

TBGE comments on the draft Wandle Delta Masterplan Supplementary Planning Document

(March 2021)

Preliminary Remarks

The **Wandle Delta** Masterplan - the clue is in the name. But the plan ignores the actual Rivers themselves. Why?

(p99) **5.10.10 ‘This is a key gateway into the borough** and will need achieve a high quality development..’

We agree it is a key gateway but suggest that the two Rivers - the Wandle with its short tributary, Bell Lane Creek, and the Thames - have *not* been given centre stage to enable this ambition. River traffic and usage of any sort is not mentioned. Therefore it will not function as a River gateway into the borough at all.

The Rivers barely rate a mention other than as a pretty backdrop to entirely land-based activities. A ‘key gateway’ in this context surely means a small harbour, a river-village hub, a celebration of a precious and rare chalk stream tributary entering old Father Thames? Something to be wholeheartedly embraced by the boating and marine world. And a natural, linking blue extension of the green spaces we have learned to deeply appreciate during the pandemic - the water just waiting to be enjoyed by so many.

As Ratty famously told Mole in ‘Wind in the Willows’: “Believe me, my young friend, there is nothing—absolutely nothing—half so much worth doing as simply messing about in boats.”

‘Simply messing about in boats.’ This is a River development. The necessary important marine facilities need to be factored centre-stage into this River delta masterplan and brought to the fore as the *raison d’être* of the whole plan.

From the SPD Wandle Delta 1 INTRODUCTION

(p3) **‘Figure 4 Key messages:** Many of the comments made can be grouped into a few ‘key messages’. The size of the boxes on the right are related to how many times the comment was made.’

The green box at bottom left, **Make More of Rivers**, is the same size as **Tackle the traffic, Improve public transport capacity before more**

growth, Improve walking and cycling, More community amenities and significantly larger than **More green and public space**, yet has been completely overlooked in the masterplan, while the other messages, all of which we endorse, have been well-embedded. To essentially overlook both Rivers' huge potential to attract the people of Wandsworth and beyond to actually **use** the rivers, rather than simply admire them, is a glaring oversight.

The emerging London Plan (Sustainable Infrastructure SI14 Waterways) sets out extensive recommendations and policies for the Blue Ribbon Network of which the River Thames, Wandle delta and the River Wandle themselves are all parts. Has this informed the draft masterplan?

Recreational River use should include any form of non-fossil-fuelled nautical transport of suitable size - rowing boats, canoes, sailing boats, dinghies, ribs, kayaks, water-taxis — in fact anything of suitable size and with the stipulation it must be electric, wind or human-powered, opening up the heritage of the Wandle River again to navigation to and from the River Thames. Fossil-fuelled, noisy, air-polluting motorised boating would not be allowed, aligned with your Carbon Neutral by 2030 policy.

There is much evidence that, with careful management, quiet boating communities are well-positioned to care for marine biodiversity and Riverbank ecologies and are well known to actively enhance the local environment. (references available)

Feathers Wharf could be considered as site to base these activities, with a chandlery in the retail quarter for all boating requirements (a glorious place to explore on wet Saturday afternoon). However, before any decisions are made a full, robust Environmental Assessment made be made for the whole River environment. (NPPF requirement)

Public-access undercover storage at low cost or free for all boats and equipment (as for street bicycle parking) at suitable height, bearing in mind tides and future flooding, should be explored. Alternatively, all boating needs could be available for public hire at low cost to ensure availability across the community, with an emphasis on giving young people experience and knowledge of the water through community and social amenity organisations. (see PLA/Thames Academy skills)

Education (added as heading)

The other overlooked aspect of the Rivers is their educational potential - an easily accessible resource for both children and adults to enjoy while learning about chalk streams and marine environments generally - to understand the tides and learn about the wide range of biodiversity flourishing at the water's edge and below the surface - waterfowl, insects, tiny fish darting in the shadows. To 'splodge' around in the mud at low tide searching for clay pipes and Roman coins. To fish for crabs with string lines from a wooden jetty. These childhood activities foster a life-long love of the Rivers.

Clearly, jetty access is required in this plan.

And for more advanced education, PLA Training

<https://www.pla.co.uk/Thames-marine-training-and-skills-to-be-stepped-up>

(p4) **Fig 6: Shows considerable concern that tall buildings are not appropriate.** We suggest from these indices the feeling is, that a community green and open space with nature trails, and walking and cycling prioritised (always linked to the River) rather than intense development, is preferred. Unfortunately, under the Rivers graph there was no options for 'Enabling sail & oar-powered boating' and 'Nature exploration activities in the delta waterways and the wider surrounding River Thames'.

We support the general approach around retaining historical buildings and features as well as emphasis on active travel - walking, cycling and public transport, creation of play streets and play zones, minimal car access and parking provision, creation of work hubs and community spaces and provision of amenities within a 10-15 minute walk from homes. If people will be living much more locally-based lives post-pandemic, it is vital to provide an urban realm with maximum greening - which requires maximum water i.e. blue-green infrastructure and attenuation (IWRM+BGT- see below and <http://www.bluegreenuk.com/freewater/tbge/LocalPlans.html>).

It must be emphasised that this vision needs to always inter-connect with the River Delta water itself.

However, we noticed a contradiction regarding minimal vehicle access into the general masterplan area at point 2.2.26 stating that TfL and Council proposals to decrease traffic dominance in Wandsworth town centre through various changes will require 'significant traffic diversion within the town centre, and will directly impact on the Masterplan area.'

This contradiction must be seriously addressed to maintain enhancement of the Delta area.

from the SPD **2 EXISTING CONTEXT**

(p17) **Environment, Landscape (add) and Riverscape**

'2.2.15 Much of the area is at high risk of flooding, though this context has potentially been improved by recent alleviation works.'

We would question the assertion that sufficient flood mitigation is in place. There is high risk of flooding during the lifespan of the envisioned realm, due to polar ice melt and rising sea levels from climate change, with prediction of annual flood zones well beyond the masterplan area. Local surface water flooding events are also predicted to increase with heavier, more extreme storms. (see also point 3.5.1 below)

‘Nonetheless, integrated water management and sustainable urban drainage should be part of any new developments to improve resilience. Uses at ground floor should be allocated with this risk in mind.’

Integrated Water Resource Management and deployment of Blue Green Technologies (IWRM+BGT), such as porous roads and permeable pavements, reticulating rainwater into a wide range of new green infrastructure as well as existing parks, gardens and street trees, is internationally-accepted best practice in urban realm design. The long term investment in blue-green infrastructure will bring a range of benefits, beginning from early stages - biodiversity increase, flood/drought/Urban Heat Island effect mitigation, physical and mental health and well-being as well as financial. Sustainable Urban Drainage Systems (SuDS) is just one element in the Blue Green toolkit.

‘2.2.16 The River Thames and the River Wandle are both ecologically significant, with designations as sites of metropolitan and borough importance respectively. Strong guidance is needed to maximise the opportunities that exist to protect and enhance the rivers' ecology.’

In rural or semi-rural spaces, ‘rewilding’ land and river systems from cultivated and controlled forms back to their former non-manipulated, natural states is the corollary of urban Blue Greening. Very different from actively-managed conservation, rewilding is the removal/absence of human interference, allowing native flora and fauna biodiversity to flourish, and mitigating both drought and flood.

Feathers Wharf and Causeway Island are ideal for rewilding, with *no* new island development allowed to proceed. Maximum stretches of the Wandle Riverbanks should also be set aside for rewilding.

The River Wandle should be ‘de-culverted’ with appropriate bridges where required.

<https://www.theguardian.com/cities/2016/may/25/story-cities-reclaimed-stream-heart-seoul-cheonggyecheon>

‘2.2.17 Compared with the surrounding context the study area has relatively little green space, planting and trees. Some planting and green corridors exist alongside the railway tracks and the River Wandle, but this space is not usable and can cause issues of visibility and safety. Future changes to the SPD area should build on and enhance the green network to encourage greater biodiversity.’

The reason so little green space exists is precisely because historical development has subsumed the natural River banks and mud flats. The Rivers Thames and Wandle should be at the top of the planning hierarchy with the aim of re-naturalising them as much as possible by not developing anywhere near the River edge (littoral) zones. Where possible along railway tracks and River banks, existing green areas should be left to rewild, ensuring visibility and safety are maintained. Intense human activity eg restaurants/bars along the River banks are likely to cause far more damage to nature than a family in a rowing boat. Clear evidence exists that excessive use during 2020 of the

Thames towpath has been detrimental to the wildlife ecology. Therefore, we need areas which are completely protected from human activity.

(p21) **Movement and access**

While walking (with particular emphasis on improving the Wandle Trail facility), cycling and public transport use is prioritised, with car entry actively discouraged and parking provision minimal, **boating for recreation, leisure use and local water-based passenger transport (water taxis) must be included at the top of the transport hierarchy.**

3. Planning Policy Context

(p22) 3.1.1

Add: **International Planning Context**

Rio Declaration 1992

The Aarhus Convention 1998

The UN Sustainable Development Goals (SDGs)

The UN Paris Climate Agreement 2015

Add to: **Regional Planning Policy Context**

Thames Landscape Strategy - Kew to Chelsea

<http://thames-landscape-strategy.org.uk/who-we-are/vision/partnership/>

PLA Thames Vision

<http://www.pla.co.uk/About-Us/The-Thames-Vision/About-the-Vision-Project>

Add to: **Local Planning Context**

Wandsworth Borough Council declaration of climate emergency and commitment to becoming Carbon Neutral by 2030, Carbon Zero by 2050 (obliges this development to be carbon zero, requiring carbon accounting to be embedded from the start of firm plans.)

There is no mention of how the masterplan incorporates considerations of the **Clean Air Strategy 2019**. TBGE have included feedback into Section 2.18 of the draft Local Plan (access via

<http://www.bluegreenuk.com/freewater/tbge/LocalPlans.html>) on how IWRM+BGT can be utilized in support of better air quality. The SDP requires sufficient flexibility built into it to incorporate upcoming amendments within the Environment Bill update (as does the Local Plan).

Other designations

‘3.5.7 The western segment of the site forms part of a wider ‘Focal Point’ designation. The Local Plan sets out that focal points of activity along the Thames will be created to be a focus for new homes, jobs and leisure facilities located around public spaces.’

Add: These River-based focal points should put the Rivers Thames and Wandle with their marine ecology and water-based activities first and foremost as the focus for the human community.

'3.5.8 The land to the north of the railway line is within the Thames Policy Area (TPA).....'

We endorse 'enhance the open quality of the River and Riverside public realm' but emphasise this should be achieved by *not* building within an agreed distance from both rivers and encouraging rewilding, and build no hard-paved open space which may satisfy a planning idea of 'open'.

The River will require 'marine recreational' inserted into '**marine recreational**, leisure and social infrastructure facilities with public spaces at focal points' and

And 'and onto' inserted into 'a riverside walk and cycle way and increased public access to **and onto** the Rivers'

(p28) '3.5.11 Parts of the study area fall within **Flood Zone 3**.'

However, as alluded to above, there is high risk of regular annual flooding during the lifespan of the envisioned realm, due to polar ice melt, rising sea levels and more frequent violent storms, with predictions of an annual flood zone well beyond the masterplan area.

https://coastal.climatecentral.org/map/11/-0.118/51.4848/?theme=sea_level_rise&map_type=coastal_dem_comparison&base-map=roadmap&contiguous=true&elevation_model=best_available&forecast_year=2050&pathway=rcp45&percentile=p50&refresh=true&return_level=return_level_1&slr_model=kopp_2014

Indeed, climate scientists warn that with locked-in total melt of the Arctic ice cap increasing the albedo effect and the likely complete melting of the Greenland Ice Sheet could lead to a 7M sea level rise by 2100, forcing the evacuation of all coastal cities around the globe. This forecast must be borne in mind by the council as it moves towards its 2030 climate emergency aspirations, guided by the Precautionary Principle.

<https://www.carbonbrief.org/new-climate-models-suggest-faster-melting-of-the-greenland-ice-sheet>

(p32) **4.1 VISION**

4.1.2 (Revised to now read)

"The Wandle Delta will be a place that puts the Rivers first in order to protect them and their ecology as well as maximise their attraction for the people who live, work and visit in the area - strengthened as a mixed urban neighbourhood with the rivers and Riverscape at its core, a focus for living and working, and a local destination for visitors.

4.1.3 (Revised to now read)

With the Rivers and waterscape at its heart, the area will be transformed by creating an accessible and permeable network of water routes, inter-connected with streets and land spaces. It will be easy and enjoyable to get around by boat, on foot and by bike. Enhancements to the existing station access, and the creation of a new northern entrance will also improve the experience of train travel to and from Wandsworth Town.

4.1.4 (Revised to now read)

With a range of new open spaces, a wide variety of greenery will dominate the hard grey infrastructure surfaces, connected by the blue/water infrastructure, bringing nature to the fore across by a range of marine and land-based leisure and community activities; creating a green buffer zone between the Riverscape and built landscape, to enable maximum naturalisation and rewilding of the water and land/water boundary zones.

4.1.5 (Revised to now read)

The Thames, the Wandle and its tributary, Bell Lane Creek, will be a key focus for placemaking in the area, with clear access onto the Rivers for boating and water-based recreation, complemented by continuous nature-based and sympathetic riverside paths and spaces along the way for nature, play and leisure, connecting to Old York Road, the wider Wandle corridor, King George's Park and beyond. The natural blue-green riverside theme will extend into streets and spaces of urban and industrial character, making a feature of the existing railway line, arches, infrastructure and listed buildings, softened by greenery and natural water features.

4.1.6 (Revised to now read)

A diverse mix of workspace, homes and local amenities will serve this growing community. The Wandle Delta Area will also benefit from the continued presence of safeguarded wharves which play a vital role in maintaining river access to the whole community, particularly for oar and sail powered recreational boating, as well as to service waste management and recycling. Opportunities to combine cultural and leisure activities with new forms of workspace, set against the backdrop of distinctive waterway and waterside spaces and connections, and enhanced links to Old York Road, the Ram Quarter and the town centre, will announce the Wandle Delta as an important destination for both incoming visitors from the upper and lower Thames and those from the Borough."

For general comments on

5. PLANNING, DESIGN AND DELIVERY GUIDANCE we draw your attention to an extract from our recent submission to the WBC draft Local Plan below.

In brief, the two Rivers must be at the heart of the planning, design and delivery for the project to warrant the name 'Wandle Delta Masterplan', with the maximum embedding of IWRM with RWH and BGT in the built environment and maximum rewilding of the green and river ecology.

We would like to be involved in the development of plans going forward with other River stakeholders and amenity groups along the Rivers Thames and Wandle.

(from our TBGE Local Plan comments)

5.4 BLOCK STRUCTURE, TYPOLOGIES AND FRONTAGE

In consideration of meeting updated air quality demands, building massing should be considered to promote 'breathways' taking advantage of the proximity to the Thames to facilitate wind penetration further into the southern areas of the masterplan and beyond for NW and NE quadrant winds. Also applicable to Section 5.6.

5.7 ENVIRONMENT AND SUSTAINABILITY

Suggest renaming 'green and blue infrastructure' title to 'Integrated Water Resource Management with Blue Green Technologies (IWRM+BGT)' and incorporating best practice as highlighted in TBGE comments to draft Local Plan.

General Note

All Policy references in Place Making sections should include IWRM with BGT in clauses referencing Blue and Green Infrastructure.

LP55 Protection and Enhancement of Green and Blue Infrastructure

Suggest addition of new item,

Point F. The council will embark on developing and implementing an Integrated Water Resource Management (IWRM) Plan encompassing Rainwater Harvesting (RWH) and all available blue green Technologies (BGT) to complement the natural rivers, streams, other watercourses and bodies of water in order to generate a scaled expansion of green spaces and a program of planting within and on the existing built (grey) infrastructure.

LP58 Tree Management and Landscaping – Point 8

There must be consideration of the tree pit design and potential water supply (e.g. direct drainage off street) to promote healthy trees. It should be noted that poor design leads to stunted trees that may require replacement should they fail and negative carbon impact as a result.

Another key consideration for developments is for the use of trees to shade and, as a result, reduce cooling / energy requirements. Consideration of the wind environment is also required, such as reducing windiness in the pedestrian zone for comfort and safety as well as increasing windiness for pollution dispersion purposes.

LP59 Urban Greening Factor

Point A. All development proposals should contribute to the greening of Wandsworth borough by including urban greening (Integrated Water Resource Management with Blue Green Technologies) as a fundamental element of site and building design, and by incorporating measures such as high quality land-

scaping (including trees), green roofs, green walls and nature-based sustainable drainage.

and

Point B2. incorporate as much soft landscaping and porous / permeable pavement and road surfaces as possible. In consideration of their wider benefits, these can be included at a reduced cost to traditional surfaces.

LP60 River Corridors

A. The natural, historic and built environment of the River Thames corridor and watercourses within the borough will be protected and, where appropriate, enhanced by rewilding to ensure the achievement of a high quality and accessible environment including through the provision of connections to existing and new communities and to maximise biodiversity benefits.

[NB good to see Thames development being disallowed]

E. Development which encroaches onto the river foreshore will not be supported. Opportunities will be taken, in consultation with partner agencies including Natural England, the Port of London Authority and the Environment Agency, to create new habitats and reduce flood risk in accordance with the requirements of the Thames Estuary 2100 Plan.]

LP62 Moorings and Floating Structures

We very much support this clause especially naturalisation element C. The culverting of river channels and watercourse will not be permitted and the naturalisation of river channels and watercourses will be sought as part of development proposals where appropriate and feasible

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<http://www.bluegreenuk.com/freewater/tbge.html>

[In line with the United Nations Sustainable Development Goals](#)