

Battersea Society Open Spaces Committee
Comments on Wandsworth draft Local Plan
2021 Public Consultation

Remit of this document

These comments focus specifically on the draft Local Plan as it affects Wandsworth's open spaces. It should be read in conjunction with the separate and more comprehensive submission made by the Battersea Society's Planning Committee within Wandsworth Council's public consultation procedure.

The draft Local Plan is accompanied by a number of supporting documents which form its evidence base, including a draft **Open Space Study**. We note that there is no requirement to consult publicly at this stage on these documents, albeit the consultants who compiled them should have made contact with interested parties in their production.

We feel that it is reasonable to make reference to this evidence base when commenting on the draft Plan, and to draw connections between the evidence as presented and the draft policy. We have therefore chosen to begin by commenting on the draft Open Space Study, suggesting some areas where that would benefit from correction or expansion.

The draft Local Plan also makes reference to a separate **Open Space Strategy**. This has not yet been made available, however. We would like to see it, and trust that it will ultimately form part of the Local Plan.

Within the **draft Local Plan** itself, we have commented on the chapter on Green and Blue Infrastructure. Like our colleagues on the Planning Committee we believe that as a draft policy this document needs clarifying and strengthening; we have attempted to suggest some specific measures and targets which could help Wandsworth achieve positive change and delivery in relation to open spaces.

We have welcomed this opportunity, and hope that our suggestions for improvement will be taken in the constructive spirit in which they are intended. We will be happy to discuss any of them further, should that be helpful, and will in any case look forward to reviewing the next stages of the Study, Strategy and Plan's development.

Open Space Study

General points:

- The maps are not sufficiently legible. Clearer maps are required to ensure clarity and the delivery of policies.
- Some spaces smaller than 0.2 hectares have been excluded. Whatever the requirements of an evidence base, in terms of placemaking a finer level of detail will be required. For example, Christchurch Gardens should not have been omitted. It includes a unique listed war memorial, has its own Friends' group and is moreover a link within a "green chain" of small parks (Latchmere Recreation Ground—Falcon and Shillington Parks—Christchurch Gardens—Fred Wells Gardens—Vicarage Gardens and the Thames Path). Their linking is undermined by its exclusion. We would wish to see all open spaces, however small, recorded in the Study. All have potential to deliver neighbourhood amenity and character; even forgotten and unloved spaces can become valuable local assets when nurtured and cared for.
- We are not convinced that grouping spaces by Wards is useful, as connections and linkages cross ward boundaries. Analysis in distance/travel time, as on **p80**, is potentially more helpful.
- Analysis should also include the examination of physical and perceived barriers to pedestrian and cycle movement e.g. safety, quality of environment, inclines.
- In making assessments of quality, we remain unclear what methodology has been used. Air quality would be an example of a useful measure.

P26. Fred Wells Gardens and Falcon Park have failed quality scores; the reasoning is covered on **p32**. The improvements to Fred Wells Gardens are now complete, so its score should be reassessed. Our own comments are quoted on Falcon Park; the problems we mention remain unaddressed.

Map, p.38. Why is the Thames Path classed in its entirety as a natural or semi-natural green space? Why is only a small section of Wandsworth Common classed as such? In reality it's the other way round. This is also misleading when it comes to catchment areas, with swathes of north Battersea shown within reach of such space compared to, say, streets off Northcote Road. Again, in reality the area "between the Commons" currently has much better public access to green space than areas neighbouring the Thames Path, with a street pattern that feels both safer and easier to read. Good sightlines and high quality connections for pedestrians and cyclists are critical aspects of access for any local amenity.

Table 6.2, p47 seems to include land in housing estates, where there might be public access but not public use; indeed, many estates are designed to dissuade non-

residents from passing through. There should be some discussion about how green space in estates might be opened up and used more beneficially, for instance by encouraging community gardening initiatives, which could go some way to address the absence of allotments in Battersea, or providing additional play space. Also, there should be a presumption against gated developments. Privately owned open space has been omitted from the Study; as this does contribute to overall local biodiversity, we believe it should be taken into consideration too.

P51. Harroway Road (correctly, Harroway Gardens) scores second highest for quality, but the draft Local Plan (**RIV 7**) suggests a need for substantial improvements. This leads us to question the validity of the scoring system used for this Study.

P56. Discusses facilities for children and young people. It refers to play equipment, more robust equipment for older age ranges such as skate parks, BMX, basketball courts and Multi Use Games Area (MUGAs) and youth shelters. This really should be more than one group.

Properly equipped and maintained play areas for young children are good measures. Here a finer grain of distribution and safe access to play equipment would be even more useful as such equipment is not confined to larger open spaces.

Similarly, the distribution of ball courts, basketball hoops, etc. should be assessed at a more detailed level, as should areas of deficiency. Skate parks and BMX tracks have wider catchment areas and as with ball courts form part of sporting provision, not just for young people, but people of all ages.

We have doubts about the usefulness of youth shelters within open spaces; teenagers want safe places to meet, just like anyone else, and don't need a designated structure. Also, these facilities need to be read against indoor spaces where they can meet to attend clubs etc. We note too that there was no targeted consultation of young people.

Table 9.3, p75. We again question the validity of the scoring system used when we see Battersea Rise Cemetery's poor result. Some work to the chapel building and headstones would doubtless improve public perceptions but given that it is no longer actively used for burials, we feel it is being well managed as a semi-natural space by Enable. It is a place of great character and charm, especially picturesque in spring and early summer, and providing a peaceful haven for both humans and wildlife at all times of the year.

Draft Local Plan

General points:

- The benefits of open space should lie at the heart of a planning strategy that is concerned about the environment, climate change and people's health and wellbeing.
- The planning process needs to embrace both the protection and improvement of existing open spaces, and the delivery of new ones.
- This requires an over-arching vision, and also specific strategies for its achievement.
- Clearly-stated policies will guide developers and help achieve successful outcomes in this respect.
- We are concerned that at present too many policies have been worded in a way that doesn't either offer accountability or guarantee delivery, saying that certain initiatives would be *supported* when they should be *required*.
- There is also a lack of specific measures and targets; we have made some suggestions for these.
- Clearer and more detailed maps are also sometimes required.
- Where appropriate it will also be helpful to indicate funding sources; the cost of infrastructure should be factored into proposals from the outset.

Ch.21: Green and Blue Infrastructure, pp364-382

Para 21.5. *"The existing green and blue infrastructure will be managed to ensure it is reaching its potential in terms of quality and accessibility."* This is an extremely welcome comment, but in order to achieve this objective, specific actions and targets are required.

Para 21.8. *"To support all this work, the Council has produced an Open Space Study which catalogues and assesses all the open and green space in Wandsworth. The study has identified all the areas that are deficient in open space in the borough and ways for them to be improved. The Open Space Study is accompanied by the Open Space Strategy which sets aims and targets for all underperforming green spaces in Wandsworth and helps guide the borough towards its goal of becoming the greenest inner London borough."* That may have

been its purpose, but much more detailed analysis is required to achieve this ambitious objective. When will the Open Space Strategy mentioned appear? How will the Open Space Study inform it? At present all that has been presented are a few "strategic recommendations" at the end of the Study. The Strategy should form part of the Plan, and it should provide a comprehensive policy for protecting, enhancing and increasing open space provision, including specific targets and actions.

Map 21.1 shows open spaces in the borough and describes them as a network. The notion is very welcome, but needs a clear strategy if it is to become a reality. Places will only become a network through connection. There will be different requirements for people and for biodiversity, but joining open spaces together can hugely benefit both safe walking and cycling, and ecological potential and habitat creation. Measures for creating such linkages should be included within the Local Plan; ideally all open spaces should be linked, and maps should identify how those connections are made. Local strategies should be put in place to create and upgrade links. We recommend that such a strategy is included in future versions of the Local Plan. It should include an assessment of entrances to spaces. Improving connections and access to spaces can have as much benefit as the provision of a brand-new space; if places can be conveniently accessed, they are likely to be well used.

Bullet point A of LP55 takes up this theme: *"The Council will protect the natural environment, enhance its quality and extend access to it. In considering proposals for development the Council aims to create a comprehensive network of green and blue corridors and places, appropriate to the specific context. In doing so, it seeks to connect and enrich biodiversity through habitat improvement and protection at all scales, including priority habitats and extend access to, and maximise the recreation opportunities of, our urban open spaces."* More detail on how this is to be achieved should be included.

Para 21.10 includes the line: *"All types of green and open spaces including small sections of landscaping and front gardens all provide opportunities for biodiversity which benefit Wandsworth's wildlife."* Therefore, the loss of front gardens is to be resisted for its negative impact on biodiversity, and also on water management. New measures should be included both to promote re-greening, and to educate about the damage caused by removing them or replacing them with hard surfacing or artificial turf.

Para 21.11. *"Green and blue infrastructure often relate directly to place-making and enhancing local character. At a wider scale, they can contribute to local identity and landscape character. Wandsworth's green and blue infrastructure, in particular its street trees, soft landscaping, roof gardens, green/brown roofs and walls, and the Wandle Valley, form a green corridor performing a range of functions and delivering a wealth of benefits for the local population and wildlife."* Please clarify what point is being made here. We

welcome recognition of the value of green corridors, but they also need to be protected, improved and promoted through specific measures.

Para 21.15. It's not clear how GiGL (Greenspace Information for Greater London) correlates with the Open Space Study as it is not referred to within that Study. There is reference to local GiGL deficiency areas. If the GiGL is to form the basis of Open Space policy, then this should be explained.

Map 21.2 on p370 shows access to various types of open space, taken from evidence in the Open Space Study. Again, with only a small part of Wandsworth Common classified as natural and semi-natural space, its catchment area is consequently reduced; proximity to Wimbledon Common/Putney Heath, the River Wandle and River Thames is currently shown as much more significant. Thus the Arndale and Winstanley Estates are deemed within catchment areas, while the area between Wandsworth and Clapham Commons is outside. This reads strangely, or is the implication perhaps that the management regimes of the Commons require reworking, to enhance their biodiversity?

Policy LP56 discusses Open Space, Sport and Recreation. The policies are clear in resisting the loss of facilities, but should say more about the route to improvements and even the unlocking of existing facilities. For example, **C2** states the new facilities should: "*maximise the multiple use of facilities, and encourage the co-location of services between sports providers, schools, colleges, universities and other community facilities*". This is an excellent objective. Shared use of school facilities has long been talked about, but measures need to be put in place to ensure that it happens.

Similarly, point **D** says: "*Public access to open space and sports and recreation facilities on private land will be supported, particularly in areas with an identified deficiency in open space.*" How? What measures are proposed to deliver such a change?

More is required on new proposals (see point about mapping of sites for "sports cages" and basketball hoops etc.) Can land in housing estates (say expanses of parking or grassland, often with "no ball games" signs) be rationalised and intensified so allow more areas for play, as well as greater naturalisation and/or food production?

Further measures to increase areas for Open Space, Sport and Recreation should be identified, e.g. by simplifying road infrastructure (removal of roundabouts, covering of underpasses), or exploring the use of roofs of buildings for recreation/school use/public access gardens on tall buildings, as has been done in the City of London and other London boroughs.

21.18. "*This policy seeks to maintain, and where possible improve, the quality and provision of Public Open Space, sports fields and pitches and play areas in the borough, particularly in areas identified as deficient.*" As the quality of playing pitches has been in decline for

many years, it would be helpful to include strategies and policies to reverse this trend. We urge the council to include clear measures for this transformation.

21.24. *"For all proposals affecting areas of open or used for sport or recreation the following will be important considerations with any application and the assessment of whether the proposed development is suitable."* This paragraph seems to sit alone and remain incomplete. Does it refer to **21.25-27**? Clarification is required.

21.26. Covers, very briefly, the use of outdoor space for cultural events. Does the Council have a policy for this, and if so, what measures are being proposed?

LP57. Biodiversity policy, **B2.** We recommend the removal of the words "where appropriate." It is not clear to which clause "where appropriate" applies, but all development sites should attempt to incorporate the principles that are mentioned.

C. We recommend that there should be a presumption against any development with the potential for adverse impact, requiring the developer to make the case.

21.31. We recommend strengthening the wording. Rather than new development "should include..." this should read: *"enhancement to biodiversity should be embedded in the design process at an early stage and be an integral part of any approved scheme."*

Map 21.3. There is no real mention of SINC's (Sites of Importance to Nature Conservation) in the text. Further detail is required to make it a network. The Council should create a policy to make all green spaces SINC's over a given period of time, and provide a strategy for achieving this.

LP58. Tree management. This section could be shortened by setting out clear objectives and referring to measures in a separate Tree Management Strategy.

B. Recommend removal of "Where appropriate". There is a requirement for net gain to biodiversity.

C8. Again, "where appropriate" should be deleted and replaced with *"species that are robust against climate change and pollution could also be appropriate and those that mitigate against poor air quality will also be supported"*.

E is particularly weak; there should be reference to GLA guidance, native planting, value of hedges/hedgerow, water, etc. Full explanations of landscaping strategies should be included in design and access statements within any design process. Presentations to the Design Review Panels on major schemes should include landscape strategies.

LP61 Riverside. The Thames Path is an open space; there should be a policy requirement to include along its length wayfinding signs connecting it with other

open spaces. We would also like to see plaques giving information about the history of its riverside sites.

A4. "*...where feasible, and does not cause harm to the operation of the river regime, or its environment, biodiversity or archaeology (including to its banks, walls and foreshore).*" This clause can be simplified and have an objective to promote naturalisation, which can be at a modest scale or part of a more complex restoration scheme. A proposal that was harmful to biodiversity would fail the over-arching requirement for net gain.

C. "*...unless it can be clearly demonstrated that neither this nor any other river-dependent or river-related use is feasible or viable*" is unnecessary. The Council's negotiating position should be to resist the loss of river-related or river-dependent uses or businesses as there are few opportunities for these activities along Wandsworth's riverside.

F. There should be a strategy and policy for public toilet facilities. This is a social equity issue, particularly for the elderly and women. Better provision would encourage more people to walk, and benefit mental and physical wellbeing.

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