

Wandsworth Local Development Framework

Core Strategy Examination

Post Hearing Consultation on Tall Buildings Representations

March 2010

| No. | Representor |
|-----|----------------------------------|
| 1 | Addition Land Ltd & Network Rail |
| 2 | English Heritage |
| 3 | Greater London Authority |
| 4 | Michael Leigh |
| 5 | Minerva |
| 6 | Natural England |
| 7 | Peabody Trust |
| 8 | Royal Mail |
| 9 | Wandsworth Society |
| 10 | Oak Trading Company Ltd |

1. Addition Land Ltd & Network Rail

12th March 2010

Policy & Information Group, Planning Service
Technical Services Department
Wandsworth Council
The Town Hall
Wandsworth High Street
London
SW18 2PU

100 Pall Mall
London SW1Y 5NQ
telephone 020 7004 1700
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www.dp9.co.uk

Dear Sir

**WANDSWORTH LOCAL DEVELOPMENT FRAMEWORK
CORE STRATEGY: EXAMINATION IN PUBLIC- PROPOSED CHANGES
FOLLOWING SESSION 5**

We act as planning advisors to Addition Land Ltd and Network Rail in relation to their site at Patcham Terrace which is located within the wider Nine Elms and North East Battersea Area and the Vauxhall Nine Elms and Battersea Opportunity Area.

We write to submit representations to the 'Consultation on changes to the Core Strategy proposed Hearing Session 5 in respect of tall buildings'.

The Vauxhall Nine Elms and Battersea (VNEB) Opportunity Area Planning Framework (OAPF) highlights that tall buildings will play a key part in defining the public realm and help landmark particular uses. Tall buildings should be located to signpost routes through the Opportunity Area.

London Plan Policy 4B.9 promotes tall buildings where they create attractive landmarks or act as catalysts for regeneration. The London Plan also recognises that Opportunity Areas may be appropriate for tall buildings. Furthermore, London Plan Policy 3A.3 encourages developments to achieve the maximum intensity of use compatible with local context, and public transport capacity.

The proposed changes to policy IS3 and paragraph 4.132 have removed reference to the VNEB OA which is identified as appropriate for tall buildings subject to relevant design criteria. The proposed changes have also removed reference to areas well served by public transport or at focal points of activity as potential locations for tall buildings. We believe these changes are unsound and will not create an effective planning regime. Locations well served by public transport offer sustainable locations for high density development which can be delivered by tall buildings (subject to satisfying relevant design criteria), building on focal points of activity and



creating regenerative and public realm benefits. The English Heritage/ CABA Guidance on Tall Buildings also recognises that tall buildings may contribute to areas of change (para 2.7).

Amendments to paragraph 4.132

We request the following change is made to paragraph 4.132. Our changes are highlighted in italics and are underlined.

‘Tall buildings are those which are substantially taller than the prevailing height of ~~neighbouring~~ surrounding buildings and/or which significantly change the skyline.’

‘Within the borough’s town centres, Nine Elms near Vauxhall and at focal points of activity (Putney Wharf, Wandsworth Riverside Quarter, Wandle Delta, Ransomes Dock, *Battersea Power Station and at other locations in the VNEB OA well served by public transport*) tall buildings may be appropriate.’

We also request the following change is made. Again, our changes are highlighted in italics and are underlined.

‘Detailed criteria for assessing the design and impact of tall buildings, consideration of the appropriateness of tall buildings on individual sites, and the *general* height at which buildings ~~will~~ *may* be considered ‘tall’ on individual sites, will be set out in the Development Management Policies document *and will have regard* to the Council’s Stage 2 Urban Design Study- Tall Buildings.’

There should be flexibility for the appropriate height of development to be considered in the context of a specific proposal and architectural response taking in to account the context of a site. The EH/ CABA Guidance advises that it is not useful or necessary to define rigorously what is or is not a tall building (para 4.1). It is also important the Core Strategy acknowledges that height is only one aspect of building form and other aspects of building mass and elevational treatment will influence whether the height of a development is appropriateness.

Further clarification is required to explain how the Council intends taking its Urban Design Study forward if the document is to be referenced in the Core Strategy and additional wording should be added to the above text accordingly. The document is in draft and has not been through a formal consultation process. In places it contains inaccuracies, is unclear and is inconsistent with strategic guidance in the draft OAPF.

There will be factors in addition to the Council’s Urban Design Study that will have a bearing on the suitability of a particular scheme and this should be reflected in the changes.

Amendments to Policy IS3d

We object to the changes made to IS3d. We set out below our suggested amendments to the draft policy. Our changes are highlighted in italics and are underlined.

Tall buildings, that is those which are substantially taller than the prevailing height of ~~neighbouring~~ *surrounding* buildings and/or which significantly change the skyline, may be appropriate in the borough’s town centres, Nine Elms near Vauxhall or at Putney Wharf, Wandsworth Riverside Quarter, Wandle Delta, Ransomes Dock, *Battersea Power*



Station, at other locations in the VNEB OA well served by public transport and at focal points of activity.....Detailed criteria for the assessment of tall buildings, consideration of the appropriateness of tall buildings on individual sites, and the *general* height at which buildings will *may* be considered 'tall' on individual sites will be contained in the Development Management Policies document and Site Specific Allocations Document.

The reasons for the proposed changes are set out above. Policy should recognise that other focal points of activity exist generally within the OA and may be enhanced as a result of future development. For example improved transport nodes may emerge as detailed schemes are worked up for sites within the OA. The draft policy should be sufficiently flexible to recognise that other focal points of activity are likely to develop over the lifetime of the plan. The policy should also avoid promoting an overly prescriptive approach in other DPDs.

We look forward to receiving confirmation that the representations have been duly made.

Yours faithfully

DP9

2. English Heritage



ENGLISH HERITAGE

Martin Howell
Group Planner- Policy and Information
Wandsworth Council
Technical Services Department
The Town Hall
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Your Ref:

Our Ref: HD/

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E-mail: nigel.barker@english-heritage.org.uk

FAO KIRSTEN MCGAVOCK

Date: 11 March 2010

Dear Ms McGavock

Re: Wandsworth Local Development Framework: Consultation on changes to the Core Strategy proposed during Hearing Session 5 in response to tall buildings

Thank you for your email dated 19th February and the opportunity to comment on the proposed changes to Policy IS3(d) and supporting text in paragraph 4.132 relating to tall buildings. As you know Claire Craig, who has been responding on behalf of English Heritage on your Core Strategy is now on maternity leave. I attended both public hearing sessions at which the tall buildings policy and its associated text was discussed and your proposed amendments have been considered with colleagues within English Heritage.

As you are aware English Heritage has endeavoured to work with your council to produce the clearest possible guidance on a form of development that by its very nature has long term and wide ranging impacts upon the built environment. Our advice has been based on a wish to see a clear and informed approach at a strategic level to considering how tall buildings can contribute to the vision that your authority is trying to develop for the borough.

I followed the council's representations on its approach very carefully and whilst I understand Mr Howell's point regarding what he sees as incorrect interpretations of the phrase "may be appropriate" English Heritage remains concerned about the potential ambiguities in the council's proposed wording which, in our view, is being interpreted as a green light to tall buildings. Mr Howell was very clear in stating that he believes the council have not taken any "in principle" decision regarding the location of tall buildings but the fact that not only English Heritage but other parties (including planning consultants for developers) are interpreting the approach differently is a cause for concern.

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Please note that English Heritage operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available

As previously indicated to you by email on 9 February English Heritage has two issues with the proposed consolidated wording discussed at the hearing.

The first is the provision of two definitions for tall buildings. The Core Strategy should provide an overarching definition of what constitutes a tall building at a strategic level. We suggest that the following wording would provide a robust and clear definition based on the joint CABE/EH guidance:

Tall buildings are those which are substantially taller than their neighbours and/or which significantly change the skyline.

We see no need to introduce a further definition later in the policy which relies on individual site appraisal because it introduces confusion and potentially renders the simple overarching definition redundant. It also suggests an approach that runs counter to the EH/CABE advice that there should be a plan led approach to tall buildings underpinned by sound urban design studies. The definition is phrased in such a way as to allow for the development of criteria to evaluate tall buildings proposals which should be applicable to the different nature of sites that are within the currently identified locations in the policy.

The second area of concern relates specifically to the proposed wording “may be appropriate”. The concept of a site as being **appropriate** or **not appropriate** for tall buildings is unambiguous. It is the “grey area” in between that potentially presents the problems of interpretation. The simple point to make is that with the level of information and evidence currently available it is not possible to say whether the town centres and opportunity areas can confidently be put into either of the above categories. The Stage 1 study has identified that these areas are focal points where development is probable but in order to plan tall buildings as part of place making and ensure they are in the right location further study is required as part of a plan led, rather than ad-hoc approach.

It therefore seems fair to describe these locations as being sensitive to the impact of tall buildings rather than using “may be appropriate”. This is the language chosen for the joint CABE/EH Guidance (paragraphs 2.8 and 2.9) and we believe is considered and clear. We have suggested that the explanatory text supporting the policy could explicitly state that, for the avoidance of doubt, sensitive does not mean that tall buildings cannot be considered – it means that further work is required to clarify which locations in the proposed areas for change would be either appropriate or inappropriate. Taking into consideration the location of some of the opportunity areas, adjacent to a World Heritage Site, with some containing significant heritage assets e.g. Battersea Power Station, we regard it as self evident that they could be sensitive to the impact of taller buildings that significantly change the skyline.

We therefore ask that our comments are taken into account and the policy is amended accordingly.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Nigel Barker', written over a horizontal line that extends to the right and then curves upwards.

Nigel Barker
Head of Regional Partnerships
LONDON REGION

3. Greater London Authority

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Our ref: PDU/LDF32/LDD01/05/03
Date: 12 March 2010

John Stone
Head of Forward Planning and Transportation
Wandsworth Council
Technical Services Department
The Town Hall
Wandsworth
LONDON SW18 2PU

Dear Mr Stone,

Wandsworth Council Local Development Framework: Changes to the tall buildings policy

Thank you for your letter of 19 February 2010, consulting me on the above changes.

The GLA attended the hearing sessions and made verbal representations at the final session where this matter was discussed in more detail.

The Council's position is unfortunate given that the submission version of policy IS3d was broadly acceptable to the Mayor at both the original submission stage and following the further consultation on changes to the submission stage, which the Mayor felt strengthened the Council's approach.

At the start of the hearing sessions, in particular session 2, the policy text with regard to tall buildings remained as proposed from the previous consultation round. At the session, English Heritage raised concern regarding the text and there was some constructive discussion regarding possible changes.

The Council has quite reasonably attempted to respond to the concerns of English Heritage but is now in the unfortunate position where drafting changes triggered during the hearing sessions have resulted in removal of key references to London Plan policy, public transport and now appear to provide a lack of clarity regarding the issue.

Changes to paragraph 4.132

The changes proposed as a result of discussion during the hearing sessions have resulted in a level of ambiguity surrounding what may be an appropriate or inappropriate location for a tall building.

In particular where the reasoned justification states in the last line of the first paragraph:

“However some sites within these areas will be sensitive to, or inappropriate for tall buildings.”

The result is that the Council appears to be indicating that in certain locations tall buildings ‘may’ be appropriate, but that these areas are also sensitive to or inappropriate for tall buildings. It appears to suggest that the locations are both appropriate and inappropriate. This can be addressed by removal of the above text as it will be subject to testing in any case as required by the detailed drafting of the Development Management policy on tall buildings, and the contents of the Site Specific Allocations Document.

In addition reference to public transport, previously included had been removed. This is one of a number of tests relevant to the consideration and links directly to Policy 4B.9 and 3A.3 of the London Plan regarding tall buildings – location, and maximising the potential of land, as well as being a consideration identified in EH/CABE guidance on tall buildings.

London Plan policy reference and reference to the Vauxhall Nine Elms Battersea Opportunity Area Planning Framework should be retained in a form of words that reflect the fact that the evidence (stage 1 and 2 Urban Design studies) have been informed by work on the OAPF and the tests within policy 4B.9 and 4B.10 and that future policy drafting in, for example the Development Management Policies DPD will also reflect the themes set out therein.

Policy IS3d

Similar to the comments set out above, the reference to, ‘*Some locations within these areas be sensitive to, or inappropriate for tall buildings*’ provides limited clarity on the Council’s approach to tall buildings. The Council may wish to clarify the intention by including the following changes:

*“IS3d. Tall buildings, that is those which are substantially taller than the prevailing height of neighbouring buildings and/or which significantly change the skyline, may be appropriate **in areas well served by public transport**, the borough’s town centres, Nine Elms near Vauxhall or at Putney Wharf, Wandsworth Riverside Quarter, Wandle Delta, Ransomes Dock, and Battersea Power Station focal points of activity.*

*Some locations within these areas ~~will~~ **may, however**, be sensitive to, or inappropriate for tall buildings. Applications for tall buildings will need to justify themselves in terms of the benefits they may bring for regeneration, townscape and public realm and be of high architectural quality, respect local context and the historic environment. Tall buildings are likely to be inappropriate in other areas. Detailed criteria for the assessment of tall buildings, consideration of the appropriateness of tall buildings on individual sites, and the height at which buildings will be considered ‘tall’ on individual sites will be contained in the Development Management Policies Document and Site Specific Allocations Document.*

New policy text IS3e

This is fully supported.

Whilst the changes do not cause significant harm to the implementation of the London Plan, they give rise to uncertainty regarding the Council’s position on tall buildings and therefore clarity is sought. If you would like to discuss any of the representations in more detail, please contact Matthew Carpen (020 7983 4272) who will be happy to discuss and arrange further meetings.

Yours sincerely



Giles Dolphin

PP Assistant Director - Planning

cc Richard Tracey, London Assembly Constituency Member
Jenny Jones, Chair of London Assembly Planning and Housing Committee
Ian McNally & John Pierce, GoL

4. Michael Leigh

From: Michael Leigh [michaelleigh@live.co.uk]

Sent: 19 February 2010 12:49

To: McGavock, Kristen

Subject: RE: Wandsworth Core Strategy - Consultation on changes to the Core Strategy proposed during Hearing Session 5 in respect of tall buildings

Dear Martin Howell,

I welcome the changes proposed by the inspector to policy IS3, particularly the decision to exclude references to designated areas of the borough where tall buildings might be beneficial.

However, I still have reservations about the presumption, still apparent in the policy, that tall buildings may add character and act as a catalyst for regeneration. Of course, they might be beneficial but equally they could well be very harmful - so why even hint at a prior judgement in their favour?

In my experience it is often very difficult for a concern citizen, or citizens (lay people), to counter proposals from professional planners backed by these kind of prior, and unnecessary, endorsements.

I would therefore urge that the statement is amended to make the consideration of proposals for tall buildings even handed.

Yours sincerely

Michael Leigh

From: KMcGavock@wandsworth.gov.uk

Date: Fri, 19 Feb 2010 11:28:44 +0000

Subject: FW: Wandsworth Core Strategy - Consultation on changes to the Core Strategy proposed during Hearing Session 5 in respect of tall buildings

Dear Sir/Madam

**Wandsworth Local Development Framework
Consultation on changes to the Core Strategy proposed during Hearing Session 5 in
respect of tall buildings**

The Core Strategy Development Plan Document (DPD) sets out the Council's spatial vision, strategic objectives and spatial strategy on how the borough should develop over the next fifteen years along with core policies and information on monitoring and implementation. The Core Strategy is part of the Local Development Framework (LDF), which will eventually replace the Unitary Development Plan (UDP) adopted August 2003.

Wandsworth Council submitted its Core Strategy to the Secretary of State for examination on 20 March 2009. The public hearing sessions, which form part of the examination, were undertaken on 2nd, 4th, 9th, 11th and 16 February 2010. Throughout the course of the hearing sessions a number of matters were raised which resulted in the Inspector requesting the Council to propose changes to the Core Strategy. These changes were made available on the 12th February 2010 and discussed at the final hearing session on the 16th February 2010. The full schedule of proposed changes is attached.

Prior to closing the final hearing session, the Inspector confirmed that the majority of proposed changes are of a minor nature, intended to provide more clarity within the Core Strategy but that she wished to further consider the change to policy IS3(d) and supporting text in paragraph 4.132 in respect of tall buildings (changes 12 and 13).

The Inspector has since confirmed that she regards most of the proposed changes to be in the nature of clarification (i.e. referring to the focal points of activity by name, and 'signposting' to detailed work being carried forward in other DPDs). However, the Inspector considers that the omission of reference to locations which are well served by public transport may be seen as significant by those with an interest in such locations and has therefore instructed the Council to undertake a targeted round of consultation for a period of 21 days.

You are being consulted on the latest change to Policy IS3 and supporting text in paragraph 4.132 (changes 12 and 13 of the attached document) as a party who made representations on the proposed submission Core Strategy and/or changes made to the Core Strategy Submission version, in relation to tall buildings. Only comments in relation to changes 12 and 13 will be accepted, any comments in relation to other policies will be returned to you and will not be considered.

Consultation on the Council's proposed changes will begin Friday 19 February 2010. Representations on the soundness of the changes must be received by 12.00 noon Friday 12 March 2010 at the latest. Any responses received after this time will be returned to you and will not be considered.

Please direct all responses by email to planningpolicy@wandsworth.gov.uk or write to the Planning Policy Team, Wandsworth Council, The Town Hall, Wandsworth High Street, London SW18 2PU.

A hard copy of this email will be sent to you shortly. We look forward to receiving your views.

Yours faithfully,

Martin Howell

Martin Howell
Group Planner – Policy & Information
for Borough Planner

5. Minerva

- City of London
- Glasgow
- Edinburgh

PD6725/JE
email: Jeremy.evershed@montagu-evans.co.uk

12 March 2010

Planning Policy Team
Wandsworth Council
Technical Services Department
The Town Hall
Wandsworth High Street
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FAO: Martin Howell

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Dear Sir or Madam

**Wandsworth Local Development Framework
Changes to the Core Strategy proposed during Hearing Session 5 in respect of tall buildings**

We write to you on behalf of our client, Minerva Plc, who as you know own the Ram Brewery and Capital Studios site as well as the Cockpen House site on Buckhold Road.

Thank you for consulting us on the changes to the Core Strategy tall buildings policy (Policy IS3d) that have been proposed during the Core Strategy EIP Hearing Session 5.

Whilst we support the principle of including a criteria based tall buildings policy within the Core Strategy, we have a number observations about the suggested detailed wording and believe the changes proposed are, in general, inappropriate.

We enclose a table setting out the suggested changes to the wording of the proposed revised Policy IS3d in the left hand column and the justification for these changes in the right hand column. We consider that the policy, if worded as proposed during Hearing Session 5, would be unsound.

We also note that the proposed policy wording does not accord with the London Plan or emerging Replacement London Plan in that it proposes to remove the criterion relating to public transport accessibility. Under the 2004 Act the planning authority must have regard to the London Plan and the Core Strategy must be in general conformity. This is a significant criterion which is appropriate to the consideration of applications for tall buildings in Wandsworth. The criterion should, therefore, be inserted into Policy IS3d.

Finally, we note that similar changes have been proposed for the associated supporting text. We consider, for the same reason as those relating to the policy wording, that these changes are also inappropriate. Additionally, we note that the supporting text inappropriately proposes to predetermine that the DMPD will include policy based on the Council's Stage 2 Urban Design Study. We consider that, whilst this study will provide part of the evidence base for policy, the DMPD should be tested in the usual way and not be predetermined.

We trust that these comments will be taken into account by the Council and will be made available to the Core Strategy Inspector for her to consider in drafting her report. Please do not hesitate to contact Jeremy Evershed at the above offices if you wish to discuss any aspects of these representations.

Yours faithfully,



MONTAGU EVANS LLP
Encl.

| <p>IS3D POLICY WORDING</p> <p>[NOTE: The following is the text of the policy wording proposed during the hearing session with text identified in red where Minerva proposes changes. Text that is erased through is proposed for deletion. Where additional or replacement text is proposed this is shown in <i>italics</i>]</p> | <p>COMMENT / JUSTIFICATION</p> |
|--|---|
| <p>“IS3d. Tall buildings, that is those which are substantially taller than the prevailing height of neighbouring buildings townscape context and / or which significantly change the skyline, may be appropriate in the borough’s town centres, Nine Elms near Vauxhall or at Putney Wharf, Wandsworth Riverside Quarter, Wandle Delta, Ransomes Dock, and Battersea Power Station focal points of activity <i>(as illustrated on Map 9)</i>.</p> <p>Some locations within these areas will may be sensitive to, or inappropriate for tall buildings.</p> <p>Applications for tall buildings will need to justify themselves in terms of the benefits they may bring for regeneration, townscape and public realm and be of high architectural quality, respect local context and the historic environment.</p> <p>Proposals for tall buildings will be assessed with regard to the following criteria:</p> <ul style="list-style-type: none"> • their contribution to regeneration; • their contribution to the townscape of the area within which they are proposed and their wider area; • the contribution to creation of public realm; • their architectural quality; • regard for local context; • regard for the historic environment; and • the transport capacity of the area, including accessibility by public transport | <p>The height of neighbouring buildings may not be representative of the area as a whole. Additionally, neighbouring buildings may be ones which are either unattractive or uncharacteristic of the area generally in terms of height or appearance.</p> <p>Add reference to Map 9 for the avoidance of doubt as a “focal point” could be construed in more general terms.</p> <p>There is no evidence to suggest that specific areas ‘will’ as a matter of principle be sensitive to tall buildings or inappropriate for them.</p> <p>Re-worded, as tall buildings cannot “justify themselves”.</p> <p>Re-worded text.</p> <p>Additional criterion to accord with London Plan.</p> |

Wandsworth Local Development Framework

12 March 2010
PD6725/JE

Response to the changes to the Core Strategy proposed during Hearing Session 5 in respect of tall buildings

| IS3D POLICY WORDING [NOTE: The following is the text of the policy wording proposed during the hearing session with text identified in red where Minerva proposes changes. Text that is erased through is proposed for deletion. Where additional or replacement text is proposed this is shown in <i>italics</i>] | COMMENT / JUSTIFICATION |
|--|---|
| <p>Tall buildings are likely to be inappropriate in other areas. Detailed criteria for the assessment of tall buildings, consideration of the appropriateness of tall buildings on individual sites, <i>consideration of sites where tall buildings will be inappropriate,</i> and the height at which buildings will be considered 'tall' on individual sites will be contained in the Development Management Policies Document and Site Specific Allocations Document."</p> | <p>The Hearing Sessions suggested wording would necessitate the review of all sites in the borough which is not feasible.</p> |

6. Natural England

From: Hammond, David (NE) [David.Hammond@naturalengland.org.uk]

Sent: 03 March 2010 12:34

To: DTS Planning Policy

Subject: Wandsworth Local Development Framework - Consultation on Changes to the Core Strategy proposed during Session 5 in respect of Tall Buildings

FAO Mr Martin Howell

Dear Mr Howell,

Thank you for your letter and enclosures dated 19th February 2010 in respect of the above consultation document seeking the views and comments of Natural England on the proposed changes.

I have now had the opportunity to look through the details submitted and can confirm that Natural England has no objections or amendments to the proposed changes as outlined in your correspondence.

I trust that this is sufficient for your purposes, but should you have any questions or wish to discuss any aspects of this document please do not hesitate to contact me at the address below.

Yours Sincerely

David Hammond

Planning & Advocacy Advisor

Natural England - London Region

Future London Team

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7. Peabody Trust



Mr A McDonald
Head of Planning
London Borough of Wandsworth
Town Hall
Wandsworth High Street
London
SW18 2PU

By email

12 March 2010

Our ref. AW/PV/1089001

Dear Mr McDonald,

RE: WANDSWORTH LDF – CONSULTATION ON CHANGES TO THE CORE STRATEGY PROPOSED DURING EIP HEARING SESSION 5 IN RESPECT TO TALL BUILDINGS REPRESENTATIONS ON BEHALF OF THE PEABODY TRUST

We write on behalf of our client, the Peabody Trust in response to the consultation on changes to the Core Strategy proposed at the EIP during Hearing Session 5. The proposed changes are in respect of tall buildings Policy IS3d and the supporting text in paragraph 4.132.

At the hearing session, the Inspector heard the serious concerns of the Peabody Trust, supported by the GLA, and we are pleased that the Inspector concluded that these changes were of potential significance. We have now had the opportunity to consider these late changes and have met with the Council to discuss why these have happened, and the opportunities for a revised form of wording which retain the principle of locations which are very well served by public transport being appropriate for tall buildings.

As it now stands, Peabody is extremely concerned as the proposed changes to the draft policy and supporting text delete the reference to sites with good public transport accessibility being appropriate locations for tall buildings. This is contrary to the evidence base findings, set out in the Stage One Urban Design Study, as explained below.

The Council has stated that the Inspector requires all locations considered to be appropriate for tall buildings to be identified on a map in the Core Strategy DPD. This approach was not raised by the Inspector during the course of the hearing, as we have attended the discussions regarding tall buildings. In any event, we believe that a plan based approach could be adopted with the suggested approach below.

However, whilst we note that the CABI and English Heritage “Guidance on tall buildings” (2007) recommends that locations should be identified using a map-based approach, there is no policy supports for this, neither in PPS12 nor the London Plan (consolidated).

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Consultant

John Spain
BBS MRUP MRICS MRTPI MIPI

Also in Manchester, Leeds and Dublin

Notwithstanding this, we suggest that if the Council is being requested by the Inspector to define the locations where tall buildings may be appropriate, it would be possible to include edge of centre sites (we suggest using the PPS4 definition of “up to 300m of a town centre boundary”) that have a PTAL rating of 6. We consider that this would satisfy this ‘requirement’, yet be consistent with the evidence base.

We therefore suggest that the following changes are made to Policy IS3 and supporting paragraph 4.132 to ensure soundness and consistency with the evidence base.

Proposed amendment to Policy IS3:

“Tall buildings, that is those which significantly exceed the prevailing height of surrounding buildings, may be appropriate in locations with a high level of public transport accessibility (defined as a PTAL of 6), including the town centres and edge of centres (defined as within 300m of a town centre boundary) and Nine Elms near Vauxhall, or at other defined focal points of activity, providing they can justify themselves in terms of the benefits they may bring for regeneration, townscape and public realm and their effect on existing historic environment. Tall buildings are likely to be inappropriate in other areas. Detailed criteria for the assessment of tall buildings and consideration of the appropriateness of tall buildings on individual sites will be contained in the Development Management Policies Document and Site Specific Allocations Document.”

Proposed amendment to paragraph 4.132:

“Tall buildings and/or small clusters of tall buildings which can demonstrate these benefits may be justified in areas with a high level of public transport accessibility (defined as a PTAL of 6), including the town centres, and edge of centre locations (defined as within 300m of a town centre boundary) particularly Clapham Junction, Wandsworth and Putney, and at Nine Elms near Vauxhall and a focal points of activity.”

Justification for proposed amendments

The proposed phrase “high level of public transport accessibility” is referenced from the Stage One Urban Design Statement, which sets out analysis used to identify where tall buildings may be appropriate, referring to UDP policy TBE6. It states that

“high buildings will only be permitted where the site has one (or more) of the following positive criteria:

- a) has a high level of public transport accessibility;*
- b) is at a focal point of activity;*
- c) has the potential to enhance existing, or create new, views and vistas.”*

Furthermore, the CABE guidance on tall buildings sets out criteria for evaluating tall buildings proposal, which includes the relationship to transport infrastructure. The criterion (para 4.1.4) states that:

“Transport is important in relation to tall buildings because of the intensity of use, as well as density, that they represent.”

We trust that Peabody’s position is clear, and that the proposed amendments are considered in light of the Council’s proposed changes, which, as they currently stand are unsound under the test of soundness (i) Justified, as the policy wording would not be founded on a robust or credible evidence base.

Should you wish to discuss any of the above issues please contact me or Tania Tindale.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Philip Villars', written in a cursive style.

Philip Villars

cc: Ms C Bennie – The Peabody Trust

8. Royal Mail



Wandsworth Borough Council
Planning Policy
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Emma Andrews
Senior Director
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BY POST & EMAIL

Our ref: EJF/SDF/041379/C/Wandsworth/004L

12 March 2010

Dear Sirs

ROYAL MAIL REPRESENTATIONS TO WANDSWORTH BOROUGH COUNCIL CORE STRATEGY DEVELOPMENT PLAN DOCUMENT CONSULTATION ON CHANGES PROPOSED DURING HEARING SESSION 5 IN RESPECT OF TALL BUILDINGS

We are instructed by Royal Mail Group (Royal Mail) to submit representations to the Core Strategy Development Plan Document (DPD) with regards to changes proposed in Hearing Session 5 in respect of Policy IS3 (Good quality design and townscape) and the supporting text in paragraph 4.132. These changes are identified as changes 12 and 13 in the "*Wandsworth Core Strategy Examination Changes to Core Strategy wording requested during Hearing Sessions*" document.

BACKGROUND

Royal Mail formerly Consignia Plc, is the successor to the former statutory corporation, The Post Office. Although its management operates independently, Royal Mail is wholly owned by the Government through the Secretary of State for Business, Innovation and Skills. Its services are regulated by the Postal Services Regulator, Postcomm. Its letters business, Royal Mail is the operator of universal postal service functions through the Royal Mail letter post delivery and collection services handling letters, postal packets, and high value (registered) packets. Royal Mail Group also operates Parcelforce Worldwide which is a parcels carrier. Post Office Ltd (a wholly owned subsidiary of Royal Mail) operates the national network of post offices and sub post offices.

The United Kingdom letter post business was fully liberalised in January 2006 by Postcomm and Royal Mail now operates in a highly competitive market place. As such, it effectively operates like any other business and is continually seeking to find ways to improve the efficiency of its business (e.g. increased automation) and respond to the changes in communications technology (e.g. email and internet). Put simply, the nature of the mail industry has and continues to change and Royal Mail's real estate needs to respond accordingly.

Royal Mail has a number of land holdings throughout the Borough, including their London South Mail Centre on Nine Elms Lane, which is a major existing operational Mail Centre. This site is located at the centre of the Vauxhall Nine Elms Battersea (VNEB) Opportunity Area and includes a Mail Centre (which serves the entire SE and SW London postcode areas) and a Cluster Delivery Office (which serves the SW1, SW3, SW7, and SW18 postcode districts).





Royal Mail did not submit representations to draft Policy IS3d of the Core Strategy, however, we have recently submitted representations on behalf of Royal Mail to Policy DMS 4 (Tall buildings) of the Development Management Policies Preferred Options Document, dated 5 February 2010, which sets out detailed planning policy for tall buildings within the Borough. In addition, representations have also been made to the Site Allocations Preferred Options Document, dated 5 February 2010.

REPRESENTATIONS

Proposed Changes 12 and 13

Royal Mail **objects** to the proposed amendments to paragraph 4.132 and Policy IS3d of the Core Strategy in so far as they relate to the suitability of the VNEB Opportunity Area for tall buildings. The revision states that 'Nine Elms near Vauxhall' and focal points of activity including 'Battersea Power Station' **may** be appropriate for tall buildings. Other areas within the Borough are '...likely to be considered inappropriate'.

This approach is inconsistent with Figure 10.2 Tall Buildings Strategy within the Draft Opportunity Area Planning Framework (OAPF) and, as such, does not maximise the development potential of the area in line with the adopted and emerging London Plan.

The draft OAPF supports the provision of high density development within the Opportunity Area. It is recognised that there is potential for a cluster of tall buildings at Nine Elms, however, the potential for tall buildings within 'Nine Elms and Battersea' subject to the parameters of the London View Management Framework (LVMF) is also recognised. This zone encompasses the majority of the area to the north of the railway line, including Royal Mail's London South Mail Centre site.

We therefore **request** that both the supporting text in paragraph 4.132 and Policy IS3d be revised to reflect the potential for tall buildings within the wider OAPF area. We propose the wording be revised as follows:

■ Supporting text in Paragraph 4.132

'...Within the Borough's town centres, the northern part of the VNEB Opportunity Area and at focal points of activity (Putney Wharf, Wandsworth Riverside Quarter, Wandle Delta, Randsomes Dock and Battersea Power Station) tall buildings may be appropriate...'

■ Policy IS3d

'IS3d. Tall buildings, that is those which are substantially taller than the prevailing height of neighbouring buildings and/or which significantly change the skyline, may be appropriate in the Borough's town centres, the northern part of the VNEB Opportunity Area or at Putney Wharf, Wandsworth Riverside Quarter, Wandle Delta, Randsomes Dock, and Battersea Power Station focal points of activity...'

We reserve the right to amend or supplement these representations at a later date if necessary. We should be grateful if you would acknowledge receipt of our representations and advise as to progress of the Core Strategy Document.

Please contact Emma Andrews on the above contact details or Sacha Ferreira (020 7338 4417 or sacha.ferreira@bnpparibas.com) should you have any queries. We look forward to hearing from you in response to the above.

Yours faithfully

BNP Paribas Real Estate.

BNP Paribas Real Estate

9. Wandsworth Society

Wandsworth Society

210 Beechcroft Road
LONDON SW17 7DP

for the attention of **Martin Howell**

11 March 2010

Borough Planner
Technical Services Department
Wandsworth Town Hall
London SW18 2PU

planningpolicy@wandsworth.gov.uk

Dear Mr Howell

Wandsworth Local Development Framework

Consultation on Changes to the Core Strategy proposed during Hearing Session 5 in respect of tall buildings

Thank you for your letter 19 February advising of proposed changes in the Core Strategy and the opportunity to comment on changes 12 and 13. We should be pleased if you would give consideration to the following comments.

Change 12 : paragraph 4.132

We would like to see this paragraph further amended to read -

Tall buildings are those which are substantially taller than the prevailing height of neighbouring buildings and/or which significantly change the skyline. Tall buildings may be appropriate providing they are located in appropriate locations and acceptable in terms of design and impact on their surroundings. They can be an efficient way of using land, in line with sustainability objectives, although it is important that they do not harm existing important views and skylines and that they respect local context and the historic environment. The borough is largely characterised by low to medium rise housing and tall buildings are likely to be considered inappropriate.

Detailed criteria for assessing the design and impact of tall buildings, consideration of the appropriateness of tall buildings on individual sites, and the height at which buildings will be considered 'tall' on individual sites, will be set out in the Development Management Policies Document and Site Specific Allocations Document based on the Council's Stage 2 Urban Design Study – Tall Buildings.

Change 13 : IS3d and IS3e

We would like to see this paragraph further amended to read -

IS3d. Applications for tall buildings will need to justify themselves in terms of the benefits they may bring for regeneration, townscape and public realm and be of high architectural quality, respect local context and the historic environment. Detailed criteria for the assessment of tall buildings, consideration of the appropriateness of tall buildings on individual sites, and the height at which buildings will be considered 'tall'

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on individual sites will be contained in the Development Management Policies Document and Site Specific Allocations Document.

IS3e. Views of the Westminster World Heritage Site will be protected in accordance with the London Plan and the London View Management Framework.

Thank you

John Dawson
for
The Wandsworth Society's planning sub-committee

For reference the annotated texts

Paragraph 4.132 as proposed by the Society

Society deletions indicated ~~xxxxx~~ and additions xxxxx

Tall buildings are those which are substantially taller than the prevailing height of neighbouring buildings and/or which significantly change the skyline. Tall buildings, ~~that is those which significantly exceed the prevailing height of surrounding buildings can, if well designed, create attractive landmarks underlining aspects of the borough's character and act as a catalyst for regeneration,~~ **may be appropriate** providing they are located in appropriate locations and acceptable in terms of design and impact on their surroundings. They can be an efficient way of using land, in line with sustainability objectives, ~~and add definition to the borough's skyline,~~ although it is important that they do not harm existing important views and skylines and that they respect local context and the historic environment. ~~Tall buildings and/or small clusters of tall buildings which can demonstrate these benefits may be justified in areas well served by public transport such as the town centres, particularly Clapham Junction, Wandsworth and Putney and at Nine Elms near Vauxhall and at focal points of activity. The Council's Stage 1 Urban Design Statement – Tall Buildings, identifies areas of the borough that may be appropriate for tall buildings. Within the borough's town centres, Nine Elms near Vauxhall and at focal points of activity (Putney Wharf, Wandsworth Riverside Quarter, Wandle Delta, Ransomes Dock and Battersea Power Station) tall buildings may be appropriate (see policies PL8, PL9, PL11, PL12, PL13, PL14). However some sites within these areas will be sensitive to, or inappropriate for tall buildings. Outside these areas~~ **The** borough is largely ~~However~~ large areas of the borough are characterised by low to medium rise housing and ~~where~~ tall buildings are likely to be considered inappropriate.

Detailed criteria for assessing the design and impact of tall buildings, *consideration of the appropriateness of tall buildings on individual sites, and the height at which buildings will be considered 'tall' on individual sites,* will be set out in the Development Management ~~Control~~ Policies Document *and Site Specific Allocations Document based on the Council's Stage 2 Urban Design Study – Tall Buildings.* ~~based on the criteria in policy 4B.10 of the currently adopted and emerging London Plan and the Vauxhall/Nine Elms/Battersea Opportunity Area Planning Framework (OAPF).~~

Paragraphs IS3d and IS3e as proposed by the Society

Society deletions indicated ~~xxxxx~~ and additions xxxxx

IS3d. ~~Tall buildings, that is those which are substantially taller than the prevailing height of neighbouring buildings and/or which significantly change the skyline, may be appropriate in~~

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~~*specified areas of* the borough's town centres, Nine Elms near Vauxhall *or at* Putney Wharf, Wandsworth Riverside Quarter, Wandle Delta, Ransomes Dock, and Battersea Power Station *or other* focal points of activity. Some locations within these areas will be sensitive to, or inappropriate for tall buildings.~~ Applications for tall buildings will need to justify themselves in terms of the benefits they may bring for regeneration, townscape and public realm and be of high architectural quality, respect local context and the historic environment. ~~Tall buildings are likely to be~~ **will be** inappropriate in other areas. Detailed criteria for the assessment of tall buildings, consideration of the appropriateness of tall buildings on individual sites, and the height at which buildings will be considered 'tall' on individual sites will be contained in the Development Management Policies Document and Site Specific Allocations Document.

IS3e. Views of the Westminster World Heritage Site will be protected in accordance with the London Plan and the London View Management Framework.

10. Oak Trading Company Ltd

letter from Husband and Carpenter Architects Ltd to

M Howells
Planning Policy Team
Planning Service
London Borough of Wandsworth
Town Hall
High Street
London
SW18 2PU

19 March 2010

Dear Sirs,

**WANDSWORTH CORE STRATEGY EXAMINATION/ TALL BUILDINGS POLICY
POLICY IS3 9(d) and supporting text in paragraph 4.132 (Changes 12 and 13)**

and

WOBURN HOUSE, 155 FALCON ROAD, LONDON SW11

We refer to your email of 18 March 2010 and resubmit our comments in the format requested as follows.

We act as agents for Oak Trading Company Ltd who have an interest in the above property.

We would be grateful if you could immediately place this before the Inspector considering the Core Strategy as part of their consideration of changes 12 and 13 of the "Changes to Core Strategy wording requested during Hearing Sessions", on the basis that they only allow any amendment to the clauses on the following basis:

Para 4.132 Line 3 after skyline, add "**taken in the overall context of existing or future building heights designated in adopted policies.**" This is suggested in order to reflect the changing emphasis that a particular site or building may have in relation to both the existing and future likely contexts.

Para 4.132 Line 18 after activity, add "**, whether existing or likely following the implementation of adopted policies.**" This is similarly suggested as, when emerging policies are eventually implemented, the context of a building or a site taken in the round will inevitably change, and it may be more appropriate to relate any new proposal to more recent developments or policies rather than to continue to pay excessive homage to earlier adjacent existing buildings, as they may well be of lesser or indifferent quality or indeed even outside the Conservation Area and Town Centre, as in the case of the terraced housing in Mossbury Road adjacent to Woburn House, and in the case of transition sites.

Generally in relation to the proposed amendment submitted by English Heritage we submit that **their proposal is far too restrictive and prescriptive**, and gives

insufficient weight to the economic benefits that can accrue from tall and taller buildings as recognised in PPS 4. In calling for “high architectural quality” we consider this to be a highly subjective term and one open to misuse. Many Conservation Areas are designated as they have a **cohesive architectural quality** rather than one that is of **especially architecturally high quality**. The EH suggestion ignores the effects of newly adopted and emerging policies on an area such as Falcon Road which is currently generally regarded as having poor quality, and with relatively low buildings, but in the future may, as part of adopted policies, have many taller buildings nearby, as proposed in the final SSAD policy documents. It needs to be realised that the site of Woburn House is not immediately adjacent to or very close to any listed buildings or indeed to any buildings typical of the special characteristics and qualities of the Conservation Area, and with that in mind an over prescriptive and blanket policy may prevent sustainable development of a site and implementation of PPS 4. **We therefore STRONGLY OBJECT to their proposed amendment and substitution.**

We would be grateful for an acknowledgment of receipt of this submission.

If you have any queries on the above points please do let me know as soon as possible,

Yours faithfully,

David Rosemont

Consultant Architect RIBA ACArch

Per pro Husband and Carpenter Architects Ltd

CC Tim Glass

CC Steve Stubbs