



Planning Applications  
2 Adelaide Road  
London SW18 1DA  
f.a.o. Julia Kelly

176 Upper Richmond Road  
London SW15 2SH

8 September 2023

Dear Julia

**Planning Application 2023/3112**  
**Vehicle hardstanding at 3 Luttrell Avenue SW15**

This application should not have been validated since none of the photos are legible in the form visible on the Council's website. Other than the dimensions on the sketch of a hardstanding big enough for 3 cars, marked as 'reinforced', there is not sufficient detail to see what is proposed.

We also OBJECT to the proposal. What we can see fails to meet the requirements of the following policies in the 2023 Local Plan:

Strategic Policy LP1 (The design led approach) requires

*A.2. a high-quality, sustainable design and layout that enhance and relate positively to the prevailing local character - and*

*A.10. an integrated approach to hard and soft landscape design which maximises urban greening,*

Strategic Policy LP2 (General Development Principles) only allows development that

*B.4. would not compromise the visual amenity of adjoining sites.*

Strategic Policy LP3 (Historic Environment) also applies here in a conservation area, and wants

*A.3. The conservation and, where appropriate, the enhancement of the space in between and around buildings including front, side and rear gardens.*

The Wandsworth Environment and Sustainability Strategy and Climate Emergency targets specifically highlight the need to promote biodiversity. This is supported by Policy LP57 A. *All development proposals should contribute to the greening of Wandsworth borough by including urban greening as a fundamental element of site and building design,* Sadly the new local plan doesn't seem to have a direct replacement for 2016's Policy DMS 6, a. v. *'retention of soft landscaping and permeable surfaces in front gardens and other means of reducing, or at least not increasing, the amount of hard standing .. is encouraged. New driveways or parking areas .. in front gardens should be made of permeable material'.*

Like too many this application does not specify the paving materials – except as 'reinforced'.

If the Council does allow this destructive application, we ask you to note that the requirement for permeable paving is only automatic where a hardstanding is constructed as Permitted Development (GPDO Schedule 2, Part 1, Class F, condition F2). Unless you make standard and include here and in other such applications a condition requiring permeable paving, then by implication impermeable is consented. Not having such a condition in the recent consent for 61 Hazlewell Road (2022/5173) has resulted in the council being seen to condone a concrete slab below the bricks.

Yours Sincerely

*Andrew Catto*

Buildings Panel Convenor  
For and on behalf of the Putney Society.

**The Putney Society**

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

[www.putneysociety.org.uk](http://www.putneysociety.org.uk)

Accompanying email to Jenifer Jackson 8/9/2023.

Dear Jenifer

The Putney Society is concerned that whilst the local plan seeks bio-diversity and sustainable drainage, which we support, meanwhile this application is only one of many where the exact opposite is happening, with the council's consent, time after time locally. If granted this application means the loss of a bio-diverse and free draining front garden, to be replaced edge to edge with a 'reinforced' (concrete?) slab big enough to take three cars.

If a new house were being built Wandsworth would require it to be car free. Why are existing houses different?

Here, as with one recently constructed on the next street, where the drawing said 'brick paving' but not what it stands on, if consented as seen this in effect gives planning consent to

Permeable paving and maximising greening may be policies in the new Local Plan, but policies only have any effect count if consents don't ignore them. Permeable paving is a requirement if this is done as Permitted Development, but that requirement does not automatically transfer if the works are granted planning consent. We would ask Wandsworth to ensure that a condition requiring permeable paving is made standard and included in any consent this time and for all such paving applications – and bigger schemes with driveways – across the Borough. The policy is there.

Ideally consents should also be limited to one car sized drives, and only where a charger is actually provided, but that would need a refinement of policy. Perhaps it's time to review the SPD to be clear what will get refused.

The attached letter is also objection to the current application at 3 Luttrell Avenue SW15, mainly for the reasons above, but also because what we can see on line – please look at this via the applications search on the council website – is so poorly presented that it should never have been validated. Photos are cut off to show only the tops of trees, half the message from Highways is missing and only the sketch can be seen in full.

If the council needed a fire strategy for a cricket wicket, then surely one is needed where the aim is to charge Lithium batteries? But there's none here, no location plan, no site plan etc. Again, we are only asking for a consistent approach.

**Andrew Catto**

Buildings Panel Convenor

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