

**WANDSWORTH LOCAL PLAN SUPPLEMENTARY PLANNING DOCUMENT
ROEHAMPTON – MARCH 2015 CONSULTATION DRAFT**

Ref	Relevant text from document	Comments – support / suggestion / objection
<i>Chapter 1 - Introduction and Background</i>		
1.1	The Council is committed to delivering a new future for Roehampton to create a high quality living environment for residents.	St James strongly supports this objective, and welcomes the development of the SPD to clearly set out the Councils aspirations for the Estate.
1.4	The purpose of the SPD is to provide guidance on the nature and form of development that the Council is likely to find acceptable.	Support It is important that this SPD does not seek to be too prescriptive in terms of the types of development that can be achieved on this part of the Alton Estate so as not to inadvertently constrain the design process. Indications of density are helpful, but should not be prescriptive.
1.6	The SPD will have significant weight in determining future applications for planning permission and listed building consent in the area.	Support Whilst the principle of this is supported, it is subject to the clarifications and comments St James have stated in this submission.
1.19	This SPD focuses on Alton West, the area defined by ...	Suggestion Whilst this SPD should focus on the area identified, it should also refer to additional potential regeneration opportunities in the rest of the Alton Estate, which could come forward following delivery in Alton West.
1.33	The SPD has been prepared following a masterplanning exercise with extensive consultation with ...	Suggestion Whilst this paragraph refers to an important number of stakeholders, it would be appropriate to also mention the discussion with potential development partners, to show the wide ranging nature of the consultation that has been undertaken.
<i>Chapter 2 - Key Issues and Challenges</i>		
2.4	Whilst the site benefits from the amount of open (and particularly green) space, 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.	Support

WANDSWORTH LOCAL PLAN SUPPLEMENTARY PLANNING DOCUMENT
ROEHAMPTON – MARCH 2015 CONSULTATION DRAFT

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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.	<p>Support & Suggestion</p> <p>The overall Estate is in significant need of regeneration, to meet the required living standards, and to meet the local communities needs. The SPD has identified a number of opportunities for regeneration which will enable the Council to meet this aspiration, however, the SPD is limited to the key areas identified in the SSAD rather than considering a wider masterplan approach to Alton West.</p>
2.20	Currently 40% of the leaseholder units in the Roehampton area are privately owned by buy to let landlords and primarily let to students.	<p>Support & Suggestion</p> <p>Whilst we support the principle of this aspiration, St James has concern regarding the method by which this is controlled. In addition any restriction would be very difficult for the Council to enforce. St James believe that greater management and discussion with the University would be a proactive way of dealing with this issue.</p>
<i>Chapter 3 - Vision and Strategic Objectives</i>		
3.1 – 3.6	The vision for the Estate	Support
3.7	Key outcomes from the regeneration of Roehampton are...	<p>Support</p> <p>Support the principle of the key outcomes subject to the comments made in this representation, and particularly the reflection that the residential figure proposed in the SPD is an approximation.</p> <p>Object</p> <p>Object to the use of the word "up to" in reference to new student accommodation, and commercial and community floorspace. A detailed design of the site should be carried out before maxima are established. This will also be subject to market testing to ensure that any new space proposed is utilised and does not remain empty – as per the existing offering.</p>
3.8	Strategic Objectives	Support

WANDSWORTH LOCAL PLAN SUPPLEMENTARY PLANNING DOCUMENT
ROEHAMPTON – MARCH 2015 CONSULTATION DRAFT

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Fig 3.2	Site Wide Concept Diagram for the Roehampton Area	Object This indicative figure should consider all areas of the Estate. Whilst there may not be significant regeneration opportunities across all areas, small scale interventions may serve to enhance those areas not currently identified in this figure.
<i>Chapter 4 – Core Principles</i>		
4.1A	Housing is expected to be the principle land use on this site.	Support
4.1B	The introduction of additional new homes in appropriate locations across the site will be supported	Support This statement is supported, particularly in the context of the supporting text which states that this should include the four key areas, but confirms that regeneration should exclusively be these four areas.
4.1C	A design-led approach should be taken to determine the appropriate quantum and density of additional housing	Support
4.1D	Meeting the core objective of a more mixed and balanced community could be achieved through the introduction of a significant proportion of market sale homes alongside the maximum viable proportion of additional affordable housing.	Support Particularly the identification of the intermediate market as being the key focus of any additional affordable housing on the Estate.
4.1E	The area is appropriate for a mixture of unit sizes including family homes.	Support
4.1F	The area is appropriate for development that delivers a mixture of houses, maisonettes and apartments.	Support

WANDSWORTH LOCAL PLAN SUPPLEMENTARY PLANNING DOCUMENT
ROEHAMPTON – MARCH 2015 CONSULTATION DRAFT

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4.1G	The area is unlikely to be appropriate for structured Private Rented Sector products	<p>Object</p> <p>The market will demonstrate the suitability of the area for these types of products, and it is not appropriate to outline this objective as a core principle in an SPD. Seeking to restrict the potential sale of any open market units by precluding PRS would have a significant impact on delivery of homes, and potential occupiers. In our experience a restriction on the potential sale of a property would harm the ability for purchasers to get the appropriate financing, and would therefore have a significant impact on the aspirations the Council have set out in this SPD and the regeneration of Alton West.</p>
4.1H	Proposals for new student accommodation will be supported in Roehampton Local Centre, provided it is of an appropriate scale.	<p>Support & Suggestion</p> <p>Whilst the principle of this location is supported, the masterplan should not seek to restrict the amount of student letting that can be achieved on the site, and what the needs of the University are. Whilst there is a pervading issue in terms of student residents in the Estate, as stated above a proactive approach in partnership with the University could alleviate this burden whilst maintaining the level and quality of accommodation required to support the ongoing development of the University of Roehampton.</p>
4.1I	All new homes will be required to meet the highest residential quality standards.	<p>Object</p> <p>Given the recent changes to Code for Sustainable Homes, it is no longer appropriate to refer to Code Level 4. Instead the Council should rely on Building Regulation requirements.</p>
4.3	The mix of additional housing should be considered in the context of the key objective of creating a more mixed and balanced community.	<p>Support</p>
4.3	The SPG confirms that affordable rent will cover similar types of needs to traditional social housing but may also be allocated to meet the needs of working households.	<p>Support</p>

WANDSWORTH LOCAL PLAN SUPPLEMENTARY PLANNING DOCUMENT
ROEHAMPTON – MARCH 2015 CONSULTATION DRAFT

Ref	Relevant text from document	Comments – support / suggestion / objection
4.2A	Development proposals will be required to support the revitalisation of Roehampton Local Centre and Portswood Place Important Local Parade.	Support
4.2B	New and improved shops and services should be delivered at an appropriate scale within the existing centres	Object As set out above, whilst the principle of new shops and services is supported, the maximum floorspace figures identified in this principle should be removed, such that market demand and design can shape the future proposals for the Estate and ensure that units aren't left vacant.
4.3	Core principle 3 – deliver new and improved community infrastructure	Support & suggestion St James support the principle of this proposal, however the policy should refer to the ability of the local community, PCT or relevant Council service to run the new facilities, to ensure that they don't remain unused or vacant. The provision of the additional services identified in this core principle will require further analysis to ensure longevity of the service, prior to the adoption of the SPD. The SPD should also provide for an alteration in the provision identified should certain aspects not be required or funded.
4.4	Core principle 4 – deliver a high quality landscape and outdoor recreation facilities throughout the area	Support
Fig 4.1	Landscape Strategy Diagram	Object Whilst the principle of regenerating the large open space in the centre of the Estate, the figure does not allow for smaller local interventions, which could enhance the overall landscape of the Estate and address the key principles of safety and security identified in Chapter 2 of the SPD.
4.5A	All new development must respect and enhance existing heritage assets and their settings	Support

WANDSWORTH LOCAL PLAN SUPPLEMENTARY PLANNING DOCUMENT
ROEHAMPTON – MARCH 2015 CONSULTATION DRAFT

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4.5B	The Council will support developments that enhance the Conservation Area and its setting	<p>Support & Suggestion</p> <p>St James supports the principle of enhancing Conservation Area and its setting, but the restriction in the principle to the four key areas will not serve to deliver the wider estate enhancements that the Council are seeking. The principle should not refer to "The following areas".</p>
4.5C	The scale of buildings must respond sensitively to the special character and qualities of the site and its context, including the Conservation Area, listed buildings and Richmond Park.	<p>Object</p> <p>The reference in this principle to more than 3 storeys being unacceptable is not appropriate. This will unnecessarily restrict development in this area, which may be able to achieve a greater height with sensitive design. There are suitable controls within the extant planning policy to control unsuitable height in this location if the design is not appropriate.</p>
4.5D	There are opportunities to explore the potential for tall buildings in less sensitive areas where this reflects an established scale and where there is a clear urban design rationale.	<p>Support</p>
4.5E	Developments should be designed to conserve and better reveal the highest qualities of the heritage assets across the area.	<p>Support</p>
4.5F	The Council will support direct improvements to the following buildings where they maintain and enhance their heritage significance	<p>Support</p> <p>Provided that any improvements are included within the site wide viability, and the Council recognise that such improvements are likely to impact upon the ability to achieve affordable housing provision.</p>
4.7D	Developments will be required to make an appropriate contribution towards improvements to public transport to improve connectivity in and through the estate.	<p>Support & Suggestion</p> <p>It is appropriate for new development to make contributions towards improvements, subject to viability. It is key that viability is a principle which is strongly referred to in this principle. The Council's aspirations are wide ranging in terms of additional facilities, and with the advent of CIL the SPD should reflect the fact that provision can only occur where the quantum of development and the viability supports it.</p>

WANDSWORTH LOCAL PLAN SUPPLEMENTARY PLANNING DOCUMENT
ROEHAMPTON – MARCH 2015 CONSULTATION DRAFT

Ref	Relevant text from document	Comments – support / suggestion / objection
4.8A	Development will be required to meet high standards of sustainable design by seeking to achieve Code 4 and BREEAM Excellent	<p>Object</p> <p>Given the significant requirements in terms of community facilities that are stated in the SPD, and the aspirations in terms of affordable housing provision, additional transport improvements and wider landscaping proposals, seeking to impose either out of date benchmarks for sustainable residential development or high BREEAM requirements, will again impact the viability further. The requirements under building regulations are such that high levels of sustainable design are required without these additional benchmarks. The SPD should not be prescriptive, instead it should simply state the aspiration for sustainable design.</p>
<i>Chapter 5 – Sub-area Guidance</i>		
5.1	Sub-area 1 Roehampton Local Centre	<p>Support</p> <p>Support the principle of the redevelopment of this key part of the Estate. However, the maximum floor space figures which are identified in paragraph 5.3 are not appropriate. Whilst the Council should identify the range of uses and potential a range of floorspace figures in this area, it is not appropriate to list a maximum figure as discussed above.</p>
5.2F	The Council will support proposals for approximately 250-275 new homes	<p>Support & Suggestion</p> <p>Support the proposal to include residential in this area, but the SPD should make it clear that the actual number of homes will be determined through a detailed design process, and that the SPD shouldn't be too prescriptive in setting target objectives.</p>
5.2G	The council will support professionally managed student accommodation in this location (up to 400 new student units)	<p>Object</p> <p>As above the SPD should not set a limit on the number of student homes that can be created, as the needs of the University are likely to change over time, and this principle in the SPD will preclude new development from responding to those needs if appropriate.</p>

WANDSWORTH LOCAL PLAN SUPPLEMENTARY PLANNING DOCUMENT
ROEHAMPTON – MARCH 2015 CONSULTATION DRAFT

Ref	Relevant text from document	Comments – support / suggestion / objection
5.2	Sub-area 2 Portswood Place Important Local Parade	Support Support the principle of regeneration in this area.
5.6D	The Council will support proposals for new and improved homes in this area (approximately 60-70)	Support & Suggestion Support the proposal to include residential in this area, but the SPD should make it clear that the actual number of homes will be determined through a detailed design process, and that the SPD shouldn't be too prescriptive in setting target objectives.
5.6F	Provision of a new community building on Portswood Place at the foot of Downshire Fields	Support & Suggestion Support the principle of providing a new community building, provided that there are adequate funds and operators identified to maintain it and ensure it's longevity as a community asset. This should be reflected in the principle.
5.6G	Given the relationship to Richmond Park and listed buildings it is unlikely that development of more than 3 storeys would be supported in this area.	Object This SPD should not seek to restrict the practice of good design by limiting the height of proposed development in this location, without a comprehensive scheme to review.
5.3	Sub-area 3 – Danebury Avenue Housing	Support
5.9A	To reflect the original intended role for this area, it is expected that the main focus will be on the provision of improved and new high quality homes. It is envisaged that approximately 375-400 new homes will be provided in this area.	Support & Suggestion Support the proposal to include residential in this area, but the SPD should make it clear that the actual number of homes will be determined through a detailed design process, and that the SPD shouldn't be too prescriptive in setting target objectives.
5.4	Sub-area 4 – central landscape	Support The redesign of the central landscape area will be key to achieving a number of the principle objectives of the Estate regeneration scheme.

**WANDSWORTH LOCAL PLAN SUPPLEMENTARY PLANNING DOCUMENT
ROEHAMPTON – MARCH 2015 CONSULTATION DRAFT**

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5.12A	There must be no net loss of public open space	<p>Object</p> <p>This is too prescriptive in its approach, and will not allow the provision of better high quality landscape which also enables additional development for the benefit of residents. The Estate currently comprises a significant proportion of open space, and with the neighbouring Richmond Park achieves far in excess of policy requirements for open space. A better design led approach to the central landscape area, may result in less open space per se, but potentially more high quality usable open space. Therefore this sentence should be removed from the principle.</p>
<i>Chapter 6 - Delivery</i>		
6.5	Wandsworth Borough Council is committed to delivering the regeneration of the SPD area in partnership with the private sector (one or more partners). The Council is willing to use its statutory powers (including CPO) to facilitate the delivery of development across the whole site if required.	<p>Support</p>

From: Katerina Andalopoulos [REDACTED]
Sent: 02 May 2015 13:09
To: PlanningPolicy
Subject: Fwd: Regeneration

Planning policy.

I have forwarded this message in support of the regeneration and to display my dissatisfaction at those who are not residents opposing it.

Our homes are cramped, our kitchens and bathrooms are not built to take the electrical appliances we have now and it is a horrible living condition desperately in need of modernisation.

Sent from my iPhone

Begin forwarded message:

From: Katerina Andalopoulos [REDACTED]
Date: 2 May 2015 13:04:29 BST
To: "info@altonwatch.co.uk" <info@altonwatch.co.uk>, Roehampton
<roehampton@wandsworth.gov.uk>
Subject: Regeneration

Dear Alton Watch,

I am a harbridge resident. While I understand your concerns, I do not think they reflect those of us who actually life on harbridge.

It is awful, the quality of life is so poor and every bit of spare green space is used for dogs to go to the toilet!!!! It drives me insane- I am more than happy for it to be pulled down. I myself am overcrowded and my husband does all the repairs himself as he is fed up of the councils shoddy work.

I just wanted to give you insight, living here the smells of people smoking drugs next door fills my home and the shouting outside, the dog excrement everywhere I have to wash the buggy wheels and children's scooters before u come inside. Honestly it is really horrid, the only thing I like is the play centre opposite that offer fab facilities for the children.

Other than that it can go and you will find most people who live here agree with me.

So if you do not live here please do not get in the way of the piece of improvement we finally have in front of us. Concern yourselves with your part of the estate and leave us to benefit from the regeneration.

Thankyou

Katerina Andalopoulos

Sent from my iPhone

Reported at: 27/05/15 14:31

Events: Roehampton SPD - draft March 2015

Person ID	Full Name	Title	Number	Comment
903431	Mr Robin Bishop	Introduction and background	1	<p>In which the Council unveils the latest iteration of its 'regeneration' plan for the Alton Estate, and reveals that it has decided to rename it 'Roehampton', an innovative feat of pars pro toto. Links to a whole bunch of other documents which no-one outside of the Council itself and some organisations with close links to the Council are unveiled, especially the Local Plan, the key part of which was put up for consultation in October 2014, when no-one was looking. Except for 43 organisations and oh - one lady respondent.</p> <p>The astonishing subsection 1.6 advances the proposition that the SPD "will be formally adopted by the Council" ! When I read that, I nearly didn't respond.</p> <p>A potted geography of our Estate and its environs is recounted, no doubt to bring quickly up to speed those readers, such as property developers, perhaps, who have no previous knowledge of our home. It is a lovely geography, and the Council sells it very nicely.</p> <p>The enigma that is the 'Baseline ' report pops up to puzzle us. Despite being written up and published in late 2014, after the 'Issues and Options' and 'Preferred Option' reports, here it miraculously predates all of them.</p>
903431	Mr Robin Bishop	Paragraph	1.1	<p>Why "Roehampton" (as our Alton Estate has been renamed) ? Why now ? The ostensible reason is "to create a high quality living environment for residents". In other places in the document, the reason mutates into tackling "deprivation and inequalities" (1.9); "to establish appropriate interventions ... a range of issues must be addressed . . . the area is not working to its full potential" (2.1);</p> <p>is this blessed estate only now having bestowed on it the "new future" the WBC promises, especially after the slow deterioration of the infrastructure the Council implicitly acknowledges it has permitted to take place, throughout this text ? The fact that the current Regeneration differs so much from the first (c. 2009) one seems to show that the impulse to bring development about trumps the plethora of reasons and repetitions given in this and other documents.</p> <p>This very first paragraph introduces a singular semantic oddity (synecdoche) – the disappearance of the</p>

Person ID	Full Name	Title	Number	Comment
				<p>Alton Estate (the western part of which is the actual subject of this document) from the text. This constitutes the symbolic laying to rest of the old Estate, its extirpation 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</p>
903431	Mr Robin Bishop	Paragraph	1.2	<p>The dominant form and reason for the Masterplan is stated twice in this paragraph, first as a collaborative effort by “residents” and other stakeholders, second as an expression of the “aspirations of the Council as landowner and planning authority”. It is fair to take the second as the more authentic statement of origin, given that there has been no impetus for this change arising from the residents, and little enthusiasm since 2013 for it, as indicated by the poor response rate of less than 7% to the two questionnaires targeted by the Council at the Estate in that period.</p> <p>This section constitutes one gross overstatement of the Council’s engagement with those most affected by its plans, the residents. The bodies supposedly representing residents have shown very little interest in making any dialogue with them – as witness any session with the Roehampton Partnership, the Roehampton Forum, the three ward councillors, who together make an interlocking triangle of indifference.</p> <p>The from-us-to-you one-way series of communications from WBC and its mouthpieces, replete with an armoury of slides, boards and presentations, seemed more intended as a show of shock-and-awe-by-PowerPoint, than any genuine desire to enter into a two-way dialogue. The Q&A sessions after each presentation demonstrated that the desired effect had been achieved: clarifications were sought, and reassuring answers were provided.</p> <p>Actual engagement was at a very low level, as indicated:</p> <p>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.</p> <p>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 (to one decimal place) in the Preferred Option Consultation Report of July 2014.</p> <p>Rather more pertinently, the resonant sentence “The recommended Masterplan reflects the aspirations of</p>

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				<p>the Council as landowner and planning authority” shows where the power, and the decision-making, lies. The mere footnote “following consultation with residents and stakeholder groups” is just that, a footnote denoting that the whole ‘consultation process’ (which the three Labour Party councillors were only too pleased to label a ‘farce’ before assuming their current power position) is no more than a fig leaf.</p> <p>Oh, btw, WBC is not landowner throughout the SPD district, despite its assertion that it is. There are freeholders on the Estate.</p>
903431	Mr Robin Bishop	Paragraph	1.3	<p>This paragraph contains a material misrepresentation, in that the “Alton Area Masterplan Baseline Report (August 2013)” is falsely represented as having been published online on the 8th October 2014 for the first published in August 2013. In fact, the online document was only published two days after the October Masterplan was confirmed by the Council Executive on 6th October 2014. This is borne out by the document’s PDF name (filename and internal properties) displaying as September 2014.</p> <p>The list of references also serves to highlight that the area called ‘Alton’ in these documents has now magically metamorphosed into the rather more genteel ‘Roehampton’, only the Sustainability document (contemporaneous with the SPD document) referring to the affected area as ‘Roehampton’.</p>
903431	Mr Robin Bishop	Paragraph	1.4	<p>This is an extremely bizarrely worded paragraph. The WBC frames a “regeneration programme” and somehow developers come forward offering up plans and projections for redevelopment which the Council judges against its SPD. This is the very opposite of a holistic development. A profound ambiguity about who proposes, and who disposes, is created.</p> <p>The bizarre disappearance of ‘Alton’ into ‘Roehampton’ recurs here.</p>
903431	Mr Robin Bishop	Paragraph	1.5	<p>This is the first overt appearance of the “Wandsworth Local Plan”. The single most germane document contained within it (the “The Second Proposed Submission Versions Wandsworth Local Plan (2014)” late in that year was apparently “subject to public consultation”: I never heard of it until reading this SPD documentation. I wonder just how many members of the public knew about it? I would guess close to zero, given that “44 organisations, groups and individuals” made representations pertaining to it, not one of which came from an individual rather than a commercial or other body (source: [http://www.wandsworth.gov.uk/downloads/download/1542/jpr111_-_local_plan_review_-_2nd_proposed_submission_2014_individual_representations_as_received])</p>

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903431	Mr Robin Bishop	Paragraph	1.6	<p>The statement “the Roehampton SPD will be formally adopted by the Council [g]iven that it has been subject to extensive community consultation” is nothing less than astonishing. Here WBC admits in so many words that it has decided already what it will do – or allow to be done by developers. And this even in a draft version of the SPD.</p> <p>This is breath-taking, even by WBC standards.</p> <p>Again, the ‘Alton SPD’ has been rechristened ‘Roehampton SPD’.</p> <p>The Wandsworth Local Plan of late 2014 was apparently “subject to public consultation”: I never heard of it until reading the SPD documentation. I wonder just how many members of the public knew about it ? The 44 written submissions appear to come from businesses or other authorities and organisations. [http://www.wandsworth.gov.uk/downloads/download/1542/lpr111_-_local_plan_review_-_2nd_proposed_submission_2014_individual_representations_as_received]</p>
903431	Mr Robin Bishop	Paragraph	1.7	<p>What was circulated to Alton Estate households was an A5 document saying little more than that the Masterplan had been adopted, and that residents are invited to play the role of passive observers of it by reading it in different locations and formats. This was received by households in the second week of October 2014.</p> <p>I am unable to trace how, where or in what way the opening of the consultation for the ‘local plan’ was made public in any way. Meetings of the Roehampton Forum and the Roehampton Partnership over this period remained mute on the matter.</p>
903431	Mr Robin Bishop	Paragraph	1.9	<p>The tackling of “deprivation and inequalities” is the introduction of a theme which recurs throughout the SPD, without any evidence of how inviting developers in to demolish and create new buildings will act to alleviate those social and economic phenomena.</p> <p>Also, large parts of Roehampton are extremely affluent: I think WBC does the denizens of the north side of Roehampton Lane, and of other locations such as Roehampton Gate area an injustice by including them in what it evidently thinks of the ‘deprived and unequal’ Alton Estate.</p>
903431	Mr	Paragraph	1.10	<p>Again, there is a vast gap between a bunch of new buildings and “improved employment opportunities for</p>

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	Robin Bishop			<p>Roehampton [sic] residents".</p> <p>The use of "Roehampton" for "the Alton Estate" is particularly inapposite here, as the employment opportunities for Estate residents and those of the well-heeled rump of 'Roehampton' enjoy two very different profiles.</p> <p>The undertaking to deliver "new transport linkages" may not be within the gift of the WBC. Transport for London provides road and rail connections, not borough councils, following my understanding.</p> <p>The statement "four sites for development that are within the SPD boundary [...] identified on Figure 1.3" is factually incorrect – 1.3 is a fairly meaningless general map showing the Alton Estate as a red-ringed area next to a red circle shown in juxtaposition to five other red blobs, representing who knows what, as figure 1.3's legend doesn't indicate the supposed meaning of said blobs. If instead figure 1.2 is construed as the intended referent, it is not a diagram of any real use, showing as it does four small dark circles inside a copy of the red-ringed area in figure 1.3 with a legend which is too small for the present writer to decipher.</p> <p>Both of these figures bring to mind the phrase 'chocolate teapot'. The incorrect reference within the text is all of a piece with the uselessness of these 'visual aids'.</p>
903431	Mr Robin Bishop	Paragraph	1.11	
903431	Mr Robin Bishop	Paragraph	1.12	<p>If regeneration of other parts of Roehampton than the Alton Estate is envisaged, this should be shared. If not, let us call a spade a spade, and say that we intend 'regenerating' the Alton Estate.</p>
903431	Mr Robin Bishop	Paragraph	1.15	<p>The area referred to lies entirely within Roehampton, and is but one part of it. It is - we are - the Alton Estate.</p>
903431	Mr Robin	Paragraph	1.18	<p>What is the relevance of "reputable institutions" around the Alton Estate? And why the omission of the Priory Hospital, home of recuperative therapy for alcoholic and addictive celebrities? Rather better known, howbeit, than the "International Tennis Federation".</p>

Person ID	Full Name	Title	Number	Comment
	Bishop			
903431	Mr Robin Bishop	Paragraph	1.20	This is the naming of parts as it should be done. This is Alton Estate, and large parts of the Alton Estate lie within the Alton Conservation Area, as distinct from the Roehampton Village Conservation Area.
903431	Mr Robin Bishop	Paragraph	1.22	<p>First emergence of the grossly subjective: "... some insensitive later additions ... have eroded the heritage value of assets and detract from their settings"</p> <p>Further to this, if indeed the preceding be true, then whose is the responsibility for having allowed such insensitivity and erosion to have occurred? Surely these additions would have required planning permission, and which would have been the relevant planning authority to have granted said permissions?</p> <p>The bald assertion that the original LCC Masterplan has been thoroughly analysed and responded to in the SPD is offered here without substantiation. The existence of "a thorough analysis and response both to the LCC Masterplan and the heritage significance of the site" is presumably documented somewhere where its existence and appropriateness as a response may be gauged, in order effectively to rebut critics who may feel that the modernist classic project of the Estate is critically threatened by WBC's current (and second) regeneration plan. It is not offered up here, for comment or for reference.</p> <p>Observance of the spirit of the LCC Masterplan implies inter alia retention of something close to the original planned population densities – the sheer mathematics of the proposed nett increases in household dwellings announced later in the SPD seems to fly sheer in the face of this.</p> <p>The use of the word "generous" in the phrase "There is a generous amount of public realm and public open space" already contains within it the implication that the provision of public realm and public space is 'overgenerous'.</p> <p>Here the clear subtext is that the Alton Estate is endowed with more space than its residents deserve or need.</p>
903431	Mr Robin Bishop	Paragraph	1.23	
903431	Mr Robin Bishop	Paragraph	1.25	

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903431	Mr Robin Bishop	Paragraph	1.27	The erasure of collective memory, with the renaming out of existence of the Danebury Avenue area (as it is commonly known by residents) to the "Roehampton Local Centre", continues. It seems to have been beyond the remit of the writers here to create an analogous neologism for Portswood Place, clumsily renaming it "Portswood Place Important Local Parade".
903431	Mr Robin Bishop	Paragraph	1.28	Now the WBC history-rewriters and renamers/rebranders render our known and familiar Bull Green, "Downshire Fields".
903431	Mr Robin Bishop	Paragraph	1.33	When was the so-called 'Baseline' report created? It's presented here as the start of the masterplanning process, and was supposedly created in September 2013 (as per its front cover). The PDF name (filename and in its internal properties) is September 2014. This is the month before the final adoption of the Masterplan. It appeared online on the 8th October 2014. The chronology outlined in this section (baseline -- issues and options -- preferred option -- Masterplan completion) is incorrect.
903431	Mr Robin Bishop	Paragraph	1.35	There has been little or nothing by way of dissemination of the opening of the SPD comments season to residents of the Alton Estate regarding this SPD consultation.
903431	Mr Robin Bishop	Paragraph	1.38	The SPD is to provide clear guidance to "future developers". WBC seems to distance itself from the development plans, putting itself forward as an enabler and door-opener to developers. Given the lack of evidential basis for many claims made within this document, and the vague, woolly manner in which much of the document is written, it is hard to see that what a developer would have to propose to be ruled outside the stipulations of the SPD.
903431	Mr Robin Bishop	Paragraph	1.39	Please, dump the bizarre neologisms here. "Roehampton Local Centre" is Danebury Avenue Town Centre; "Portswood Place Important Local Parade" is quite simply Portswood Place, and "Downshire Fields" is Bull Green.

Person ID	Full Name	Title	Number	Comment
	Bishop			
903431	Mr Robin Bishop	Paragraph	1.41	<p>It is hard to see how planning applications in e.g. Roehampton Village can be required to adhere to these SPD principles laid out pertaining to Alton Estate, being as they are, two areas architecturally and socio-economically very different from each other.</p> <p>In truth, we know the "Roehampton area" referred to here is actually the Alton Estate, and that the persistent and deliberate <i>totum pro parte</i> confusion of the Estate for the wider area manifests itself irritatingly here, again.</p> <p>In which the Council goes on the attack, bringing us the following 'home truths': our public spaces and public realm are generous; could they possibly mean 'too generous' ?</p> <p>Then, in just the first two pages (sections 2.3 to 2.6), the propaganda machine goes into overdrive, telling us about aspects of our built environment being 'poor', 'poorly defined', 'poor quality', 'inactive', 'underused', 'fragmented', 'obstacles', 'poorly sited and constructed', 'unattractive' and 'deteriorating', leading them to 'detract from quality', 'lack any positive active frontages', 'provide opportunities for anti-social behaviour', 'lack a clear role', 'create fragmented spaces', 'lack facilities and amenities', 'detract', 'obscure', 'fall considerably short of today's expectations', 'have negative effects' and 'negatively impact' ! Phew ! And all that in just two pages.</p> <p>The feeling that this is no less than an attack on our homes is heightened by examination of the faults so mercilessly lambasted. What has brought down this scorn on our neighbourhoods ? Major issues like: Doors to blocks not being properly secured; awkward little spaces; awkward little ramps and steps; and overgrown trees. Well, big deal ! These issues merit wholesale demolition and rebuilding ? Really ?</p> <p>A more serious charge against our homes is that they are "poorly sited and constructed" . Unfortunately, this charge boils down to "unattractive and deteriorating stairwells, external walkways exposing residents to the elements, worn exteriors, front doors facing away from the street" .</p> <p>Big deal.</p>
903431	Mr Robin Bishop	Key issues and challenges	2	<p>This hyperbole would be laughable, were it not for people's homes being written about here. The statement</p>

Person ID	Full Name	Title	Number	Comment
				<p>here that “a large number of existing homes within the site are at the end of their useful life” is offered up with not the slightest piece of evidence to back it up. Furthermore, this missing evidence will not be found anywhere in any of the documents referenced by the SPD, neither will it nor they refer to any other place where it can be found. The reasonable reader can only conclude that it doesn’t exist. Where is the building survey of the structural state of the Alton ? Has one ever been carried out ? Clearly not, otherwise this farrago of slur and baseless assertion would not have to stand in for missing real argument flowing from evidence.</p> <p>The hallmark of the section ‘Community safety’, is a lack of clear and logical real-world thinking: the truly ludicrous inference is made that the alleged high crime levels of the Estate are due to shortcomings of the built environment.</p> <p>The chapter continues by proposing a series of maladies – poor access to services, a lack of tenure diversity, relative difficulty in travelling outside the Estate, socio-economic deprivation – which will be used in later chapters as reasons to concoct constructional remedies to them. So, for instance, poor access to services will be cured by making new buildings in which new ‘services’ may be housed, as if the latter will spontaneously arise out of gratitude to the Council and developers for making them homes, like so many grateful blue-tits flocking to generously provided bird-houses.</p>
903431	Mr Robin Bishop	Paragraph	2.1	<p>An avalanche of denigration here.</p> <p>“Physical, environmental, social and market issues . . . concentration of problems . . . area is not working to its full potential” – all of this denigration announces that, want it or not, residents will be on the receiving end of “appropriate interventions”.</p> <p>No backing for any of these slurs is given. That’s not necessary if you’re the dominant power, of course. Assertion is enough.</p>
903431	Mr Robin Bishop	Paragraph	2.4	<p>The faults – “quality, layout and functionality of the public realm and spaces that limit its [sic] usability, pedestrian accessibility and that detract from the quality of buildings”:</p> <p>The “poor quality entrances to blocks” – what is suggested be done to address this issue ? Nothing I can see, here or later. Can it really be the case that demolition is the only remedy for a multi-storey block with an</p>

Person ID	Full Name	Title	Number	Comment
				<p>allegedly poor quality entrance, this being its ground floor door ?</p> <p>The “poorly defined spaces” – how large actually is the anti-social behaviour problem in these spaces between buildings and “smaller car parks” ? The “opportunities for anti-social behaviour” are supposedly provided: where is the evidence they are taken up and acted upon ?</p> <p>“[O]pen spaces lack[ing] a clear role, function and definition” – this doesn’t sound like a major reason for demolitions. One is, rather, tempted to say, So what ?</p> <p>“Fragmented spaces [create] obstacles to . . . movement” – again, this doesn’t sound like a major reason for demolitions.</p> <p>Open spaces “lack facilities and amenities” – that’s generally what makes them “open spaces” .</p> <p>Trees ‘detract and obscure’ – what’s a bit of needed woodlands management got to do with an urban regeneration ? Surely this should be business-as-usual work ?</p>
903431	Mr Robin Bishop	Paragraph	2.6	<p>“A substantial number of residential and commercial buildings are . . . poorly sited and constructed” – which buildings is left unspecified; “poorly sited” is an entirely subjective and unsubstantiated slur. Where is the evidence these buildings are “poorly ... constructed” ? A statement such as this simply cannot be produced from thin air without any backing.</p> <p>“The external and internal design has negative effects on residents and family living conditions” – what is the evidence for this assertion ? This is far too large a statement to be made without solid backing.</p> <p>Stairwells, walkways, exteriors – are these not capable of refurbishment ? The SPD does not even start to address the question of refurbishment versus reconstruction – the former is never discussed.</p> <p>“[F]ront 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” – the meaning of this is impenetrable. In particular, which front doors ?</p>
903431	Mr	Paragraph	2.7	<p>“ a large number of existing homes within the site are at the end of their useful life and suitability to meet current and future</p>

Person ID	Full Name	Title	Number	Comment
	Robin Bishop			<p><u>housing needs"</u></p> <p>This is, quite simply, an enormous statement, probably the largest in the whole SPD. The consequences of this statement, if true, no matter how it is sought to deal with them, are massive, in terms of millions of pounds of remedial action, and of lives adversely affected if nothing is done. Wandsworth Borough Council quite simply has no right recklessly to make this statement without exemplary empirical backing, without proof, without work done on establishing it, without due diligence.</p>
903431	Mr Robin Bishop	Paragraph	2.8	<p>"fundamental design flaws in the development layout", "poorly sited and constructed residential buildings" – if these statements are intended as critiques of the original 1950s LCC planning, why have corrections to it had to wait until well into the 21st century to be proposed ?</p> <p>What are the "area's problems" to which these alleged flaws contribute ? If these "flaws" exist, are they not "problems" in their own right ? If a causal chain is being posited, what are the end-consequences of these "flaws" ?</p>
903431	Mr Robin Bishop	Paragraph	2.9	<p>Allegedly, high crime levels in Roehampton are a "key driver" of the regeneration. This is an utterly baffling assertion. Crime is primarily an outcome of social factors. It's hard to see how the built environment can be a direct creator and instigator of crime, and the idea that the wholesale demolition and reconstruction of two focal centres in Roehampton can drive down crime levels is a weird non sequitur.</p> <p>The second key questionable in this section is the assertion that "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". WBC's 'baseline report' (table 17) ranked the Ward against the Borough and the entire Metropolitan area for nine types of crime. The "particularly high rate" assertion, taken in conjunction with the assertion that the "high levels" have a "negative effect upon the quality of life", is a fairly lurid painting of life as it is lived on the Estate, and is a clear case of taking the two most adverse crime rates and ignoring the other seven (three of which are the same or lower for the Ward compared with the Borough). This is egregious cherry-picking.</p> <p>Funnily enough, the selection of photograph #4 is a clear pointer towards at least part of the reason why crime levels might be high in the Ward. Those residents with a memory for it, might recall that the flat on the ground level on the right, used to be a police station. Under the current London Mayor's tenure, the</p>

Person ID	Full Name	Title	Number	Comment
903431	Mr Robin Bishop	Paragraph	2.10	<p>number of police actively serving in Roehampton has fallen from 7 to just 2. It should be manifestly obvious that this has rather more to do with crime rates, than the way Alton Estate buildings are constructed.</p> <p>What is meant by "limited community facilities" ? To most, that would mean services and social amenities, not buildings. The buildings at the top of Danebury Avenue and at Portswood Place exist just as they did at the start of the estate's life; the fact that less use of them is made than is useful to the community is a priori not a built environment shortcoming.</p> <p>Since when has Danebury Avenue been "now known as Roehampton Local Centre" ? No-one, but no-one, refers to the shopping area at the top of Danebury Avenue as "Roehampton Local Centre".</p>
903431	Mr Robin Bishop	Paragraph	2.11	<p>The quality of the frontages at the top of Danebury Avenue is described as "poor", "tired" and "unattractive". If for the moment one accepts this subjective judgement, what is the solution ? At an early stage in WBC's rolling out of its Masterplan, Studio Egret West showed work it had been involved with in Sheffield, Park Hill where the scale and scope of the work had been far less immoderately confined to renovation and refurbishment of residential frontages. This not being in accord with WBC's desires appears to have been not even considered as an option (despite the lip service given to the idea of consulting 'the residents').</p> <p>The close mutual proximity of the Sports and Fitness Centre, the Youth Club and Whitelands College render the comment about "poor connections" foolish. In any case, why are the connections of the two former with the latter of such importance ? They are not University ancillary services, they are there for the whole community.</p>
903431	Mr Robin Bishop	Paragraph	2.12	<p>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.</p>
903431	Mr Robin Bishop	Paragraph	2.13	<p>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 nature might run thus: those who work outside Roehampton find it</p>

Person ID	Full Name	Title	Number	Comment
	Bishop			<p>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.</p> <p>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.</p> <p>"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.</p> <p>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 ?</p>
903431	Mr Robin Bishop	Paragraph	2.14	<p>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, 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'.</p> <p>o 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.</p>

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903431	Mr Robin Bishop	Paragraph	2.15	<p>Not being an expert on, nor close to, the needs of more specialist service providers, I 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. I can only charitably suppose that this opinion is based on the views of those providers, and does not spring fully formed from the heads of the WBC.</p>
903431	Mr Robin Bishop	Paragraph	2.16	<p>However, yet again, the dispersal and lack of services is again not a priori a question of the built environment.</p> <p>The concept of "modern needs" could do with clarification.</p>
903431	Mr Robin Bishop	Paragraph	2.18	<p>The argument here is circular: we need regeneration of buildings housing "community facilities, shops and services to better serve the needs of the ... planned population" – by far the greatest part of the regeneration is the construction of new buildings increasing the resident population, but here the argument for regeneration (better facilities) presupposes regeneration (more housing).</p>
903431	Mr Robin Bishop	Paragraph	2.19	<p>Again, "tenure diversity" is not a function of architecture, but of ownership, and the manner in which ownership rights are exercised.</p> <p>Is this statement saying we need buildings knocking down so that new ones may be erected with owners other than the Council, owners of the present ones ? Another statement with a meaning lost in the mist.</p>

Person ID	Full Name	Title	Number	Comment
903431	Mr Robin Bishop	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.
903431	Mr Robin Bishop	Paragraph	2.21	So WBC thinks that "[s]tudent households are proportionally over-represented" ! The ideal rebalancing of this is to build more student housing (see section 3.7) !?
903431	Mr Robin Bishop	Paragraph	2.23	The statement "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".
903431	Mr Robin Bishop	Paragraph	2.25	The phrasing of this paragraph is biased. "Access" is a 'good' thing; and "limited" is 'bad'. Read in conjunction with 2.23, this section appears to imply that vehicle access through the estate is a good thing, mitigating the alleged "sense of the estate being a cul-de-sac".
903431	Mr Robin Bishop	Paragraph	2.26	I see no proposal in the SPD (or elsewhere) to mitigate the 'impermeability' of the Richmond Park boundary or of Roehampton Lane. The "lack of direct and good quality pedestrian routes between the site and Roehampton Lane" is a hard case to maintain: there are five paths running from Danebury Avenue up to Roehampton Lane, albeit WBC's long-term neglect of the Estate has led to their being in poor condition. There are also the roads Danebury Avenue, Kingsclere Close and Clarence Lane which lead into Roehampton Lane, all of which are flanked by pavements.

Person ID	Full Name	Title	Number	Comment
903431	Mr Robin Bishop	Paragraph	2.27	<p>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.</p> <p>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.</p> <p>Yet again, the statement that pedestrians and cyclists find Danebury Avenue an "uncomfortable environment" is pure subjectivity. I myself often walk or cycle up or down the Avenue, and have done since 2003. It is my own subjective opinion that it is not an "uncomfortable environment" – far less so than Roehampton or Priory Lane. So whose subjective opinion is more valid ? I at least am a copper-bottomed genuine user of the Avenue.</p>
903431	Mr Robin Bishop	Paragraph	2.32	<p>The renaming of the Alton Estate as 'Roehampton' never looked more inept than here. The statement "there is a clear disparity between the values in the Roehampton area and its surrounding locations" works if rephrased as "there is a clear disparity between the values in the Alton Estate and the rest of the Roehampton area".</p>
903431	Mr Robin Bishop	Paragraph	2.33	<p>It is not all clear what the point being made here 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.</p>
903431	Mr Robin Bishop	Paragraph	3.1	<p>Figure 3.2 referred to here is a lovely view of what might be, with the legend containing such words as: "improve"; "respect and enhance"; "new"; "enhance the setting"; high quality"; "restore"; "revitalised".</p> <p>But as well as all this hard sell, the lifeless cul-de-sac theme re-emerges, this time in the visual form of Danebury Avenue as a thick orange snake with its backbone severed at the Alton Primary School. Every ointment has its fly, I guess.</p> <p>I guess this counts as a political use of cartography.</p>

Person ID	Full Name	Title	Number	Comment
903431	Mr Robin Bishop	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.
903431	Mr Robin Bishop	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'.
903431	Mr Robin Bishop	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.
903431	Mr Robin Bishop	Paragraph	3.5	This is a commendable commitment, but cannot be integral to any regeneration. Work such as this should be business-as-usual.
903431	Mr Robin Bishop	Paragraph	3.7	Having noted (earlier, in section 2.21) that "[s]tudent households are proportionally over-represented" in the Roehampton area, we now get a proposal for the construction of "up to 400 student units". The rationale of and backing for "[e]nvironmental improvements to make the area safer" is not explained. The area is not perceived as 'unsafe'. Mere repetition of the idea that it is, does not make it so. See Social Audit quote below. Certainly speaking in terms of increasing the Alton population, "[a] more attractive environment to

Person ID	Full Name	Title	Number	Comment
				<p>encourage people and businesses into Roehampton” is not required, only a greater amount of housing.</p> <p>The insistence on running our estate down is beginning to grate. Allow me to insert a quote from Roehampton’s Holy Trinity Church’s Social Audit of 2010 ¹:</p> <p><i>The auditor was pleasantly surprised by the level of everyday, caring and courteous exchanges between people making their way through the estate. During the school holidays there were small groups of unsupervised children / youth playing or simply hanging around. As noted at the time: ‘ 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’</i></p> <p>Improving “pedestrian and cycle access to and from Richmond Park” can surely only come from breaching the current impermeability of the Park boundary: this is not proposed, and would appear not to be readily deliverable.</p> <p>¹http://www.roehamptonecumenical.org.uk/content/pages/documents/1297159995.pdf</p>
903431	Mr Robin Bishop	Paragraph	3.8	<p>A recapitulation of previous points.</p> <ul style="list-style-type: none"> • 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”. • 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

Person ID	Full Name	Title	Number	Comment
				<p>good to be allowed to pass unused.</p>
903431	<p>Mr Robin Bishop</p>	<p>Core principle 1 - deliver high quality homes within a mixed and balanced community</p>	<p>4.1</p>	<p>A – Which are the “existing poor quality homes” ? By what standards are they poor quality ? Who inspected them and found them wanting ? Does WBC have copies of the outcome report(s) which established their “existing poor quality” ? Can they be refurbished ? Has it been deliberate policy to allow them to become dilapidated ?</p> <p>What are the already existing “affordable homes” referred to here ? I am not aware of the Council holding a stock of “affordable” housing for which it needs to make provision not to shrink in size post-regeneration, although I am aware it holds a portfolio of socially rented housing on the Alton Estate.</p> <p>B – How is the creation of “additional new homes” meeting “local housing needs” ? Surely it’s for the ‘needs’ of those who do not currently live on the Estate, not for those who are already housed here. This kind of woolly non-sequitur permeates throughout this whole document.</p> <p>C – We hope we will have all the services to cover extra demand e.g. healthcare</p> <p>D – Again, that “affordable”. “Mixed and balanced” clearly means an influx of new residents who are not ‘deprived against at least one deprivation measure’ (section 2.28)</p> <p>F – Designing for “local housing needs” is always going to be problematic when at least part of the purpose of the regeneration seems to be to “rebalance” the community by bringing in better-educated, better-heeled people from elsewhere.</p> <p>G – What are “structured Private Rented Sector products” ? A Google search on the phrase returns exactly one hit – it’s in the WBC SPD !</p> <p>H – Time after time, local residents have complained that they do not want yet more students in the area. Yet back again comes this insistence that whatever we wish, there will be more students spilling out into the Alton Estate, rather than impugn the fair greens of Roehampton University.</p> <p>This insistence throws doubt on the (also often repeated) assertion that this SPD is the outcome of much</p>

Person ID	Full Name	Title	Number	Comment
				discussion and consensus.
903431	Mr Robin Bishop	Paragraph	4.2	The statement "The core strategic planning objective for this area is estate renewal, with a primary focus on meeting the needs of the existing community" seems to be contradicted by the main aim of the regeneration being the creation of more housing than existed before. If it were not, the regeneration would be a refurbishment, a far closer synonym of "renewal" than the demolition and reconstruction which lies behind the word as it is used here.
903431	Mr Robin Bishop	Paragraph	4.3	This section makes it clear that as well as building extra housing, the intention is to 'rebalance' the community by bringing in residents who are not 'deprived against at least one deprivation measure'. This is social engineering, and has little to do with 'regeneration' of an area for the benefit of those who live in it.
				<p>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.</p> <p>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.</p> <p>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 ?</p> <p>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 ?</p> <p>D – The delivery of floorspace does not deliver employment, all by itself.</p> <p>Throughout, "Roehampton Local Centre" and "Portswood Place Important Local Parade" are unsolicited remainings of parts of our home Estate better known more simply as 'Danebury Avenue, or 'Danebury Avenue shops', and 'Portswood Place'.</p>
903431	Mr Robin Bishop	Paragraph	4.5	So the hope is that by having new residents in the commercial centres and 'active' after the shops shut, we

Person ID	Full Name	Title	Number	Comment
	Robin Bishop			<p>suddenly have “vibrant” centres ?</p> <p>Most of this section reads as little more than pious wishes. Yet again, the delivery of retail and other business property by some process of magical thinking makes shops and businesses.</p> <p>“[T]here are issues with the range of services” doesn’t state who thinks there are issues, nor does it state what the issues are. Nor does it address the reason why demand pull for the services has not caused them to expand to the satisfaction of the writer of the statement.</p> <p>I find it surprising that the Council states that the new homes – St James and student accommodation – were permitted to have been built with insufficient additional services provided as a condition of those developments being permitted, thus allowing pressure to be placed on pre-existing services. That WBC has allowed the number of additional dwellings – 282 student bedrooms in 2001, and 24 ‘flats’ and 330 ‘new dwellings’ in 2006 – firstly to have been constructed without regard to the required expansion in scope of all the facilities needed, and secondly without rectification afterwards – concerns me, when it proposes a radical increase in housing such as this regeneration.</p>
903431	Mr Robin Bishop	Core principle 3 - deliver new and improved community infrastructure	4.3	<p>B – “may include: A new library facility” ? May ? The library is massively popular. But then, this will be well-known from extensive consultations with ‘the locals’.</p> <p>I don’t presume to speak for the Minstead Gardens senior citizens club users. I hope they want their facility ‘replaced’ by a ‘community pavilion’.</p>
903431	Mr Robin Bishop	Paragraph	4.6	<p>Where is the evidence for the assertion “Existing community facilities are inadequate (both qualitatively and quantitatively) and do not meet the needs of the existing resident population”, and which ‘facilities’ are meant ?</p> <p>Where is the evidence for the assertion “Existing community and leisure uses are poorly sited and not of a form or quality that supports the vibrancy and vitality of Roehampton Local Centre or aligns with modern service delivery models”, and which ‘community and leisure uses’ are meant ?</p> <p>These reasons for wholesale destruction and rebuilding really do demand an evidence-based underpinning. The shortfall in ‘facilities’ must either have been assessed by the Council, or should be reported by the</p>

Person ID	Full Name	Title	Number	Comment
				<p>providers. Unless of course there are studies elsewhere assessing the (mis)match between needs and services, in which case why are these not referred to ? These are not small matters, and mere assertion just will not do.</p> <p>There is also a fundamental category confusion: are 'facilities' buildings, or the services provided from them ?</p> <p>"Roehampton Local Centre" is, again, an awkward new name for what we know as Danebury Avenue.</p> <p>Ah, so there is to be a new library. Core Principle 3 B above throws this into doubt: "facilities may include" there, "identified a need for a new library" here. We're left hoping the second version is what will transpire.</p> <p>The pernicious confusion of "Roehampton" and the Alton Estate works to particular ill effect in this section.</p>
903431	Mr Robin Bishop	Paragraph	4.7	<p>"According to the Wandsworth Open Space Study (2007) the Roehampton ward has the lowest population density per hectare in the borough and the highest amount of open space per 1,000 population (23.78 ha)" appears designed to attract the attention of the jealous, or to justify the removal of open space. A look at the Atkins Open Space Study of February 20071 puts straight to rest the idea that the Alton Estate is a low population density area. The ward (Roehampton and Putney Heath) appears as great swathes of below London average density (Putney Heath, Wimbledon Common, areas either side of Priory Lane) with the Alton Estate as a patchwork of densities "above London average", "above London average but below Borough average" and "significantly above Borough average" (45.7 to 125.5; 125.6 to 154.1; and in excess of 154.1 heads/hectare respectively). Overall the density profile of the Alton Estate is more similar to that of the heavily urbanised eastern side of the Borough than the west.</p> <p>"The potential of Downshire Fields [sic] as an amenity is not being fully realised. The landscape could be significantly improved . . ." is a matter of taste. Some might prefer the officiously busy, pocket-sized Queen Elisabeth Park plan for Bull Green; others may prefer it to remain largely as it is without being meddled with.</p>

Person ID	Full Name	Title	Number	Comment
				¹ http://www.wandsworth.gov.uk/downloads/file/1783/figure_31_population_density
903431	Mr Robin Bishop	Core principle 5 - respect the heritage of the area	4.5	<p>B – “[P]oor quality housing stock and built form” is yet again a baseless assertion, its evidence base completely lacking.</p> <p>D – If density is to rise, as it must with extra homes to be built, and public open space is not to diminish, it seems almost certain that building heights must increase. This does not sit well with the shortly-following s4.8 ante-penultimate bullet point: “The site lies within an area where tall buildings are likely to be inappropriate”. I should like to know how WBC proposes to square this circle, or as ever, will it wait for the developers to submit plans which will achieve that end ?</p> <p>E – I am interested to have explained to me the precise meaning of “Sensitive transport and community infrastructure improvements throughout the area” and what it means in practical terms.</p> <p>Again, the re-emergence of the renamed, rebranded "Portswood Place Important Local Parade", "Roehampton Local Centre" and "Downshire Fields".</p>
903431	Mr Robin Bishop	Core principle 6 - update and activate the urban fabric	4.6	<p>B – Again, “place-making” is conceptualised as leading to ‘community creation’. This is not how communities are created. A place-making approach cannot be imposed by fiat (or SPD). And whom is the place-making to come from ? It sounds as if it is expected of the prospective developers. Is it being used as anything other than a buzzword ?</p> <p>Oh, there seemed to be no concerns about having an “integrated, socially inclusive, mixed and balanced community” when the Queen Mary’s Hospital development of over 350 homes was granted planning permission. It seems that only communities with social housing in place need “rebalancing”, whereas the creation of new developments without social housing is as natural to this Council as breathing.</p> <p>C – I too support “support high quality and sensitive proposals that are based on the principles of protecting, strengthening and repairing the existing fabric of the estate”, and I do not think that wholesale destruction of the Danebury area and replacing it with new high-density building respects the “existing fabric of the estate”.</p> <p>E – I also support the policy of “Proposals for new buildings will also be supported where they replace poor</p>

Person ID	Full Name	Title	Number	Comment
				<p>quality buildings", but only where buildings are shown to be of irreparably poor quality. A simple allegation does not cut it.</p> <p>Another repetition of the theft of our identity, "Roehampton Local Centre" and "Portswood Place Important Local Parade" are not names we recognised before their constant insertion into this document.</p> <p>A number of pejorative references to the current form of the built environment that allegedly engender anti-social behaviour, fly-tipping, drug-dealing, street drinking and vandalism. Obviously environment has an effect on all the non-desiderata, but yet again improvement of the environment does not require demolition and rebuilding.</p> <p>The statement that "existing buildings within the area lack a positive relationship to surrounding buildings, streets and open spaces" is ridiculously subjective as well as being woefully imprecise as to which "existing buildings" are meant.</p> <p>"A combination of physical factors, including fundamental design flaws in the development layout, along with poorly sited and constructed residential buildings contribute to the area's problems. Fundamental design flaws have created an abundance of dark and insecure settings, including non-overlooked alleys and external stairwells, which are conducive to anti-social behaviour such as drug dealing, street drinking and vandalism" is a masterpiece in character assassination, with – as ever – no proof of cause and effect, and no precise stipulation as to: which buildings in particular? with what fundamental design flaws? which problems do they cause? If it is the "anti-social behaviour" which makes up the "problems", is it demonstrable that they are on a major life-quality affecting scale? We're talking petty crime here, to the extent the assertions are true.</p> <p>"The estate is isolated from neighbouring areas and has little presence on arrival to the area along Roehampton Lane" is in error, as the estate is within easy reach of an array of towns by bus; it has "little presence" because of showing its age at the top of Danebury Avenue, due to a lack of ongoing care and maintenance.</p>
903431	Mr Robin Bishop	Paragraph	4.9	
903431	Mr Robin	Core principle 7 - improve access and connections	4.7	C – Is the bus stand at the bottom of Danebury Avenue really a "barrier between Portswood Place ... and the Park"? You just cross the road, don't you?

Person ID	Full Name	Title	Number	Comment
	Bishop			<p>D – So can WBC guarantee delivery of increased frequency of #72 buses, or a new route passing through the heart of the area ? TfL will just jump to attention ?</p> <p>E – What are and how much would cost these “improvements to the busy section of the route between Roehampton and Queen Mary’s Hospital” ? What exactly is envisaged ?</p> <p>What exactly are “insecure and poor quality pedestrian connections from Roehampton Lane into the area [Alton West]” ? Paths there can easily be upgraded and maintained.</p> <p>More importantly, the text “[The two traffic barriers] 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.” means what exactly ? What improvements ? Growth of what ?</p> <p>The remark that journey times and distance result in “a sense of general disconnection and remoteness for residents” is yet again absolutely unsubstantiated. Some people supposedly feel this. Who ? How many of them ? Who didn’t feel this way ? Who gathered evidence of this feeling, when, and how ?</p> <p>Increased population “is likely to be reflected in increases buses [sic] on existing routes and the provision of a new route passing through the heart of the area” – as it stands, this ridiculous statement says that new buses and routes will arise as a result of population increase. News for you – buses don’t arise. They have to be made, planned, programmed.</p> <p>The promise of raising and using Community Infrastructure Levies for as yet unspecified transport improvement is hopelessly vague. Are the improvements only to be planned as development proposals begin to be made ? or does WBC plan to be a little more proactive than this ?</p>
903431	Mr Robin Bishop	Paragraph	4.10	
903431	Mr Robin Bishop	Core principle 8 - create a sustainable environment	4.8	Does "D. The Council will support proposals that incorporate opportunities for community food production within Downshire Fields" mean we may have allotments on Bull Green ?
903431	Mr	Paragraph	4.11	An admission by WBC it has neglected its stewardship: “overgrown”; impermeable”; “overcrowding and evidence of tree failures and some trees in poor health” are testimony to work not done over the years.

Person ID	Full Name	Title	Number	Comment
	Robin Bishop			Catch-up work hardly core to a regeneration.
903431	Mr Robin Bishop	Paragraph	5.2	Yet again, if the redevelopment of the top of Danebury Avenue is a "long-standing priority", why's it not been done before ? All the longstanding neglect of the Estate seems to have been stored up over many years until now, when it may have achieved significant mass enough to provide one of several 'reasons' given for demolition.
				Again, Build It And They'll Come.
	Mr			For shops and services, why the use of "This may include" followed by a list of three highly significant new constructions ? Does the Council intend to stand back whilst 'developers' offer their rival schemes, which may or may not include some or any of these projects ?
903431	Robin Bishop	Paragraph	5.3	"[m]ay include . . . a library" is simply not good enough. Lord alone knows why it should be thought that the few metres the Sports Centre is from Danebury Avenue still requires "improved views and connections through from Danebury Avenue". The idea of a "new public square" however is not unattractive.
				Again, the implication that existing streets are unsafe is untrue and unfair.
				This section is little more than a mixture of unbacked assertions and blatant subjectivity.
903431	Mr Robin Bishop	Paragraph	5.4	"Roehampton Local Centre is not currently fulfilling its role in meeting daily needs and providing access to higher order centres": to the first statement, I beg to differ, to the second I ask, how the heck is it the role of a local centre to "provide access to higher order centres" ? Granting for a moment that the first point be true, why then has this state arisen ? Demand has been insufficient to cause the supply to arise which would constitute 'fulfilment' of Danebury Avenue's 'role'. Is mere (re)building sufficient to correct the position ? If you build it, will they really come ?

Person ID	Full Name	Title	Number	Comment
				<p>The "harsh" environment the writer perceives is just that, a perception. A rather snobbish one at that.</p> <p>"Public space has also seen significant deterioration over time" is a condemnation of WBC's custodianship of the area over the years, and the lack of abilities of the ward councillors to pursue an active advocacy of their area.</p> <p>What is a "Protected Core Frontage" ? Who gets to confer this status, and what are its implications ?</p>
903431	Mr Robin Bishop	Paragraph	5.5	<p>This over-heated paragraph is over the top even as a piece of sales pitch. It has no place in a document of this type, at this advanced stage in the progress of the Regeneration.</p>
				<p>Again, Build It And They'll Come.</p> <p>Why the use of "This may include" followed by a list of four highly significant new constructions ? Does the Council intend to stand back whilst 'developers' offer their rival schemes, which may or may not include some or any of these projects ?</p> <p>How is the Focus Hall going to be replaced ?</p> <p>Why does WBC remove itself from the driving seat of the regeneration in this manner: "key design requirements that the Council will expect new development to deliver" ? Who's leading here ? Who's following ?</p>
903431	Mr Robin Bishop	Paragraph	5.6	<p>The picture here is of untrammelled inchoate development which has not even led to a semi-functioning commercial or community centre. And whose fault has that been ? A council occupying a back seat whilst developers do what they like. Now another round of the same thing is proposed, on a gigantic scale. If good stewardship of Portswood Place, a small enough project, has been shunned through the years, why should we trust now that this should reverse overnight ?</p> <p>What is the purpose of the mention of Policy DMC1 ? Are we being softened up for the permanent removal of the Focus Hall ? Or something else ?</p>
903431	Mr Robin Bishop	Paragraph	5.7	

Person ID	Full Name	Title	Number	Comment
903431	Mr Robin Bishop	Paragraph	5.8	The current housing there is to be demolished, but "[t]he design approach [of the replacements] will reflect and enhance the street and public space framework set by the original LCC Masterplan". How exactly does one "reflect and enhance" the LCC's work by destroying its physical manifestation ?
903431	Mr Robin Bishop	Paragraph	5.9	The return (again) of the "poor quality" assertion, with not the slightest evidence that any kind of architectural survey has been carried out on the unfortunately scapegoated present buildings.
903431	Mr Robin Bishop	Paragraph	5.10	Never mind the empty lip service paid to the original LCC estate plans in 5.8: "fundamental design flaws in the development layout, along with poorly sited and constructed residential buildings" supposedly plague the Danebury/Harbridge area. A phrase such as "an excess of leftover, directionless and rarely used spaces" (which spaces, exactly ?) is meaninglessly subjective, and as part of a rationale for destroying several hundred homes, frankly pathetic. The only "current issues" seem to be those the Council has with this area.
903431	Mr Robin Bishop	Paragraph	6.3	Given that 282 student bedrooms were built in 2001, and 24 'flats' and 330 'new dwellings' in 2006, not to mention other smaller constructions throughout the same period, in short "[l]ocal retail demand has also increased in recent years", it seems strange that the top of Danebury Avenue and Portswood Place have not flourished as retail or service centres by all accounts within this SPD. If we accept this proposition, why should we think that the increase in housing proposed here will have a major significant growth effect on the Alton Estate's shopping offer ? The "soft market testing" mirabile dictu backs the Council's narrative. But it is far from being a commitment on any retailer to move in, or a guarantee of success if they did.

Events: Roehampton SPD - draft March 2015

Person ID	Full Name	Title	Number	Comment
906044	Mr Joseph Cairns	Roehampton SPD - draft March 2015		<p>This draft SPD is a deeply flawed document. It attempts to make a case for "regeneration" (read redevelopment) by pointing to real and imagined defects in the building stock. However, nowhere are these arguments supported with hard evidence such as surveyors' reports or other substantive documents. Where there are issues these are easily remedied at low cost. The failure of the SPD to convincingly make out the case for redevelopment, as opposed to refurbishment, and the many errors and omissions highlighted, including the worthless Sustainability Appraisal, leave me feeling distinctly uncomfortable about its usefulness as a guide for future development. I strongly feel that the document should be reworked in the light of the comments received and reissued for further consultation. The SPD is too important a document to be rushed through in its current defective form. Failure to amend and reconsult could create the grounds for a challenge to the document or worse still an expensive and unsuccessful redevelopment that would blight the lives of residents and reflect badly on the Council.</p>
906044	Mr Joseph Cairns	Paragraph	1.9	<p>The Core Strategy Policy PL15 at 4.115 when referring to Roehampton states that: "... despite extensive private sector investment and significant regeneration funding, roehampton has not enjoyed the same levels of economic success as the rest of the borough and levels of deprivation persist." So why should more of the same work now when it has failed before? There appears to have been no lessons learned from the previous attempt. Absent from the SPD is the recognition that a local Jobcentre allied to careers advice for some of the young, and not so young, unemployed on the estate might help. Additionally, the Conclusion to the Baseline Report recognised the problem of low educational attainment: " This combination of low educational attainment and high levels of economic inactivity suggest that there are problems with the labour supply in the area compared to the borough as a whole, with educational attainment and the lack of skills, among other factors, preventing people from entering the labour market." but does not relate this to the closure of the Alton Education Centre at Portswood Place by the Council that could have attempted to address this problem. This has been exacerbated by the loss of South Thames College at 166 Roehampton Lane. Despite this, the redevelopment proposals do not include any educational/training buildings that could address this problem.</p>

Person ID	Full Name	Title	Number	Comment
906044	Mr Joseph Cairns	Paragraph	1.10	It is difficult to know what is meant by "... new transport linkages." unless it is referring to the unpopular opening of the Danebury Avenue and Highcliffe Drive barriers. If so, it is difficult to see what benefits would accrue to the estate from such openings. Certainly a rat-run would develop between Richmond Park and Roehampton Lane, increasing the traffic risk to residents and especially children attending the three local schools.
906044	Mr Joseph Cairns	Paragraph	1.22	The text coyly refers to "... some insensitive later additions ..." but fails to identify them. I wonder why? Could it be that as WBC has been the planning authority for the area, approval for them must have come from the council? Examples of such insensitive additions would surely include the out-of-character yellow brick housing estate erected on the site of the Alton Education Centre and Danebury Primary school at Portswood Place. Clearly when there is a conflict between insensitive housing development and respecting the architectural heritage of the estate, the insensitive housing comes first. Of course having identified the insensitive developments another solution suggests itself - remove them. The hideous yellow brick houses could go and be replaced by a modernist block in the style of the rest of the estate. This would increase the density on that site which is very low due to the presence of terraced housing and make a positive contribution to the appearance of the area. I commend this idea to the Council.
906044	Mr Joseph Cairns	Paragraph	1.25	The "generous" amount of public realm and public open space are what makes the estate work. Unlike many later estates which were built with inadequate public realm and quickly became known as "concrete jungles" e.g. Ferrier Estate in Kidbrooke, Greenwich, since demolished, the Alton works despite its high population density. Consider the expense to the public purse of the Ferrier estate and contrast that with economy of the Alton which for the cost of some extra green space has an indefinite life expectancy. The wonderful thing about the green space on the Alton 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 look at it; when they are walking past it, riding on a bus or watching from a balcony.
906044	Mr Joseph Cairns	Paragraph	1.31	Whilst East Putney LU station is the nearest as the crow flies because it is not close enough to walk and has no direct bus link it is not used by estate residents. Why should they when Putney Bridge LU is only 15 minutes away on the 265 bus and 19 minutes by the 430 or 85. The example given misrepresents

Person ID	Full Name	Title	Number	Comment
	Cairns			the level of access to underground rail services.
906044	Mr Joseph Cairns	Paragraph	1.34	It is disingenuous if not fraudulent to claim that the final masterplan represents " a broad consensus on the approach required to bring about the necessary change in the Roehampton area." The Options Consultation Questionnaire was not neutral with respect to redevelopment. In particular it did not give an option of no redevelopment. Perhaps for this reason only 6.7% (254 of the 3,800) questionnaires distributed were returned. Consider further that of that 6.7% many replies opposed specific proposals e.g. student housing in the town centre and opening of the Danebury and Highcliffe barriers and one can see that the Council have no mandate for this redevelopment.
906044	Mr Joseph Cairns	Paragraph	2.3	The "generosity" of the public spaces and public realm are 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 works despite its high population density. Consider the expense to the public purse of the Ferrier estate and contrast that with economy of the Alton which for the cost of some extra green space has an indefinite life expectancy. The wonderful thing about the green space on the Alton 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 look at it; when they are walking past it, riding on a bus or watching from a balcony.
906044	Mr Joseph Cairns	Paragraph	2.4	This section attempts to set out the case for redevelopment. It fails spectacularly. Instead of a closely reasoned argument backed up with solid evidence we get unsubstantiated allegations about the condition of the estate. Indeed it is impossible to reconcile the description of the estate given here with its status as an architectural icon that has programmes made about it by the likes Richard Rogers and the Open University and feature in books on world architecture. I will address some of the more egregious examples. "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

Person ID	Full Name	Title	Number	Comment
				<p>that lack them!</p> <p>" Poorly defined spaces that are frequently not overlooked and lack any positive active frontages. In particular there are small spaces between buildings and smaller car parks which are not well supervised or visible to residents or visitors." - So where exactly are these spaces? Is this really a justification for wholesale demolition and redevelopment? Could WBC guarantee that any new development would totally eliminate them?</p> <p>" 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 anti-social behaviour taking place rather than just the opportunity for it.</p> <p>" Many of the open spaces and parts of the public realm lack a clear role, function, definition and are underused." - Vague. What areas are you talking about?</p> <p>" 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.</p> <p>" A number of the open spaces (including Downshire Fields) lack facilities and amenities." - I would caution any person who wants to open a cafe at/on Downshire Fields as there have been several attempts to open a cafe in Danebury Avenue and on Roehampton High Street e.g. Sunflowers, which have not survived. Locals will not use relatively expensive cafes when they are only a few minutes from home.</p>
906044	Mr	Paragraph	2.6	" A substantial number of residential and commercial buildings are however poorly sited and

Person ID	Full Name	Title	Number	Comment
	Joseph Cairns			<p>constructed ..." Again no specific examples given. This is a very unprofessional piece of work.</p> <p>" ... as well as falling considerably short of today's expectations and indeed the standards set in the London Housing Design Guide." So is the Council proposing to redevelop all properties that do not meet "today's expectations" or the London Design Guide? Patently not. So why write this stuff? It's simply a weak attempt to manufacture a rationale for redevelopment.</p> <p>" 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." - More weak attempts at a rationale. None of this comes near to justifying the redevelopment proposed.</p>
906044	Mr Joseph Cairns	Paragraph	2.7	<p>A fantastic statement, and if true, a damning indictment of WBC's mismanagement of the estate since its inheritance from the LCC. Where is the evidence to support this claim? Where are the surveyors' dilapidation reports to back this up? None are quoted because none exist.</p> <p>However, it is not true and it would be amazing if it were as none of the buildings are over 60 years of age.</p>
906044	Mr Joseph Cairns	Paragraph	2.8	<p>This is an LCC standard type, common across much of the estate and London. It is functional rather than stylish. The shopping parade suffers from the loss of trade due to the closure of Danebury Primary school and the Alton Education Centre by Wandsworth Council.</p>
906044	Mr Joseph Cairns	Paragraph	2.8	<p>Again no specific examples to substantiate the argument. This is mere empty opinion and out of place in a reasoned document such as this. Where there are issues such as cleanliness and weathering of communal areas they are largely the result of inadequate maintenance by WBC who have systematically neglected the estate for decades. Furthermore such issues are easily remedied without redevelopment.</p>
906044	Mr Joseph	Paragraph	2.9	<p>I am sure that the Metropolitan Police could identify which buildings have the longest criminal records. These buildings could then be punished by being pulled down. This would teach the other buildings not to step out of line. Of course, if you believe that crime is caused by people then there is</p>

Person ID	Full Name	Title	Number	Comment
	Cairns			<p>no justification for demolishing buildings.</p> <p>If there are higher crime rates in Roehampton, and the statistics seem to be conflicting on this, then it is probably due to the relatively larger numbers of families with males in the age range 14-24. Not something that will be significantly impacted upon by redevelopment.</p>
906044	Mr Joseph Cairns	Paragraph	2.10	<p>Portwood Place has limited community facilities because WBC closed both the primary school and an adult education centre previously there.</p> <p>Like many statements in this document it studiously avoids commenting on how the estate has come to be in the condition it is in.</p>
906044	Mr Joseph Cairns	Paragraph	2.15	<p>What issues? There are substantial medical and dental facilities within a few minutes walk from the SPD zone. There are no issues with access to health services.</p>
906044	Mr Joseph Cairns	Paragraph	2.16	<p>The only thing that can be "confirmed through consultation" is the opinion of the consultees. If you are trying to make factual statements about the facilities you should state what they are and exactly what requirements they fail to meet.</p> <p>WBC should be cautious about building facilities where there is no pressing demand for them. As I write, The Cornerstone, Roehampton Parish Hall, is up for sale due to the lack of demand from hirers. Additionally the Focus Hall is underutilised.</p>
906044	Mr Joseph Cairns	Paragraph	2.18	<p>While "community facilities, shops and services" are generally welcome, it is difficult to say that there is a pressing need for them. Some shops on Danebury Avenue seem to struggle to survive and there are empty units on Roehampton High Street. Like local high streets everywhere, the competition from larger town centres and larger out of town shopping centres has pulled business away from the locals. This is a trend WBC will not be able to reverse in Roehampton with some new shiny shop fronts. Similarly for recreation facilities, the pull of the larger surrounding towns of Kingston, Putney and Wandsworth not to mention the attractions of central London itself make it difficult to establish a sustainable local arts facility. Perversely the community facility most valued by the locals, the library, is</p>

Person ID	Full Name	Title	Number	Comment
				under threat in this redevelopment.
906044	Mr Joseph Cairns	Paragraph	2.19	" The Council's dominant ownership levels" has helped inhibit development out of character with this award winning estate, though not entirely. Responsibility for the "insensitive later additions" (1.22) which presumably includes the tasteless yellow brick development on the site of the Danebury primary school and Alton Education Centre, lies wholly with the Council. It is not clear what benefit greater tenure diversity would bring to the estate.
906044	Mr Joseph Cairns	Paragraph	2.20	I think it is the market demand by students for short term lets that has resulted in this being prevalent in the area, not the lack of "tenure diversity."
906044	Mr Joseph Cairns	Transport accessibility	2.6	In my opinion, compared to other London areas, Roehampton is not as well served by public transport as it lacks a nearby (within a 10 minute walk) rail or underground station. Hence, travel by public transport has to begin with a bus and buses get caught up in road congestion adding significantly to travel times. Given London's integrated transport service, most people travelling from Roehampton to work or leisure take a bus to connect to a rail or underground station . Thus what is needed is fast, frequent shuttle services to Hammersmith, Putney and Putney Bridge stations. This has recently happened with the increase in frequency of the 72 service to Hammersmith, though we have been warned not to expect this to continue. If the Council wishes to improve the quality of life of Roehampton residents including helping unemployed people travel to work, it could do no better than try to prevail upon Transport for London (TfL) to revise its bus timetables to achieve the rapid shuttle services to rail stations described.
906044	Mr Joseph Cairns	Paragraph	2.25	And long may it remain so. There is no local demand to create a rat-run between Richmond Park and Roehampton Lane.
906044	Mr	Paragraph	2.27	" ... despite traffic calming measures, vehicle speeds along the central spine road of Danebury Avenue

Person ID	Full Name	Title	Number	Comment
	Joseph Cairns			create an uncomfortable environment for pedestrians and cyclists." I am not sure that this is true, as a traffic survey found average speeds of 24mph on Danebury Avenue, however, if it is, would it be improved by the opening of the barrier? I think not.
906044	Mr Joseph Cairns	Paragraph	2.29	The large number of pensioners on the estate would increase the number and percentage of economically inactive residents. It ought to have been simple enough to find out the number of unemployed residents claiming benefit from the Wandsworth Jobcentre, but this has not been done. This report lacks the evidence on which to make informed decisions about employment levels.
906044	Mr Joseph Cairns	Paragraph	2.30	Of course, these figures, if correct, may not have been so bad if the Council had not demolished the Alton Education Centre at Portswood Place. Encouraging South Thames College to keep a meaningful presence at 166 Roehampton Lane would also have helped. Nevertheless, there is nothing in the redevelopment proposals which would help people to obtain qualifications and skills relevant to the job market.
	Mr Joseph Cairns			This "lack of demand from the market" could be for a variety of reasons including: 1. The lending policies of financial institutions which will not lend on properties in tower blocks; or when the block is owned by a local authority or where local authority tenants share the same facilities. 2. A preference on the part of homebuyers not to live in local authority managed blocks. Thus the "lack of demand" is not necessarily due to concerns about the buildings. Nor will it necessarily be solved by redevelopment.
906044	Mr Joseph Cairns	Core principle 8 - create a sustainable environment	4.8	The SPD documents include a Sustainability Appraisal produced by WSP Global Inc. As there seems to be no other place to comment on it I shall comment on it here. It is difficult to know how to respond to the Sustainability Appraisal when the document itself acknowledges in 1.1 that "Sustainability appraisal is not a precise science." Indeed, it is not a science at

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				<p>all unless one considers it a pseudoscience.</p> <p>The main body of the report is given over to assessing the SPD and four sub-areas (Roehampton Local Centre, Portswood Place important local parade, Danebury Avenue housing and Central Landscape) against the 19 Sustainability Appraisal (SA) objectives used in the SA of WBC's Local Plan Review 2nd Proposed Submission Version (March 2015). For each objective the SPD is rated between Potential for a significant positive effect (++) to Potential for significant negative effect (--) with intermediate ratings and exceptions where there is no effect or an uncertain outcome. Unsurprisingly this report, commissioned by the Council of the consultancy WSP Global Inc., rated the SPD for each of the 19 objectives either (++, 12 times) or (+, 7 times) with (++) ratings for each of the 4 sub-areas. However, close reading of the text reveals that these "findings" are built on assumptions. For example:</p> <ol style="list-style-type: none"> 1. <i>Objective 10 Ensure people have access to suitable housing</i> assumes: New housing is expected to meet high standards of sustainability including ... However, the SPD, at 4.1 I, 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 indents. 2. <i>Objective 11 Ensure people have access to essential community facilities</i> assumes: <ul style="list-style-type: none"> • 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

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				<ul style="list-style-type: none"> • A new community pavilion to replace the Minstead Gardens senior citizens club. <p>However, the SPD at 4.3 only states that:</p> <p>“It is envisaged that the facilities may include :” the aforementioned 5 items</p> <p>3. <i>Objective 12 Reduce the need to travel</i> assumes the same public facilities as 11 yet while recognising that a proportion of the increased population would need to travel off-site for employment, still rates the SPD a (+).</p> <p>These and other carefully worded assumptions render the Sustainability Appraisal worthless.</p> <p>Furthermore, no-where does it consider the sustainability aspect of demolishing perfectly satisfactory buildings which though dirty and neglected only need a minor refurbishment to restore them to their original glory at the entrance to the estate. I shudder to think how much public money has been wasted on this worthless but no doubt expensive report.</p>