

### South Fulham Riverside Supplementary Planning Document (SPD) Consultation Summary Report – December 2012

#### 1 INTRODUCTION

This report summarises the outcome from the consultation on South Fulham Riverside draft SPD March 2012. The consultation period ran from Friday 30<sup>th</sup> March 2012 until Friday 11<sup>th</sup> May 2012. Representation after this deadline have been included in the Consultation Summary Report Schedules in full as well as included in this summary report.

#### 2 METHOD OF CONSULTATION

A variety of consultation methods were used during the six week consultation period to ensure information regarding the draft SPD was made aware to a broad range of people.

##### 2.1 Consultation Newsletter

A newsletter which included details regarding the impending consultation on the South Fulham Riverside Draft SPD was distributed to properties in and a substantial area around the regeneration area at the beginning of the consultation period.

The article in the newsletter provided background information to the SPD and explained the key priorities regarding new homes, roads and transport, design, use of the river and community facilities. It invited residents to comment on the future of South Fulham Riverside, set out the dates for drop in sessions and advised regarding how to view the documents through the website. It also provided an email address and postal address regarding where to send comments.

The Newsletter was also made available on LBHF's website.

##### 2.2 Public Notice

A public notice was placed on the Hammersmith and Fulham Chronicle on Friday 30<sup>th</sup> March 2012. The public notice introduced the subject matter and area covered by the SPD, the period in which representations can be made, the address where comments need to be sent and where the SPD is available for inspection during the consultation period.

The Public Notice was also made available on LBHF's website.

##### 2.3 Press Release

A press release encouraging residents to have their say on the future of South Fulham Riverside was released on 2<sup>nd</sup> April 2012. It also provided details regarding the drop in sessions, the deadline for comments and had a link to the South Fulham Riverside page on LBHF's web site.

##### 2.4 SPD Distribution

A copy of the SPD and supporting information was sent to organisations who requested it.

Copies of the SPD and supporting documentation were also made available for inspection at the following locations.

- Fulham Library, 568 Fulham Road, Fulham, SW6 5NX.
- Duty Planner Office. First Floor, Hammersmith Town Hall Extension, King Street, London, W6 9JU

The draft SPD and supporting documents were made available online on the LBHF website [www.lbhf.gov.uk/southfulhamriverside](http://www.lbhf.gov.uk/southfulhamriverside).

## 2.5 Letters and E mails

An e - mail was sent to all people who commented on the first draft of the South Fulham Riverside SPD in April/May 2011 notifying them of the consultation period, where to view the documents as well as the deadline and ways to comment.

Approximately 1,500 individually addressed letters were sent to statutory consultees and individuals and groups on the LBHF Local Development Framework database that included special interest groups and resident organisations.

The letter introduced the Revised Draft SPD, advised where to view the documents and invited comments.

## 2.6 Drop in Sessions

Three drop in sessions were held at the following times and locations during the consultation period. Each session was based around display boards summarising the key principles of the draft SPD. Hard copies of the draft SPD were made available. LBHF staff were on hand to answer queries.

- 12.00 – 2.00pm Tuesday 17<sup>th</sup> April 2012 – Wharf Rooms Imperial Road
- 5.00pm – 8.00pm Wednesday 18<sup>th</sup> April 2012 - Wharf Rooms Imperial Road
- 10.00am – 1.00pm Saturday 21<sup>st</sup> April 2012 – Wharf Rooms Imperial Road

## **3 CONSULTATION FINDINGS**

**3.1** In total of 83 written responses were received from a wide range of respondents including individuals, residents, landowners, developers, resident groups, statutory organisations and a range of special interest groups. Responses to each of these comments have been recorded separately in separate schedules for each chapter in the Consultation Summary Report Schedules which are available on LBHF's website. The following summary of comments by chapter identifies themes and trends.

### **3.2 General Comments**

A total of 18 comments were received.

Four comments support the adoption of the South Fulham Riverside SPD. RBKC comments that the adoption of the SPD extends the collective vision

for high quality regeneration of the Thames riverside that is fully supported by them.

One comment registered deep concern regarding the council's summary of responses from the first round of consultation not including details regarding deep concern residents had regarding building heights. One comment raised concern that the SPD includes guidance and is not enforceable.

The Fulham Society welcomes the involvement of the Princes Foundation in the early stages of the preparation of the SPD and generally supports the second draft of the document. They are however concerned that the SPD is quite generic and capable of wide interpretation. They also recommend that low density development is proposed in keeping with the current area.

Thames Water Utilities commented that the SPD should be updated to have due regard to the policy support for the Thames Tunnel project, the DCLG Safeguarding Direction and the safeguarded wharf status of Hurlingham Wharf. The Environment Agency remains supportive of the SPD and is pleased that the majority of comments recommended in their previous response have been incorporated.

### **3.3 Chapter 1 – Vision**

A total of 3 comments were received on this chapter.

Natural England welcomes the proposals for new public spaces and improvements to the Thames Path. The Port of London Authority expressed concern that the vision should highlight objectives in the London Plan and Core Strategy regarding a focus on transport uses, freight and passenger for the river rather than leisure, recreation and sport. One organisation supports the vision.

### **3.4 Chapter 2 – Introduction**

A total of 10 comments were received on this chapter.

Two comments raised concern that although LBHF are consulting on the draft SPD they have not considered the comments and have made very few changes to the SPD as a result. Two comments believe LBHF has not fulfilled its obligation to proactively engage with local people setting out in simple terms the key impacts regarding height, density, transport and traffic. One organisation believes the council has not engaged effectively with the local community in the early stages of the preparation of the SPD in line with the NPPF and the Council's "Statement of Community Involvement" and the consultation methods were ineffective.

One comment supports the information in the Emerging Design Principles regarding "Architecture – Height Massing and Density". One organisation supports the Council's aspiration to enhance the Thames Path. The Port of London Authority raises concern that the set of "Emerging Design Principles" does not include the London Plan's policy that new developments adjacent to safeguarded wharves should be designed to mitigate any potential conflicts with cargo-handling.

### **3.5 Chapter 3 – Executive Summary – No Comments received.**

### **3.6 Chapter 4 – Contextual Overview**

A total of 27 comments were received on this chapter.

One comment opposes the closure of the Sands End Community Centre and its relocation of services to Hurlingham and Chelsea School as it is not centrally located. Two comments want to see improvements to youth club provision in the area and did not agree with the statement in the SPD that the area has numerous community halls. One comment believes the text implies the youth club in Townmead Road is council run and this should be amended. One organisation comments that the shopping facilities at Imperial Wharf should be recognised as providing neighbourhood shopping provision. One comment raised concern that low income households will be squeezed out of the area when the new 80% of market rents are introduced.

One comment requests the safeguarding of wharves on Carnwath Road lifted as the historic reason for safeguarding is no longer relevant in the contemporary context. One organisation raised concern that Swedish and Comley's wharves have not been identified as having the potential for redevelopment as is the case with Hurlingham Wharf. The Port of London Authority comments that the vacancy at Hurlingham Wharf has nothing to do with non viability for cargo handling as there is substantial operator interest in reactivating the wharf. Also Hurlingham is identified for development but the SPD does not identify any sites to relocate wharf capacity to hence it is contrary to the London Plan and Core Strategy. One organisation wants it emphasised in the SPD that the last occupier of Hurlingham Wharf vacated the site as they considered it no longer viable to operate from it. One comment requests details are included regarding the Mayors recent review of safeguarded wharves.

One comment believes that the area has a neglected run down feeling because of poor quality of development that has been allowed and a lack of maintenance of the riverside walk. One organisation commented that although the National Grid site is identified as potentially coming forward for redevelopment in 10-20 years that there is a good likelihood that this may come forward earlier. One organisation believes it is misleading to describe Piper building as seven storeys tall as the floor to ceiling heights are much greater than standard residential which means it is in fact 10/11 storeys. One organisation requests that as they intend to submit planning applications on Whiffin, Hurlingham and Carnwath Road Industrial Estate in the immediate future that these are identified as "current applications developed in 0-5 years". One organisation comments that the Land Use map implies Imperial Wharf is just residential rather than highlighting all the other commercial and leisure uses that it offers. One comment raised concern regarding the onerous restrictions on the use of Imperial Wharf Park.

One comment raised concern that from Chelsea Harbour it is hard for cyclists to access the riverside walk, also better cycle paths and better signage especially at Wandsworth Bridge should be sought. Two comments welcome improvements to the Thames Path. One comment wants more emphasis made of the congestion at Wandsworth Bridge Road and the importance of

diverting traffic elsewhere. One comment queried whether the Council had given up on the long term aim of a tube station on Crossrail 2. One comment requests that Clancarty, Settrington and Woolneigh Roads are classified as local roads to stop them from being used as through roads for motorists.

One organisation comments that the PTAL is higher demonstrating that the most accessible sites in the area as Albert and Swedish wharves however they are not considered as sites with potential for development and should be along with Comley's Wharf as the SPD states there are limited opportunities to increase the PTAL in the area. One organisation requests that the PTAL map is updated to reflect accurate PTAL ratings for Imperial Wharf and Chelsea creek sites.

### **3.7 Chapter 5 – Planning Policy Context**

A total of 17 comments were received on this chapter.

Thames Water Utilities commented that Thames Tunnel (TT) is included in the now adopted National Policy Statement (NPS) for Waste Water (2012) as a nationally significant project. They recommend that the NPS for Waste Water should be referenced in this chapter of the SPD and afforded considerable weight and should be considered as part of the evidence base for development plan documents including South Fulham Riverside SPD. They also confirm that given the policy support for the TT at a regional level, the requirements in the NPPF and support in local policy Thames Water are keen to work proactively with LBHF to align the TT project with the aspirations of the Council for the South Fulham Riverside Area.

One comment wants recognition of the value of local shops included and that to ensure people have access to local shops small units must be included with rents set at realistic levels to encourage sole traders. One organisation comments that the references to London Plan and Core Strategy are not necessary as the SPD should be read alongside these development plan documents. The same organisation comments that Figure 5.2 should be updated to also show the Imperial Square and Gasworks Conservation Area as a large proportion of it covers the SPD area.

One comment raises concern that poor quality development has taken place in and around the regeneration area hence welcomes the emphasis on “a very high standard of urban design” in the SPD. H & F Disability Forum raised concern that London Plan Policy 7.2 on accessible environments has not been referred to throughout the SPD instead the Access for All SPD has been relied upon that will shortly be replaced LBHF Development Management SPD. One comment believes that the SPD should be clear regarding the types of development that should be prohibited and set clear guidance on the heights and density of new development. One comment proposes that due to the lack of open space and nature conservation areas that the whole of South Park is designated as a Nature Conservation Area.

One organisation commented that the 2,200 target for new homes identified in the Core Strategy should be identified as a minimum target as new homes would exceed this target.

One organisation objects to reference to a new link road and new area of green space on the National Grid site that will add an unreasonable financial burden threatening the viability of developing the site which is contrary to the NPPF.

### **3.8 Chapter 6 - Issues and Objectives**

A total of 3 comments were received on this chapter.

Natural England supports the key objectives especially “protect and enhance biodiversity and nature conservation” and “promote high quality urban design and enhance the public realm. Emphasis should be placed on seeking opportunities to provide green infrastructure and soft landscaping in addition biodiversity and the natural environment can also provide opportunities in health, recreation, climate change adaptation and improving quality of life.

One organisation supports these key principles and demonstrates how potential redevelopment of the Curry/PC World site could deliver in response to these objectives. One organisation considers the objective “to increase the use of the river and riverside for leisure, transport and educational uses is too ambiguous and should be more specific.

### **3.9 Chapter 7 – Area Planning Framework and Land Use Strategy**

A total of 65 comments were received on this chapter.

Two comments generally support the key principles regarding Area Planning Framework and Land Use. One comment supports the proposed residential development as opposed to the Thames Tunnel Sewer.

One comment wants to see the introduction of a pier from which a river bus can work effectively. One comment is concerned that expansion of the Wandsworth Bridge junction will bring more lorries down Carnwath Road.

One comment wants affordable housing and mixed communities to be prioritised. One comment states that the nature of housing typologies should be left to the developer to consider in response to the market. One organisation would like it to be clear that the council is not limiting new homes to an additional 2,200. The SPD should be explicit regarding the location of tall buildings.

One comment supports new open space in the regeneration area. One comment would like to see soft landscaping as opposed to hard landscaping. One comment is concerned that the regeneration area has inadequate open space and as well as new space in the east of the area there should also be additional space at the Wandsworth Bridge location. One organisation objects that children’s play space should not be available to the wider public but specific to the scheme.

One comment requests that genuine workspaces are provided that can be used by locals. One comment disagrees with the principle of retaining existing employment or seeking replacement opportunities as this conflicts with the overall aim to deliver residential led mixed use development. One

organisation wants the SPD to make clear that it is not a requirement to provide new retail in the western part of the regeneration area due to low footfall. One comment would like the PC World site and Industrial Park preserved for employment to protect jobs. One comment is concerned about destroying existing successful businesses.

Two comments request that the SPD is more specific regarding the types of community uses required to support the regeneration. One organisation is concerned that community facilities are not proposed in a location central to the regeneration area.

Fifteen comments support a river transport or river use on Hurlingham Wharf as it is a safeguarded wharf. Fourteen comments support similar land use restrictions on adjoining Whiffin Wharf. One comment rejects any residential development on the wharf sites. One comment supports the potential for dual use on safeguarded wharves but wants this to specifically apply to Comleys and Swedish Wharves. One organisation wants the three safeguarded wharves treated the same rather than as currently proposed “seeking consolidation on wharves east of Wandsworth Bridge” and to be informed by the Mayors review of safeguarded wharves. One organisation wants all safeguarded wharves to be identified as development opportunities for residential led mixed use development. The Port of London Authority (PLA) and GLA and another organisation would expect the SPD to include details regarding how consolidation east of Wandsworth Bridge Road could occur, at present it doesn’t conform to the London Plan. The GLA wants the SPD to emphasise the importance of development proposals adjoining safeguarded wharves. Two comments support the principle of consolidating wharf use east of Wandsworth Bridge. One comment notes that bringing Hurlingham back into wharf use is not feasible or viable. One comment notes lifting the safeguarding on Hurlingham Wharf is against the Mayors recommendation. The SPD is premature in its approach to remove the safeguarded status of Hurlingham and it should be removed from consideration for residential and commercial development. The GLA commented that they remain committed to bring safeguarded wharves back into river freight uses.

Four comments strongly oppose the location of the Thames Sewer Tunnel on Carnwath Road sites and one organisation wants the SPD to clearly state this opposition. Thames Water Utilities confirm their support for the regeneration of the area and believe the Thames Tunnel (TT) proposals can take place alongside and support the vision for South Fulham Riverside. The SPD should be amended to accommodate the TT and the SPD should be amended to ensure conformity with the NPS for Waste Water 2012 and other London Plan policies. The SPD is wrongly drafted in that no other adjoining sites to Whiffin, Hurlingham and Carnwath Road industrial estate will be required for TT.

### **3.10 Chapter 8 – Housing Strategy**

A total of 17 comments were received on this chapter.

Two comments expressed concern that there will be a lack of social housing in the regeneration area. One comment expressed concern that there is not enough land available to provide for 2,200 new homes. One comment believes the SPD should be more explicit on the criteria for affordable housing

and set targets for each type of tenure. One comment expressed concern that affordable housing target is often ignored by developers.

One organisation opposes the reference to the percentage mix of units from the London Strategic Housing Market Assessment 2008 as instead a more flexible approach should be taken responding to the market.

One comment supported higher buildings on Chelsea Creek/National Grid site. One organisation expressed concern that lower buildings should apply west of Wandsworth Bridge Road in order to respond to local context.

One organisation expressed concern regarding the amenity space requirements of 36sqm and 14sqm as excessively onerous. One organisation objects to the provision of play space on all new residential development.

One comment objected that Watermeadow Court is being demolished and the opportunity has not been taken to provide large family homes or key worker accommodation. One comment expressed concern regarding who the new homes were being built for.

### **3.11 Chapter 9 – Urban Design Strategy**

A total of 105 comments were received on this chapter.

Eight comments support the SPD's aim to open up the riverside and make it an appealing destination with buildings at 4 – 6 storeys and some at 7 on the riverfront and are not opposed to a couple of finer grain buildings at 10 storeys. One comment was on the poor quality of new development on the riverside that should not be repeated in the regeneration area. One comment noted there is no sense of community at the Imperial Wharf development as properties have been bought by investors who are often absent. One organisation wants Swedish and Comleys wharves identified as regeneration areas on the plans in the same way as Hurlingham.

RBKC felt that the design guidance in the chapter was too generic and woolly and may prove ineffective in managing development proposals to a high standard. The Key Principles should be revisited to ensure they are comprehensive and the principles are expanded upon in the remaining sections. The spatial framework could do more to ground the key design principles. A map illustrating preferred building heights would be helpful. There is insufficient justification provided for increased height on the riverside. RBKC are concerned that there is no definition of a tall building contained within the section and they are concerned regarding the impact of a tall building on the adjoining Royal Borough. The chapter underplays how connectivity could be improved with the wider Lots Road /Kings Road area.

Ten comments want to see lower rise housing. Four comments are concerned the proposed new buildings are too high and will dwarf and overshadow existing buildings. Five people comment that proposals for heights up to 7 storeys and even 10 are too high because the strip of land south of Carnwath Road is narrow and to the north there is predominantly 2 storey housing, two organisations therefore proposed there should be a height limit of 4 storeys. Two comments support the proposals put forward by the Princes Foundation for human scale development and want the guidance



amended to max five to six storeys. One comment raised concern that high buildings would cast shadows. Two comments profoundly disagree with buildings of 10 storeys, one considers most buildings should be around 4 storeys and seven should be the maximum for a few. One comment proposes that the area on the river in front of the Piper Building wants should be landscaped and buildings no higher than Broomhouse Lane Estate. One comment notes as a number of tall buildings have been approved and medium density is the maximum that can be supported due to highway constraints can the remaining areas are spared high rise buildings. One comment suggests that all buildings be limited to 6 storeys with all storeys above the 4<sup>th</sup> set back. One comment wants to see building heights on Carnwath Road not to exceed the residential buildings which they face stepping up to four storeys on the river and at low density. One comment disputes the guidance that buildings west of Imperial Road should be lower than west of Wandsworth Bridge Road when the local context has higher buildings. One comment notes that high rise new build developments do not attract local households or families with children.

One organisation supports increased height and massing fronting the Thames due to its setting and the scale of buildings on the Wandsworth side. One organisation feels the SPD is too restrictive in naming only two areas for increased height and massing and requests that as PTAL is highest at Wandsworth Bridge and the emerging townscape includes taller buildings that this is also highlighted as an area for increased height and massing. One organisation supports the proposal that taller elements could act as visual signals in the townscape and that Imperial Wharf should be one of these. One organisation raised concern that a limit of 10 storeys maximum west of Wandsworth Bridge Road will unnecessarily limit the residential output in the regeneration area; a high quality design led approach would enable the appropriate siting of buildings of variable height whilst optimising the density achieved. Also the SPD would benefit if it included details regarding the height of buildings as this allows more accurate comparison between existing and proposed development. One organisation supports buildings up to seven storeys in height however it should be recognised that there may be circumstances outside of focal point areas where greater than 7 storeys is acceptable.

The Fulham Society does not want tall buildings permitted close to the river walk. They consider there should be a maximum of 5 storeys and are against inward looking closed residential developments instead development should be open, encourage through access, small parks and main entrances should look out onto roads. They can find no reference to the Fulham Wharf Pontoon but want it retained and a suitable use found for it.

Two comments believe the river should not be cut off by a wall of high rise blocks. One comment believes that the guidance in the SPD will not achieve reconnection of the hinterland with the river as it intends. One comment believes people should be able to see the river and have greater access to the Thames Path. Natural England welcomes improvements and realignment to the Thames Path and the commitment to provide new public space. One comment wants seating on the public realm/river walkway to be designed to accommodate the elderly and disabled. One comment proposes gardens and green areas on top of buildings. One comment believes that Imperial Wharf Park is not serving the local community.

One comment highlighted the importance of buildings to human scale at ground floor level and that wording should be used to discourage the interpretation of “green buffer space” as invisible gardens behind fortress hedges.

One comment highlighted the importance of retaining existing heritage buildings connected to the past and wants Fulham Wharf to be rescued even if it's just a few facades. There are also river related artefacts along the river that should be preserved. The area should be encouraged to evolve as a high quality urban quarter at a scale sufficient to enclose the river. Concern was also expressed that public realm will be publically owned and managed which gives the opportunity to exclude people as is the case with Imperial Park. One comment thought event spaces on the river should include green space and that the SPD should stipulate that indigenous plants should be used and those that are known to attract pollinators. One organisation does not agree that all new development should provide a level of public space provision or that there should be general provision for play space on all development sites.

English Heritage has concerns regarding how heritage assets will be preserved and enhanced in accordance with the NPPF and that the Sustainability Appraisal has not appropriately assessed the potential impacts on heritage assets. To accord with the NPPF the word “conserve” should be substituted for the word “preserve”. They have concern regarding the contradiction between development of a sufficient scale to enclose the river and the aims of the Sands End Conservation Area Character Profile that new development should open up views of the river. The River Thames should be included as a heritage asset and the heritage section should demonstrate an understanding of heritage in the regeneration area in the broader context. English Heritage requests a fuller rationale for the two key focal points identified for tall buildings.

One comment would like to see a river bus service, water taxis, boating amenities, floating homes, urban beaches, restaurants with a proper river frontage. This area should offer a destination to visitors looking for riverside recreation. One comment wants Breer Street and Dymock Street to continue down to the river.

One comment states that architecture should borrow from the industrial vernacular. One comment wants more architecturally unique developments that encourage maximum use of the river. One comment wants more architecturally unique developments which will encourage use of the river and three comments want it to be an improvement on what's been produced on the other side of the river.

### **3.12 Chapter 10 – Development Capacity Study**

A total of 14 comments were received on this chapter.

One comment expressed a desire to have visual variety in the regeneration area taking inspiration from existing tight knit grain and old wharves. One organisation supports the guidance regarding building heights east of Wandsworth Bridge Road at 3 – 7 storeys with some higher buildings but considers account needs to be taken of PTAL levels and density guidance in

the London Plan and surrounding context when considering tall buildings. Consequently they consider there should be a tall building as a visual marker on around Albert and Swedish wharves and this should be recognised in the SPD. One comment believes we have to be careful regarding the height of buildings as they relate to the hinterland as well as on the riverside. One organisation believes the SPD is too prescriptive regarding its approach to height and massing

Thames Water expressed concern that the Carnwath Road sites (identified by them as potential sites for the Thames Tideway Tunnel) are identified in the SPD for early development which they consider is not required as there are sufficient sites in the pipeline that will contribute to the early transport infrastructure required. In addition the SPD pre judges the outcome of the safeguarding review in its approach regarding the development of Hurlingham Wharf.

One organisation raises concern that the 40% affordable housing is a borough wide target and flexibility should be applied to reflect site circumstances including viability. One organisation considers that policy guidance provided in this chapter is duplication and should therefore be deleted. The same organisation believes that the massing models included in this chapter could be inappropriately used to prescribe layout and massing of development. One comment requires that open space and children's play space must conform to the latest London Plan guidance.

Two organisations believe there are flaws in the Transport Study that therefore unnecessarily restrict density. Two comments expressed concern that the proposed density will impact adversely on the infrastructure of the area, especially traffic. One organisation is concerned that the Core Strategy and Transport Study should not be solely used to direct the level of appropriate density; it should consider other issues like site specific characteristics and local need. One organisation believes the council can still meet its target housing numbers in the Core Strategy delivering a low density scenario.

### **3.13 Chapter 11 – Transport Interventions**

A total of 98 comments were received on this chapter.

One organisation commented that the images in this section were poor and should be improved.

Three comments raised doubt that transport interventions can accommodate the increase in cars. H&F Disability Forum welcomes the proposed transport interventions as they are much needed to assist disabled people.

Four comments request that the SPD updates and strengthens its support for a new pedestrian and cycle bridge between Imperial Wharf and Battersea. RBKC also support this proposed intervention. One organisation points out that the railway bridge is a listed structure and that some of the land required to construct the bridge is in private ownership.

Three comments support the aim to deliver a fully connected riverside walk. One comment considers that as the Thames Path is a long distance

nationally designated walking route that priority should be given to pedestrians where it is not convenient or safe for multiple uses. Two comments suggest the riverside walk could include a cycle lane so that cyclists can avoid the main roads.

One comment disagreed with the proposed extension and enlargement of the 424 bus route and considers it is unclear regarding its entire route. H&F Disability Forum welcome the improvements to the 424 and 391 buses that will make a real difference to disabled people. It would be useful if these could be implemented to mitigate the adverse impact of the move of the library and other community facilities to Hurlingham and Chelsea School. One comment suggests the introduction of bus bays so buses can pull in and not make the traffic wait. RBKC consider that this chapter should also include details regarding the potential extension of the C3 bus route northwards that would increase the destinations available and another route that could serve the area is an express bus service via the embankment to Victoria that would help relieve capacity constraints on the District Line. One comment was not convinced that the 424 bus should operate outside the existing hours.

Seventeen comments support the use of Hurlingham Wharf as a terminal for transport on the River Thames.

One comment supports a new link road from Imperial Road to Kings Road. One organisation supports the new timescales identified in the Transport Addendum for a new link road through to Kings Road in 15 plus years when the National Grid site is developed. Although not opposed to improving physical linkages through the gasworks site to the Kings Road they are concerned that the current proposals are not acceptable. RBKC have serious concerns regarding the transport study findings that the medium density quantum of development would generate an 18% increase in eastbound traffic flows onto the Kings Road in the morning peak, this impact has not been modelled and there are no mitigation measures proposed in the transport interventions section.

Three comments are particularly concerned regarding additional traffic on the already busy Townmead and Carnwath Roads and one considers the Jacobs transport study underestimated the level of additional traffic significantly. In addition the data gathering was undertaken when schools were closed so there was less traffic than there would normally be. Two organisations support the expansion of the Wandsworth Bridge junction however one is concerned that Swedish and Comleys wharves would need to be highlighted as sites with potential for development if land were required from them and if the other objective were to be achieved of delivering a continuous riverside walk. Also the brief given to Jacobs may have pre-determined the preferred solution without a thorough technical appraisal of potential solutions. One comment believes there were flaws in the Jacobs transport studies that have skewed the results and that the increased density proposed in the area will dramatically worsen this situation. One organisation queried why the outcome from the transport studies put restrictions on medium density residential numbers and not just the commercial.

One organisation believes elements of the transport study have been overestimated regarding future traffic flows hence underestimating the ability of sites to be developed at higher density levels. They are concerned regarding the modelling assumptions, the design of the junction and the

accuracy of data presented in the Jacobs reports. They want to work with the Council to further limit the land take from the sites as proposed in the options presented in the draft SPD.

Another organisation is concerned regarding the potential detrimental impact on the operation of the Porcelanosa store and car park linked to the proposed junction expansion. They also question some of the evidence in the Jacobs transport studies especially regarding the modelling and the base data used and that the council have failed to consider alternative proposals.

One comment considers that car restraint policies would be very unpopular with existing residents and two comments propose there should be a parking space for every home built, these should be underground car parks. Two organisations comment that recent studies have show that there is no link between car ownership and car use hence providing car parking should not necessarily contribute to road congestion.

One comment considers that pedestrian crossings are needed now to assist in crossing Carnwath Road as this would provide a direct and quicker route to terminals on the river and would provide welcome relief to the already congested bus and underground routes. One comment raised concern that there should be a pedestrian crossing at the junction of Townmead and Imperial Roads. One comment considers it is important to make Wandsworth Bridge more acceptable to pedestrians.

One comment raises concern that the information regarding usage of Imperial Wharf station is out of date and therefore the impact of new residents on this station has not been adequately assessed. RBKC supports continued capacity enhancements to the West London Line and the District Line as well as identification in the DIF Study of contributions to lengthening platforms at Imperial Wharf station. One comment raised concern that the tube lines accessed by those living west of Wandsworth Bridge Road are already very overcrowded.

Thames Water Utilities point out that the early development and financial contribution from the Carnwath Road riverside sites is not vital to fund essential transport infrastructure improvements as a number of sites have already been approved that will fund these improvements as detailed in the DIF Study. Also the Council should review its strategy for South Fulham Riverside to ensure that assumptions regarding infrastructure funding reflect the delay to sites as a result of the Thames Tunnel construction.

One organisation queried the accuracy of the figure detailing PTAL levels as being too low on the Chelsea Creek sites. One comment considers the PTAL is not a useful measure and PAWP index should be used instead.

One comment raised concern that it would be useful if the road could be opened up for cars between Townmead Road into lots Road.

RBKC comment that there is an opportunity to create a link between the two boroughs across the West London Line which it strongly supports however this has not been identified in this chapter neither has funding been identified in the DIF study to deliver this.

One comment raised concern regarding the use of Dymock and Breer Streets for rat running.

### **3.14 Chapter 12 – Social Infrastructure**

A total of 13 comments were received on this chapter.

Natural England welcomes the advice regarding open space in this chapter and has provided general guidance regarding considerations regarding access to open space. One organisation wants the SPD to be more specific regarding the requirements for new areas of open space. One organisation objects to the obligation to provide new areas of open space to meet the needs of new residents and a fair and reasonable approach would be to distribute the open space allocation across a number of new sites identified for development. One organisation objects to the provision of play space on all development sites.

One organisation advised that text and maps should be updated to reflect the closure of the Sands End Community Centre. One organisation advised that they could not find details regarding plans for further facilities relating to adult education, primary school space, nurseries or doctors surgeries. One organisation commented that information regarding Library and Community Services is incorrect and that promises given when the Sands End Community centre closed that appropriately accessible services would be provided has not been fulfilled. One organisation welcomes the proposal for a community safety hub.

RBKC support the approach taken in the SPD to ensure there are adequate social and community facilities to support the growth in new homes. In order to avoid putting pressure on adjoining RBKC these facilities need to be ready for use prior to the occupation of new units. RBKC also has concerns regarding the proposed location of education and health facilities which they consider relatively distant from sites in the east of the regeneration close to the boundary with RBKC.

The NHS Healthy Urban Development Unit question the assumption in the SPD that if there was growth in the area of 4,000 additional homes that this would not necessitate the provision of new health facilities.

### **3.15 Chapter 13 – Environmental Strategy**

A total of 19 comments were received on this chapter.

Natural England would like the SPD to define “major development” that triggers the requirement for an Environment Impact Assessment.

Thames Water Utilities are pleased to see many changes have been made to the draft SPD following their comments on the first round of consultation. Thames Water Utilities wants the text amended that the combined sewer overflows do not cause sewer flooding but allow the sewers to overflow into storm relief sewers on the River Thames when capacity is exceeded.

The Port of London Authority (PLA) supports the SPD's approach to using the river for construction of riparian developments.

One organisation raised concern that as the regeneration area contains safeguarded wharves it is considered excessive to require that internal noise levels beyond "reasonable" in accordance with the BS8233 guidance are provided.

The Environment Agency support the way flood risk, biodiversity and contaminated land are dealt with in the chapter. However there are few changes to make to ensure the guidance is consistent with national policy, the section does not refer to Ground Source Heat Pumps in relation to decentralised energy. In addition the section remains incorrect in relation to when a site specific Flood Risk Assessment (FRA) is required. They also recommend that text is updated in relation to Flood Defence Consent within 16m of the River Thames tidal flood defences.

One comment raised the issue that new development should strengthen flood barriers and defences, in addition new high buildings should avoid creating wind tunnels. Two comments raised concern regarding the extra sewage and water capacity that will be required to cope with the growth. One person supports the key principles.

### **3.16 Chapter 14 – Delivery and Implementation Strategy**

A total of 11 comments were received on this chapter.

RBKC welcomes the DIF study but believes it is important that it considers the potential impact on the adjoining borough's facilities by considering appropriate walking distances to services.

Friends of South Park greatly welcome the council's commitment to improve facilities and infrastructure in South Park detailed in the DIF study.

TfL welcomes the DIF study and associated Transport Study however requests more information on how this will work in practice. The GLA also welcomes the DIF study however they are concerned regarding there being no useful guidance to the council or certainty for developers in respect of how section 106 contributions would be negotiated prior to the borough CIL charge being adopted in 2013.

One comment requested that the St Michael's centre in Townmead Road is added to the list of recipients for infrastructure funding.

### **3.17 Chapter 15 – Appendices**

A total of 8 comments were received on this chapter.

Port of London Authority (PLA) comments that the vacancy mentioned at Hurlingham Wharf relates to the aspiration of the owners rather than the viability of the wharf and operator demand.

Friends of South Park (FOSP) comments that it states that South Park is well catered for in terms of sports facilities yet chapter 7 recognises that improved facilities are needed for South Park. Also FOSP experience is that facilities are not closely monitored to ensure they do not suffer from over use.

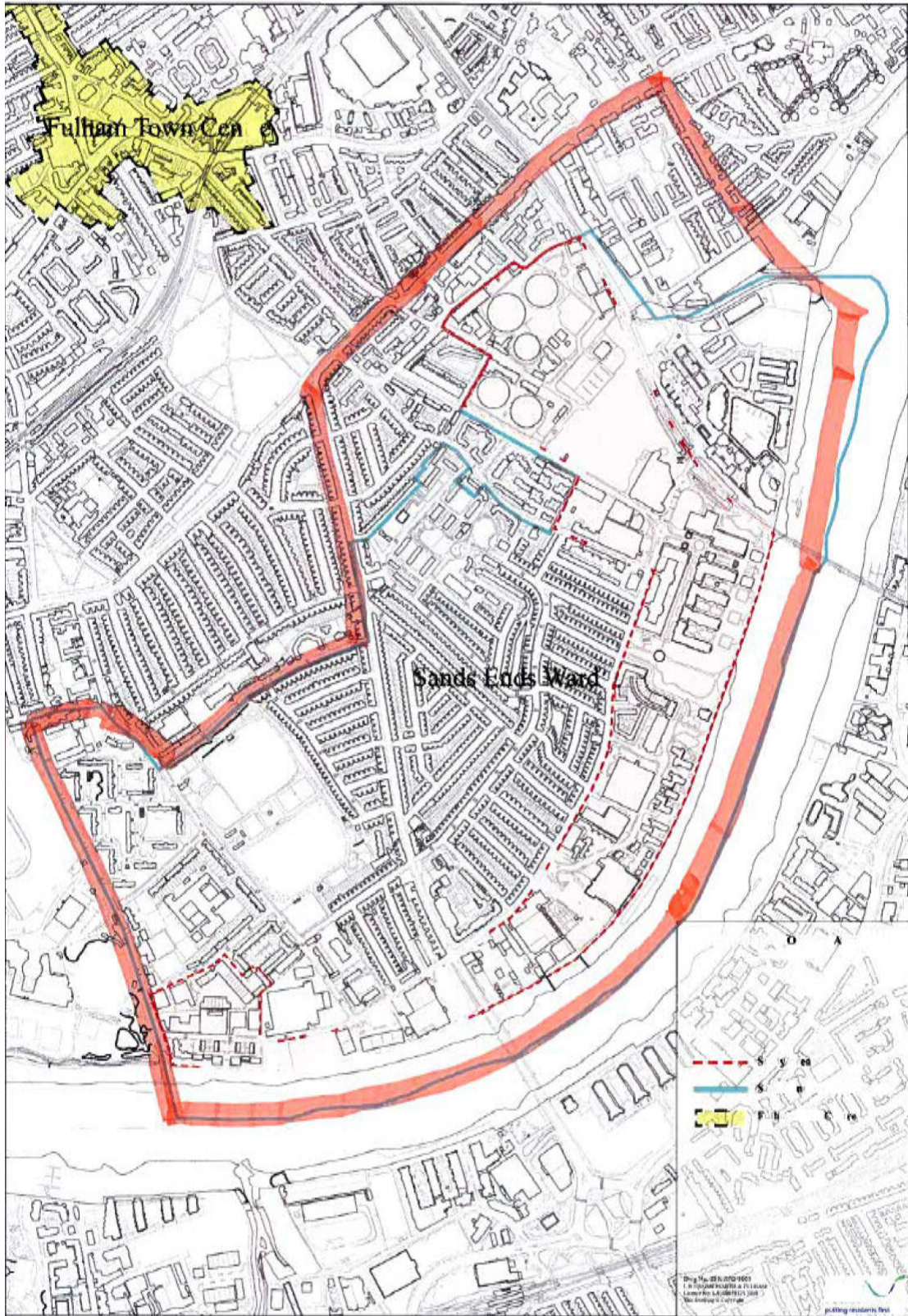
A comment has queried the description of building heights along Carnwath Road as not being accurately described. Another requested that the paragraph regarding the community centre should be updated regarding the closure of Sands End Community Centre.

### **3.18 Sustainability Appraisal – Supporting Document**

A total of 4 comments were received.

English Heritage would recommend that the SA identify the role of the River as an undesignated heritage asset. The section on heritage and the built environment should include modelling of the potential mass and scale of the development, particularly along the waterfront, in order to identify and overcome any tension between proposals and the conservation and enhancement of heritage assets. Natural England believes overall the Sustainability Appraisal covers the issues and themes that they would expect to see considered by such a document.





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