



Planning Applications  
Wandsworth Borough Council  
The Town Hall  
Wandsworth High Street  
London SW18 2PU  
f.a.o. Marie Joseph

154 Putney High Street  
London SW15 1RS

27 June 2012

Dear Ms Joseph

Planning Application 2012/1833.  
45-53 Putney High Street and 329-339 Putney Bridge Road, SW15

The Putney Society wishes to strongly OBJECT to this application.

Whilst the Society wishes to support development proposals for Putney that are sensitive to and in keeping with their surroundings and respect the heritage of Putney that residents hold in high regard, this is scheme singularly fails to do so for the following reasons:-

**Bulk and massing.**

This location is rightly defined in the Local Development Framework as sensitive to buildings over 6 storeys. The scale of both buildings, particularly on the eastern side, is grossly out of keeping with the surroundings (even Jubilee House). The 15 storey tower is incongruous and damaging to views within and of Putney, and particularly the setting of St Mary's church and the iconic view of listed bridge and historic church from across the river. The bulbous overhang over the Putney Bridge Road pavement is unprecedented, and probably a trespass on public land. The High Street elevation although lower is overbearing and intrusive on the High Street.

The combination of the above factors is particularly inappropriate in the heritage setting of St Mary's Church and the closely adjacent Oxford Road and Putney Embankment Conservation Areas with particular emphasis upon the imposition upon 3 storey Burstock Road, the alms houses on the Putney Bridge Road and locally listed 63 Putney High St. By aligning with Felsham and Lacy Roads it will also impose upon the Charwood Road CA. This tower is in the worst possible place.

**Public Realm.**

The Site Specific Allocation Document calls for this site to provide a public square with active frontages linked to both streets. Instead we are offered the existing service yard made much smaller, but now acting as access to the new flats as well as a delivery yard, yet no longer providing rear access to 37 to 43 High Street. It is well known that large shops deliver in large vehicles, yet anything above mid size will be unable to turn in this space, even if they can get in through the queue for the lights at this point. The result is sure to be an increase in on street deliveries around two already very busy junctions.

**The Putney Society**

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

The High Street frontage fails to take the opportunity to widen the busy pavement to the line of 31 to 35 as has long been proposed by the Society.

The service yard, 12m wide with a 21m high building to the south will be sunless and unwelcoming as an access to the flats, dangerous and congested with delivery vehicles and cars queuing for lift access to the basement parking. As a dark dead end close to but hidden from an area busy in the evenings it almost certainly fails 'Secured by Design'. Contrary to policy DMS4 there is no assessment of the impact on wind speed at ground level, likely to be severe next to the gap on Putney Bridge Road.

#### The Wrong Kind of Development

The scale of the increase in floor space from 5,660 to 18,707m<sup>2</sup> is excessive, constitutes significant overdevelopment and harms local spatial character as noted above.

The scheme claims an increase in retail space by adding a first floor, but Dyas and Boots already have this but don't use it. Since the basement is full of cars, the first floor is likely to end up as storage, as at Sainsbury in Werter Road, or M&S adjacent to the site. Along Putney Bridge Road 4 out of 5 useful small shops will go, resulting in a reduction in ground floor space and retail choice. Fewer shops means less staff and a loss in employment.

As with too many recent applications there is a loss of office space contrary to the Core Strategy policy PL8 and DMTC 13. Replacement of B1a space is a requirement of the SSAD, and important to the vitality of the town centre. None of the other town centre uses suggested in the SSAD are provided.

The rest is new flats. Consents granted for the Upper Richmond Road in the last year alone already exceed the number sought for Putney town centre over the whole 15 year span of the LDF, with more on the way. According to your own figures there is no need for Putney to take more flats, and adding more here fails to take account of transport constraints as required by policy 4.113. The site may have a PTAL of 6, making it ideal for workers and shoppers coming *into* Putney, but there is no spare capacity on the trains or roads for yet more commuters travelling *out* of here in the mornings. The same is true of other infrastructure such as school places, doctors etc. No more large residential developments should happen in the town centre until this is addressed. Affordable housing at 20% is below target levels.

#### Traffic and Air Pollution

The problem of traffic related air pollution in Putney High Street is severe and well known. The council should not permit any development that makes this worse to any degree, no matter how limited. The undersized service yard is likely to result in an increase in street deliveries as noted above. Even those vehicles that do get into the yard will need to turn through the almost constant queue for the junction at this point, again adding to congestion. The 44 cars to be parked in the basement will get used, adding more traffic. All of this will add to congestion and emissions, already in breach of European standards.

Design.

In addition to the excessive height and bulk noted above, the scheme is poorly designed or incomplete, and therefore unable to be approved, in many significant details. Contrary to planning requirements building materials do not appear to be noted on the drawings, but if the muddy green triangles are storey height windows, then this will be an energy inefficient, uncomfortable building to live in, contrary to DMS3.

Good design, as well as being visually satisfying, which this is not, must ensure that all spaces inside and out are pleasant to use, and that all planning requirements are met. Either there is no external amenity space for the market units, contrary to the Residential Development SPG, or the balconies shown on plan are inconsistent with the elevations. In any case these are often off bedrooms and are all too small to be useful, except for looking down into the gardens of Burstock Road. Some of the flat layouts and rooms are unusable e.g. the third bedroom in 2.10 on the third floor.

As too often, there are single aspect flats, whilst others face each other across the gap between the two blocks as little as 12-14 metres apart, well below SPG guidance of 20m, offering no privacy.

Access to many of the flats, once across the dangerous service yard, leads directly to a single lift with no visible option of stairs, and finally for some to a north facing access deck.

Residents cycle parking is in a basement accessed by lift. This is impractical.

Refuse provision in the service yard is hardly enough for more than a handful of flats, with apparently none for the shops.

This is not a scheme that can be sorted out by simply lopping off a couple of floors. Many of the worst problems are at the lower levels. This proposal is fundamentally flawed and must be REFUSED. To assist you we have appended a long, but by no means exhaustive list, of the Council's policies not met by this design. As demonstrated above there is NO overriding regenerative benefit to the local economy, rather a further loss of town centre vitality.

The Putney Society is particularly disappointed that the above points, many of which were raised at the developer's earlier public consultation, were not reflected in a new design or the developer's report on that consultation. It is also disappointing that this unsatisfactory application was apparently produced after several years of consultation with officers and councillors.

Yours sincerely

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

Amongst others the application fails to meet the following current planning policies applicable in Wandsworth Borough:-

DMS 1a – Fails to ensure a high level of integration with its surroundings.

DMS 1b – Fails to contribute positively to local spatial character.

DMS 1c – Harms the amenity of occupiers and other local residents by virtue of unacceptable overshadowing, loss of outlook, loss of privacy, exacerbating traffic congestion etc. This is particularly the case on the eastern boundary facing Burstock Road and in the gap between the proposed buildings where some flats in the tower face those in the 'low' block are only 12 – 14m away, not the current standard of 20m.

DMS 1d – Fails to integrate and be sympathetic to local landscape characteristics and competes to be an unwanted local landmark to the detriment of a wide area.

DMS 1e – Fails to take account of existing or planned social and transport infrastructure, adding to overloading of current facilities, trains, schools etc.

DMS 1j – Fails to address security and safety of public realm, particularly at night.

DMT 1/DMT2 – Fails to demonstrate that the impact of mixed uses, including additional retail, have been adequately assessed for impact upon the local transport systems.

DMS 2 – Fails to enhance the appearance, character and setting of the Oxford Road and Putney Embankment conservation areas, or the setting of the listed church and bridge.

DMS 4b, DMS4v – As a building over 6 storeys this application has to meet the additional "Tall Building" policies. Such a tall building in the vicinity of St Mary's church has a unacceptable visual impact on that building particularly from across the river and on the adjacent Charlwood Road, Oxford Road and Putney Embankment conservation areas.

DMS4 xi – Shared public realm and servicing contrary to this policy.

DMS4 – Fails to provide a wind assessment.

PL5 - Housing Supply sets a target over the 10 year plan for 1000 dwellings from the four town centres other than Clapham Junction. The recent big consents for the Upper Richmond Road therefore already provide for more than the ten year target for Putney with its consequent load on services.

Any unmet need is for family houses (policy DMH3), not more flats.

PL8d and DMTS13 – Fails to meet the policy for retention of office space, which becomes more urgent with each consent that breaks this. Putney has already lost two major professional employers. The existing space is ideal for SME's.

Core Strategy 4.113 – Fails to take account of transport constraints i.e. capacity rather than accessibility/PTAL rating. This scheme would add to traffic congestion and air pollution.

Site Specific Allocation Document – Application fails to provide the new public square called for, linked to both PHS and PBR. Further the proposed service yard is actually smaller than the existing one, has space for only one truck and no turning room for vehicles above 3.5 tonnes.

Residential Development SPG - Insufficient amenity space. Insufficient gap between facing windows. Single aspect dwellings.