



THE PUTNEY SOCIETY

RESPONSE TO DRAFT NEW LONDON PLAN 2017

The Putney Society, is the local amenity/civic society for Putney and Roehampton – the SW15 postcode. We are a long-established voluntary organisation (with charitable status) and with nearly 1000 household members. Our main objective is to protect and improve the quality of life of people who live, work or visit Putney and Roehampton. We want our area to be an attractive place for this and future generations.

The Society therefore takes an active interest in planning policy. We have looked at the consultation draft, and now attach our comments for your consideration below. For convenience these are arranged in the same order as in the consultation document, and as with that document this order therefore does not indicate any order of importance or weight.

27 February 2018.

FOREWORD:

We strongly endorse the sentence in paragraph 6
'Good growth is not about supporting growth at any cost'.

INTRODUCTION:

0.0.4. says *'The Draft London Plan can only deal with the GLA area'* although 0.0.5 in part contradicts this, and as a result treats London, and to some extent the South East, in isolation and contradicts the Government's Industrial Strategy which aims to spread growth across the UK.

0.0.17 says *'This is a new Plan (also known as a Replacement Plan). This means it is not an alteration or update to previous Plans'.*

This clarification is welcome since a high degree of continuity is essential to sustaining confidence in our internationally well-regarded planning system. It would be good to have a statement on the importance of planning (often maligned), and its prime purpose of balancing public benefit with private gain for those who invest in development.

0.0.23. says *'It is crucial that all those involved in planning and development in London understand how London's two tier planning system works and do not seek to duplicate policy or evidence unnecessarily'.* We note that Wandsworth Council in their comments to you have flagged policies where the draft London Plan trespasses on local matters, and we ask that these points be taken in to account. We have also flagged two cases where the draft Plan includes matters already covered by National standards and/or Building Regulations, which therefore have no place in this plan.

CHAPTER 1: GOOD GROWTH POLICIES

In general we support all these Good Growth policies, but note that vigilance is required to ensure that all strategic developments flowing from this document are informed by and adhere to these underpinning principles.

Policy GG1 – Inclusive Communities

1.2.7 Says *‘London’s distinctive character and heritage is why many people want to come to the city. As new developments are designed, the special features that Londoners value about a place, such as cultural, historic or natural elements, can be used positively to guide and stimulate growth, and create distinctive, attractive and cherished places.’*

Key point: London’s local, national and global appeal is much more fragile than statements like this would have us think. London’s distinctive character often relates to patterns of use and is an asset that once destroyed by drastic damage or by a thousand insidious cuts cannot be replaced. Warm words like this need to be supported by robust policies in Chapter 7.

1.2.8 Says *Making the best use of land will allow the city to grow in a way that works for everyone.*

Key point: This use of the word ‘best’ is too vague and subjective. Optimising density can too easily mean maximising density, here and throughout the Draft Plan. Optimisation will enhance local character whereas maximisation will destroy the relationship between elements of the suburban landscape. Again ‘best’ use of land should not be used to invalidate policies in Chapters 3 and 7.

Policy GG2 – Making the best use of land

We support GG2.C and D, on strengthening not diminishing character.

Policy GG3 – Creating a healthy city

GG3 omits reference to the growing body of research on the beneficial impact of well-maintained heritage on health, especially mental health.

Policy GG4 - Delivering the homes Londoners need

We agree with increasing housing supply for all the reasons stated.

To meet the growing need, London must seek to deliver new homes through every available means. Reusing large brownfield sites will remain crucial, although vacant plots are now scarce, and the scale and complexity of large former industrial sites makes delivery slow. Small sites in a range of locations can be developed more quickly, and enable smaller builders to enter the market. Building more housing as part of the development of town centres will also be important, providing homes in well-connected places that will help to sustain local communities.

This should also include as one of the ‘available means’ the conversion potential of historic buildings which is often more spade-ready than new development as well as enhancing rather than detracting from local character.

Policy GG5 - Growing a Good economy

1.4.9 says *The things that make London's economy so strong are the same things that make London an attractive and exciting place to live, work and visit. London's ethos of tolerance and respect, its rich cultural and historic assets, the quality of its streets and public places, its spirit of creativity and entrepreneurialism – these things attract businesses of all sizes and allow them to develop and thrive. The people who these businesses employ need strong communities, pleasant environments that promote good health, and good quality, affordable homes in places they want to live. The continuing success of London's economy is reliant upon making the city work better for everyone.*

Warm words but that phrase 'work better for everyone' must not become shorthand for work better for developers. It is essential that public engagement in London's future development is taken seriously by the Boroughs, following the Mayor's example.

Key point: it is essential that public consultation provides genuine engagement 'for everyone', otherwise what 'works for everyone' means what works for the Councils and developers who have the time and resources to influence consultations. Proportionate and realistic timeframes will help avoid consultation fatigue. We would welcome a Principles of Consultation for London Boroughs along the same lines as the Government's Principles to its Departments 2016.

In respect of B, C & G in particular, employment uses, including offices and SME workshops need to be distributed widely to reduce the strain on transport of everyone commuting to the centre, and because a distributed work force will in turn support local shops and town centre services.

Policy GG6 – Increasing efficiency and resilience

Efficiency and resilience can also be promoted by maximising route choice and connectivity between all parts of London. The history of their development leaves too many places where transport routes, notably railways, cross without connecting. The prime local example is the District Line at East Putney / crossing but not linked to the SW Railways line from Waterloo. The same SW Railways line then between Chiswick & Kew Bridge passes under the District and Overground Richmond branch with no connection. We could cite many more examples, including the Overground at Brixton.

CHAPTER 2: SPATIAL DEVELOPMENT PATTERNS

The Map seems to confirm that despite continuing intensive growth, Putney and neighbouring areas are expected to get by with a transport network significantly unchanged for the last century. We invite the author of this to try to board a train at Putney Station in the morning peak hours.

In this respect we welcome the various statements that development be phased in line with the provision of infrastructure.

CHAPTER 3: DESIGN

Policy D1 - London's Form and characteristics

We generally support all of D1

Key point: But D1.A 'Use land efficiently by optimising density' can too easily be interpreted as maximising density despite all the very important aspirations in D1B. Despite all the policies set out in Chapters 3 and 7, Chapter 4 is likely to trump all. It is therefore even more important to ensure that at least on paper, Chapters 3 and 7 are not weakened in the final Plan.

D1.A.10. Servicing means somewhere for the servicing tradesman's van – often forgotten.

We endorse all of D1.B, especially 3.1.1. and 3.1.2

3.1.9. We endorse the future adaptability of buildings.

3.1.10 the idea of circular economy should be taken further to include retrospective adaptation i.e. encourage re-using and adapting existing building stock. In Inner London, 37% of housing stock, was built before 1900. We can't afford to replace it all so new techniques, especially retrofitting should be given more prominence.

1 https://www.london.gov.uk/sites/default/files/housing_in_london_2015.pdf

Policy D2 - Delivering good design

We endorse D2.A. 7 It is essential Boroughs are able to commit enough resources *to identify historical evolution and heritage assets (including an assessment of their significance and contribution to local character).*

D2.F We support the use of design reviews, including well qualified local design panels.

Policy D3 – Inclusive design Fully supported

3.3.6 (also 3.3.7 3.3.8) *When dealing with historic buildings and heritage assets, careful consideration should be given to inclusive design, in conjunction with their heritage value, at an early stage. This is essential to securing successful schemes which will enable as many people as possible to access and enjoy the assets now and in the future, whilst retaining their heritage value.*

It should be kept in mind that some heritage assets can never be made fully accessible (eg for wheel chair users) without irrevocably damaging their unique values. In a few cases, inclusive design may not be advisable in the wider national interest.

3.3.7 Design Statements. These are often simply tick box exercises, the Mayor should explore how to make these more meaningful.

3.2.9 We agree that *The cumulative effect of amendments can often be significant and should be reviewed holistically.* Death by a thousand cuts is as destructive as demolition.

Policy D4 - Housing Quality and Standards

D4.D. These standards were welcome and necessary when introduced in the current London Plan, but the government has now introduced the Nationally Described Space Standards, based on the 2016 London Housing SPD. All that is now needed is to reference these.

D4.D.9 Most Boroughs already have more generous standards for outside space. Will the provisions here conflict these?

What happens to conversions where outside space cannot be provided, or would conflict with the need to avoid overlooking?

3.4.3 Overall we support minimum ceiling height for new dwellings, but flexibility is needed for conversion and extensions to existing buildings. Most 20th century stock was built to a 2.3m (7'6") standard, and lots of 19C stock has low ceilings in rear kitchen wings. If these can't be converted, do they have to be demolished?

3.4.9 We support the opposition to gated developments, except for small courtyards etc.

Policy D5 Accessible housing

We support the 10% requirement until supply catches up with need.

Policy D6 - Optimising housing density

A Development proposals must make the most efficient use of land and be developed at the optimum density. We welcome a design-led approach but still think this gives permission for maximising density!

D6.A.3 The capacity of surrounding infrastructure should include often overloaded transport.

D6.B.1 Future capacity taken in to account has to be at least approved and funded. We've been waiting for a bigger South Circular Road since the 1920's (and probably don't want it).

Policy D7 - Public realm

This is generally welcome especially D7.A and D7.F.

'Consideration should also be given to the local microclimate created by buildings', yes, with reference to the canyon effect created by high rise buildings closely packed, which is especially challenging at street level for pedestrians and cyclists.

D7.I We welcome this rejection of street clutter although use of word *unnecessary* is subjective. *normally* is sufficient.

D7.M Drinking water is also easy to retrofit. The challenge is to ensure responsibility for maintenance, and who is to provide this given that most public realm is also publically owned. TfL and Network Rail should be encouraged to provide water at all stations.

We agree that the public realm is even more important when densities increase and for cultural activities (3.7.6) as well as on the importance of maintenance (3.7.9)

Policy D8 - Tall buildings

'supporting legibility across the city to enable people to navigate to key destinations' is a specious argument in favour of tall buildings and should be discarded (also 3.8.1).

D8.A We agree that Boroughs should define 'tall' locally.

D8.C Impacts, welcome the emphasis on visual (including local views) and environmental as well as functional impact. It should be made clear that visual and environmental impact assessments are equally valid.

D8.C.1.d Proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area.

The last sentence should be discarded since it negates the paragraph's intention. In reality new tall buildings are very unlikely to enhance the setting of something much smaller in scale.

D8.C.1.f We agree that 'Buildings near the River Thames, particularly in the Thames Policy Area, should not contribute to a canyon effect along the river which encloses the open aspect of the river and the riverside public realm, or adversely affect strategic or local views along the river.

Key point: The Draft London Plan very properly recognises the value of Thames. We welcome recognition of the special value associated with River Thames, so vital to Putney's distinctive character, as the key attraction for residents and workers and for its global profile.

We need stronger guidance on Thames-side views throughout its GLA length including beefing up of protection of local views. We recommend a review of operation of Thames Policy Area. What has already happened from the Wandle down to Chelsea show how NOT to do it.

D8.C.2. Functional impact: We welcome 2d and 2e, and ask that it is made clear that supporting infrastructure is needed with or before, not years after development.

3.8.1. That high density need not mean high rise is not said clearly enough. 30m high is all most of London needs.

D9 – Basements

Generally we support limiting basements to one storey, but most of the impacts are already covered by Building Regulations and the Party Wall etc. Act.

Policy D10 - Safety, security and resilience to emergency

No comment

Policy D11 - Fire safety

All of this is regulated at a national Level by the Part B of the Building Regulations, which are currently under review by the inquiries resulting from the Grenfell Tower tragedy. Leave this to Central Government to avoid more confusion.

Policies D12 – Agent of change & D13 – Noise. Generally supported.

3.13.6 *The definition of Tranquil Areas, Quiet Areas and spaces of relative tranquillity are matters for London boroughs. These are likely to reflect the specific context of individual boroughs, such that Quiet Areas in central London boroughs may reasonably be expected not to be as quiet as Quiet Areas in more residential boroughs. Defra has identified parts of Metropolitan Open Land and local green spaces as potential Quiet Areas that boroughs may wish to designate.*

We welcome this Quiet Areas designation and wish to keep it.

CHAPTER 4: HOUSING

Policy H1 - Increasing housing supply

H1.B Some Town Centre boundaries – including Putney’s along the Upper Richmond Road - roam a long way. 800m further beyond this is often a long way from the transport. *This clause should read ‘within a town centre boundary or within 800m of .. stations’.*

H1.C *‘Boroughs should proactively use brownfield registers and permission in principle to increase planning certainty for those wishing to build new homes’.*

Very little development land is not brownfield in London and we welcome the principles of brownfield first and Permission in Principle as well as the Mayor’s commitment to retaining Green Belt and MOL.

However London is also rich in undiscovered archaeological finds. Care should be taken not to remove the opportunities for sites to be assessed for surviving archaeological evidence as part of the process of applying for planning permission.

Policy H2 - Small Sites

Welcome the presumption in favour of small housing developments as more likely to respect and respond to their surroundings. And in 4.4.2 to help revive the role of small and medium-sized developers in delivering new homes in London.

*4.2.7 Special attention will be required within **conservation areas** to ensure that increased housing provision is accommodated in a way that also complements and enhances an area, taking into account conservation area character appraisals and management plans.*

We endorse this special attention for small housing developments in CAs.

H2.D We support all of these subject to the comment above at H1.B, but Boroughs should be allowed to continue to prevent the conversion of family homes below a specified size (150 sq.m. in Wandsworth).

Policy H4 - Meanwhile uses

How about using these sites for smaller scale residential developments? Why wait for the big boys?

Policy H5 - Delivering affordable housing

4.5.1 We support the Mayor’s principle of increasing supply of affordable housing for a sustainable city. However we are concerned by how little of this seems to be actually affordable for the low paid workers on whom the city relies.

Policies H6-H8 No comment

Policy H9 - Vacant Building Credit.

C To demonstrate that a building has not been made vacant for the sole purpose of redevelopment, an applicant will be required to demonstrate that it has been vacant for a continuous period of at least five years before the application was submitted and will also be required to provide evidence that the site has been actively marketed for at least two of those five years at realistic prices.

While the principle here is excellent, some flexibility is needed for listed buildings which may deteriorate irreparably in 5 years. A more rapid VBC may make all the difference between a viable scheme and the loss of a significant building. Even better would be to have VBC apply automatically to Heritage Assets.

Policy H10 - Redevelopment of existing housing and estates.

H10.B & C. Where possible the replacement affordable rented housing needs to be built first so that tenants can stay in their community.

4.10.1 The regeneration and intensification of London's housing areas has been, and will continue to be, a key part of the evolution of London, and critical to meeting its housing needs. It is important that existing homes of all tenures are well-maintained and are of good quality as these will continue to be the bulk of London's housing stock.

Welcome this comment on the importance of good maintenance and think it should be elaborated more forcefully. Private owners on the whole understand William Morris' dictum to 'stave off decay by daily care', and that with regular maintenance and the occasional new boiler, kitchen or rewiring most homes can be kept useful for centuries. All over London there are streets where one side was cleared as slums 50 years ago, but it is the old houses on the remaining side that are now the desirable homes, not the ill maintained replacements.

We commend Wandsworth Council's leadership in creating Hidden Homes on many estates as showing a way to intensification without demolitions and the consequent disruption of established communities. 'Regeneration' should not be seen as a substitute for repair and renovation of essentially sound homes.

Policy H11 – Ensuring the best use of stock

This policy should include a requirement for developments to be marketed locally first.

Policy H12 – Housing size mix.

H12.B & C. These two clauses are in direct opposition to each other. We feel that Boroughs should encourage provision of family sized homes in appropriate locations (and be allowed to define those).

Policy H13 – Build to rent

Generally we welcome a properly set up build to rent market rather than individual small landlords, but

H13.B 50 units is too high a limit.

Well managed HMOs (4.12.7) along the lines of six bedrooms and shared dining / kitchen often provided in new student accommodation is a model that should be explored for other young singles.

Policy H17 – Purpose built student accommodation

H17.B Student accommodation needs to be located close to where they study, not spread about. Short commutes and being close to your friends matters here. Otherwise students will price out families from local 3 bedroom and bigger houses.

Students have cars too. Not recognising this is causing real problems in Roehampton.

Policy H18 Large-scale purpose-built shared living

See comments above for H13, H17, & H18.

This level of services would be expensive to provide. There is potentially demand too for those who can do their own cleaning etc.

CHAPTER 5: SOCIAL INFRASTRUCTURE

Policy S1 - Developing London's social infrastructure

Para 5.1.3, 5.1.8, 5.1.9. We agree that the shared use and co-location of community facilities, across a very broad spectrum, should be encouraged. Boroughs must work collaboratively with all stakeholders to overcome barriers to effective joint working. The Community Infrastructure Levy and other legislative tools may be used to good effect in facilitating this.

The growing problem of rough sleeping by London's homeless people requires innovative and insightful approaches. The increased involvement of community facilities such as churches, to provide Night Shelters and other assistance, should be encouraged. There is clearly also an increased and vital role for adequately resourced voluntary sector organisations to help tackle this issue.

Policy S4 - Play and informal recreation

Para 5.4.7. We agree that Play Strategies for children should be developed and integrated with other borough strategies. In this regard, in line with the Mayor's promotion of child-friendly neighbourhoods, the Putney Society has investigated the feasibility of introducing a 'Playing Out' scheme in Norroy Road (<http://playingout.net/>)

Policy S6 - Public Toilets

Para 5.6.1 We strongly agree that public toilets are a vital facility for both Londoners and visitors. Provision of public toilets is inadequate in many parts of London, including Putney. One solution is for the Mayor to work with TfL, Network Rail and the operating companies to ensure that station renewal programmes include toilet facilities.

Para 5.6.4 We understand and support the need to comply with the provisions of the Equality Act 2010 in the provision of toilet facilities for people with disabilities. Such provision should include temporary facilities which meet their needs. We draw your attention to Centre for Accessible Environments (CAE) Managing Accessible Toilets Factsheet 2017.

Para 5.6.6 We support and encourage the provision of Changing Places toilets to meet the needs of people for whom the standard wheelchair-accessible toilets are inadequate.

Why were toilets not included in the recent major reconstruction of Putney Station?

Policy S7 - Burial space

Para 5.7.1 We support the statement that in assessing the requirements for burial space, account should be taken of the fact that different faith groups have different needs for burial provision. The pressure on available land for burial must encourage sub-regional and cross borough planning, as well as innovative approaches to the provision of space for burial of ashes.

CHAPTER 6: ECONOMY

Policy E1 – Offices

E1.D.4 We strongly support that '*locally-oriented, town centre office provision to meet local needs*' and often wider London needs should be supported in local centres. Spending by office staff in turn supports local shops and services.

E1.E We strongly support this. Putney is designated as the office centre for the borough in the current Wandsworth local plan, yet has lost around half of all office space in a few years through a combination of Permitted Development changes to private residential and developers arguing that in each case that development of older office stock (usually still in use at the time) can only be supported by replacing it with flats. As a result there is now little if any surplus space. E1.G

Locating offices in the middle and outer suburbs should be supported as reducing demand for commuting to the centre, and allowing more Londoners to work near home, perhaps at a distance where they can walk or cycle.

6.1.5 & 6.1.6. The requirements of most SME offices are not complex and can often be met by older buildings. Unfortunately these are too often now more valuable if converted to flats. We encourage the use of Article 4 Directions to remove permitted development rights in and around town centres.

Policies E2 & E3 – Low-cost business space & Affordable workspace

These two groups of uses have seen the biggest reductions as a result of rising residential land values. Locally we have lost half the petrol stations and almost all car repair workshops in the last ten years. A balanced community means local facilities for the maintenance as well as shops supplying new, otherwise the result is extra car and van traffic to the suburbs where these facilities are still to be found.

Low cost space usually means second hand. Policies for protection are needed more than those 'allowing' the construction of new.

Policies E3 – E8 No comment

Policy E9 - Retail, markets and hot food takeaways

Para 6.9.1 Retailing. We strongly urge a more robust approach to the fact that *'retailing is undergoing a period of continuing restructuring'* (para 6.9.1) by making greater and sustained efforts to identify and plan for additional 'click and collect' sites in the borough. The large, apparently underused, areas at Putney Station might be utilised for the purpose.

Para 6.9.7 Hot food takeaways. We support the recommendation that these outlets should not be sited near schools – but in most cases they are already there.

In Putney – and almost certainly in many other parts of London – there is a growing problem with proliferation of delivery companies such as Deliveroo, whose delivery bikes and scooters congest the pavements and areas outside the restaurants they serve.

Policy E10 - Visitor Infrastructure

Para 6.10.1 We agree that tourism should be promoted across the whole of the city.

Putney has a unique heritage with its long association with rowing, still marked each year with national and international events, the best known being the Oxford and Cambridge Boat Race. This is celebrated and promoted locally and beyond; further publicity focusing on its historical significance would be beneficial. Again, the need for adequate visitor accommodation and public toilets to support such events is of high importance.

Para 6.10.4 We agree with the need to offer alternative forms of accommodation whilst ensuring that short lets such as offered by Airbnb do not distort the balance between more conventional lets and the residential sectors.

CHAPTER 7: HERITAGE AND CULTURE

We welcome the recognition of the importance of Heritage with both a chapter and also references elsewhere notably in chapter 3 Design and to some extent Chapter 4 Housing. This reflects the consensus that economic, social, environmental and cultural benefits derive from historic assets and surroundings.

We support the principle of this chapter to 'inform the effective integration of London's heritage in regenerative change'.

Policy HC1 – Heritage, Conservation and Growth

*7.1.1 London's historic environment, represented in its built form, landscape heritage and archaeology, provides a depth of character that benefits the city's economy, culture and quality of life. The built environment, combined with its historic landscapes, provides a unique sense of place, whilst layers of architectural history provide an environment that is of **local, national and international value**. London's heritage assets and historic environment are irreplaceable and an essential part of what makes London a vibrant and successful city, and their effective management is a fundamental component of achieving good growth.*

This is a very welcome recognition of the role of heritage in London's reputation and in the Plan's concept of good growth.

7.1.2 has a welcome reference to undesignated assets archaeological as well as *buildings of local interest*. This seems to be the only reference to Local Lists kept by some Boroughs which should be more strongly encouraged.

7.1.5 stresses the importance of engagement but puts the onus on developers not the Councils. This should include a reference to public consultation which is conducted impartially.

7.1.6 says '*Today **urban renewal** in London offers opportunities for the creative re-use of heritage assets and the historic environment as well as the enhancement, repair and beneficial re-use of heritage assets that are on the At Risk Register*'. We strongly support this recognition of the creative re-use of heritage, one of our greatest national assets, and of the need for beneficial use to fund maintenance, not just of assets 'at risk'.

7.1.7 We endorse the definition of significance and importance of setting as well as the asset itself but should add that the condition of the asset is not relevant to its significance.

7.1.8 We strongly agree that deliberate neglect/damage should be disregarded in decision making.

7.11 '*Developments will be expected to avoid or minimise harm to significant archaeological assets*'. Insert 'whether designated or not'.

Policy HC3 – Strategic and Local Views

We welcome the weight given in HC3.F and HC3.G to strategic views but the wording should be made stronger to make Boroughs support local views. LB Wandsworth has reduced the number with the result that protection of key views including those of the Thames have been discontinued.

7.3.3 – the definition of the Wider Setting Consultation Area rightly includes the ‘*background of the Protected Vista*’. However, no detail is given about the extent of the background that will be protected. The London View Management Framework Supplementary Planning Guidance, March 2012, paragraph 176 contains this same protection for protected Linear View 9 from King Henry VIII’s Mound to St Paul’s yet, because the mapped protection stopped short, an obtrusive tall tower has since been built east of St Paul’s which severely affects a viewer’s appreciation of the cathedral. There should be no limit by distance of the extent of background protected from development. (See also HC4.F.3 and 7.4.1.)

7.3.4 Table 7.1 sets out the Designated Strategic Views. An additional River Prospect should be listed – Upriver from Putney Bridge. This is the first bridge, moving upriver, from which the view to one side is largely undeveloped, with Bishop’s Park to the north and the rowing clubs to the south.

7.3.6 *Local views should be given the same degree of protection as Strategic Views.*

We agree – but to do so they must be listed by the Boroughs

Policy HC4 – View Management Framework

HC4.F.3 This, importantly, notes that one should look beyond as well as within the Wider Setting Consultation area, when considering the impact of a development proposal on a Protected Vista. (See also 7.3.3 and 7.4.1.)

7.4.1 See comments under 7.3.3 and HC4.F.3.

Policy HC5 - Supporting London’s culture and creative industries

We support HC5.A.2 to spread cultural facilities more widely across London through locally-distinct clusters.

7.5.11 The link between heritage and cultural offer should be made more explicit, this para should note the importance of historic venues as the backdrop to many cultural activities, frequently enhancing the emotional experience. This is a well evidenced aspect of London’s creative offer.

Policy HC6 - Supporting the night-time economy

Para 7.6.2 We agree that the night-time economy is a valuable asset in the mix of businesses and attractions in Putney. However, many people live in Putney High Street and similar locations with a busy night life and in surrounding residential roads, and it is important that any negative impacts on their quality of life resulting from increased late-night noise late should be minimised, and that this should be part of the borough’s policy and strategy.

Para 7.6.3 In thinking about central Putney’s status in the night-time economy as an area with more than local significance (category NT3), we agree that people are attracted to its various bars and restaurants, including students from Roehampton, people returning from rugby and football matches, and to the riverside in summer. Putney is well placed to capitalise on these temporary populations, and in this regard, it is essential that there is adequate provision of public toilets (see para 7.6.11 and Policy S6 above) and that these are accessible to all.

Policy HC7 - Protecting public houses

HC7.A.1 and HC.7.C .strongly support the case for retaining public houses for their heritage, economic, social and cultural value. We are pleased to note that Wandsworth has designated all pubs as ACVs, and introduced an Article 4 Direction removing Permitted Development rights for change of use. This could be adopted by the GLA, or other Boroughs asked to do likewise.

CHAPTER 8: GREEN INFRASTRUCTURE

Policy G1 - Green Infrastructure - We support this policy.

Policy G2 - London's Green Belt- We support this policy.

Policy G3 - Metropolitan Open Land

We strongly support this policy. We are concerned that Wandsworth Borough Council has failed to apply this policy in some instances and are disappointed that the Mayor has not intervened to protect the MOL concerned.

Policy G4 - Local green and open space - We strongly support this policy.

Policy G5 - Urban greening - We support this policy.

But what is the Mayor to do if boroughs do not develop an Urban Greening Factor?

Policy G6 - Biodiversity and access to nature

We support this policy, especially the reference to 'vegetated railway corridors' as green wildlife habitats.

Policy G7 - Trees and woodlands

We strongly support this policy. The reference in para 8.7.1 to 'private spaces' refers, presumably, to private garden spaces. "*Private gardens make up 24% of London's land area*" says the Mayor's 2017 Draft Environment Strategy. It does seem odd that the draft London Plan hardly mentions private gardens in this Chapter 8. Why is this? There are many fine trees in private gardens - something often appreciated by the general public.

There is ample scope for the Mayor to plant more trees on TfL owned land - why is this not being done?

Policy G8 - Food growing

We support this policy. It is a pity the policy was not applied by the LCC in earlier times!

Policy G9 - Geodiversity

We support this policy. Are boroughs taking this policy seriously?

Whilst these green policies are generally sound and deserving, we wonder whether the Mayor has the ability to secure compliance with the policies - given that so many decisions in these respects are taken by the boroughs with seldom any opportunity for the Mayor to become involved. How can the Mayor secure greater compliance by the London boroughs?

CHAPTER 9: SUSTAINABLE INFRASTRUCTURE

Policy SI 1 - Improving air quality

The policy says clearly enough that "*air quality should be significantly improved*" (para A) and yet the first sub-para then says that "*Development proposals should not (a) lead to further deterioration of existing poor air quality (b) create any new areas that exceed air quality limits.*"

This is not the same thing at all and is a hopelessly feeble response. What is needed is a genuine commitment to improve air quality, not an aim to fail to make it worse (i.e. to do nothing).

Para 9.1.1 goes on to say quite rightly that "*Poor air quality is a major issue for London ... [with] direct impacts on the health, quality of life and life expectancy of Londoners,*" but again (para 9.1.2) turns this in to "*the aim of this policy is to ensure that new developments are designed and built, as far as is possible, to improve local air quality ...*" (emphasis added). This is simply not good enough. Developers will simply argue, as has been seen already, that it's outside their control.

The policy does say later on (para 9.1.3) that with larger-scale areas "*there should be an aim to be Air Quality Positive,*" but no attempt is made to quantify what this would mean in practice, and even here the language of 'should be an aim' is defeatist.

A few more detailed points are made later on (para 9.1.5 and 9.1.6), but by then it is far too late for this limited proposals to be worthwhile. This is not what the Mayor promised Putney when elected.

Policy SI 2 - Minimising greenhouse gas emissions

SI 12.A states clearly enough that "*major development should be zero-carbon. This means reducing carbon dioxide emissions from construction and operation...*" which is we support.

SI 12.C sets targets for reducing emissions, but the establishment of carbon offset funds (SI 12.D) provides an easy escape from actually achieving these targets, so in practice, despite the funds being ring fenced, these are likely to prove ineffective. Every site must do its bit.

And although it is excellent in theory that "*the Mayor is committed to London becoming a zero-carbon city,*" (para 9.2.1), since, as it recognises that London's homes and workplaces are responsible for producing about 78% of the city's greenhouse gases, it is not at all clear how the zero-carbon target can be reached by 2050.

Altogether, these policies are long on aims but completely inadequate when it comes to the means of achieving them.

Policies SI 3-6 No comment

Policy S1 7 - Reducing waste and supporting the circular economy

We feel strongly that there should be much greater intra- and inter-borough commercial waste strategies, with same-contractor collections, to minimise or eliminate the impact of many vehicles from different contractors using the roads at the same time, with the same aim. However, a certain reluctance from traders to move to consolidated waste collections (as in New York) has been noted. This seems a pity, given that in a consolidated service, regulations governing management of waste and promotion of good practice would be easier to enforce, to the benefit of all. The current trade waste situation is often haphazard and difficult to 'police', particularly at weekends, leading to uncollected waste being all too visible, particularly in town centres.

The Mayor is urged to use the Strategy to explore the feasibility of introducing enforceable policies in this regard. Linked to this, an admirable strategic aim would be for all London boroughs to harmonise their waste and recycling policies, practices and procedures, to ensure maximum understanding and take-up by residents and visitors.

We would like to see provision of food waste collection facilities, with all collected waste being transferred to anaerobic digesters. As part of an integrated waste management system, this would reduce the emission of landfill gas or, where incineration is used, CO₂, and would provide a source of renewable energy.

Policies SI 8-12 No comment

Policy SI 13 – Sustainable drainage

We support that in addition to the criteria listed, all new building must be compatible with the Sustainable Urban Drainage Systems (SUDS) requirements. The London Plan includes proposals for increasing building density in some suburban areas which will increase the area of paving as well as building. All such plans should take account of SUDS.

Policy SI 14 - Waterways: Strategic Role

9.14.1. We welcome the emphasis on riverside boroughs working together to develop and update local policies within Thames Policy Areas (TPAs) where they exist e.g. the TPA for Kew to Chelsea which includes Putney. The current PLA Vision for the Thames should also be taken into account as should the views of other groups such as Thames 21, the West London River Group and Thamesbank.

The tributaries of the Thames are of special importance. The River Wandle and the Beverley Brook enter the Thames in our area and we very much appreciate the work carried out by various voluntary groups and the Councils through which they flow in transforming, especially, the Wandle. The Wandle Valley Regional Park Trust now promotes the conservation of the natural environment and the use of the area for recreation and education.

9.14.3 We welcome the establishment of The Thames and London Waterways Forum and would hope that membership can be widened to include river users and other stakeholders.

9.14.4. TPAs We would especially draw attention to the following "*Within TPAs, lower-height thresholds for referable planning applications apply (25m compared to 30m elsewhere)*"

We hope that this will be made mandatory in all areas along the river whether or not they fall within TPAs.

Policy SI 15 - Water Transport

9.15.1. We very much encourage initiatives to increase the numbers of people travelling by river. The Clipper commuter service from Putney Pier is now transporting more and more passengers to and from work down-river and there is a lobby for an all-day service. Both this and an up-river service, especially at weekends, to Richmond and Hampton Court would increase tourist opportunities.

9.15.2. Pier Strategy Where new developments are happening along the river new piers and jetties have been erected to facilitate use of the river for transport and recreation. We welcome this but note that care should be taken to mitigate damage to the ecology of river walls and the foreshore including any archaeological heritage.

9.15.4. Freight Transport We strongly support the development of freight transport by river but note that this will require investment in barges and the training of bargemasters. The fact that Thames Tideway will be transporting much of the equipment and carrying away spoil by river from their works at Putney Bridge is a current illustration of this policy in practice. Pollution from emissions by barges and tugs should be monitored. (See 9.17.3.)

9.15.5 - 9.15.9. Safeguarded Wharves We understand that a review of safeguarded wharves is in progress. They are essential for the facilitation of freight transport. However, as there are none in Putney, we cannot really comment on the situation locally.

Policy SI - 16 Waterways – use and enjoyment

9.16.1. Leisure, Recreation & Sport. Putney's riverside has historically been the focus for rowing, sailing, canoeing and other water-sports. Tourists and others flock to the area for events such as the Oxford & Cambridge Boat Race, the Heads of the River Race and other rowing events. Such large events require crowd control by the police and provision of facilities for the public such as public toilets. (See Policy S6 5.6.1)

9.16.2. Moorings & Houseboats. We note and welcome the increase of boats on London's waterways and appreciate the need for more moorings of varying kinds. These needs have to be managed carefully and we await the publication of the Canal and River Trust mooring strategy. We would strongly support the provision of short-term moorings for casual users.

Whereas there have always been houseboats moored on some stretches of the river the proliferation of these brings its problems. To quote the West London River Group: *“Now there is a threat of long lines of floating houses, sometimes of significant height, which block views of the river. In addition gated entrances and waste bins can obstruct the Thames Path and there are concerns that there may not be appropriate facilities for the disposal of sewage”*. We would agree that, in some cases, permanently moored facilities such as restaurants and bars enhance riverside locations. However we note with some concern the suggestion that *“some residential moorings may be considered as community-led housing”*. To quote the Thames Strategy - Kew to Chelsea: *“As a general principle, any residential moorings should be for vessels capable of navigation and should be permanently occupied”*. In the past the PLA have enforced this regulation but we do not know whether this is still the case.

9.16.3. Thames Path & Towpath. A considerable section of the Thames Path/National Trail and Towpath passes along Putney's river banks and is extensively used by walkers, runners, dog walkers and cyclists the needs of whom sometimes compete and need to be carefully managed. The maintenance of the river walls, revetments and paths falls between the Council and the PLA. The latter are presently carrying out much needed refurbishment and repairs to the revetments and towpath up to Hammersmith. Of particular ecological interest in this stretch are the rare black poplars which are being carefully preserved. The Putney Embankment is a designated conservation area.

There is a significant gap in the Thames Path at Putney Bridge which means that users now have to cross a particularly complicated junction at the southern end of the bridge. A suggested solution already suggested by the Putney Society would be to connect the path through the existing vaults under Putney Bridge. However due to complexities of ownership and lack of funding the project has, for the moment, been shelved until Tideway Tunnel works in the area are finished, but should be included in future proposals.

9.16.4 & 9.16.5. Cultural Strategy. Putney Embankment is already a focus for water sports (See 9.16.1) Many schools have their boathouses on the embankment. A flourishing Art Show and market takes place monthly and the embankment is also the venue for festivals of one sort and another. Riverside Pubs and restaurants are popular and well used.

Policy SI - 17 Protecting London's Waterways

9.17.1. River Restoration. We enthusiastically support the enhancement of the biodiversity, water quality and amenity value of the river. We appreciate what has already been done but realise there is much still to do. We have been working along with Justine Greening our MP to support and monitor the plans for the Thames Tideway Tunnel at their sites at Barn Elms and Putney Bridge.

We have concerns about the increase in the amount of plastic waste entering the river either directly or via sewage outflow. Thames 21 are currently monitoring this through their Riverwatch programme.

9.17.2. Development into Waterways (See 9.16.2 above). We are also very concerned about encroachment into the river. Policy 7.28 page 245 of the London Plan 2011 states "*Planning proposals should restore and enhance the Blue Ribbon Network by ... preventing development and structures into the water space unless it serves a water related purpose*". A particularly blatant example of encroachment into the river is provided by the plans for the new Fulham Football Club which include extending the stands 8m out over the river. There is no excuse for allowing this.

There is no mention of The Blue Ribbon Network. Has it been abandoned?

CHAPTER 10: TRANSPORT

We support the aspirations in the draft Plan to encourage a much greater proportion of trips to be made by foot, cycle and public transport and seek to reduce London's dependency on cars.

We welcome proposals that:

- provide greater step-free access on the Underground and other railways across London and would recommend that the stations at East Putney and Putney Bridge be considered;
- funded proposals be used to improve transport capacity and connectivity. For example, in Putney there may be scope for private investment to help fund a second entrance to Putney railway station thereby providing a better pedestrian link with the nearby East Putney underground station. However we believe that developments that give rise to such investment should be considered in the round. They should not be at the expense of good design or the failure to provide adequate affordable housing;
- improve freight consolidation. However we note that Wandsworth and other boroughs have examined this unsuccessfully before. We would wish to see more detail about how it might be made to work in practice. The draft Plan has an emphasis on new developments but it also needs to address the rapid growth in number of delivery vehicles for home deliveries. One solution might be more centralised collection points for example at railway stations such as Putney where there is ample storage space;
- ensure all operational parking should provide infrastructure for electric or other Ultra-Low Emission vehicles
- encourage more cycling however the cycle hire scheme needs evaluating as it is not well used in Putney. A review might consider how uptake might be improved or whether some existing hire space, for example near the railway station, be released for bike parking. We also recommend that Network Rail work with the rail companies to ensure that unused platforms or 'dead space' is used for cycle parking e.g. at Putney station.

We would also wish to raise the following points:

- Bring forward from 2021 the proposed extension of the Night Tube to passengers using the District line;
- Falling rail and underground usage – we would support an evaluation of the reasons for this decline. Is this trend likely to continue as more work from home or are there other factors?
- Efficiency and resilience can also be promoted by maximising connectivity between different parts. The history of their development leaves too many places where transport routes, notably railways, cross without connecting. The prime local example is the District Line at East Putney / crossing but not linked to the SW Railways line from Waterloo. The same SW Railways line then between Chiswick & Kew Bridge passes under the District and Overground Richmond branch with no connection. We could cite many more examples, including the Overground at Brixton.
- We encourage greater use of river passenger transport. We would welcome an extension to the hours the Clipper Service operates so it covers both off peak in week days but also serves at weekends. It is a greatly under utilised resource which could relieve pressures on the bus, tube and rail networks;
- The GLA and Boroughs should consider simple ways of easing congestion to improve traffic flows. For example, a day time delivery loading ban in Putney High Street has reduced traffic holdups while a longer term problem of an inappropriately located bus garage remains.

- In Putney – and almost certainly in many other parts of London – there is a growing problem with proliferation of delivery companies such as Deliveroo, whose delivery bikes and scooters congest the pavements and areas outside the restaurants they serve. This and the resting drivers from Uber and other big taxi services represent a large population with nowhere to park, and often no access to toilets etc.

Policy T8 - Aviation

We believe it should be made explicit that any proposal for airport expansion should include the need for infrastructure for movement of cargo by rail. Otherwise an increased air freight capacity at Heathrow will inevitably lead to increases in road deliveries.

We urge the need to review the noise impacts from helicopters. Traffic using the Battersea heliport is causing high levels of disturbance and we are concerned that this might increase once the Nine Elms developments are completed.