **Final Masterplan**, there are 191 mentions of the word 'Alton' and 105 of 'Roehampton'.

Selecting the following phrases produces these totals: 'Alton Area' (121), 'Alton Estate' (5), 'Alton West' (1), 'Alton East' (0), 'Alton Road' (0).

Of the 105 'Roehampton' mentions, around 75% are specific place names such as 'Roehampton Lane' (68), 'Roehampton High Street' (7), 'Roehampton University' (3), 'Roehampton Library' (1).

In the **Roehampton SPD**, there are 18 mentions of the word 'Alton' and 248 of 'Roehampton'.

The 18 'Alton' mentions include 'Alton Area' (3), 'Alton Estate' (4), 'Alton West' (1), 'Alton East' (1), and 'Alton Road' (1).

Of the 248 'Roehampton' mentions, approximately 20% are specific place names such as 'Roehampton Lane' (40), 'Roehampton High Street' (1), 'Roehampton University' (4), and 'Roehampton Library' (1).

So, 378 mentions of 'Alton' at the start and 18 now. 'Roehampton' was 202 at the start but is now 248. If one takes out the specific place names (such as 'Roehampton Lane') the before and after figures come out as 'Alton' 377 down to 17, 'Roehampton' 127 increasing to 202.

All mentions of search word

Search Word	Baseline Report	Final Masterplan	SPD
Alton	378	191	18
Roehampton	202	105	248

All mentions of search word with road names etc omitted

Search Word	Baseline Report	Final Masterplan	SPD
Alton	377	191	17
Roehampton	127	26	202

Whether one retains or excludes specific place names, the transition from Alton to Roehampton is equally obvious. Most startling is the change in use of the references to Roehampton from the *Final Masterplan* on to the *Roehampton SPD*, particularly if the street names are omitted.

Build It And They'll Come

Core principle 2 - breathe new life into the existing centres

A. Development proposals will be required to support the revitalisation of Roehampton Local Centre and Portswood Place Important Local Parade. This will be achieved by ensuring that they become active places (where a range of appropriate and good quality shopping, employment, community, arts and leisure facilities are available), as well as being accessible, safe, and attractive. Regard must be paid to the designated frontages within Roehampton Local Centre and Portswood Place, although the Council recognises that there are opportunities to reconfigure and relocate these frontages within the centres where this contributes to the wider regeneration objectives.

B. New and improved shops and services should be delivered at an appropriate scale within the existing centres. The masterplan has identified the potential for up to 5,000 sqm (gross) A1-5 of replacement and new floorspace across the area (approximately 3,100 sqm additional floorspace over and above existing), providing new employment opportunities for local residents. This should include:

- A convenience store in Roehampton Local Centre (of sufficient size to meet daily shopping needs) with associated car parking and visibility from Danebury Avenue.
- New smaller units in Roehampton Local Centre.
- Replacement small units (for retail and other appropriate uses) in Portswood Place Important Local Parade.

C. The Council will support proposals for high quality new housing within the existing centres (alongside an appropriate mix of uses) to provide a greater mix of new homes and to encourage activity at different times of day. This may include an appropriate amount of student accommodation in the Roehampton Local Centre, subject to the guidance under Core Principle 1.

D. Development proposals within the Roehampton Local Centre should seek to create new employment opportunities for local residents by delivering additional B1 floorspace for small businesses and workspaces (approximately 400 sqm gross). (Core principle 2 - breathe new life into the existing centres: pages 33-34)

A – So how actually is this revitalisation to be brought about ? You make the buildings, and then what ? Who occupies them, sets up a business; who comes to patronise them ? None of this happens as a result of just building.

B – Again, this is a supply-side initiative, with no proof that demand, even with increased housing units and concomitant rise in local population, is present. It's more than just the delivery of built units.

The same goes for “incubator employment space”. The built workplace does not guarantee the presence of an employer, nor of employment. What are the plans to ensure occupation of this space ?

C – So the hope is that by having new residents in the commercial centres and ‘active’ after the shops shut, we suddenly have “vibrant” centres ?

D – The delivery of floorspace does not deliver employment, all by itself.

Claims To Have Consulted

Response rate – poor to very poor

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

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

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

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

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

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

Preferred Option Consultation, WBC, February 2014

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

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

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

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

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

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

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

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

The Highcliffe Drive Barrier

Tim Lloyd says:

Whilst I do support the main objectives of the regeneration proposals at Roehampton I consider that Wandsworth has not properly consulted residents on this specific issue. Question 21 in the 2013 and 2014 questionnaires simply asked: 'Do you agree with proposals to extend the K3 bus route through the Alton?'. The consequences of this proposal (which I describe below) were never communicated to residents so that the question is misleading. Previous proposals to open the vehicle barrier in Danebury Avenue in 2008 were very strongly opposed by residents (96% against) and in 2009 WBC confirmed there were 'no plans to open the barrier'. A recent informal poll taken by local residents last year found even stronger opposition to opening the vehicle barrier in Highcliffe Drive – I understand that only 2 out of approximately 250 respondents agreed with this proposal. Justine Greening MP confirmed (14.07.2014) that following her conversation with Councillor Govindia it was agreed that the final preferred masterplan would not include the opening of either the Highcliffe Drive. Approximately 1,000 people live along Highcliffe Drive and Sherwood Gardens – there will be very strong opposition to this proposal if it goes ahead. Your website claims that the SPD formalises the proposals in the final master plan, which is based on consultation for more than a year with residents but it does appear that Wandsworth is not listening to local residents on this specific issue as you claim.

Tim Lloyd, as emailed to planningpolicy@wandsworth.gov.uk on 22nd May 2015

The Danebury Avenue Barrier

- The option ideas for the Danebury Avenue Barrier appears controversial from respondents of the consultation. There is fear that this will increase traffic flow, road accidents and noise pollution.
- Respondents mention that this could be dangerous for the nearby school. However there is some support of limited access to barriers, at certain times or buses only.

Alton Area Masterplan interim consultation report, February 2014

During the drop-in sessions, engagement events and door knocking programme residents were generally supportive of the ideas for new transport connections. However, the proposal for the controlled access through the Danebury Avenue barrier was the most contentious of all the ideas suggested. Many residents cited the idea that controlled opening of the Danebury barrier could result in lower levels of safety for pupils at Ibstock and Alton schools as a concern. Parents and other residents expressed concerns about child safety, the potential for Danebury Avenue to become a rat run where commuters could avoid congestion on Roehampton Lane, noise and other related anti-social behaviour. Two petitions from Alton Primary School parents and Tunworth Crescent residents, comprising 76 and 71 signatures respectively, requested that the Danebury barrier be kept closed and not opened for restricted hours. Some residents voiced concerned about how the controlled barrier would be managed and thought that the accompanying ideas of a reduced speed limit of 20mph and other traffic calming measures were key to the idea working effectively.

Alton Area Masterplan preferred option consultation report, July 2014

Although the SPD currently remains mute on the subject of the Danebury Avenue barrier, it remains clearly shown in the Masterplan (see right, from page 133 of that document). A revised #72 bus route ploughs straight through it on its detour up and down Clarence Lane. The uncontroversial #493 rerouting down Clarence Lane and Priory Lane is conspicuous by its absence.

Meanwhile, the question hangs in the air in the SPD. It is clear that WBC regards the issue as open, even if the Barrier itself is not (yet).

In any case, the inclusion of the opening of the Barrier is not integral to the intention of the SPD, which is a priori a menu for developers to choose from.

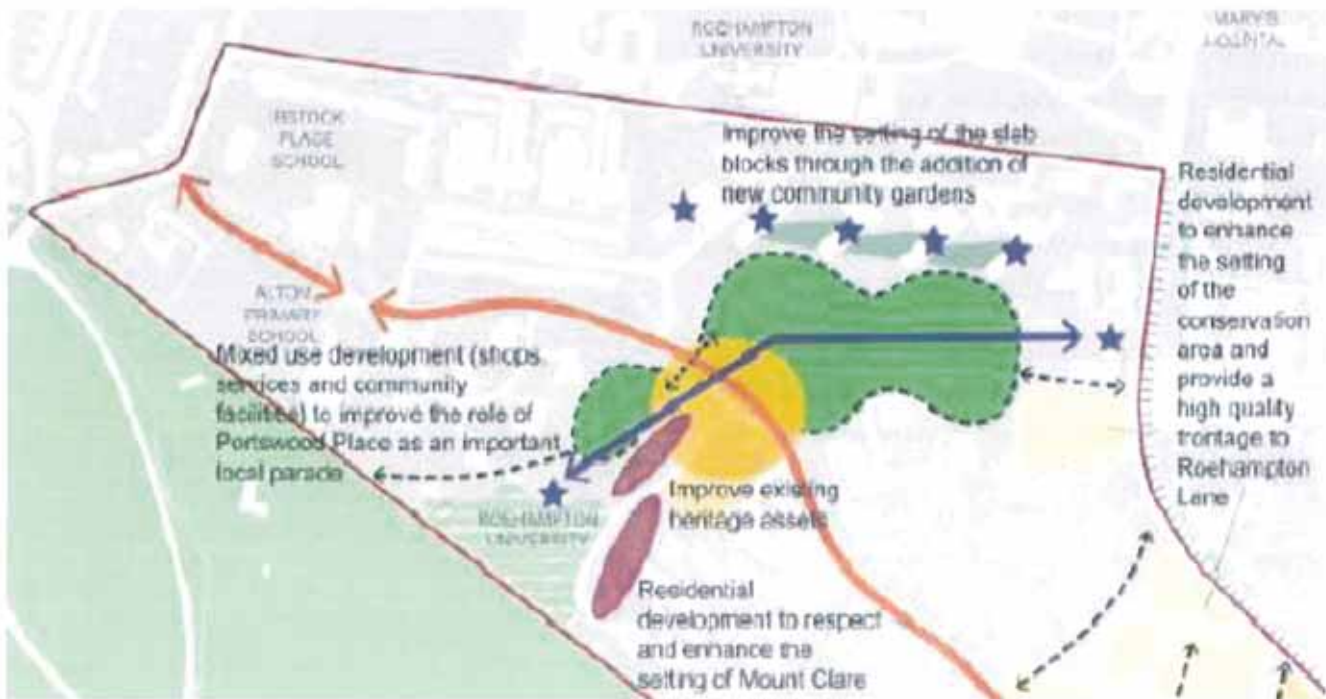


WBC Masterplan, October/November 2014, page 133

The Danebury Avenue Barrier in the SPD: two very similar representations:



SPD, April 2015, page 26



SPD, April 2015, page 29

Student Housing

16% of respondents (and 18% of those in the redevelopment area) would like to see student housing if the town centre is redeveloped.

Alton Area Masterplan interim consultation report, February 2014

4b) When residents were asked about the Preferred Option proposals for the town centre as a location for housing for students, respondents stated that:

	Support Proposals	Support in part	Do not Support
All respondents	26% (67)	32% (82)	34% (88)
Redevelopment area	30% (15)	30% (15)	37% (18)

Whether we take the earlier report or the later one with its unclear 'support in part' fudge, it is clear that support falls very far short of a majority. Even more cogently, the response rate for the questionnaires which elicited these figures were in both cases less than 7% !

WBC's ideological soulmates in Westminster are about to have made illegal industrial action based on this level of response, but that lack of mandate does not seem to apply the other way round. One law for them, and another one for us.

Highcliffe Drive – A Case Study

We are lucky enough to have the benefit of an associate's submission, being an intense focus on a single issue within the SPD, which also touches on many other strands running through that document. Tim Lloyd, who wrote it, gives full permission for us to reproduce it here.

I have lived on Highcliffe Drive for more than 15 years. My comments relate to the proposals in the SPD to widen this road and convert it from a residential access road into a bus route. These proposals are shown as 'upgraded public realm' in Figure 4.1 page 39 and as a 'potential bus route extension' in Figure 4.3 page 48 and described under the heading Core Principle 7 - improve access and connections.

My comments fall into the following categories:

1. Consultation and status of the master plan
2. Transport policy and design standards
3. Health and safety issues
4. Environmental issues
5. Heritage issues
6. Car parking
7. Value for money

Consultation and status of the master plan

Whilst I do support the main objectives of the regeneration proposals at Roehampton I consider that Wandsworth has not properly consulted residents on this specific issue. Question 21 in the 2013 and 2014 questionnaires simply asked: 'Do you agree with proposals to extend the K3 bus route through the Alton?'. The consequences of this proposal (which I describe below) were never communicated to residents so that the question is misleading. Previous proposals to open the vehicle barrier in Danebury Avenue in 2008 were very strongly opposed by residents (96% against) and in 2009 WBC confirmed there were 'no plans to open the barrier'. A recent informal poll taken by local residents last year found even stronger opposition to opening the vehicle barrier in Highcliffe Drive – I understand that only 2 out of approximately 250 respondents agreed with this proposal. Justine Greening MP confirmed (14.07.2014) that following her conversation with Councillor Govindia it was agreed that the final preferred masterplan would not include the opening of either the Highcliffe Drive. Approximately 1,000 people live along Highcliffe Drive and Sherwood Gardens – there will be very strong opposition to this proposal if it goes ahead. Your website claims that the SPD formalises the proposals in the final master plan, which is based on consultation for more than a year with residents but it does appear that Wandsworth is not listening to local residents on this specific issue as you claim.

Transport policy and design standards

The SPD states: 'Additionally, vehicle access from the north and west of the site area is restricted by two vehicle gates on Danebury Avenue and Highcliffe Drive preventing access from Priory Lane and Clarence Lane respectively. This has effectively made the area one large cul-de-sac, with no through movement of vehicles. Improvements will therefore be required to support growth on this site.' However, WBC Paper 09-562 Section 32 regarding a previous proposal to open the vehicle barrier at Danebury Avenue states: ' there is no direct evidence that opening the route would lead to a direct positive economic benefit for the businesses. It is even possible that it could have the opposite effect whereby drivers would just use it as a convenient route (or rat run) and would not stop and shop in Roehampton.' The argument in the SPD appears to be that cul de sacs are automatically bad and 'connectivity' is always good but many people disagree with this standpoint. The layout of the Alton estate is based on a hierarchy of roads that are designed to meet their intended functions. Highcliffe Drive is 5.5m wide and designed as a residential access road. I draw your attention to the recommendations of DB32: 'New development and redevelopment should be designed to fit into and strengthen this hierarchy. The aim of the hierarchical approach is to influence traffic distribution in order to: help traffic use the main roads safely; discourage the use of local residential roads for through travel; create safe conditions for all users of residential roads, especially young pedestrians.' Although DB32 is now superseded by new guidelines there is a case for using this standard in Highcliffe Drive because it is in a Conservation Area – refer item 'Heritage Issues' below.

Health and safety issues

WBC Paper 09-562 documents 9 road traffic accidents along Danebury Avenue between 2005 and 2008, including 3 that involved children aged 12 and below. Some long-term residents recall fatal accidents that led to the installation of vehicle barriers in 1975. I don't believe that the proposed traffic calming measures will mitigate the risk of further casualties. It is very common to see large, articulated vehicles stopped at the Highcliffe barrier after following their sat navs and if the bus barrier is only as sturdy as the barriers on Hammersmith Bridge (which are frequently broken) cars and heavy vehicles will be free to use Highcliffe Drive as a short cut through the estate for long periods of time, which is a great concern to residents. There are two sharp bends on Highcliffe Drive, which are already fairly dangerous and would be a significant safety issue in the new proposals even after road widening. In addition, the junction with Clarence Lane is regularly grid locked with traffic diverted from the closure of Robin Hood Gate in Richmond Park, which will create further problems being close to the junction with Roehampton Lane.

Environmental issues

There are a number of Georgian cedar trees along Highcliffe Drive where the roots are close enough to the road that widening Highcliffe Drive will either kill these trees or affect their health. From conversations with your design team I understand that the technical implications of this situation have not been taken into account.

Heritage issues

The master plan design team have based their transport proposals on Manual for Streets. In the context of the new town centre in Roehampton outside the conservation area this approach is sensible but Highcliffe Drive is different. Figure 4.2 on page 43 of the SPD indicates its heritage significance with five Grade 2* listed buildings along the route. In such situations it is appropriate

and accepted practice to refer to superseded guidelines such as DB32 that reflect the original design intent and setting for the buildings. WBC's Alton Conservation Area Appraisal and Management Strategy item 4.17 emphasises the difference between the street layout found on the Alton estate and the traditional Victorian or Georgian street patterns recommended in Manual for Streets. I am certain that the proposals for Highcliffe Drive will be opposed by English Heritage and the Twentieth Century Society, who were not aware of plans to widen Highcliffe Drive when they made their initial response to the master plan proposals.

Car parking

Car ownership has increased dramatically since the Alton estate was built. There is also pressure for parking places along Highcliffe Drive from Roehampton University students and parents of children at the local schools. The proposal to widen Highcliffe Drive involves a net loss of car parking spaces, which is not supported by local residents.

Value for money

WBC Paper 09-562 estimated the cost of opening the Danebury Avenue barrier to be more than £250,000 in 2009 figures. The proposed works at Highcliffe Drive are far greater in scale, involving widening the road along its entire length, retaining walls and earthworks, additional widening at bends, bus stops, new car parking spaces, possible relocation of services, drainage, lighting, a new barrier, traffic calming measures, re-landscaping and tree root protection, new junctions, professional fees, survey costs, on-going monitoring, and any other measures are likely (based on figures from EC Harris) to exceed the £250,000 figure by a factor close to 10. This estimate was not disputed at a recent meeting with your transport consultant from Alan Baxter Associates. I cannot see how two new bus stops at a cost of roughly £1 million pounds each can represent value for money, particularly when there are alternative bus stops several hundred yards away in each direction.

Summary

The proposed bus route along Highcliffe Drive is not a welcome proposal – I don't believe it has been sufficiently evaluated in technical terms so far. I hope further analysis and improved consultation with local residents will be made before this proposal is considered part of the final SPD.

In general terms, the overall transport policy described in the SPD is disappointing; it seems to me that this is the weakest aspect of the regeneration proposals. I believe that economic regeneration must be underpinned by a credible transport policy if the plans for this area are to succeed but the transport policy in this SPD seems to be mainly an afterthought. This shows up in quite simple things such as the absence of WCs for the bus drivers at the Danebury Avenue terminus ... these facilities are included in the Local Plan but not in the master plan, so that it appears bus drivers will continue to relieve themselves in the bushes. I agree with the statements in the SPD that the historic layout of the Alton estate poses problems for regeneration but I consider that the many good features of the master plan proposals would be a lot stronger if they were supported by a transport policy that worked with 'the grain' of the local area and supported new development in a more thoughtful way, rather than focussing on perceived problems with cul de sacs. I consider small steps, such as the recent campaign by Justine Greening to improve the frequency of the 72 bus

service, and ensuring that buses ran to timetable would be far more welcome by residents than expensive, inappropriate interventions, such as widening Highcliffe Drive. I hope this section of the SPD is developed along such lines in the final SPD.

Tim Lloyd, as emailed to planningpolicy@wandsworth.gov.uk on 22nd May 2015

Conclusion

Given all the foregoing, which we are aware only touches the main points – this document could quite easily have been twice the length it is – we can only form and express the opinion that the many of the underlying reasons for the regeneration are other than have been publicly expressed.

Consultation has been an impressive exercise in paying lip service to the concept of participational democracy. From the first, now many years ago, WBC has shown itself determined to implement the regeneration – whether this regeneration, the ‘first’ regeneration, or the form it anticipates the future regeneration will take.

This document has been compiled with the hateful words “brownfield site” ringing in our inner ears.

For us, however, the Alton Estate is not an edible treat for developers, but our home. Some of us have lived here since childhood; others have moved to the Estate, drawn by call of friend or family, or by its unique blending of the Georgian and the Modernist. It has its faults and imperfections, just as does anywhere, but as we recognise and accept those imperfections in our loved ones, so do we accept our Estate for all its flaws. We ask only that it be treated as the friend, the family, the heirloom that it is, and that it be changed in step with us, as we change and age.

We conclude this document with an iconic image from another era, Lynn Chadwick’s sculpture, *The Watchers*. Currently in storage after attempts on it – theft of one of its members, vandalism – in its mixture of beauty, pathos and menace in a way seem to echo our plight. As we watch, are we also the watched ? Will our beloved Estate see the light of day in the future, still standing ?





National Landlords Association:

Response to Wandsworth Council proposal for Roehampton redevelopment

May 2015

1. The National Landlords Association (NLA) exists to protect and promote the interests of private residential landlords.
2. With more than 55,000 individual landlords from around the United Kingdom, we provide a comprehensive range of benefits and services to our members and strive to raise standards within the private rented sector.
3. The NLA seeks a fair legislative and regulatory environment for the private rented sector while aiming to ensure that landlords are aware of their statutory rights and responsibilities.
4. The National Landlords Association (NLA) would like to thank Wandsworth Council for providing the opportunity to comment on the regeneration of Roehampton.
5. The regeneration of areas by the council can benefit landlords, tenants and communities, if done correctly. The proposal for Roehampton has not convinced us that it will benefit landlords, tenants and the community.
6. One of the dangers of the proposed regeneration is that it is trying to create an artificial community that exists only in aspiration, and is not reflected by the reality of how people live today and will live tomorrow. The status quo does not correspond with what was proposed when the area was last re-developed. Thus there is little reason to suggest that the currently desired outcomes will come to fruition. The current proposal appears an unreasonably subjective approach to housing.
7. We are concerned around the SPD's approach to landlords and housing tenure. The document alludes to tenure by percentage and the council's desire to determine an optimal tenure mix. With tenure in constant flux, it is unclear how will the council keep tenures to their prescribed levels that are outlined in the SPD.
8. The development of housing through the SPD has to be balanced with an unknown future. The document says it should be design led. This does not take into account the current mix and the impact on those who have invested in the area. This is disappointing and reflects a less than comprehensive approach to housing.
9. This policy is described as regeneration yet it is prescribing the type of housing and type of resident that is wished to have in the area. This does not reflect the community which currently exists in the area. It is questionable whether the council has the authority, moral or otherwise, to better judge the chosen homes of local residents.
10. The SPD could result in many people being forced to leave an area in which they wish to live and increase the cost for those who choose to stay. We also have concerns around the Council's message to existing and future landlords and their attitude towards investment..
11. The SPD has proposed a shift in the current population make-up. The ability for people to choose where they wish to live has to be an option which is both considered and respected. For instance, there are a number of students in the area due to the closeness of two universities. The ability of

students to live in an area close to their place of study is an important. Undermine great many businesses have developed to cater for this subset of the local population and the proposal's impact should be considered beyond housing. Their role is important and should be embraced.

12. The SPD says that that the Council will support professional managed student accommodation. This implies that the current landlords are not professional. The NLA does not recognise this generalisation and would request that the Council clarifies its definition of professional landlord.
13. The document says there needs to be types of housing such as 'family housing' but no definition is included. Other local authorities have been defined flats as family housing; the term family housing is misleading.
14. The proposal will have serious impacts on many landlords and the way that they conduct their legal business. The Council will require the private rented sector to help house people, such polices as this will not encourage them to come forward to the council.
15. The quality of the built environments perspective changes over time, a perspective from the 1980s is different to 1990s.
16. The risk of marginalising a group of landlords, when the Council will require greater cooperation in coming years, in planning documents such as this is a disappointing approach by a council with which we have had a good working relationship.
17. A more suitable approach to dealing with nuisance and other housing problems is required. These cannot and will not be solved through planning documents.
18. Again, the NLA would like to thank Wandsworth Council for the opportunity to respond to this proposal and hope you find our comments useful.

Putney Labour Party

35 Felsham Road, London, SW15 1AY
0208 788 8961
info@putneylabour.org.uk
www.putneylabour.org.uk



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

Tuesday 19th May 2015

Dear sir,
ROEHAMPTON SUPPLEMENTARY DOCUMENT

The following are the comments of the Putney Labour Party on the draft Wandsworth Local Plan Supplementary Planning Document for Roehampton dated March 2015.

Putney Labour Party broadly welcomes the Roehampton Supplementary Planning Document and notes that it is in broad conformity with the Roehampton Masterplan, the version of which was adopted incorporated a number of changes sought by the Putney Labour Party and local residents. We believe that the voice of the community is important in shaping the improvements to both the built and social environment of Roehampton which the regeneration process seeks to obtain. This response includes both comments and specific additions we would like to see.

The nine strategic objectives outlined at Section 3.8 do not align directly with the eight Core principles detailed in Section 4. It would be better to align these so we can see how it is proposed to achieve the strategic objectives. In particular it is not clear how the third strategic objective: 'Provide improved job and training opportunities for Roehampton residents.' is to be delivered through the eight Core principles. The Council should indicate the number of jobs and training opportunities it is seeking to achieve. Nor is it clear how the eighth Core principle: 'Create a sustainable environment' relates to any of the strategic objectives.

4.1.D It needs to be made clear that the 'additional affordable housing' is in addition to the replacement of the 309 existing homes at 4.1.A

4.1.E Expand by adding at the end: 'This will include three and four bedroomed family accommodation to help alleviate the overcrowding currently experienced on the estate.'

4.1.G It needs to be made clear that if appropriate proposals for structured Private Rental Sector products were put forward they would be considered.

Putney Labour Party

35 Felsham Road, London, SW15 1AY

0208 788 8961

info@putneylabour.org.uk

www.putneylabour.org.uk



-2-

4.1.H There has been some controversy among local residents about the location of the student accommodation proposed. While there is support for additional student accommodation there is no agreement that the Roehampton Local Centre is the best place for it. We suggest this section is modified to widen the area in which student accommodation will be considered. It is also not clear whether it is proposed to replace the existing student accommodation will be considered. It is also not clear whether it is proposed to replace the existing student accommodation at Mount Clare on the Mount Clare site or to relocate it. In the event of relocation there is no clarity as to what proposals for the Mount Clare site would be considered. This section needs to be amplified to clarify the planning intentions.

4.2.C The comments on student accommodation need to be expanded to incorporate our comments at 4.1.H.

4.2.D This section should be expanded to elaborate on the types of small business that might be appropriate, for example enterprise and incubator space, perhaps associated with the Roehampton University Business School. There may be additional opportunities for such business space within the Portswood Place local parade, so increasing the total area. In planning this space the needs of existing businesses should be Taken into account.

4.3.B It should be made clear that given the additional residents proposed for the area, there will be a significant increase in the net community space in the area. While there is the opportunity to consolidate community spaces around the Roehampton Lane Centre and Portswood Place Local Parade, it will remain appropriate for other facilities, such as residents' clubrooms, to remain dispersed across the estate. In bullet 3 after 'police services' add 'and the voluntary sector'. In bullet 4 after 'community organisations' add 'the voluntary sector'.

4.3.C Any additional education and healthcare requirements which are identified need to be incorporated into the plans. If, for example, there is a requirement to expand The Alton School to two form entry to meet the additional demand, that should be incorporated into the development plans. Similarly any need to expand the doctors' surgery and health care provision needs to be incorporated into the development plans. This section should be expanded to reflect this.

4.7.A Add an additional bullet point 'A new pedestrian and cycle access to Richmond Park in the area of Mount Clare.'

4.7.D Expand bullet 2 by adding at the end 'but retaining the Danebury Avenue barrier'. Add an additional bullet point : 'extending the Tram from Wimbledon to Barnes Station to provide additional capacity'.

Putney Labour Party

35 Felsham Road, London, SW15 1AY

0208 788 8961

info@putneylabour.org.uk

www.putneylabour.org.uk



-3-

4.7 H Add at end 'Parking to meet the needs of the additional residents should be provided within the structure of new buildings'.

5.3 B Add the net gain of floorspace.

5.3 Add a new section 5.3 D and reletter thereafter 'The provision of new employment facilities (approximately 1,000 sqm of B1 floorspace)'. To provide for employment facilities in Roehampton Local Centre as well as Portswood Place local parade.

5.3 G Add 'or nearby' after 'in this location' in line 2 to reflect the changes to 4.1 H above.

5.6 D bullet 2 Add at end 'OR retrovision of the student accommodation' to reflect the uncertainty about the future of Mount Clare.

5.9 E Add at end 'but will include some three or four bedroomed units' so as to conform with 4.1 E above.

5.12 A Add an eighth bullet point ' Pedestrian and Cycle access to Richmond Park in the Mount Clare Area' to conform with 4.7 A above.

6. Add a new section 6.9 headed 'Timescales'. 'Wandsworth Borough Council is seeking to commence the first phase of delivery in 2018 and deliver the [lan in stages over the period 2018-2022'.

Yours faithfully,

Donald ROY

Secretary, Putney constituency Labour Party.



21st May 2015

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

Dear Sir or Madam

Re: Wandsworth Local Plan – Supplementary Planning Document – Roehampton

Please find below the Putney Society's Response to the SPD for the regeneration of Roehampton (Alton Estate).

1. Introduction

The Putney Society has followed with interest the borough council's efforts to regenerate the Alton Estate, Roehampton. We accept that it is an area in need of investment in renewal and we therefore welcome the opportunity to comment on the Supplementary Planning Documents - as the latest phase in the regeneration process.

The SPD shows that the council now acknowledges the importance of the area's significant heritage assets: its Listed buildings, conservation areas and historic landscape. It is good that the need to treat these elements with care and respect is accepted.

The Society has concerns with the SPD and these are spelt out below.

2. Previous comments

The Society's comments on the earlier phases of the regeneration process form the basis of our comments on the SPD. These previous three letters were:

19 September 2012 - commenting on the council's proposals for the regeneration of Roehampton town centre.

The Putney Society

The amenity society for Putney and Roehampton. Registered Charity No. 263242

www.putneysociety.org.uk

20 October 2013 - commenting on the different options for the regeneration of the Alton West area.

9 April 2014 - commenting on the preferred option proposals for the regeneration of the Alton West area.

Where necessary, our response to the SPD carries forward the relevant concerns we have expressed before. These concerns are set out under the following headings:

3. Roehampton Local Centre, Danebury Avenue

The Society maintains that the renewal of this centre ought to provide for the retention of Allbrook House and the Library. These iconic buildings are a key feature of Roehampton, at the entrance to an area of internationally acknowledged architectural and historic importance. They provide an introduction to the collection of heritage assets which make Roehampton the unique place it is. Their retention would enhance the new centre to be created around them.

The 'village green' is a significantly valuable element in the centre's layout. Its trees are mature, established and visually important. They should be retained in any landscaping enhancement works.

4. Portswood Place Important Local Parade

We continue to be concerned that the council is proposing to locate so many uses in this centre that the building will become too large for this location, particularly since it is within the setting of the Grade I listed Mount Clare. The uses at present located in the former South Thames College building at 166 Roehampton Lane ought to be seen as more appropriate in a town centre location. They should be accommodated in the Danebury Avenue local centre.

We welcome the new intention to retain and enhance the listed old peoples' bungalows in Minstead Gardens.

5. Danebury Avenue/ Harbridge Avenue housing

Section 2, "Key issues and challenges" attempts to set out the rationale for the regeneration/redevelopment. It makes a number of important assertions about the buildings but fails to show evidence to back them up. A selection of examples would include:-

2.1 ...evidence suggests that the area is not working to its full potential.

2.6 A substantial number of residential and commercial buildings are however poorly sited and constructed. Where are these - since most of the proposed new buildings will stand on the same footprints as these apparently poorly sited buildings?

2.7 Overall, a large number of existing homes within the site are at the end of their useful life and suitability to meet current and future housing needs.

2.8 A combination of physical factors, including fundamental design flaws in the development layout, along with poorly sited and constructed residential buildings are contributing to the area's problems.

In other sections where assertions are manifestly self-evident, such as in 2.4 "Entries to stairwells or ground floor level units are not secured in every instance.", the obvious remedy

of securing them is ignored in favour of rolling them all up together to justify wholesale demolition and rebuilding.

Furthermore the council's critical assessment of the design of these existing blocks of maisonettes with its conclusion that the blocks ought to be redeveloped raises serious questions. There are many other similarly designed blocks of maisonettes on both the Alton East and West estates. It is understandable that the council's proposals have given rise to concerns amongst residents in these other maisonette blocks. The option of refurbishment of the blocks identified for demolition does not seem to have been properly assessed.

This concern is given greater weight by the inclusion of six maisonette blocks in Alton East which were not included within either the Options or Preferred Options consultations.

The loss of greenery (open spaces and trees) which the proposed redevelopment of this area involves is a matter of concern. There can be little or no prospect of the open spaces being replaced elsewhere.

Student housing within the Town Centre is not a popular choice amongst residents as highlighted in the Options consultation section 5.8 and Preferred Options section 4b. Thus we should prefer this accommodation to be found on campus, or at 166 Roehampton Lane, and only if necessary on the estate.

6. Downshire Fields - central landscape

There must be a clear risk that the council's proposals for the inclusion in this landscape of all the new elements which the SPD describes will clutter the appearance of the open field in a way which would harm the setting of the Grade II* Listed slab blocks adjoining. More detailed consideration is needed of this element in the SPD before it can be considered to be appropriate.

7. Transport issues

Vehicular movement around the area is affected by the barriers in Danebury Avenue and Highcliffe Drive - no doubt, to the inconvenience of motorists. This aspect of the regeneration proposals has aroused considerable concern amongst residents in the areas around the barriers. The local community has made it quite clear that the barriers need to remain - to limit rat-running traffic and danger to pedestrians. The Leader of the council has given clear assurances that the barriers will not be removed. It is particularly concerning that this matter is not properly addressed in the SPD.

The SPD seems to indicate that the Alton Estate is not very accessible to local train stations. This is not the case. For example the TfL journey planner indicates a 16 minute travel to Putney Bridge station with the 265 bus via Barnes station, rather than the 40 minute journey to East Putney as indicated in section 1.31.

8. Community issues

The Roehampton Social Audit of 2010 concluded that the most pressing social need in Roehampton was for a centrally located community building which would serve the needs of the whole Roehampton community. Since that study was carried out, there has been a steady erosion of community facilities in the area. The council has failed

to ensure the replacement of lost facilities. We now have the closure of 'The Cornerstone' and the possibility of it being redeveloped, with the loss of this historic public hall.

This aspect of the SPD is not very convincing and leaves the provision of community facilities in Roehampton in some doubt. Community facilities to serve the whole of Roehampton are needed and the SPD ought to make clear that this is what can be expected to be provided in the town centre.

9. Delivery

This section of the SPD seems rather vague. It does not make it clear just how the council plans to deliver the regeneration proposals. The way the council envisages working with the private development sector is left unexplained. This lack of information must be concerning, given the outcome of the council's previous regeneration proposals for Roehampton.

Of importance to residents impacted by the move from old to new housing is to move only once, a commitment that the Council has said that it is endeavouring to meet. This commitment is not mentioned within the SPD.

Another omission is the lack of any reference to limiting maintenance of the future regeneration to restrict any adverse impacts to leaseholders through their service charges.

10. Errors in the SPD

It is disappointing that the SPD contains a significant number of straight errors of fact. This tends to undermine the confidence one can have in the document. These errors are listed in a separate attachment to this letter.

11. SPD Sustainability Appraisal

We note the statement in 1.1 that "Sustainability appraisal is not a precise science." We also note that against the nineteen Sustainability Appraisal objectives, the SPD is said to have a positive or significant positive effect in every instance. We are greatly concerned that these positive outcomes have been achieved by making hopeful and optimistic assumptions about how and whether the underlying criteria will be met. Two illustrations would be:-

- *Objective 10 Ensure people have access to suitable housing* assumes:
New housing is **expected** to meet high standards of sustainability including:.....

However, the SPD, at 4.1, only states that:

"All new homes will be required to meet the highest residential quality standards. This *should be achieved by seeking to:*" and then listing the same 4 items.

- *Objective 11 Ensure people have access to essential community facilities* assumes:

- A new library facility in Roehampton Local Centre;
- A new arts facility in Roehampton Local Centre;

- New community services including health, youth, and housing and police services in Roehampton Local Centre;
- A new community building at Portswood Place containing co-located community facilities, including the nursery and family services relocated from Roehampton Lane, additional health facilities, space for community organisations, workshops and enterprise space, and local retail; and
- A new community pavilion to replace the Minstead Gardens senior citizens club.

However, the SPD at 4.3 only states that:

"It is ***envisaged*** that the facilities ***may include***:" the aforementioned 5 items.

Unless these conditional words are removed from the SPD, the positive rating of the SPD can have little value or substantiation as they are based on aspiration not commitment. Past experience indicates that grand aspiration rarely survives the final planning application approval.

In conclusion The Putney Society feels that greater consideration should be given to rejuvenation and reworking of some of the buildings on the estate and that genuine, not qualified, commitment should be made to those elements of sustainability which, at least superficially, are the prime reasons for the regeneration.

Yours truly

Judith Chegwidden
Chair, Putney Society

Roehampton Supplementary Planning Document - March 2015

Errors in the Document

This document contains a significant number of errors and confusions. This undermines the credibility of the document and makes it more difficult to take the document seriously.

Note the following errors:

Page 5 Para 1.11 Figure 1.3 - or 1.2 ??

Page 6 Para 1.16 Why is Putney left out ??

Page 6 Para 1.18 Why does the council consider Roehampton University to be a 'disreputable institution' ??

Page 7 Figure 1.3 Is Roehampton Club a Green Public Space ??

Page 8 Para 1.19 Why the first mention of the Alton Estate ??

Page 8 Para 1.23 responds ??

Page 9 Figure 1.4 Are all Locally Listed Buildings shown ??

Page 11 Para 1.28 Other parks What parks ??

Page 11 Para 1.29 St Joseph's RC Church is not in the SPD area

Page 11 Para 1.29 Chapel Street Family Hub ??

Page 15 Para 1.33 principle ??

Page 15 Para 1.34 No mention of the consultation being described as a 'farce' by leading local community representatives

Page 19 Para 2.4 'open spaces underused' This is not explained

Page 20 Para 2.6 'poorly sited and constructed' No explanation offered

Page 21 Para 2.7 'a large number of existing homes' No evidence

Page 21 Para 2.9 No mention here of the council's letting policies as a cause of these problems

Page 22 Para 2.10 missing 'those'

Page 22 Para 2.14 'whilst providing access to higher order centres...' How ??

Page 22 Para 2.15 'only one GP surgery' Wrong!

Page 23 Para 2.23 'no direct local route to Barnes' Wrong!

Page 23 Para 23 'a cul-de-sac' So ??

Page 24 Para 2.25 No explanation given

Page 24 Para 2.28 No mention of this being caused by the council

Page 28 Para 3.8 'open spaces and creating new ones' No mention of how or where

Page 30 Para 4.1 principle

Page 34 E. 'signature architecture' What is this ??

Page 34 'low vacancy rate (14%)' Wrong!

Page 35 B. 'may include' Why 'may' ??

Page 36 C. 'an assessment' By whom ??

Page 36 Ibstock Place School No mention of the new Performing Arts Centre
Why ??

Page 36 Why is Roehampton Church School excluded ?? Why no mention of the
Ark Academy ??

Page 41 F. 'including the following' ??

Page 41 'county estates' ??

Page 41 Manresa House Not Parkstead ??

Page 43 Why exclude locally listed buildings ??

Page 45 B. 'nearby rail and underground stations' In Downshire Fields ??

Page 46 E. 'to' ??

Page 47 'West Danebury Avenue' ??

Page 47 Kingsclere Road ??

Page 47 'Improvements will therefore be required to support growth on this site'
The barriers to go ??

Page 52 E. 'of a new of an associated new space' ??

Page 52 Manresa House Parkstead ??

Page 60 'The circumstances.....policy DMH1' ??

Page 61 'Retained Trees' None in Danebury Avenue ??

Page 65 Para 6.2 Alton ??

Page 65 Para 6.4 '.... a nominations agreement' Between whom ??

DEC

21 MAY 2015

Roehampton Forum

“Aiming to enable local people and organisations to work together to improve the quality of life in Roehampton”

Planning Policy,
Housing and Community Services,
Wandsworth Town Hall,
Wandsworth High Street,
Wandsworth
SW18 2PN

Flat 2, 58A Hazlewell Road,
SW15 6LR

Telephone No. (0208) 788 8361

Email: donaldroy@btinternet.com

Wednesday 20th May 2015

Dear sir,-

ROEHAMPTON SUPPLEMENTARY PLANNING DOCUMENT

I am writing to you on behalf of the Roehampton Forum to let you know its agreed response to this document.

In addition I would like to express its appreciation of the comprehensive presentation to the Forum at its meeting on Tuesday 12th May which clarified a number of issues and removed a number of misconceptions about what was proposed.

The Forum decided to comment collectively on only one aspect of the document. This relates to community infrastructure.

It resolved *nem con* to comment that there is a need to ensure that the local community has a say in the development and provision of community facilities and infrastructure. More specifically, while acknowledging that the Council has been careful to ensure the replacement of existing facilities for the community within the regeneration proposals (among them the G.P.surgery and a children's nursery) and the inclusion of a specific arts centre, it believes that not enough attention has given to the provision of general community space.

In this it reflects the findings of the Roehampton Social Audit of 2010 which concluded that the most pressing need in Roehampton was for a centrally located community building which would serve the needs of the whole community. This aspect of the Supplementary Planning Document is not particularly convincing and appears to leave the provision of such a community facility in Roehampton in some doubt.

-2-

It feels that community facilities to serve the whole of Roehampton are needed and the final version of the Supplementary Planning document should make clear that this is what can be expected to be provided.

Yours faithfully,

A handwritten signature in cursive script that reads "Donald Roy". The signature is written in black ink and has a long, sweeping underline that extends to the right.

Donald ROY
Secretary, Roehampton Forum

22 May 2015

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

DP9 Ltd
100 Pall Mall
London SW1Y 5NQ

Registered No. 05092507

telephone: 020 7004 1700
fax: 020 7004 1790

www.dp9.co.uk

BY E-MAIL ONLY
planningpolicy@wandsworth.gov.uk

Dear Sir/Madam,

DRAFT ROEHAMPTON SPD – MARCH 2015: REPRESENTATIONS SUBMITTED ON BEHALF OF THE ROEHAMPTON METHODIST CHURCH

Introduction and Statement of Interest

This letter constitutes the formal representations of our client, the Roehampton Methodist Church (RMC), on the Draft Roehampton SPD (March 2015).

RMC's landholding in the SPD area comprises the Roehampton Methodist Church and Church Hall site, located to the east of Minstead Gardens at its junction with Clare Place, directly south of Portswood Place Important Local Parade.

Representations

General

RMC supports the generally pro-active, pro-growth but sensitive approach being taken towards development in the SPD area, as reflected in the document's vision and strategic objectives. A flexible approach to wording is encouraged where appropriate, in order to enable officers and members to secure the greatest benefits for the Borough in collaboration with landowners, developers, the local community and other key stakeholders. Detailed comments on the draft document are set out below.

As a general point, we request that the above site is referred to in planning policy documents and guidance as 'Roehampton Methodist Church and Church Hall' going forward.

In light of the Deregulation Act 2015, reference to the Code for Sustainable Homes should be removed from 4.1 Core Principle 1 'I' and Core Principle 8 'A', and the Council's approach to other emerging build quality and performance standards clarified.

1. Introduction and Background

For clarification purposes, we request that 'Methodist Church' under 1.29 is updated to read 'Roehampton Methodist Church and Church Hall'.



3. Vision and Strategic Objectives

The objectives of increasing the quantum and quality of housing and the provision of new and improved community facilities in the area, are welcomed and supported by RMC. Specific recognition of the Church and its surrounding area as somewhere with 'potential to improve facilities' and partially as a 'Mixed Use Development Opportunity' is advocated and supported. However, RMC strongly consider that the 'Mixed Use Development Opportunity Area' shown in this location on Figure 3.2 'Site Wide Concept Diagram for the Roehampton Area' and Figure 5.3 'Key Principles for Portswood Place Important Local Parade' (and any other figures as relevant) should be amended to extend further south to clearly include the entire Church building and its curtilage.

The key outcome from the regeneration of the area of 'improved housing' through the provision of high quality new accommodation and the provision of student accommodation as set out under 3.7, is supported in principle. However, it is not considered appropriate for the SPD to be prescriptive of unit numbers for the area as a whole, or for the sub-areas within. It is important that flexibility is retained to allow for the appropriate capacity of individual sites to be established on a site by site basis through a collaborative and detailed design-led process involving relevant stakeholders, with consideration given to relevant planning policies. We therefore request that the first bullet point under 3.7 is updated to remove reference to proposed unit numbers.

For the avoidance of doubt and in accordance with the SPD's vision and objectives, we suggest that 'and student accommodation' is inserted after the first reference to 'housing' in the first bullet point under 3.8.

We recommend that it is made clearer exactly which areas the annotations on Figure 3.2 'Site Wide Concept Diagram for the Roehampton Area' relate to. We consider reference to specific uses for potential mixed use development sites to be too prescriptive at this stage. We therefore request that the following annotation on Figure 3.2 'Mixed use development (shops, services and community facilities) to improve the role of Portswood Place as an important local parade' is amended so that the bracketed text is deleted.

4.1 Core Principle 1 – Deliver high quality homes within a mixed and balanced community

In the policy context of housing provision being a key objective for the entire SPD area, RMC consider it overly prescriptive for the document to identify specific locations which are suitable for housing. The appropriate mix of uses on individual sites should be considered via the design-led approach set out under 'C', which is supported. On this basis, we request that the bracketed text under 4.1 Core Principle 1 'B' is removed.

Specific reference to 'Roehampton Local Centre' under 'H' is again considered too prescriptive and should be removed. As drafted, 'H' may inhibit proposals for high quality, well located student accommodation to come forward on other sites in the area (as may be identified as appropriate via the proposed design-led approach). The same reference to 'Roehampton Local Centre' should be removed from 4.2 Core Principle 2 'C'.

For completeness and to ensure that the adopted policy is fully and accurately referred to, we request that the sentence under 4.1 Core Principle 1 'H' referring to DMPD Policy DMH9 has the



following text added 'or it can be demonstrated that the facility no longer caters for current or future needs.'. The same complete policy reference should be made under the last bullet point of 4.1 Core Principle 1 – 4.4.

4.2 Core Principle 2 – breathe new life into the existing centres

The preference for signature architecture to be used in new community buildings to create focal points and to reinforce the existing centres as key hubs of activity is welcomed and supported.

4.3 Core Principle 3 – deliver new and improved community infrastructure

We request that the reference to the 'Methodist Church' under 'A' is updated to read 'Roehampton Methodist Church and Church Hall'.

4.5 Core Principle 5 'respect the heritage of the area'

RMC supports the principles set out under 'A', 'B', 'E' and 'F', in particular the statement under 'B' that the Council will support developments that enhance the Conservation Area and its setting through the redevelopment of poor quality housing stock and built form.

'C' and 'D' are also supported in principle, however, the reference under 'C' to a building height of more than 3 storeys as being likely to be inappropriate in specific locations is considered too prescriptive a design parameter for the SPD to assert, and should be removed. It is important that flexibility is retained to allow for the appropriate scale and design of development on individual sites to be established and agreed through a collaborative and detailed design-led process involving relevant stakeholders, with consideration given to relevant planning policies.

Core Principle 6 – update and activate the urban fabric

The principles of high quality design set out under Core Principle 6 are supported and endorsed.

For clarity, we request that 'area' is inserted after 'Local Parade' in the second bullet point under 'E'.

4.7 Core Principle 7 – improve access and connections

The principle of improving accessibility and connectivity in the area is encouraged and supported.

5 Sub-area guidance

It is not clear whether the four 'Key intervention areas' identified under Figure 5.1 directly relate to the four 'Sub-areas' which follow. For the avoidance of doubt, we suggest that consistent terminology is used.

5.2 Sub-area 2

We request that the final bullet point under 5.6 'B' is revised to read 'a new Church and Church Hall'.

As set out above, it is not considered necessary for the SPD to be prescriptive in terms of residential unit numbers for the area, including references made in the sub-area guidance. The appropriateness and capacity of individual sites to accommodate residential development should be considered on a site by site basis.



With respect to the above paragraph and for the sake of clarification, we recommend that 'D' is revised to read: 'The Council supports proposals for new and improved homes and student accommodation in this area including the following:'

We recommend that a third bullet point is added under 'D' to read: 'other sites within the areas allocated as 'Mixed Used Development Opportunity''. This is to encourage housing to be incorporated into new mixed use developments in appropriate locations.

For the avoidance of doubt and in accordance with the vision for this area, we request that 'Replacement of the Methodist Church and Church Hall' is added to the list under 5.6 'F'.

The reference in the fourth bullet point under 'G' to it being unlikely that development of a building height of more than 3 storeys would be supported in this area is considered too prescriptive a design parameter for the SPD to assert, and should be removed. As set out above, in order not to stifle potentially appropriate development, it is important that flexibility is retained to allow for the appropriate scale and design of development on individual sites to be established and agreed through a collaborative and detailed design-led process involving relevant stakeholders, with consideration given to relevant planning policies.

We kindly request to be kept up to date with the Draft Roehampton SPD's progress and next steps. Please do not hesitate to contact Richard Ward or Dan Fyall at this office if you have any questions or require any further information.

Yours faithfully,

DP9 Ltd.

RAW/DF/DP3756

22 May 2015

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

DP9 Ltd
100 Pall Mall
London SW1Y 5NQ
Registered No. 05092507
telephone 020 7004 1700
facsimile 020 7004 1790
www.dp9.co.uk

BY E-MAIL ONLY
planningpolicy@wandsworth.gov.uk

Dear Sir/Madam,

DRAFT ROEHAMPTON SPD – MARCH 2015: REPRESENTATIONS SUBMITTED ON BEHALF OF THE SOUTHLANDS METHODIST TRUST FOR AND ON BEHALF OF THE TRUSTEES FOR METHODIST CHURCH PURPOSES

Introduction and Statement of Interest

This letter constitutes the formal representations of our client, the Southlands Methodist Trust (SMT) for and on behalf of the Trustees for Methodist Church Purposes (TMCP), on the Draft Roehampton SPD (March 2015).

The landholding in the SPD area which is vested in TMCP and managed by the SMT comprises 1.43 hectares of the 1.57 hectare Mount Clare site, as identified under 8.1.3 of the Site Specific Allocations Document (SSAD - 2nd Proposed Submission Version, October 2014, submitted for examination March 2015). The remaining 0.14 hectares comprises the 5m wide strip of Freebord land owned by the Crown, which runs between the site's western boundary and Richmond Park.

On a separate but related matter, we draw attention to the 'University of Roehampton' being incorrectly stated under 'Land Ownership' in the submission version of the SSAD Site Allocation 8.13, instead of 'TMCP' (and the Crown), which for the avoidance of doubt is an entirely separate organisation. The University of Roehampton occupies the site under a lease until 2026. We request that the Council raises this matter with the Inspector as part of the current Local Plan examination process and that this factual inaccuracy is corrected before the SSAD is adopted.

Representations

SMT supports the generally pro-active, pro-growth but sensitive approach being taken towards development in the SPD area, as reflected in the document's vision and strategic objectives. A flexible approach to wording is encouraged where appropriate, in order to enable officers and members to secure the greatest benefits for the Borough in collaboration with landowners,



developers, the local community and other key stakeholders. Detailed comments on the draft document are set out below.

1. Introduction and Background

Figure 1.5 'Existing Building Heights' currently shows Mount Clare House as a 1-2 storey building. While the building is two full storeys above ground level, owing to the raised ground floor level and partially sub-terrain level below, the high floor to ceiling heights and pitched roof, we consider that it would be more accurately represented in the '3-4 storeys' category.

For clarification purposes, we recommend that the second bullet point under 1.29 is amended to read 'University of Roehampton – Student Accommodation and Administrative Offices'.

Figure 1.6 'Existing Land Uses' currently incorrectly categorises Mount Clare House and Picasso House as 'Community Facilities'. These are privately owned buildings currently being leased to the University of Roehampton for administration and student accommodation purposes, respectively. We request for Figure 1.6 to be updated to reflect this.

3. Vision and Strategic Objectives

The key outcome from the regeneration of the area of 'improved housing' through the provision of high quality new accommodation and the provision of student accommodation as set out under 3.7, is supported in principle. However, it is not considered appropriate for the SPD to be prescriptive of unit numbers for the area as a whole, or for the sub-areas within. It is important that flexibility is retained to allow for the appropriate capacity of individual sites to be established on a site by site basis through a collaborative and detailed design-led process involving relevant stakeholders, with consideration to relevant planning policies. We therefore request that the first bullet point under 3.7 is updated to remove reference to proposed unit numbers.

For the avoidance of doubt and in accordance with the SPD's vision and objectives, we suggest that 'and student accommodation' is inserted after the first reference to 'housing' in the first bullet point under 3.8.

We recommend that it is made clearer exactly which areas the annotations on Figure 3.2 'Site Wide Concept Diagram for the Roehampton Area' relate to. To reflect the SPD's vision and objectives and the flexibility that was set out in the Alton Masterplan, we suggest that the following annotation should be amended as follows: 'Residential development and/or student accommodation to respect and enhance the setting of Mount Clare'.

4.1 Core Principle 1 – Deliver high quality homes within a mixed and balanced community

In the policy context of housing provision being a key objective for the entire SPD area, SMT consider it overly prescriptive for the document to identify specific locations which are suitable for housing. The appropriate mix of uses on individual sites should be considered via the design-led approach set out under 'C', which is supported. On this basis, we request for the bracketed text under 4.1 Core Principle 1 'B' to be removed.

Specific reference to 'Roehampton Local Centre' under 'H' is again considered too prescriptive and should be removed. As drafted, 'H' may inhibit proposals for high quality, well located student accommodation to come forward on other sites in the area (as may be identified as



appropriate via the proposed design-led approach). This is further relevant given that student accommodation is specifically identified in the SPD and Alton Masterplan as a potentially suitable use on the Mount Clare site. The same reference to 'Rochampton Local Centre' should be removed from 4.2 Core Principle 2 'C'.

For completeness and to ensure that the adopted policy is fully and accurately referred to, we request that the sentence under 'H' referring to DMPD Policy DMH9 has the following text added 'or it can be demonstrated that the facility no longer caters for current or future needs.'. The same complete policy reference should be made under the last bullet point of 4.4.

Also under 'H' and in order to reflect the flexibility that was set out in the Alton Masterplan for the Mount Clare site, we suggest that 'either housing and/or' is inserted before 'up to 400 additional student units'.

4.5 Core Principle 5 'respect the heritage of the area'

SMT supports the principles set out under 'A', 'B', 'E' and 'F', in particular the statement under 'B' that the Council will support developments that enhance the Conservation Area and its setting through the redevelopment of poor quality housing stock and built form; and the Council's support for direct improvements to the buildings referred to under 'F', as appropriate in their heritage context. SMT also agree that the Mount Clare site presents 'Opportunities to Upgrade/Improve the setting of Heritage Assets', as identified throughout the draft SPD.

'C' and 'D' are also supported in principle, however, the reference under 'C' to a building height of more than 3 storeys as being likely to be inappropriate in specific locations is considered too prescriptive a design parameter for the SPD to assert, and should be removed. It is important that flexibility is retained to allow for the appropriate scale and design of development on individual sites to be established and agreed through a collaborative and detailed design-led process involving relevant stakeholders, with consideration given to relevant planning policies.

For clarity, we recommend that 'including Tunworth Crescent' is inserted after 'Danebury Avenue area' in the second bullet point under 'D'.

4.6 Core Principle 6 – update and activate the urban fabric

The principles of high quality design set out under Core Principle 6 are supported and endorsed.

In accordance with the SPD's vision and objectives and to reflect the flexibility that was set out for the Mount Clare site in the Alton Masterplan, we request that 'and/or student accommodation' is inserted after 'New homes' in the third bullet point under 'E'.

4.7 Core Principle 7 – improve access and connections

The principle of improving accessibility and connectivity in the area is encouraged and supported. The proposed new route providing traffic-free pedestrian and cycle linkages between the Central Landscape and Richmond Park set out under 'B' is also supported in principle. The exact routing and form should be determined in consultation with landowners in the SPD area.

5 Sub-area guidance

It is not clear whether the four 'Key intervention areas' identified under Figure 5.1 directly relate to the four 'Sub-areas' which follow. For the avoidance of doubt, we suggest that consistent



terminology is used. We request that the red dotted line outlining 'Key intervention area 2' is amended to ensure that it includes the entire Mount Clare site.

As set out above, it is not considered necessary for the SPD to be prescriptive in terms of residential unit numbers for the area, including references made in the sub-area guidance. The appropriateness and capacity of individual sites to accommodate residential development should be considered on a site by site basis.

5.2 Sub-area 2

With respect to the point made in the above paragraph and for the sake of clarification, we recommend that 'D' is revised to read: 'The Council supports proposals for new and improved homes and student accommodation in this area including the following:'

In accordance with the SPD's vision and objectives and to reflect the flexibility that was set out for the Mount Clare site in the Alton Masterplan, we request that the second bullet point under 'D' is amended to read: '... and new homes and/or student accommodation around Mount Clare'.

The reference in the fourth bullet point under 'G' to it being unlikely that development of a building height of more than 3 storeys would be supported in this area is considered too prescriptive a design parameter for the SPD to assert, and should be removed. As set out above, in order not to stifle potentially appropriate development, it is important that flexibility is retained to allow for the appropriate scale and design of development on individual sites to be established and agreed through a collaborative and detailed design-led process involving relevant stakeholders, with consideration given to relevant planning policies.

General

In light of the Deregulation Act 2015, reference to the Code for Sustainable Homes should be removed from 4.1 Core Principle 1 'I' and Core Principle 8 'A', and the Council's approach to other emerging build quality and performance standards clarified.

We kindly request to be kept up to date with the Draft Roehampton SPD's progress and next steps. Please do not hesitate to contact Richard Ward or Dan Fyall at this office if you have any questions or require any further information.

Yours faithfully,

DP9 Ltd.