

Narinder Lakhan
Planning Department
Wandsworth Council
London
SW18 1DA

Dear Mr Lakhan

Winstanley and York Road Estate Regeneration: 2019/0024

As ward councillors for the area of the proposed development and wider estates we support the principle of regenerating the Winstanley and York Road Estates. The estates desperately need investment after years of neglect. Resident's homes are in a poor condition and many families are overcrowded.

We welcome the guarantee that all existing council tenants will have the opportunity to move into a new council home in the regenerated estate that meets their needs and that they will pay the same rent as they are currently being charged for the same size of property. We are also pleased to see the additional investment in a new Leisure and Community Centre bringing together a range of community services, including leisure, community halls and a children's centre.

Affordable housing

However, estate regenerations must demonstrate they are maximising the delivery of affordable housing. There has been no bid for affordable homes funding from the GLA and over time an extra 500 units have been added to the scheme, largely in tall private tower blocks.

Consequently, on the uplift of housing levels on the estate only 18% constitutes affordable housing and this is split 10% council homes and 90% intermediate. We also note that it is questioned whether the shared equity units meet the affordable housing definition and with the shared equity removed this application only provides 31% affordable housing units. Additionally, although the affordable rent homes are to be let at London Affordable Rents these are exclusive of service charges and we ask that further consideration be given to ensuring service charges for these units are benchmarked against other affordable rent homes in the local area and the Council's affordable rent guidance.

The Council's Housing and Regeneration Overview and Scrutiny Committee has been told that the rate of return for the property developer on this project is currently 35%. That's around double the industry average. While this will fluctuate over the life of the project, the profits are projected to be in the hundreds of millions. We note that the benchmark land value has been subtracted from the viability calculations despite the Council being the landowner and ask for further consideration of whether this calculation is appropriate.

As you will be aware, Wandsworth Labour has committed to add 100 council homes into the regeneration if it takes control of the Council in 2022. We therefore ask that the financial viability assessments are robustly interrogated to make sure no opportunities for more genuinely affordable homes for local people are being missed.

In addition to ensuring that developer profits are not made at the expense of affordable homes for local people we want the regenerated estate, both during and after demolition and construction, to be a vibrant and liveable neighbourhood and ask that the following matters are taken into consideration:

Height: We share residents' concerns regarding the height of some of the blocks, particularly Block 1's 32 storey tower which is significantly taller than any other development in the York Road/Lombard Road area and the use of slab blocks for these residential towers. When residents were initially consulted about the regeneration, they told the Council that they wanted improved homes with fewer towers. We are also particularly concerned about the reported major adverse daylight-sunlight effects on Falconbrook Primary School and sheltered housing at John Kirk House and Haven Lodge.

Winstanley Road: We welcome further consideration being given to re-routing the 170 bus route along Winstanley Road as well as the location of any coach drop off point for the Leisure Centre. However, we remain concerned about the risk of rat-running along Winstanley Road and that high volumes of traffic along the road may mean the new York Gardens park is less easily accessible for residents living south of Winstanley Road. We support the work being undertaken as part of the York Road Corridor Study and further consideration being given to investing in improvements to York Road.

Demolition and construction works: We note that the demolition and construction is likely to take 16 years and would welcome consideration of whether the build could be completed within 10 years. These works will impact those living and working on the estate and the immediate surrounding area not least because of an increase in construction traffic, air and noise pollution and reduced green space. We welcome a comprehensive Air Quality and Dust Management Plan that ensures adequate monitoring takes place particularly outside local schools and that the negative impacts on air quality are minimised. We also ask that the Construction and Environmental Management Plan and Construction Logistics Plan gives particular consideration to minimising construction/demolition vehicle trips along Wye Street which runs between Falconbrook Primary School and Thames Christian School, especially at the start and end of the school day.

Affordable community facilities: The current York Gardens community centre is a popular and well-used facility. Accessible community facilities promote community wellbeing and can reduce isolation. We ask that consideration be given to (i) a commitment that library, community centre and children's centre services are continuously provided on the estate throughout the build, (ii) whether the current functions and activities in the library and community centre can be provided and enhanced by the new Leisure and Community Centre, (iii) whether all the facilities in the new Centre will continue to be available and affordable for local community groups, schools and current residents and (iv) reducing the cost of accessing the new facilities for residents living on the estate, particularly children and young people, whilst there is a reduction in green space during the demolition and construction phase.

Employment and Skills Plan: Local residents have told the Council they want to see improved employment opportunities and we note that the unemployment rate in Latchmere ward was 9.5% of the population which was significantly higher than the borough average. We would therefore like to see a stronger and binding commitment to ensuring there are employment, training and apprenticeship opportunities for current residents living on the estate including in areas such as project management and construction as well as hospitality, leisure and retail during and after the regeneration.

Communication with residents: We welcome the recognition that residents should be key partners in any regeneration scheme, particularly where they are personally affected. As the scheme has developed and plans have changed some residents are unclear about the regeneration plans and whether, where and when they might move. We would like to see a greater commitment and support for a robust plan for how the developers will effectively communicate with residents, particularly more isolated residents, during the period of the development.

Consultation on new York Gardens park: We endorse the recognition of the importance of community engagement as a prerequisite of the planning submission and that greater scrutiny should be placed on this because the Council is a joint venture partner. Residents are fond of their local green spaces and we ask that these are re-provided as early as possible in the scheme and temporary play spaces are provided during the construction phase. Given the new York Gardens park will be a focal point for the development we would welcome more detailed resident and stakeholder consultation as to the landscaping, play spaces and structures in the park and for more investment in consulting under-represented groups such as young people.

Block 11: We note that one of the objectives of the scheme is to encourage better integration with the surrounding area and greater permeability. Consequently, we are concerned at the Design Review Panels significant concerns regarding Block 11's current outline design being bulky and impenetrable and that the block could act as a barrier to achieving permeability and pedestrian desire lines from the new York Gardens park through to Clapham Junction station entrance. We would welcome further involvement in the design of block 11 to ensure that the design is future-proofed and achieves the network of safe and attractive routes through the area for pedestrians and cyclists as envisaged in the regeneration's masterplan.

Environmental impact: In 2019 the Council declared a climate emergency and set a target to become zero-carbon by 2050. We note that a gas fired Combined Heat and Power system is proposed meaning that given the expected life of these buildings a zero carbon solution will have to be retrofitted. We ask for further consideration to be given at this stage to the installation of ground source heat pump solutions prior to blocks being built. We are concerned about the number of mature trees that are proposed for removal and ask that this be looked at in more detail. We also ask that condition 19 regarding existing water supply infrastructure is amended so that the developer reduces demand on the existing water supply by reusing water in the buildings.

Community Infrastructure Levy: The Borough CIL contribution for this development is significant. We would welcome further consideration being given to ensuring that some of this contribution is allocated to schemes that will improve the immediate area around the regeneration such as the Falcon Road railway bridge underpass, the public realm along Falcon Road and improved green and community spaces on other local estates.

We look forward to a response to the above comments to ensure that the regeneration of the Winstanley and York Road estates delivers a better place to live for existing residents.

Yours sincerely

Cllr Simon Hogg and Cllr Kate Stock
Labour Councillors for Latchmere Ward