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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 Wandsworth Holdings Limited The Town and Country Planning (Local Planning) (England) Regulations 2012

Quod is instructed by Wandsworth Holdings Limited ('Wandsworth Holdings') 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.

1 Executive Summary

On behalf of Wandsworth Holdings Limited, Quod raises several concerns with the Reg 19 Plan as policies within it do not meet the tests of soundness.

The principal concern is that the Council has taken an overly mechanistic approach to building heights across the borough without undertaking the necessary evidence-based assessment required by London Plan Policy D9. The inflexible tall and mid-rise building zones and buildings heights proposed are not justified and restrict all buildings outside of these zones to four storeys, notwithstanding the local context or character. The policies are not based on the evidence, which is vague and this is the first opportunity for land owners to comment on the mid rise zones introduced in Policy LP4, which does not reflect early and effective engagement as required by the NPPF.

Without modification, the approach to building heights may undermine the deliverability of the Plan. We have identified mitigating measures, through modifications, to make the policies sound, and would welcome the opportunity to work with Wandsworth Council (the 'Council') to address these prior to submission to the Secretary of State.

2 107- 117 Wandsworth High Street, SW18

Wandsworth Holdings recently became the single owner of 107-117 Wandsworth High Street, SW18 ('the Site') situated on the corner of Buckhold Road and Wandsworth High Street. The Site comprises

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3no. commercial units at ground floor level, currently occupied by Ladbrokes, Tesco and Kaspas. There is 1no. residential unit above the Ladbrokes unit (117 Wandsworth High Street) and 2no. residential units above Kaspas (107 Wandsworth High Street). Until recently the Site was under multiple ownerships, but Wandsworth Holdings have recently acquired all three sites. A Site Location Plan is presented at **Appendix 1**.

This is a centrally located, brownfield site in the centre of Wandsworth Town and fronting onto a strategic route. It is situated within the backdrop of the Southside Shopping Centre tall building zone (TB-G1a-01), the Ram Brewery Tall Building Zone (TB-G1d-02) and a midrise zone along the eastern boundary of King George's Park. The Site is within, but on the edge of, the Wandsworth Town conservation area.

It is a significant site with regard to the future placemaking of Wandsworth Town and the proposed pedestrianisation of Wandsworth High Street, which is expected to be delivered by Transport for London (TfL), once funding has been approved. It is a highly visible site on the corner of two major roads and will become a transition area between the proposed pedestrianised area and the proposed low traffic public transport area along Wandsworth High Street. The Site currently benefits from high pedestrian and vehicle traffic and should be viewed as having the potential to provide a sense of arrival into Wandsworth town and with a new development contributing to new and improved public realm, which will fit in with the pedestrianisation and low traffic zone proposed for the town centre.

However, the Site has not been viability tested through the Local Plan process and remains unallocated, along with the adjacent site to the south, which already accommodates an existing ten storey building. This means that Policy LP4, as currently drafted, restricts any development on this corner plot in a major town centre to a maximum of just four storeys. The single ownership of the Site now provides a significant opportunity for a building of exemplary design and an enhanced public space at the front and including Hardwick Square at the rear. Any decisions on the future development of the Site should be made at planning application stage.

3 NPPF and London Plan

The National Planning Policy Framework must be taken into account in preparing the development plan and is a material consideration in planning decisions.¹ All development plans in London must be in general conformity with the London Plan (2021).

NPPF (February 2019)

In response to the Government's commitment to delivering 300,000 homes a year by the mid-2020s, the report Fixing our Broken Housing Market was published in 2017. This report sought to make more land available for homes in the right places, by maximising the contribution from brownfield and

¹ NPPF (February 2019), paragraph 2.



surplus public land. It advises that development proposals should make efficient use of land and avoid building homes at low densities, addressed the particular scope for higher-density housing in urban locations that are well served by public transport; or which offer scope to extend buildings upwards in urban areas by making good use of the 'airspace' above them. It also states that a flexible approach should be taken when adopting and applying policy and guidance that could inhibit these objectives.

The NPPF subsequently set out policies to support the Government's objective of significantly boosting the supply of homes. It seeks a sufficient amount and variety of land to come forward where it is needed; that the needs of groups with specific housing requirements are addressed; and that land with permission is developed without unnecessary delay. It also establishes a clear policy objective to optimise surplus brownfield land in accessible locations. With regard to town centres the NPPF specifically states that minimum density standards should be adopted for town centres. The NPPF gives substantial weight and support to the development of under-utilised land and buildings where this would meet identified needs for housing.

London Plan (March 2021)

The London Plan ('LP') also recognises the importance of development in accessible town centre locations. Policy SD6 (Town Centres and High Streets) states that the potential for new housing should be realised within town centres through mixed-use or residential development that makes the best use of land, capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public transport.

Policy SD7 (Town Centres – Development Principles and Development Plan Documents) states that development plan documents should identify centres that have particular scope to accommodate new commercial development and higher density housing, having regard to the growth potential indicators for individual centres in Annex 1. Wandsworth Town is identified in Annex 1 as a major town centre in London with medium commercial growth classification and a high residential growth classification. Wandsworth Town should therefore be the ***“focus for the majority of higher order comparison goods retailing, whilst securing opportunities for higher density employment, leisure and residential development in a high-quality environment”***.² Policy SD9 specifically states that Boroughs should take a proactive and partnership-based approach and support land assembly so that sites can be brought forward for development.

Policy GG2 'Making the best use of land' seeks to create successful, sustainable mixed-use places on brownfield land. The policy prioritises sites that are well-connected by existing or planned public transport and seeks to proactively explore the potential to intensify the use of land to support additional

² London Plan 2021 Policy SD8(D)



homes and workspaces, promoting higher density development particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.

LP Policy D3 requires all development to make the best use of land by following a design led approach and optimising site capacity. This means that development should be of the most appropriate form for that particular site. A design led approach require design options to be considered so that the most appropriate form for each site can be assessed with regard to the local circumstances, context and capacity for growth. This policy also states that incremental densification should be encouraged by boroughs to achieve a change in densities in the most appropriate way and in the context of Policy H2 (Small Sites). Where there are existing tall buildings, expansion of these areas should be positively considered by Councils, where appropriate. Policy H1 of the LP seeks to increase housing supply having identified a need for a minimum of 66,000 additional homes per year.

The Mayor recognises that development of this scale will require not just an increase in the number of homes approved but also a fundamental transformation in how new homes are delivered. Policy H1 requires Councils to optimise the potential for housing delivery and lists six sources of future supply. Three of these sources set out at Part B(2) of the policy (a, c and e) directly relate to the characteristics of Wandsworth High Street. Part B(2)(a) refers to locations with existing or planned public transport accessibility levels (PTAL) of 3 to 6, which are located within 800m distance of a station or a town centre. Part B2(c) promotes housing intensification on other low-density sites in commercial, leisure or infrastructure uses and Part B2(e) supports redevelopment of small sites.

These representations are made in the context of these relevant policies in the NPPF and the London Plan.

4 Strategic Polices

Strategic policies are subject to the full weight of the soundness tests and set out strategic priorities and an overall strategy for the pattern, scale and design quality of places. The tests of soundness are only applied to non-strategic policies in a proportionate way³. Paragraph 1.12 of the Reg 19 Plan lists the strategic policies, including *inter alia*, Policies SDS1 Spatial Development Strategy; PM1 Area Strategy and Site Allocations Compliance; PM2 to 10 – Place-based policies for each Area Strategy; and LP41 (Wandsworth Centres and Parades).

However, Policy LP4 (Tall and Mid-Rise Buildings) is not included, which we consider is a major omission. It is imperative that Policy LP4 is subject to viability testing against the other policies in the Local Plan (particularly the affordable housing policies), given the impacts on the site allocations and non-allocated sites which may be suitable for five or six storey development.

³ NPPF (February 2019), paragraph 36.



5 Policy SDS1 Spatial Development Strategy 2023 - 2038 & Table 2.2

Policy SDS1 Part A – Wandsworth Holdings **object** to the strategic housing target set for Wandsworth Town and for the borough as a whole. Policy SDS1 (A) sets a strategic target to provide a minimum of 20,311 new homes in the borough by 2038 (1,354 homes per annum for 15 years). This underestimates the housing need required by Table 4.1 of the London Plan which seeks 19,500 homes across ten years (1,950 homes per annum for 10 years). Across the 15-year Local Plan period this would require at least 29,250 homes.

The supporting text to Policy SDS1 indicates that the Council has adjusted its figures due to the oversupply of housing completions achieved and forecast to be delivered up to 2026. However, the Council cannot rely on the delivery of extant planning permissions, and these completions are not guaranteed. Furthermore, the NPPF⁴ requires Council's to provide a minimum of 5 years' worth of housing against their OAHN. It is not acceptable to manually adjust down the annual housing target required by the London Plan.

The Council has failed to deliver against the current London Plan target of 1,950 homes per year in the last three years (18/19 - 1,877; 19/20 – 1,359; 20/21 – 1,422)⁵ which indicates that planning permissions are not being delivered as expected and confirming that the Council will find it challenging to meet their housing need over the lifetime of the Local Plan. This is particularly apparent when one considers the reliance on new homes in the VNEB Opportunity Area over the past ten years.

Table 2.2 of the Reg 19 Plan 'New Homes Distribution' indicates a capacity of 24,380 homes, which represents a short-fall against the revised 15-year target of 29,250 homes based on the London Plan annual targets for Wandsworth. The minimum housing requirement should therefore be revised to 29,250 homes.

Policy SDS1 Part B - Wandsworth Holdings **support** the identification of Wandsworth Town within Policy SDS1 'Spatial Development Strategy' as a location with a strategic economic role and/or opportunities for regeneration. Wandsworth Holdings also support the sequential approach to locating new homes, first seeking to locate new homes in these identified locations, such as Wandsworth Town. The Council's capacity for new homes in Wandsworth Town is identified as 3,510 homes broken down to 118 on small sites and 3,391 on large sites⁶. Footnote 2 of the Reg 19 Plan states that this capacity is derived from the Council's HELAA for the period 2023/24 to 2037/38. Wandsworth Holdings also support Part F of this policy which commits to supporting town centre development and regeneration.

⁴ NPPF (February 2019), Paragraph 74.

⁵ Reg 19 Plan Table 2.3

⁶ Housing and Economic Land Availability Assessment (January 2022) - Appendix A



Given the comments made with regard to Part A of this policy, we are concerned that the proposed housing capacity of 3,315 homes in Wandsworth Town is too low. This is a major town centre in a London wide context. Limiting the majority of new homes to allocated sites significantly underplays the capacity of the town centre and is an underutilisation of accessible brownfield land contrary to paragraph 125 of the NPPF.

In review of the Council's own evidence base, we note that the Arup Urban Design Study (2021) (UDS 21) allocates Wandsworth Town within character Area G1, which it is identified as having low - medium sensitivity whilst being a location with a higher probability of change, and therefore it is identified as a site with the highest probability for development capacity⁷. The supporting text states that these areas ***“are the most likely to have the greatest development capacity, with a high probability of change compared against a low sensitivity, including areas such as some estates in East Putney Residential, Battersea Residential and Tooting Residential; Wandsworth Town Centre; some industrial plots within the Wandle Valley; parts of Clapham Junction Town Centre and Balham Town Centre; and Nine Elms Opportunity Area”***. Indeed, the area around Wandsworth High Street is included in the broad areas considered in more detail for tall or mid-rise buildings⁸.

The capacity for new homes in Wandsworth Town, a major town centre in the London context is far higher than that proposed in Policy SDS1. The number of homes proposed for Wandsworth Town within Policy SDS1 is heavily reliant on delivery of allocated sites, and is not consistent with the London Plan OAHN for the borough. Wandsworth Town is a highly accessible, major town centre site with a PTAL 6a. In accordance with the London Plan and the NPPF, sites in the town centre should be optimised in order to allow the Council meet its minimum housing requirements of 29,250 homes over a 15 year period (see our comments on suggested amendments to Policy LP4).

6 Policy LP4 – Tall and Mid-Rise Buildings

The Council has taken an overly mechanistic approach to the allocation of tall and mid-rise building locations and heights in the Borough. This applies to Policy LP4 as a whole but Sections G and H (mid-rise building policy) results in an unnecessary limitation of four storeys on all un-allocated sites, regardless of design quality or compliance with the Local Plan as a whole. The approach is overly complex, is inconsistent with national and London Plan policies, has not been viability tested and may prejudice the ability of development sites to meet the requirements of other policies in the Plan, such as the required affordable housing levels and tenure.

⁷ Arup Design Study Urban Design Study - Executive Summary Characterisation, development capacity and design guidance (December 2021) page 8, 9 and 10

⁸ Arup Design Study Urban Design Study - Executive Summary Characterisation, development capacity and design guidance (December 2021) page 11



Policy LP4 and Appendix 2 of the Reg 19 Plan result in building heights which are not supported by a sufficiently robust evidence base. It is therefore not a sound approach to prescribe very detailed and inflexible building zone heights and building lines for each site allocation. The mid-rise zones are unnecessary and are not a London Plan requirement. We are concerned that the inflexible drafting of the policy will prevent the delivery of sustainable development on any unallocated site on viability grounds.

With regard to the context of Wandsworth High Street, the UDS 21 states that mid-rise buildings are appropriate along strategic routes and in town centres. The high street is allocated in area G1(a) which is identified as having a higher probability of change than other parts of the Borough. Factors which give rise to a lower probability of change include **“areas which are designated in their existing use (such as Strategic Industrial Locations), areas of open space and areas with a low PTAL score”**⁹. None of these factors apply to Wandsworth High Street, further highlighting that this major town centre is not sensitive to change. The UDS 21 also states that there are opportunities for tall buildings within town centres of *inter alia* Wandsworth and **“in all cases, the acceptability of individual plots will depend on specific characteristics of the site”**.

With regard to mid-rise buildings, the UDS states that mid-rise buildings will generally be concentrated within five different types of area – **“(1) transition areas to tall building zones; (2) along strategic road corridors; (3) within town centres; (4) within or adjacent to existing estates; (5) alongside large scale open space”**. Wandsworth High Street, which meets criteria (1), (2) and (3) has not been included in a mid-rise zone. No evidence is provided to justify the four-storey restriction in this major town centre high street, between two tall building zones and on strategic route. Policy LP4 does not recognise that there may be some circumstances, where compliance with the Plan (when read as a whole) requires flexibility to be applied for building heights and zones at the determination stage of a planning application.

Whole Plan Viability Assessment (January 2022)

The wording of Policy LP4 is intended to strictly apply so that proposals exceeding the appropriate height range will be refused on design grounds. This strategy is set out in the LBW Whole Plan Viability Assessment¹⁰. The Whole Plan Viability Assessment (WPVA) also states **“For future developments, principally retail and other town centre use developments (excluding offices), where the Reg 19 Local Plan may raise the risk of development being unviable, there may need to be provision for some flexibility to ensure a fully deliverable plan. This may include introducing flexibility in on-site and off-site developer contributions, and leaving the market to deliver the sites”**¹¹ (our

⁹ Arup Design Study Urban Design Study - Executive Summary Characterisation, development capacity and design guidance (December 2021) page 9

¹⁰ Whole Plan Viability Assessment January 2022, paragraph 4.17.

¹¹ Whole Plan Viability Assessment, January 2022, paragraph 8.11.



emphasis). Where flexibility is applied, paragraph 8.12 of the WPVA explains that this should depend on the types of sites coming forward.

The WPVA modelled a limited number of typologies, which used broad assumptions of development types. Some of the typologies listed in tables 7.4 – 7.9 of the WVPA are unrealistic if they are to comply with Policy LP4 and other policies within the Local Plan as a whole. Given the broad assumptions undertaken in the WPVA, and the overly constrained zones and heights applied in policy LP4, flexibility must be provided so that decisions can be made at planning application stage.

Wandsworth Holdings commissioned Quod Development Economics to carry out a financial viability assessment of their site in Wandsworth Town Centre, against the Councils affordable housing policy. The Assessment considered a four story, six storey and 10 storey building. This report concludes that the proposed policy approach is not justified and would inhibit delivery of this specific site and prejudices the ability for the Council to effectively meet its affordable housing target and objectively assessed needs for affordable housing. The Viability Assessment is presented at **Appendix 2**.

Arup Urban Design Study (2021)

The Urban Design Study produced by ARUP on behalf of LB Wandsworth provides a high-level contextual study for the whole borough and splits it up into seven places and 25 character areas. The Study considers the capacity for tall buildings within the borough: ***“Buildings which are either 8 storeys or taller; or are 50% higher than the prevailing height of the character area defined on the opportunity map, whichever is less.”***¹²

It goes on to state: ***“within town centres and along key strategic routes there are potential locations for tall buildings, where again the acceptability of individual plots will depend on specific characteristics of the site.”***

For Wandsworth Town, the main site allocations are the Southside Shopping Centre (TB-G1a-01) and the Ram Brewery (TB-G1d-02). A mid-rise zone runs along the eastern boundary of King Georges Park, which meets two of the mid-rise criteria, being in the town centre (3) and adjacent to an open space (5). The buildings along Wandsworth High Street meet three of the criteria, being in a tall building transition area (1); on a strategic road (2); and in a town centre (3). The UDS sets the criteria that apply generally to all of the mid-rise building zones, which are general design guidelines that should be applied at all development regardless if they are in a mid-rise building zone, as follows:

- *“be carefully located and designed to step down to surrounding existing and proposed buildings.*

¹² Arup Urban Design Study, 2021, page 9.



- *respond positively and protect the setting of existing buildings in the surrounding area, including heritage assets such as conservation areas, listed buildings and locally listed buildings.*
- *respect the scale, width and proportion of adjacent streets and watercourses, and local character, as outlined in the character area profiles in Section 3, including potential effects on key characteristics, valued features and sensitivities.*
- *respond to the character area design guidance provided in Section 3.*
- *deliver a varied and interesting roofline in response to surrounding architectural styles, avoiding long monotonous blocks of development.*
- *Development within town centres should include active uses and frontages at ground level.*
- *incorporate an appropriate range of building heights and open spaces.*

The UDS goes on to state that the criteria is based on the site observations of the team undertaking the study and are not intended to be exhaustive or detailed. It is unclear why some mid-rise zones have been selected over other, more compatible zones which meet more of the criteria and consequently why so many sites in Wandsworth Town have not been selected for mid-rise development, despite meeting multiple characteristics listed as appropriate for mid-rise building zones in the UDS 2.

For example, Wandsworth High is a strategic route, in a town centre with PTAL 6a. Sites along this strategic route are not considered suitable for development above four storeys, despite proximity to Southside Shopping Centre which is in the backdrop and setting of the high street being allocated for up to 20 storeys (90 metres). The Ram Brewery site which is also in the backdrop of the high street is allocated for 10 storeys (30 metres) with an extant planning permission for a 36-storey building. Wandsworth High Street sits in between these two tall building zones but Policy LP4 limits development to four storeys. The consequence of this is that a significant number of sites will be prevented from delivering sustainable development due to the inflexible restriction of four storeys.

Wandsworth High Street is located in sub-area G1a. The Wandsworth Town and Common Opportunity Map does not include mid-rise and tall buildings already present within its townscape. The supporting text acknowledges that sub-areas G1b, G1c and most of G2 is considered inappropriate for tall buildings. Sub-areas G1, G1a and G1d are considered to have the potential for tall buildings subject to addressing set criteria which relates to its context.

There is very little mention of the character created by these existing tall buildings in the UDS 21, despite there being an acknowledgement that they form an important character to the town centre. In



particular, the report fails to recognise locations where tall buildings are consented and being built out, the 36 storey Ram Brewery development is the most obvious example (TB-G1-03).

An analysis of the consented or built out tall buildings within Wandsworth Town above 10 storeys are summarised below.

- 36 storeys (+ 12 storeys buildings) – Ram Brewery (Greenland)
- 27 storeys – Mapleton Crescent (Pocket) 2015/5777
- 26 storeys – Wandsworth Exchange (L&Q) 2014/5149
- 25 storeys - Sudbury House
- 22 storeys - Argenton Tower, Maplton Road (Barratt) 2002/3275
- 3 x 22 storeys - Neville Gill Close
- 21 storeys – Enterprise Way (Barratt) 2009/3017
- 20 storeys – The Light Bulb, Filament Walk
- 20 storeys – Pencil Tower, 86-96 Garratt Lane (Baylight Properties) 2017/0535
- 17 storeys – Buckhold Road, Wandsworth 2013/4653
- 17- 8 storeys - Former Homebase (L&G) 2020/0011
- 15 and 3 x 11 storeys - Wandsworth Riverside Quarter Phase 3 (Fraser Group)
- 15, 12, 12 storeys - Wandsworth Riverside Quarter Phase 2 (Fraser Group)
- 15 – 8 storeys - Former B&Q (L&G) 2019/4583
- 14 and 10 storeys – Former Linton Fuels, Osiers Road (Taylor Wimpey) 2016/6164
- 14 and 10 storeys - 9, 11 and 19 Osiers Road (Hollybrook Limited) 2018/3709
- 10 storeys – 29 Hardwicks Square
- 10 storeys – 4 Buckhold Road
- 3 x 10 storeys - Osiers Square, Osiers Road (Taylor Wimpey) 2014/6746

Wandsworth Holdings commissioned Neaves Urbanism to carry out an independent Townscape Analysis and review of the UDS21, which is presented at **Appendix 3**. This review concludes that the draft policy LP4 Tall and mid-rise Buildings within G1: Wandsworth Town and Riverside does not completely reflect the findings of the Urban Design Study nor does it respond to its current mid-rise and tall buildings context. The tall building zone shown in Map 23.26 of the Local Plan does not reflect Wandsworth Town and Common Opportunity Map Figure 252.

The draft policy also does not consider the areas current mid-rise and tall buildings context. This includes mid-rise buildings between five and ten storeys being present within the Ram Quarter with an extant consent for a 36 storey building, and Hardwick Quarter, along with taller buildings such as



the Bronze Building and Jacquard Apartments of up to 27 storeys being present to the south of the town centre.

The Urban Design Study states that the ability of the sub-area to accommodate tall buildings is “... **limited by the cumulative effects of existing and recent developments and the modest scale of the town centre around Wandsworth Town Conservation Area.**” However, the potential cumulative effects should be considered on a site-by-site basis based on the criteria set out within the London Plan’s Policy D9 Tall buildings point C.

Design

Policy LP4 prevents the opportunity for creative architecture or design solutions to allow taller buildings that may better comply with the Reg 19 policies as a whole, than the prescribed heights shown in Appendix 2. The NPPF promotes a design led approach and sets six design criteria¹³ that should be considered at plan making but also at decision making stage to ensure that developments function well, are visually attractive, are sympathetic to local character, establish a strong sense of place, optimise the potential of the site and create safe and inclusive places.

The London Plan supports this approach under Policy D9 Tall buildings point A that “**Development Plan should define what is considered a tall building for specific localities**” and that this is “**based on local context**”. The selection of very detailed tall and mid-rise building zones and buildings heights proposed have not been justified.

London Plan Policy D9 (‘LP Policy D9’)

London Plan (LP) Policy D9 sets a minimum requirement for tall buildings in London to be no less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. This is the equivalent of 7 storey’s in total. There is no requirement for buildings which do not meet these criteria to be subject to such scrutiny and it is unclear why Policy LP4 has applied Policy D9 criteria to mid-rise buildings of 5 and 6 storeys. This approach is overly burdensome and does not conform with the London Plan. LP Policy D9 requires a single tall building policy that defines zones up to 18 metres; the final height of which would be subject to detailed testing at the planning application stage.

LP Policy D9(B) ‘Locations’ requires boroughs to determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan and that any such locations and appropriate tall building heights should be identified on maps in Development Plans. There is no requirement for mid-rise buildings zones to be set out within Local Plans.

LP Policy D9 explicitly requires the consideration of “other requirements of the plan”; that “locations and appropriate tall building heights should be identified on map in the development plan”; and that

¹³ NPPF (February 2019), paragraph 130



“tall buildings should only be developed in locations that are identified as suitable in Development Plans”. Where location and heights are prescribed in the development plan these should be informed by Part C of Policy D9 (Impacts). LP Policy D9 does not require inflexible parameter heights, nor does it require tall buildings to only be developed at the heights identified in the development plan. It does however expect a detailed analysis to be undertaken to identify appropriate locations for tall buildings.

This approach was recently tested by the Planning Inspectorate at the Brent Local Plan Review. The Report on the Examination of the Brent Local Plan 2019 -2041 published 17 January 2022 stated the following:-

- The Brent Tall Building Strategy which outlined an assessment of suitable locations based on an assessment of the identified growth areas, existing building heights and townscape considerations such as protected views as well as areas with high public transport accessibility did not undertake a level of sieve analysis as detailed as that envisaged by the London Plan.
- Subject to the main modifications identified, the approach to both tall buildings and the Intensification Corridors presents a sound approach which accords with both the London Plan and the Framework.

The Brent Council Tall Building Local Plan Policy BD2 was found sound on the following grounds, which included a degree of flexibility: -

- It requires heights to be consistent with the general building heights shown on the plans¹⁴
- The plans indicate the heights likely to be generally acceptable to the council¹⁵.
- Proposals will still need to be assessed in the context of other policies to ensure that they are appropriate in that location¹⁶.
- There might be circumstances where the quality of design of a development and its impact on character is such that taller buildings in these locations could be shown by applicants to be acceptable¹⁷.

LP Policy DP9 does not require a rigid inflexible approach to tall buildings (and certainly not mid-rise buildings), and as demonstrated, a more flexible approach employed by Brent Council was deemed as sound by the Inspectors.

Suggested amendments to Policy LP4

¹⁴ Brent Local Plan Policy BD2

¹⁵ Brent Local Plan paragraph 6.1.15

¹⁶ Brent Local Plan paragraph 6.1.15

¹⁷ Brent Local Plan paragraph 6.1.15



Policy LP4 states that tall buildings in Tall Building Zones would only be appropriate where the development would not result in any adverse visual, functional, environmental and cumulative impacts.

It requires planning applications for tall buildings to be assessed against the criteria set out in Parts C and D of the London Plan Policy D9 (this comprises twenty-one criteria) and an additional nineteen local criteria set out at Policy LP4 (1 to 19). LP4 (C) states that proposals for tall buildings will not be permitted outside the identified tall building zones; and (D) 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). LP4(G) states that mid-rise buildings will not be permitted outside the identified tall and mid-rise building zones. LP4 (H) states that proposals for mid-rise buildings should not exceed the appropriate height identified within the relevant mid-rise building zones as identified at Appendix 2 of this Plan.

The inflexible approach to Policy LP4:

- does not enable the delivery of sustainable development, particularly by limiting the potential heights of development outside of tall building zones;
- is not compliant with Policy LP9 of the London Plan;
- should be listed as a strategic policy and viability tested;
- has not been fully consulted upon with the development industry or local communities at Regulation 18 stage.

Policy LP4 and Appendix 2 should be included within the strategic policy schedule at Paragraph 1.12, due to the strategic implications that this policy has on the Plan as a whole. The deliverability of the housing capacities resulting from LP4 should be viability tested taking into account other strategic policies of the Reg 19 Plan. Without modification, the approach to tall and mid-rise buildings and in particular the inclusion of mid-rises zone, is very likely to undermine the and deliverability of the Local Plan. Without viability testing, the policy is not consistent with national policy, is not justified and is not effective. Policy LP4 is therefore not considered to be “sound”.

In our opinion, the policy for tall buildings should be retained in line with the requirements of LP Policy D9 but introduce flexibility which can be tested during the planning application process, as is the case with the Brent Local Plan.

We would suggest that the following wording is introduced 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 tall and mid-rise buildings that exceed the general heights in these locations could be shown by applicants to be acceptable.

This would also address paragraph 14.31 which states that “Development proposals exceeding the appropriate height will not be supported on design grounds”. We suggest that the following modifications are undertaken to make Policy LP4 sound:

Table 1 Suggested Amendments to Policy LP4

Policy Reference	LP4 - Tall and Mid-rise Buildings
Proposed Modification	<p>C. Proposals for tall buildings should will not be permitted outside the identified tall building zones.</p> <p>D. Proposals for tall buildings should be consistent with the general not exceed the appropriate height range identified for each of the tall building zones as set out at Appendix 2 to this Plan. The height of tall buildings may will be required to step down towards the edges of the zone as indicated on the relevant tall building map 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.</p> <p>G. Proposals for mid-rise buildings should will not be permitted outside the identified tall and mid-rise building zones.</p>
Proposed Modification to Supporting Text	<p>The plans indicate the heights likely to be generally acceptable to the council.</p> <p>Proposals will still need to be assessed in the context of other policies to ensure that they are appropriate in that location and that the site allocation is deliverable when the plan is read as a whole.</p> <p>Paragraph 14.31 - Development proposals exceeding the appropriate height will not be supported on design grounds unless it can be demonstrated through successfully addressing the tests in LP4(B) that there are circumstances where the quality of design of a development and its impact on character is such that taller buildings in these locations could be shown by applicants to be acceptable.</p>
Justification	<p>The policy should allow a degree of flexibility so that tall and mid-rise building may be permitted outside of the designated zones in exceptional circumstances.</p>



	This is particularly pertinent to mid-rise buildings, to which the Policy D9 of the London Plan makes no allowance for the identification of non-tall building zones (i.e. mid-rise buildings) through a Development Plan.
--	--

There are several policies (including LP1 to LP3) in the Reg 19 Plan, which will inform more detailed design. LP Policy D9 does not promote the identification of mid-rise building zones and heights. We consider that the mid-rise tall building zone should be deleted, and instead any planning application of 5-6 storeys be required to meet criteria set out in other design policies of the Reg 19 Plan, which will allow a decision to be made on the suitability of the height at planning application stage.

7 Chapter 3 Placemaking – Area Strategies Policy PM2 Wandsworth Town

PM2A – Placemaking

PM2.A.1 - Wandsworth Holdings **support** PM2A1 (a-h), in particular the ambition to provide an appropriate mix of activities in Wandsworth High Street and promoting height and massing that either reflects local character or conforms with the approach for tall buildings in Wandsworth Town. Part (b) of this policy provide some flexibility with regard to height and massing and allows place makers to take account of the local character of an area when considering the height and massing of a development, even if a site is not within a tall or mid-rise buildings zone. This is fully supported by Wandsworth Holdings.

PM2A.3 – Wandsworth Holdings fully **support** the approach to ensure that development proposals help to maximise opportunities provide by the Wandsworth gyratory proposals. Implementation of the TfL proposals will ensure that the placemaking aspirations for Wandsworth Town are met.

PM2A.5 – Wandsworth Holdings **object** to the inflexible approach towards tall and mid-rise buildings in Wandsworth Town. See our comments on policy LP4. This should be removed to allow for greater flexibility and creativity in design solutions.

PM2A.9 – Wandsworth Holdings **support** the approach to take advantage of opportunities to create high quality public realm to be enjoyed by the public.

PM8B. Inclusive Growth

PM2B.1 – Wandsworth Holdings **object** to the housing target for Wandsworth Town. Please see our objections made to Policies SDS1 (Part A) and LP4.

PM2B.3(b) – Wandsworth Holdings **object** to this part of the policy which promotes a blanket ban on amalgamation of small retail units on Wandsworth High Street. There is no reasoning behind this restriction, when traditional shopfronts can be provided with internal amalgamations to allow a single occupier operate the units.



Map 4.1 Spatial Area Map – Wandsworth Town

The key should be amended to provide more clarity. Existing public spaces such as King George's Park are shown as proposed new public open space.

The main shopping area allocation is limited to Southside Shopping Centre. There are multiple retail units west of Southside Shopping Centre, along Wandsworth High Street which should be included as part of the main shopping area.

8 Early and Effective Engagement

The NPPF requires plans to be shaped by early, proportionate, and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators, and statutory consultees. The Reg 19 Local Plan consultation is the first opportunity that stakeholders have been able to review and comment on the Council's proposed approach to tall buildings (LP4 an Appendix 2). The main source of engagement we have had to date is through the pre-application process, where feedback we have received from officers as well as the council's expert design panel is entirely in contradiction to the draft plan.

Given the wider implications of this policy, it is considered that earlier and more effective engagement should have been undertaken.

The NPPF requires succinct plans which avoid duplication¹⁸. The Reg 19 Plan contains significant duplication across policies. It is a fundamental planning principle that the development plan should be read as a whole and therefore duplication across policies should be removed.

The design guidance is unnecessarily duplicated in Chapter 8 Placemaking – Area Strategies; Chapter 4 to 12 Area Strategies including the Site Allocations; and Chapter 14 Achieving Design Excellence. Inconsistencies occur where there is reference to the Council's UDS 21.

9 Summary

Wandsworth Holdings Limited are supportive in general of the Reg 19 Plan policies which seek to ensure that high quality development is delivered in the borough. However, there are fundamental flaws to some of the policies which need to be addressed:

- Policy LP4 must be assessed as a strategic policy and viability tested, given the impacts on the site allocations. We consider that this policy should be subject to viability testing against the other policies within the Local Plan (particularly the affordable housing policies);

¹⁸ NPPF paragraph 15 and 16

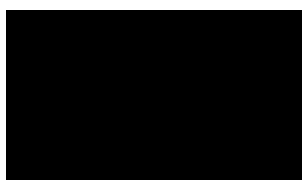


- Flexibility should be introduced to LP4 to allow final decisions be made on quality of taller buildings at decision making stage;
- The minimum OAHN should be increased to 29,250 homes based on the London Plan annual targets for Wandsworth and considering the shortfall in delivery against this target when annualised over the past three years.

We consider that broad assumptions were made in the Whole Plan Viability Assessment (2022) and that the allocations for Wandsworth Town are not consistent with the Arup Urban Design Study (2021). Wandsworth Town is a major centre in the London wide context and in accordance with the NPPF the Local Plan should identify a minimum quantum of residential homes and commercial floorspace in compliance with the London Plan housing numbers for the borough.

We trust that the content of this letter will be taken into consideration. On behalf of Wandsworth Holdings Limited Limited, Quod reserves the right to add to or amend these representations where the Council issues new guidance or there is a change in policy at a local, regional or national level. We would be grateful if you could keep us informed of the progress of the Local Plan.

Yours sincerely



Angie Fenton
Director

cc. Wandsworth Holdings Limited



Appendix 1

Site Location Plan (107-117 Wandsworth High Street)

- General Notes
1. Dimensions are in millimetres unless states otherwise.
 2. Levels are in meters AOD unless stated otherwise.
 3. Dimensions govern. Do not scale off drawing.
 4. All dimensions to be verified on site before proceeding.
 5. All discrepancies to be notified in writing to Matt Architecture Ltd.

Notes:



Legend:

▬ SITE BOUNDARY

No.	Date	Description

MATT ARCHITECTURE
 MATT Architecture Ltd.
 17-19 Leicester Square
 London WC2H 7LE
 T: +44 (0) 20 3490 1243
 E: contact@mattarchitecture.com

Client
Eagle Lane Management Ltd

Keyplan

N

Project
107-117 Wandsworth H. St

Drawing Title
Location Plan

Drawn	Author	Date		
Checked	Checker	Scale	1: 1250	
Approved	Approver	Size	A1	
XXX MATT XX	DR A	01100	0	



Appendix 2

Financial Viability Evidence (107-117 Wandsworth High Street)

107-117 Wandsworth High Street Financial Viability Evidence (Rev 004 – 25.02.2022)

Purpose

1. This evidence base document provides an assessment of the viability and deliverability of the above site based on the maximum height proposed in the Wandsworth Draft Local Plan (Regulation 19) Review. It also tests a range of other options which could feasibly be accommodated on this site.

Evidence

Approach

2. The approach taken considers the ability of the development to provide a minimum return to the landowner after all development costs (including a minimum developer return) have been deducted from scheme revenues.
3. The output Residual Land Value (RLV) generated by the financial appraisal is compared to a minimum Benchmark Land Value (BLV). If the RLV is equal to or higher than the BLV then the scheme is evidenced to be **viable**. If the RLV is lower than the BLV the scheme is evidenced to be **not viable**.
4. The approach taken is fully consistent with national planning policy as detailed in the Planning Practice Guidance (PPG) and the broad approach which has been taken in the Wandsworth Whole Plan Viability Study (January 2022) ('WWPVS').
5. Unlike the WWPVS our assessment is however based on a detailed site-specific assessment of the quantum of development that could be accommodated by a scheme with a maximum of 4-storeys, as determined by an architectural feasibility study prepared by MATT Architecture.
6. For the purpose of this assessment only, all other inputs and assumptions in the RLV appraisal are consistent with those set out in the WWPVS as set out in Annex 1. These assumptions are however considered to be overly optimistic, particularly in respect of build costs.
7. The minimum BLV of the site has been adopted at £5m. This is based on an assessment of the minimum Existing Use Value (EUV) of the site inclusive of premium. The EUV+ approach is fully consistent with the approach to assessing minimum land value set out in the PPG. It is also consistent with the broad approach which has been taken in the WWPVS but is specific to this particular site (which includes existing retail and residential assets).

Assessment Results

8. The appraisal results (Table 1) demonstrate that the RLV of the scheme with the proposed policy level of affordable housing (35%) is below the BLV and would create a substantial viability deficit of **-£2.14m**. It is therefore evidenced to be **'Not Viable'**.

Table 1: 4-Storeys 35% Affordable Assessment

Appraisal Item	35% Affordable Housing
Private Units	12 Units
Affordable Units	7 Units
Scheme Revenues	£12,996,621
Scheme Costs/ Return	£10,135,075
Residual Land Value (RLV)	£2,861,546
Benchmark Land Value (BLV)	£5,000,000
Viability Surplus/ Deficit	(£2,138,454)
Viability Conclusion	Not Viable

9. Further testing (Table 2) demonstrates that where the affordable housing is removed from the 4-storey scheme in its entirety (NIL Affordable Housing) the viability of the scheme would improve. The output RLV of the 4-storey scheme with NIL affordable housing would however remain below the minimum BLV. It is therefore also evidenced to be 'Not Viable'. This evidences it is extremely unlikely the site would come forward for any residential development during the plan period.

Table 2: 4-Storeys NIL Affordable Assessment

Appraisal Item	NIL Affordable Housing
Private Units	19 Units
Affordable Units	0 Units
Scheme Revenues	£15,574,170
Scheme Costs/ Return	£11,404,444
Residual Land Value (RLV)	£4,169,726
Benchmark Land Value (BLV)	£5,000,000
Viability Surplus/ Deficit	(£830,274)
Viability Conclusion	Not Viable

Alternative Options

10. Many of the costs associated with development of this nature do not reduce proportionately with reduced height and density. The minimum BLV which the scheme needs to exceed (£3m) also remains constant. The viability of the scheme is therefore primarily constrained due to its proposed height and density.
11. Additional option analysis has therefore been prepared to determine the height required to provide a viable and deliverable scheme with varying levels of affordable housing from NIL up to the 35% policy target. The additional options tested (6-Storeys and 10 Storeys) have been informed by an architectural feasibility study prepared by MATT Architecture. The study evidences these additional options could be accommodated on-site.
12. The results (Table 3) evidence that the site would need to accommodate a minimum of c.10 storeys to meet the 35% policy target. The viability of the scheme is marginal on this basis. A lower level of affordable housing (c.15-20%) could potentially be provided at 6 storeys. This analysis does however exclude abnormal costs.

Table 3: Height Sensitivity Testing

Height	Units	35%	25%	15%	5%	NIL
4 Storeys	19	Not Viable	Not Viable	Not Viable	Not Viable	Not Viable
6 Storeys	33	Not Viable	Not Viable	Viable	Viable	Viable
10 Storeys	47	Marginal	Viable	Viable	Viable	Viable

Analysis

13. This evidence base document demonstrates that a four-storey scheme would not be viable and deliverable even if the proposed quantum of affordable housing was reduced to NIL at the application stage. This means it is extremely unlikely the site would come forward for development during the plan period.

14. This evidence base document also demonstrates the height of the scheme would need to increase to 10 storeys to support the policy level of affordable housing (35%). While a lower height and density scheme could potentially be deliverable with reduced levels of affordable housing (c.15%), it is unlikely there would be sufficient number of affordable homes to provide sufficient critical mass for a Registered Provider of affordable housing. Furthermore, a proposal for a low level of affordable housing may not provide sufficient benefits in the overall planning balance.

Conclusion

15. The proposed policy approach is not justified. It would inhibit delivery of this specific site and many other similar sites prejudicing the ability of the Council to effectively meet its affordable housing target and objectively assessed needs for both private housing and affordable housing.

Annex 1 – Appraisal Inputs

Annex 1 – Appraisal Inputs

Appraisal Item	Input	Source
Revenue Assumptions		
Private Residential	£901 PSF	WWPVS 2022
Affordable Housing	£392 PSF	WWPVS 2022
Commercial Values	£40 PSF Rent 6% Yield	WWPVS 2022
Cost Assumptions		
Land Acquisition Costs	5.5%	
Purchaser Costs	6.8%	WWPVS 2022
Construction Costs	£170 PSF Residential £137 PSF Retail	WWPVS 2022
Site Abnormals	Excluded	n/a
Contingency	5%	WWPVS 2022
Other Costs	Biodiversity NG - £243 PU Urban Greening - £2.79 PSF Fire Safety - £1.86 PSF Remediation - £6.97 PSF Demolition - £9.29 PSF Climate (LP 10) Residential – 2.5% Climate (LP 10) Commercial – 10%	WWPVS 2022
Professional Fees	10%	WWPVS 2022
Community Infrastructure Levy	LBWCIL (Residential) - £34.69 LBWCIL (Commercial) - £13.80 MCIL2 - £7.50	WWPVS 2022
S106	£3,000 PU	WWPVS 2022
Car Parking	Cycle - £758 PS EV Space - £950 PS WC Space - £2,300	WWPVS 2022
Disposal Fees	3%	WWPVS 2022
Finance Costs	6%	WWPVS 2022
Developer Return	17.5% Private 15% Commercial 6% Affordable Housing	WWPVS 2022



Appendix 3

Townscape Analysis – Wandsworth Town

Odd nos. 107 – 117 Wandsworth High Street SW18 4HY

Client: Wandsworth Holdings Ltd	File Ref: 2203NT02.2
Prepared by: Katy Neaves	Date: 28 th February 2022
Subject: Townscape input into Local Plan Reg 19	Status: Final

Introduction

1. This note has been prepared to support representations to the Wandsworth Local Plan Regulation 19¹ consultation. It addresses townscape matters regarding the emerging policy LP4 Tall and Mid-rise Buildings and the implementation of the policy within the character area referenced within LB Wandsworth's Urban Design Study² produced by ARUP as 'G1: Wandsworth Town and Riverside'.
2. It first outlines the relevant national, regional, and local planning policy and guidance regarding siting tall buildings. Through undertaking a field study consideration has been undertaken on the existing townscape character of the Urban Design Study's sub-area G1. It then summarises the emerging policy LP4 Tall and Mid-rise Buildings regarding the G1: Wandsworth Town and Riverside character area. A conclusion is then drawn on whether emerging policy LP4 Tall and Mid-rise Buildings has been informed by the Urban Design Study or the existing townscape character.
3. The note concludes that the draft policy LP4 Tall and Mid-rise Buildings within G1: Wandsworth Town and Riverside does not fully reflect the findings of the Urban Design Study or respond to its current mid-rise and tall buildings context.

Tall Building Planning Policy Background and Guidance

4. Of the core objectives set out in the National Planning Policy Framework³ (NPPF) is: *"to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."*
5. Section 12 of the NPPF (Achieving well-designed places) in paragraph 126 states that *"the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities."*
6. Paragraph 130 requires planning policies to ensure quality developments, which (in summary):
"will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

¹ LB Wandsworth (2022) 'Publication' Draft Local Plan (Regulation 19)

https://wandsworth.gov.uk/media/10136/wandsworth_local_plan_2023_38.pdf [accessed on 21st February 2022]

² LB Wandsworth (2020) Urban Design Study https://www.wandsworth.gov.uk/media/8075/urban_design_study.pdf [accessed on 21st February 2022]

³ Ministry of Housing Communities & Local Government (2021) National Planning Policy Framework <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [accessed on 21st February 2022]

are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities); establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;”

7. The National Design Guidance⁴ sets out how well-designed places that are ‘beautiful, enduring and successful’ can be achieved and provides ten characteristics that will address how well-designed places are recognised. One of the characteristics is context and the National Design Guidance states in paragraph 40 that:

“Well-designed places are:

- *based on a sound understanding of the features of the site and the surrounding context, using baseline studies as a starting point for design;*
- *integrated into their surroundings so they relate well to them;*
- *influenced by and influence their context positively; and*
- *responsive to local history, culture and heritage.”*

8. The London Plan⁵ supports this approach under Policy D9 Tall buildings point A that “Development Plan should define what is considered a tall building for specific localities” and that this is “Based on local context”. It goes on to state that “locations and appropriate tall building heights should be identified on maps in Development Plans” under point B and under point C sets out what impacts such proposals should consider.
9. The approach to considering the location of tall buildings that are informed by local context is supported within the current (2015) and draft (2019) Historic England Advice Note 4, which is based on the 2007 English Heritage and CABE Tall Building guidance. The Second Edition Consultation draft of Historic England Advice Note 4⁶ concludes in paragraph 1.1 “... *In the right place well-designed tall buildings can make a positive contribution to urban life.*” It also recognises in paragraph 1.4 that “*What might be considered a tall building will vary according to the prevailing character of the local area*”.
10. The Urban Design Study⁷ produced by ARUP on behalf of LB Wandsworth provides a high level contextual study for the whole borough and splits it up into seven places and 25 character areas. The Study considers the capacity for tall buildings within the borough stating in page 9: “*Buildings which are either 8 storeys or taller; or are 50% higher than the prevailing height of the character area defined on the opportunity map, whichever is less.*” Within this page it goes on to state: “*It notes that within town centres and along key strategic routes there are potential locations for tall buildings, where again the acceptability of individual plots will depend on specific characteristics of the site.*”

⁴ Ministry of Housing Communities & Local Government (2019) National Design Guide <https://www.gov.uk/government/publications/national-design-guide> [accessed on 21st February 2022]

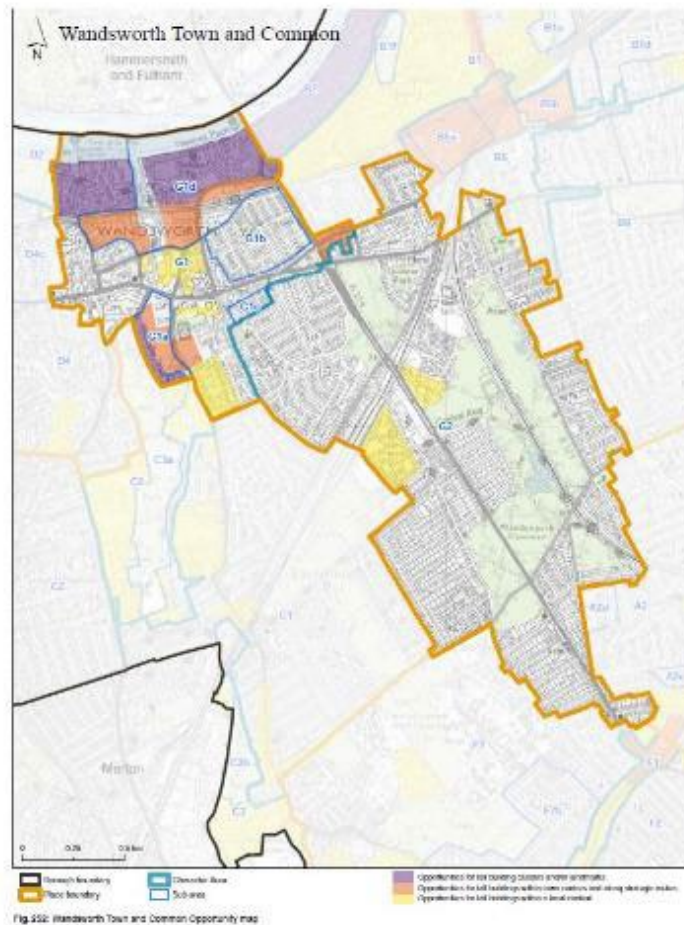
⁵ Greater London Authority (2021) The London Plan: Spatial Development Strategy for Greater London https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf [accessed on 21st February 2022]

⁶ <https://historicengland.org.uk/content/docs/guidance/tall-buildings-hean4-consultation-draft/> [accessed on 21st February 2022]

⁷ LB Wandsworth (2020) Urban Design Study https://www.wandsworth.gov.uk/media/8075/urban_design_study.pdf [accessed on 21st February 2022]

11. Design guidance for the G1: Wandsworth Town and Riverside character area is set out within pages 158 to 161 of the Urban Design Study. The character area's key characteristics on page 158 include "*Building heights range between 2-4 storeys and towers up to 27 storeys. Towers have recently become a feature of the skyline, sometimes uncomfortably relating to adjacent residential areas. And "Landmarks at key junctions are important to the legibility and framework of the town."* Within the character area's design guidance on page 161 one of the principles include: "*Respect the prevailing building height within the old town area (3-4 storeys), ensuring taller buildings behind them do not adversely impact on views, character or heritage value*".
12. In considering the siting of tall buildings within the G1: Wandsworth Town and Riverside the character area is split up into sub-areas and the Urban Design Study's Appendix A provides guidance for selection of appropriate tall building sites and development of suitable building proposals. The Wandsworth Town and Common Opportunity Map Figure 252 is shown in Extract 1.

Extract 1 taken from page 201 of the Urban Design Study



13. The Wandsworth Town and Common Opportunity Map does not include mid-rise and tall buildings already present within its townscape. The supporting text acknowledges that sub-areas G1b, G1c and most of G2 is considered inappropriate for tall buildings. Sub-areas G1, G1a and G1d are considered to have the potential for tall buildings subject to addressing set criteria which relates to its context.

Existing character of the Urban Design Study's sub-area G1

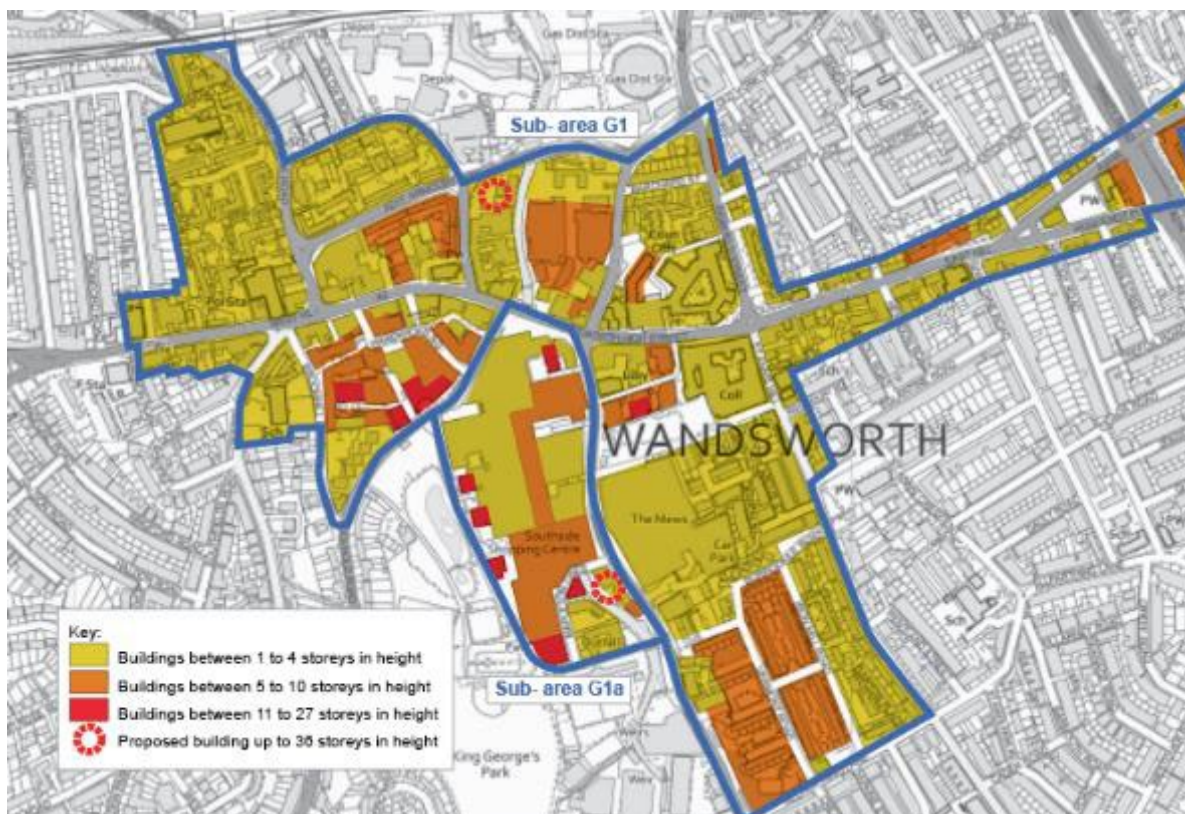
14. Through undertaking desk-top and field studies consideration has been undertaken on the existing character of the Urban Design Study's sub-area G1 using the relevant National Design Guidance's paragraph 41 features. This is summarised in Table 1 and illustrates in Extract 2.

Table 1: Sub-area G1 townscape features

Features	Description
Landform and waterways	The landform slopes down from the east and west to the centre of the sub-area by around 10 metres. This is due to the shallow river valley of the River Wandle, which runs under the Southside Shopping Centre to the south of the sub-area.
Built form inc. layout, form, scale, appearance, details, and materials	<p>Buildings that line Wandsworth High Street are typically two to four storeys in height, with the mid-rise eight storeys building of no. 104 and the 25 storey tall building of Sudbury House providing an anomaly directly addressing this historic route. Mid-rise buildings of between five and ten storeys are present within this townscape, with taller buildings of up to 27 storeys in height present to the south of the sub-area. The Ram Quarter to the north of the sub-area includes consent for a tall building of up to 36 storeys in height.</p> <p>The 19th to mid 20th century properties typically have a brick façade which includes London stock and red brick with varying architectural detailing. The late 20th to recently constructed Ram Quarter buildings include a mix of brick panels and coloured panelling. Roofs vary in type.</p>
Heritage	The Wandsworth Town Conservation Area falls within the sub-area and there are a number of listed buildings in the area around the Site, all bar the Church of All Saints, Church Row and Rams (Youngs) Brewery Complex (which are listed grade II*), are listed grade II.
Movement	<p>The primary route of Wandsworth High Street forms</p> <p>The busy one-way gyratory associated with the A3 and runs from east / west and vehicles using this route currently influences the perception of the townscape. Further secondary and tertiary residential street are accessed from the gyratory and provide north / south links to the surrounding residential areas.</p> <p>A further network of historic alleys, yards and passages provide access into and through the urban blocks offering pedestrian permeability away from the busy gyratory.</p>
Views inwards and outwards	No London View Management Framework strategic views or LB Wandsworth Local Views SPD borough views cross the sub area.

Features	Description
	The Wandsworth Town Conservation Area Appraisal ⁸ states that the topography provides a sense of arrival and Wandsworth High Street having a “subtle curve with progressively changing vistas”. Travelling from the east to the west the vista takes in the Church of All Saints, whilst from the west to the east the Ram Brewery chimney provides a local landmark.
Pattern of uses and activities	The buildings that line Wandsworth High Street include retail, leisure, civic and office uses. To the north and south of the route the land use is predominately residential with associated uses such as schools and places of worship.

Extract 2 Existing and emerging building heights within sub-area G1 and G1a



Application of LP4 Tall and Mid-rise Buildings within G1: Wandsworth Town and Riverside

15. The draft policy states (in summary)

A. Buildings which are 7 storeys or over, or 21 metres or more from the ground level to the top of the building (whichever is lower) will be considered to be tall buildings.

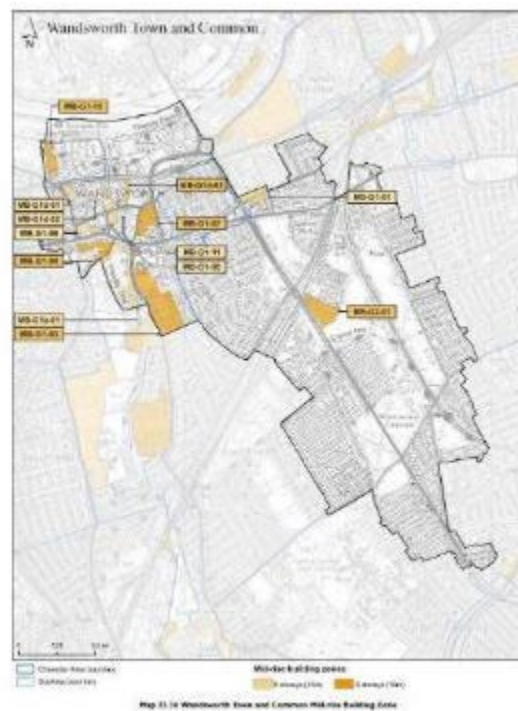
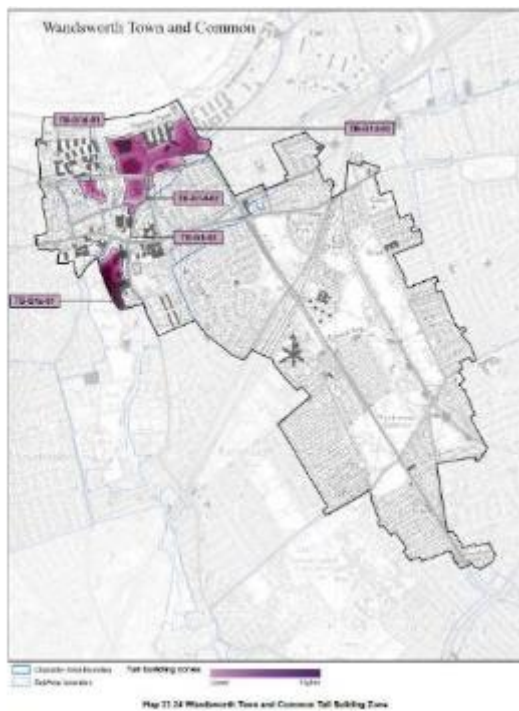
⁸ <https://www.wandsworth.gov.uk/media/1713/wandsworthplustownplusdraftplusappraisal.pdf>

B. Proposals for tall buildings will only be appropriate in tall building zones identified on tall building maps included at Appendix 2 to this Plan, where the development would not result in any adverse visual, functional, environmental and cumulative impacts. Planning applications for tall buildings will be assessed against the criteria set out in Parts C and D of the London Plan Policy D9 and those set out below as follows:

16. Section B also includes criteria to assess tall building proposals.
17. The policy goes on to state in section E that buildings of five storeys or over, or 15 metres or more from the ground level to the top of the building would be considered to be mid-rise buildings. Section F it includes criteria to assess mid-rise buildings within the identified zones.
18. Section C and G recognise that proposals for tall or mid-rise buildings will not be permitted outside the identified tall building zones, and Section D and G state that proposals for tall or mid-rise buildings should not exceed the appropriate height range. Also, that the height of tall buildings will be required to step down towards the edges of the zone unless it can be “... demonstrated that this would not result in any adverse impacts including on the character and appearance of the local area.”
19. Map 23.24 of the Local Plan illustrates the G1: Wandsworth Town and Riverside tall building zone, which is shown in Extract 2, and Map 23.26 of the Local Plan illustrates the G1: Wandsworth Town and Riverside mid-rise building zone, which is shown in Extract 3. These zones do not reflect the findings of the Urban Design Study and are reduced in size.

Extract 3 taken Map 23.24 of the Local Plan

Extract 4 taken Map 23.36 of the Local Plan



Conclusions

20. National, regional and local planning policy all support the need to consider local context when developing new proposals, with documents such as the National Design Guidance and Urban Design Study respectively providing high level and local characteristics to consider.
21. The Urban Design Study states that tall buildings within the borough are either 8 storeys, or taller; or are 50% higher than the prevailing height of the character area noting that within town centres and along key strategic routes there are potential locations for tall buildings, subject to the specific characteristics of the site.
22. The G1: Wandsworth Town and Riverside character area includes buildings that have heights range between two to four storeys and tall buildings up to 27 storeys. Its associated Wandsworth Town and Common Opportunity Map (extract 1) does not, however, consider mid-rise and tall buildings already present within its townscape. It notes that sub-area G1 has the potential for tall buildings subject to addressing set criteria which relates to its context.
23. Based on a field study of the sub-area G1 it is considered that low-rise buildings within the area are typically four storeys or less, mid-rise buildings between five and ten storeys and taller buildings 11 storeys or more. The sub-area includes four tall buildings that range between 15 and 27 storeys in height, it also includes the proposal for a tall building within the Ram Quarter for up to 36 storeys in height.
24. The draft policy LP4 Tall and Mid-rise Buildings within G1: Wandsworth Town and Riverside does not completely consider the findings of the Urban Design Study. An example of this is where the tall building zone shown in Map 23.26 of the Local Plan does not reflect Wandsworth Town and Common Opportunity Map Figure 252. The draft policy also does not consider the areas current mid-rise and tall buildings context. This includes mid-rise buildings between five and ten storeys being present within the Ram Quarter and Hardwick Quarter, along with taller buildings such as the Bronze Building and Jacquard Apartments of up to 27 storeys being present to the south of the town centre.
25. It is noted that the Urban Design Study states that the ability of the sub-area to accommodate tall buildings is “... limited by the cumulative effects of existing and recent developments and the modest scale of the town centre around Wandsworth Town Conservation Area.” However, the potential cumulative effects should be considered on a site-by-site basis based on the criteria set out within the London Plan’s Policy D9 Tall buildings point C.