

Our ref: BF/Q200622
Your ref: St George South London Ltd
Email: [REDACTED]
Date: 28th February 2022



Planning Policy
Environment and Community Service
Wandsworth Council
The Town Hall
Wandsworth
London
SW18 2PU

By Email: planningpolicy@wandsworth.gov.uk

Dear Sir or Madam,

**Consultation on the Wandsworth Publication Draft Local Plan (Regulation 19)
Representations made on behalf of St George South London Ltd
The Town and Country Planning (Local Planning) (England) Regulations 2012**

Quod is instructed by St George South London Ltd (“St George”) to submit representations to the Wandsworth Publication Local Plan Regulation 19 (hereby the “Reg 19 Plan”). These representations are submitted within the consultation period that runs from 10th January to 28th February 2022.

The representations relate to the Ram Brewery site known as WT2 Ram Brewery/Capital Studios/Former Dexion/Duvall site, Ram Street/Armoury Way, Wandsworth, SW18

St George has acquired Phase 2 and Phase 3 of the Ram Brewery site and is completing the development under the extant planning permissions. Planning permission 2019/5169 approves development of 2-12 storeys in height and a tall building of 36 storeys in height. This is a material consideration which should inform the Regulation 19 Plan.

St George's principal concern is that the implemented development already approved at Phase 2 and 3 appears not to have been used as a material consideration to inform emerging policy. We would therefore like to see both site allocations explicitly refer to the extant consents in both Phase 2 and Phase 3 in respect of the approved number of homes; approved uses; and approved building heights. This will provide a far more appropriate context to the site and for the public to understand.

A summary of our comments is set out in Table 1 below.



Table 1: Summary of Reg 19 Plan Comments

Policy	Reason for non-conformity
Map 3.2 Site Allocations	St George supports the allocation of the Ram Brewery site as a development plan allocation.
Site allocation WT2 - Ram Brewery/Capital Studios/Former Dexion/Duvall site, Ram Street/Armoury Way, Wandsworth, SW18	<p>St George support the site allocation of a mixed-use development including residential, replacement economic floorspace; retail, restaurants, business space, cultural, and entertainment uses with provision for a riverside walk.</p> <p>St George’s principal concern is that the implemented development already approved at Phase 2 and 3 under planning permission 2019/5169 and 2020/2745, which is a material consideration, is not referenced in the allocation. St George would therefore like to see both site allocations explicitly refer to the extant consents in respect of the approved number of homes; approved uses; and approved building heights. This will provide a far more appropriate context to the site and a greater understanding for the public.</p> <p>WT2 excludes Phase 1 of the Ram Brewery development. It is therefore not necessary to include obligations relating to Phase 1 within the site allocation “uses” section (e.g There is also a requirement to deliver an ongoing cultural and heritage programme over the site’s various development phases, including celebrating the 500 years of brewing onsite through an on-site heritage centre which will be open for a minimum of ten years).</p> <p>The allocation states that part of WT4 is subject to tall building zone TB-G1-03. Within this zone, the maximum appropriate height range is 7 to 10 storeys.</p> <p>Part of the site falls within mid-rise building zone MB-G1-08 and MB-G1-11, and the maximum appropriate height for the zone is 5 storeys. This approach should be revised to reflect the maximum height approved at the site (up to 36 storeys) which has already been granted planning permission and is currently being built out.</p>
LP4 - Tall Buildings and Appendix 2	It is considered that the policy is not justified. It is inconsistent with Policy D9 of the London Plan and the maximum zones and heights proposed are not justified by the Council’s evidence base Urban Design Study 2021 (‘UDS 21’). This document uses an “Analysis of existing buildings and consented masterplan” (by which is means the SPD) as justification for



	<p>the proposed heights, not recent planning permissions that are currently being built out.</p> <p>The policy is inflexible as it does not permit heights beyond those prescribed despite planning permission having been granted by the Council for taller buildings. This is unsound.</p>
Policy LP23 - Affordable Housing	To ensure consistency with the London Plan and National Policy.
Policy LP24 – Housing Mix	To ensure consistency with the London Plan.
Policy LP30 – Build to Rent	To ensure consistency with LP Policy H11 and National Policy NPPF paragraph 65, and NPPG Paragraph: 002 Reference ID: 60-002-20180913 and to include flexibility as required by the Council’s whole plan viability statement.

Chapter 14 Achieving Design Excellence - Policy LP4 Tall Buildings / Appendix 2 Tall Building and Mid-rise Building Maps - OBJECT

St George support the identification of part of site allocation W2 as a tall building location at Appendix 2 Map 23.27 Tall Building Zone TB-G1d-02, however are concerned that the height parameters for this zone are 7 to 10 storeys, and that the remainder of the site is identified as Map 23.36 Wandsworth Town and Common Mid-rise Building Zone MB-G1-08 and MB-G1-11) where buildings of no more than 5 storeys are permitted.

St George, consider that the height parameters are unjustified by the evidence base to the Local Plan, and fails to acknowledge planning permission 2019/5169 granted by the Council which permits a building up to twelve storeys within Tall Building Zone TB-G1d-02 (where the Reg 19 plan proposes a ten-storey maximum); and permits a building up to 36 stores within Mid-rise Building Zone MB-G1-08 (where the Reg 19 plan proposes a five-storey maximum).

The UDS 21 evidence base considers the site allocation at Page 213 Appendix A Tall Buildings, and states that the justification for the Tall Building Zone TB-G1d-02 is an analysis of the consented masterplan. Page 283 of the UDS 21 A.8.1 TB-G1-03: Wandsworth Town and Riverside which discusses the zone in more detail fails to make reference to planning permission 2019/5169 within the “existing/consented tall building assessment section”. It does not make reference to the approval of a 36 storey tower which is being built out. This is an omission and should be rectified through a re-zoning of the tall building zone and proposed maximum heights.



St George is also concerned with the approach taken for Policy LP4. LP4(C) states that proposals for tall buildings will not be permitted outside the identified tall building zones; and LP4(D) states that proposals for tall buildings should not exceed the appropriate height range identified for each of the tall building zones, and the height of tall buildings will be required to step down towards the edges of the zone (unless it can be clearly demonstrated that this would not result in any adverse impacts including on the character and appearance of the local area).

This approach is not flexible and would result in an in-principle policy objection to heights at 6 storeys+ and 11 storeys+, despite planning permission existing for taller buildings.

St George suggest that the following wording is introduced into LP4 as a modification: -

- Heights to be consistent with the general building heights shown on the Tall Building Zone Maps.
- Maps indicate the heights likely to be generally acceptable to the council.
- Proposals will still need to be assessed in the context of other policies to ensure that they are appropriate in that location and deliverable when the plan is read as a whole.
- Apply flexibility whereby circumstances where the quality of design of a development and its impact on character is such that taller buildings that exceed the general heights in these locations could be shown by applicants to be acceptable.

Policy LP23 (Affordable Housing) – OBJECT

St George support the Council's intention to adopt the London Plan's Fast Track Route for affordable housing. However, the Policy LP23 should define that the Fast Track Route will be available to developments that deliver a minimum of 35% affordable housing in line with Policy H5 of the London Plan. St George believe that flexibility should be introduced to the proposed Council's tenure split of 50% low-cost rest products, 25% First Homes and 25% other intermediate products as this limits flexibility within the intermediate tenure.

Policy LP24 (Housing Mix) – OBJECT

Policy LP24 is not in general conformity with LP H10 Housing Site Mix which acknowledges¹ that a higher proportion of one and two bed units is appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity. The policy should be revised to state that generally a higher proportion of one and two bed units in locations which are closer to a town centre or station or with higher public transport access and connectivity.

¹ LP Policy H10 (6)



Chapter 18 Building A Strong Economy - Policy LP38 (Affordable and Open Workspace) – OBJECT

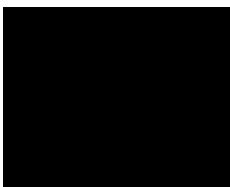
St George propose that the policy should be revised. It currently proposes that any economic floorspace, regardless of size, should make a contribution to the provision of affordable and/or open workspace. It is considered that Policy LP38 should relate to developments which propose in excess of 1,000sqm (GIA) of economic floorspace.

Conclusion

On behalf of St George, Quod reserves the right to add to or amend these representations. This may be required where the Council issues new guidance or there is a change in policy at a local, regional or national level.

Kind regards.

Yours sincerely



Ben Ford
Board Director