

Your Ref: 'Publication' Draft Local Plan

28 February 2022

**By email only:** [planningpolicy@wandsworth.gov.uk](mailto:planningpolicy@wandsworth.gov.uk)



Dear Sir/ Madam,

### **Representations to the Draft Local Plan: Publication Version**

We write on behalf of our client, Workspace PLC, to provide representations on the London Borough of Wandsworth (LBW) 'Publication' Draft Local Plan (Regulation 19).

This representation is made in relation to two sites: Havelock Terrace, located within the draft Battersea and Technology Quarter site allocation and Morie Street Studios, located within the draft Ferrier Street Industrial Estate site allocation.

This representation starts by setting out the previous representations made in relation to both sites. General comments are then made on the Tall Buildings Policy, followed by specific comments on the draft Battersea and Technology Quarter site allocation and the Ferrier Street Industrial Estate site allocation.

This representation is supported by a Townscape Note, included at **Appendix I**, prepared by Cogent Heritage. This Townscape Note provides technical evidence in support of increased height ranges for the draft Battersea and Technology Quarter site allocation, within Tall Building Zone TB-B3a-01 and increased flexibility for differing height arrangements within the draft Ferrier Street Industrial Estate site allocation and Tall Building Zone TB-G1d-03.

### **Background**

We have previously submitted representations on the Draft Local Plan 'Pre-Publication' version in March 2021 in relation to both sites, which are included at **Appendix II and III** and can be summarised as follows:

#### Havelock Terrace

- Draft site allocation supported in principle and Workspace can confirm that the site is deliverable in the short to medium term as confirmed through pre-application discussions held with the LBW.
- Several comments were made regarding introducing flexibility into the site allocation relating to ground floor uses, active travel requirements and active frontages to avoid constraining the design process.
- It was suggested that the wording of the allocation should be updated to clearly demonstrate that the site is suitable for a tall building. This is critical given the changes to

the Publication London Plan Policy D9 which requires that tall buildings are located in locations identified as being suitable within a development plan. We note this has been picked up, but we have further comments as set out below.

#### Morie Street Studios

- Suggested that the land use requirements should be updated to provide at least a 25% increase in the amount of industrial (use classes E/B2/B8/SG) or office (use class E) to provide greater flexibility and avoid precluding the redevelopment of the site.
- It was noted that a connection through the Morie Street Studios site is not feasible and would risk precluding the future redevelopment of the site. This is because any link through the site will take up a disproportionate quantum of ground floorspace which would have significant adverse impacts on both design and viability. There are also issues in relation to noise and security, leading to low quality routes with any potential options through the centre of the site. This is discussed further below.
- It was noted the site was not identified in a location with opportunities for tall buildings on the tall buildings maps in Appendix 2 of the draft Plan despite the allocation and tall buildings study confirming it should be. We note this has now been rectified.

These latest representations focus on the key issues relating to both sites and do not seek to reiterate minor points previously raised, although we note that in our view all changes proposed in our previous representations should be picked-up to ensure that the site allocations provide the best opportunity for sustainable development.

### **Tall Building Policy**

'Publication' Draft Local Plan Policy LP4 (Tall and Mid-rise Buildings) now states that buildings which are 7 storeys or over, or 21 metres or more, will be tall buildings. The policy identifies tall building zones where tall buildings will be appropriate. The identification of tall building zones is welcomed and ensures that the draft policy complies with London plan Policy D9 Part B by determining locations where tall buildings may be appropriate and identifying locations on maps in the Development Plan.

However, Part D of Draft Policy LP4 states that proposals for tall buildings should not exceed the appropriate height range identified for each of the tall building zone as set out at Appendix 2 of the draft Plan. This wording should be amended as follows:

*'Proposals for tall buildings should not exceed the appropriate height range identified for each of the tall building zones as set out at Appendix 2 to this Plan, **unless it can be clearly demonstrated that this would not result in any unacceptable adverse impacts, including on the character and appearance of the local area.**'*

This wording will ensure that there is greater flexibility for additional height in appropriate areas within the Borough.

This wording is supported by the recent High Court decision (Case Number CO/1683/2021) at the Former Master Brewer Site where the London Borough of Hillingdon (LBH) sought judicial review of the decision made by the Mayor of London on 30<sup>th</sup> March 2021 to grant planning permission for buildings up to 11 storeys in height. LBH claimed that the Mayor of London misinterpreted Policy D9 of the London Plan by concluding that, notwithstanding conflict with Part B of that policy, tall buildings were to be assessed for policy compliance against the criteria in Part C.

The Judge noted that the Mayor acknowledged in his decision that the proposal did not fully accord with London Plan Policy D9 as it had not been identified as suitable in the Development Plan under Part B. However, the Judge added that the mayor determined that the proposal accorded with the provisions of the Development Plan when read as a whole and that it was planning judgement, based on the benefits of the proposal. This ground for judicial review was therefore not successful.

It is therefore clear that even if a site has not been identified within the Development Plan as a suitable location for tall buildings in accordance with Part B of London Plan Policy D9, it is wrong to interpret the policy in a way that automatically treats proposals for tall buildings as contrary to the Development Plan. Instead, proposals should be assessed against the criteria within Part C and considered within the planning judgement.

The proposed building height thresholds set out in the plan have been informed by an Urban Design Study (2021) prepared by Arup. The assessment provides a borough wide review and sets potential indicative height thresholds. However, it does not have the benefit of detailed technical and environmental analysis that is required to support a full planning application which can better identify appropriate building heights on a site-specific basis.

The wording of draft Policy LP4 should therefore be amended as above to ensure that even if building heights are not identified as suitable within the Development Plan, they should still be assessed against the relevant policy criteria.

The Townscape Note, included at **Appendix I**, provides an overview of the Urban Design Study, which was prepared by Arup and which forms part of the evidence base for the draft policy and allocations. The Note considers that the Study generally uses an appropriate methodology and a sound approach to identify areas suitable for tall buildings, bearing in mind the document only allows broad conclusions to be reached. Despite this, however, the document has inherent limitations as it fails to assess individual sites or areas in any great detail and creates limitations in setting height parameters.

The acceptability of tall buildings on individual sites will depend on the specific characteristics of the site and its context and the Urban Design Study is not intended to assess the suitability of specific proposals for individual sites. Further detailed study is necessary to make an assessment and judgments about acceptability and appropriateness. Furthermore, the 'appropriate range' identified within the Study across the various sites has equally not been tested in a site-specific way and, as a consequence, there may be flexibility for increased heights on specific sites which go beyond the identified ranges.

Therefore, given that individual sites have not been considered and there is no detailed assessment on a site-by-site basis, a degree of flexibility is necessary to avoid the broad findings of the Study being applied in an unnecessarily restrictive way. The Study provides only broad guidance on appropriate heights for tall buildings, and it would be incorrect to use this guidance on heights as inflexible maximum heights. Applying the Study in this way would result in an overly restrictive approach to height which would not accommodate the necessary flexibility in emerging proposals.

It is for this reason that the wording of Policy LP4 should be amended to enable the necessary flexibility for emerging proposals to allow detailed, site-specific analysis to demonstrate that taller buildings should be allowed where there would be no unacceptable adverse impacts, including on the character and appearance of the local area.

## Battersea Design and Technology Quarter Site Allocation

This section of the representation is made in relation to 5-7 Havelock Terrace, which is included within the draft Battersea Design and Technology Quarter (BDTQ) site allocation.

Within the site allocation, it is noted that the site falls within tall building zone TB-B3a-01 which has a maximum appropriate height range of 7 to 13 storeys. It states the height of developments within that zone should not exceed the heights of, and be in accordance with, the tall building maps in Appendix 2, which set out the identified maximum appropriate heights in line with Policy LP4.

As above, the word 'maximum' should be removed and the paragraph should be worded as follows:

*The ~~maximum~~ appropriate height range for the zone is 7 to 13 storeys, and the appropriate height range for the cluster must be in accordance with the tall building maps in Appendix 2. The height of developments within that zone should not exceed the ~~heights of~~ appropriate height range, unless it can be clearly demonstrated that this would not result in any unacceptable adverse impacts, including on the character and appearance of the local area.'*

The Urban Design Study (2021) identifies the site as being in an area of lower sensitivity, high probability for change, and higher development capacity and within Nine Elms Opportunity Area. The strategy for the B3 Nine Elms Mixed Use area is 'transform'. The existing character of the area is fragmented and incoherent, therefore the strategy is to transform the character of the place, as is already underway.

The Urban Design Study notes that the existing prevailing height within tall building zone TB-B3a-01 is 2-12 storeys, however, this does not consider recently approved developments. An application (ref. 2020/2837) at Site at Palmerston Court was approved on 8<sup>th</sup> March 2021 for the construction of 4 buildings of up to 21-storeys in height, directly to the north of 5-7 Havelock Terrace. Subsequently, construction has started on site and the consent has been implemented.

Given the lower sensitivity of the area, the high probability for change, higher development capacity and high accessibility of the site (PTAL 5), the appropriate height range for the zone should be increased to ensure that the Opportunity Area fully realises its growth and regeneration potential, in accordance with London Plan Policy SD1, and development can make the best use of land that optimises the capacity of sites, in accordance with London plan Policy D3.

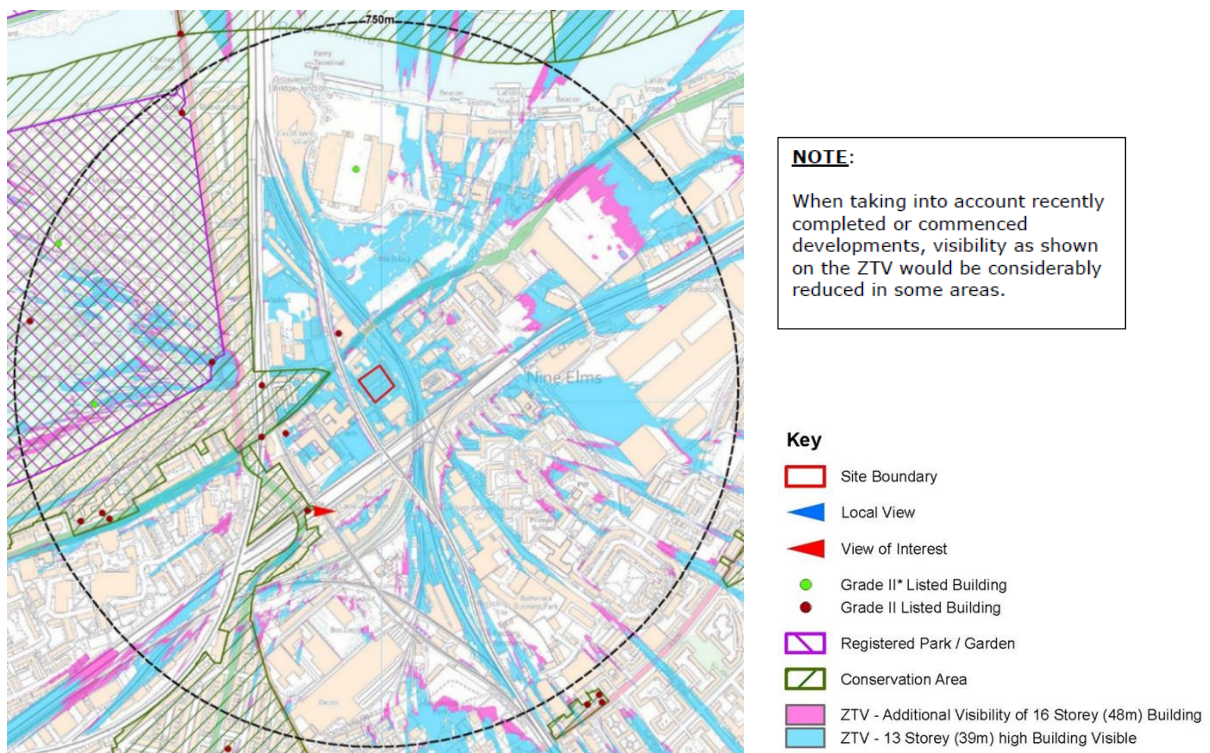
Furthermore, the appropriate height range should be adjusted to consider the recently approved development at Site at Palmerston Court so that adjacent and surrounding sites can be designed to respond to and enhance the emerging character of the area. Restricting building heights to 13 storeys will result in an isolated tall building that fails to integrate successfully into the area. Therefore, greater flexibility should be provided within the appropriate building range so that proposals can respond to surrounding sites and be assessed against the relevant criteria within Draft Policy LP4 and London Plan Policy D9.

As set out within the Townscape Note within **Appendix I**, Cogent Heritage have tested the views towards Battersea Power Station in relation to 5-7 Havelock Terrace. This demonstrates that development on the site of up to 16-storeys would neither block views of Battersea Power Station,

nor be seen behind it, taking into account emerging development. The Urban Design Study sets out that existing buildings are relatively modest in scale and there is a need to ensure appropriate stepping down to these where retained. However, it is well established that such a stepping is not a necessary prerequisite for all tall buildings or all sites, and a development that does not incorporate such a stepping in height could be entirely acceptable in its own right. In any event, the Palmerston Court development immediately to the north of 5-7 Havelock Terrace was approved on 8 March 2021 (ref. 2020/2837) and comprises 4 buildings of up to 21-storeys in height. A site at the suggested maximum height of 16 storeys on the site of 5-7 Havelock Terrace would constitute a stepping down.

The Townscape Note also highlights that the Urban Design Study sets out that tall buildings will need to respond positively to the adjacent Parktown Estate Conservation Area and nearby Battersea Park Registered Park & Garden and Conservation Area. The recent permission at Palmerston Court directly to the north of the site demonstrates that it is possible for buildings up to 21-storeys and it cannot reasonably be argued that a lower development on the immediately adjoining site would cause unacceptable impacts. The 21-storey building would also restrict view of 5-7 Havelock Terrace from the north.

There is no evidence in the Urban Design Study that would support limiting the height of development on the site of 5-7 Havelock Terrace to 13-storeys instead of the suggested 16-storeys. As part of the Townscape Note, a differential Zone of Theoretical Visibility (ZTV) has been produced, shown below and within **Appendix I**. This demonstrates that a 16-storey building would have a very marginal increase in visibility from small parts of the nearby Conservation Areas, for an area of lower sensitivity, and other areas of increased visibility are of low sensitivity. Whilst there would be a degree of greater visibility over longer distances, no heritage assets, protected views or especially sensitive areas would be affected, and at such distances the development would become a more distant presence. It is also relevant that in the longer views from the south (and north), the consented Palmerston Court development would be taller and therefore break the skyline, rather than any 16-storey development on the site of 5-7 Havelock Terrace.



It has therefore been demonstrated that it would be incorrect to restrict any future proposals to a maximum height of 13-storeys, particularly following the approval of buildings up to 21-storeys on the adjacent site. The wording of the site allocation should therefore be amended to allow greater flexibility which will allow heights to be increased following in-depth, site-specific analysis.

### **Site Allocation WT8: Ferrier Street Industrial Estate**

This section of the representation is made in relation to Morie Street Studios, SW18 1SL which is located within the Ferrier Street Industrial Estate site allocation (WT8).

In the first instance, the inclusion of the site within tall building zone TB-G1d-03 is supported by Workspace following our previous representations.

Our previous representation, included at **Appendix III**, was supported by a feasibility study prepared by Steer. The feasibility study demonstrates that a connection through the centre of the Morie Street Studios site is not feasible and would risk precluding the future redevelopment of the site.

The feasibility study provides a review of four different potential routes through the site and assesses their suitability in terms of design, viability, acoustics, light, air quality, safety, and service of desire lines.

As a result of the significant level changes between the site and Swandon Way at the centre and the north of the site, any link through the site will take up a disproportionate quantum of ground floorspace which would have significant adverse impacts on both design and viability. There are also issues in relation to noise and security, leading to low quality routes with any potential options through the centre of the site.

There is, however, potential to provide a route to the south of the site. This represents the best option when considered in the round as demonstrated by the diagram included at **Appendix IV** and for the following reasons:

- It would minimise the impacts upon the Morie Street studio site's ground floor layout by allowing one building to be provided and not splitting the site into two buildings. The route makes natural use of the desire to have a building that is set back from the southern boundary to facilitate windows along the elevation.
- Would be less disruptive to the building entrances and common facilities.
- Would make best use of available natural daylight compared to other options.
- The configuration of the building and the adjacent ground floor units would promote natural surveillance.
- Although the Metropolitan Police would prefer to see no new route, the southernmost route would be the most acceptable to them as it would be less likely to result in creating conditions which would encourage criminal activity.
- It would provide a direct and gently graded step-free route, with no ramps or stairs required in comparison to the other proposed routes.
- It could be designed to a high quality incorporating soft landscaping and street furniture.

In addition to the above, the future connection can only be successfully realised if sites, on the west and east of Swandon Way, seek to accommodate the crossing. The emerging masterplan for most of the Wandsworth Gasholder site has been published and is included at **Appendix V**. It is

evident that the design intent is for the main pedestrian connection to the site to be directed to the south-east towards York Road. This further supports that any pedestrian/cycle connection across Swandon Way should be located further to the south than would be achieved with a route through the centre of the Morie Street Studios in order to avoid a disjointed travelling experience.

It is strongly recommended that the proposed site allocation is updated to reflect this to avoid precluding the future redevelopment of the site and ensure that the site allocation is deliverable and therefore meets the relevant tests set out in the NPPF.

Revised text for the site allocation has been proposed below.

Paragraph 4.73:

*“Development should provide a mix of residential and intensified economic uses, including office, industrial and workspace for SME businesses, with appropriate loading yard space for the industrial uses. Food and drink businesses are appropriate to the east of the site where it adjoins Old York Road. Future provision should be made at the south-western edge to allow for a future installation of a new pedestrian/cycle connection, south of Morie Street Studios, across Swandon Way to the Gasholder site (WT4). Public realm improvements to the area around the southern entrance to Wandsworth Town station will be required.”*

Paragraph 4.79:

*“Proposals should ~~allow~~ explore the feasibility for a connection across Swandon Way to the Gasholder cluster (WT4) with a new pedestrian/ cyclist crossing, south of Morie Street Studios, that would provide a direct and safe connection to Old York Road and Wandsworth Town Station. Careful design of proposals adjacent to Swandon Way will be required to accommodate this street level pedestrian connection towards the Gasholder cluster. ~~potentially arranged as an archway to maximise workspace accommodation and act as a natural buffer to vehicle noise from Swandon Way.~~”*

Furthermore, the Urban Design Study sets the appropriate height range of 7-15 storeys for tall building zone TB-G1d-03. The heights ‘heat map’ shows taller elements to the north east of the Morie Street Studios and closer to the Old York Road Conservation Area than the Morie Street Studios site, even though the Study states that development closest to Swandon Way must respect the small scale character of Old York Road Conservation Area. The Townscape Note included within **Appendix I**, prepared by Cogent Heritage, states, therefore, that it is wholly illogical to require a step down in heights on the Morie Street Studio site because of the proximity to the Old York Road Conservation Area.

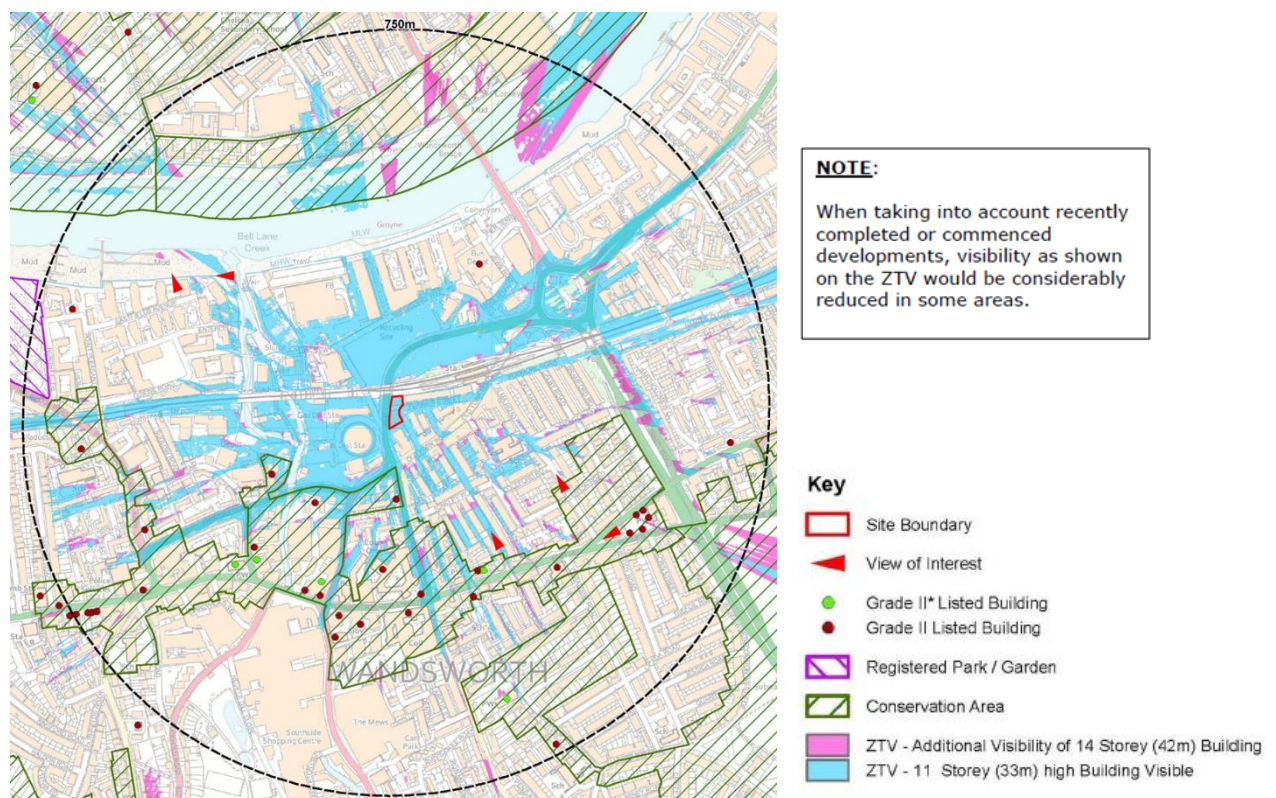
The Study seeks to locate taller buildings closest to the elevated railway line and the Wandsworth gyratory on Swandon Way. The Morie Street Studios site is located immediately adjacent to both the railway line and the Wandsworth gyratory and so it therefore can accommodate greater height.

The Study states that additional height beyond 15-storeys would risk adverse effects on the character or the nearby Conservation Areas, the River Thames character and sensitive features. This identifies a potential risk, but it should not exclude the potential for buildings taller than 15-storeys being acceptable. The acceptability of such height would of course need to be tested on a site-specific basis and justified if brought forward and there are no issues with the Study cautioning against greater heights. However, there is an issue when the cautious, risk-averse

approach in the Urban Design Study is then directly translated into fixed parameters in the draft Local Plan, without any flexibility.

A differential ZTV has been produced, as included below and within the Townscape Note, which shows to what degree there would be in seeing the heights of an 11-storey building and a 14-storey building on the site. The differential ZTV shows quite clearly that the sensitive townscape areas, especially the conservation areas and listed buildings, would not experience any notable differential visibility when the different heights are compared. The differential ZTV also shows that no identified local views (in either the Local Views SPD or the Urban Design Study) would be affected.

It is also worth noting that the ZTV does not show any development on the remainder of the draft allocation or adjacent draft allocation sites. Of particular relevance is the increased visibility that can be seen at the south east of the ZTV which needs to be placed in the context of the tallest development on the draft allocation being located to the north east and north west of the Morie Street Studios, and taller buildings on both of these sites would have greater visibility in the same locations, which means there would not be a perceived increase in the visibility of tall buildings in the distance from here due to a height increase on the Morie Street Studios site. Such a perceived increase on visibility of tall buildings in the distance from this area is implicit in the draft allocation.



In conclusion, the Morie Street Studios site lies in exactly the right location for height as identified in the Urban Design Study (i.e. adjacent to the railway line and the Wandsworth gyratory). there are no indications of unacceptable townscape or heritage impacts that would arise from increasing capacity for up to 14 storeys on the Morie Street Studios site, or alternatively to reword the policy requirements to provide flexibility in heights, subject to demonstrating that would not give rise to any unacceptable impacts.

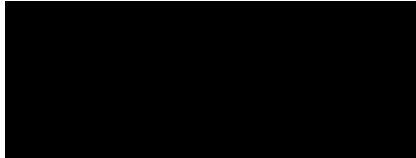


## **Summary**

We look forward to seeing how the 'Publication' Local Plan progresses through to examination and we appreciate the opportunity to submit further feedback.

We would appreciate it if you could provide confirmation that the response has been received. Please let us know if you have any questions.

Yours faithfully



**Laura Jenkinson**  
**Director**

**For and on behalf of Avison Young (UK) Limited**

# Appendix I: Townscape Note, prepared by Cogent Heritage

# Townscape Note

## WANDSWORTH 'PUBLICATION' DRAFT LOCAL PLAN (Reg 19)

**Havelock Terrace** (draft site allocation TB-B3a-01)

**Morie Street Studios** (draft site allocation TB-G1d-03)

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<b>Written by:</b>	Ignus Froneman B Arch Stud ACIfA IHBC	<b>Date:</b>	25 February 2022
<b>On behalf of:</b>	Workspace	<b>Ref:</b>	0492

### 1.0 INTRODUCTION

- 1.1 This Townscape Note has been prepared by Ignus Froneman, Director at Cogent Heritage, in consultation with Workspace (the landowner) and Avison Young Planning.
- 1.2 The author of this report has over 20 years of experience in heritage and townscape matters. This includes providing expert evidence at public inquiries, on behalf of both appellants and local planning authorities, and cases include assessing the impacts of tall buildings in London. One of these cases, on behalf of the London Borough of Tower Hamlets, was the subject of the controversial decision by Robert Jenrick MP (then Secretary of State for Housing, Communities and Local Government), which disagreed with the Inspector's dismissal of the scheme, but which was then overturned following a Judicial Review, and redetermined in November 2021. The tallest proposed building in that case was 43 storeys.
- 1.3 The Townscape Note presents an independent review of the Urban Design Study (2021), which was prepared by Arup and which forms part of the evidence base for the draft allocations for tall buildings. This considers the rationale behind the heights set out in the draft allocations for tall buildings, and finds support for increased heights on the two subject sites as part of a Local Plan Regulation 19 representation. The two subject sites are:
- i. 5-7 Havelock Terrace, located within the draft Battersea and Technology Quarter site allocation (TB-B3a-01); and
  - ii. Morie Street Studios, located within the draft Ferrier Street Industrial Estate site allocation (TB-G1d-03).

- 1.4 The Townscape Note considers the findings of the Urban Design Study, specifically in relation to the heights identified for the above sites. It provides further detail about whether the sites would be capable of accommodating additional height (i.e. compared with the heights set out in the Urban Design Study), in the interest of site optimisation, whilst being policy compliant and without causing harm to the surrounding townscape. It considers at a technical level the potential implications of height increases on both of the sites on the surrounding receiving townscape. This enables a conclusion as to the robustness of the maximum recommended heights set out in the draft allocations in the Urban Design Study, which in determines absolute heights for the purposes of Policy LP4 of the emerging Local Plan (Regulation 19 version, January 2022).
- 1.5 In short, this Note provides technical evidence in support of:
- i. increased height ranges for site allocation (TB-B3a-01), which includes 5-7 Havelock Terrace; and
  - ii. increased flexibility for differing height arrangements within the Ferrier Street Industrial Estate site allocation (TB-G1d-03) in relation to the Morie Street Studios site.

### **Approach and methodology**

- 1.6 This Note was informed by a review of the Urban Design Study, which was prepared by Arup and which forms part of the evidence base for the draft allocations for tall buildings, specifically in relation to the approach to heights identified for the above sites, and the rationale behind the suggested heights in the Urban Design Study. The assessment of each site starts with a brief summary and consideration of the findings of the Urban Design Study.
- 1.7 This was supplemented by observations of the current and emerging townscape contexts to both sites. The assessment used comparative Zones of Theoretical Visibility (ZTVs), based on LIDAR data, as well as modelling selective additional buildings where the LIDAR data was not up to date (not all buildings were modelling, as the exercise is illustrative). The ZTVs are not based on actual proposals for the sites, but generic extruded massing to comparative different heights, which help to show whether there would be any significant increases in visibility in the surrounding townscape when comparing different heights (i.e. heights in accordance with the draft allocations, compared with suggested heights for the two subject sites). It is also possible to understand where such increases would occur, and the sensitivity of the receiving environment.
- 1.8 Designated heritage assets were mapped on the ZTVs to assist in determining the sensitivity of the surrounding townscape. The study area for each site was 750m, an

appropriate area to capture any likely significant effects, bearing in mind that the sites are within areas identified for tall buildings and, in the case of Havelock Terrace, adjacent to a consented tall building (which is considerably taller than the maximum parameters requested for this allocation).

- 1.9 The information in the ZTVs was then related to the actual townscape, with focussed observations about the areas where the changes between the differential heights would be notable.

## **2.0 OVERVIEW OF THE URBAN DESIGN STUDY**

- 2.1 The Urban Design Study is generally a well-structured and well-presented document that generally uses an appropriate methodology (bearing in mind the broad coverage of the document, which allows only broad conclusions to be reached) and a sound approach to identify areas suitable for tall buildings. The Urban Design Study is a sound basis to produce *broad guidance about likely acceptable heights* for tall buildings on the allocated sites.

- 2.2 However, the document has inherent limitations; the breadth of assessment means that no one site is assessed in any great detail. Whilst the conclusions are sound on a broad and general basis, the document neither purports to assess individual sites or areas in any great detail, nor does it contain such assessments. Whilst this is therefore useful as a broad evidence base, there is paucity of detailed assessment for individual sites, which creates limitations in setting height parameters.

- 2.3 Specifically, the Urban Design Study states on page 12, under the heading “*Tall building capacity*” that:

*“In all cases, the acceptability of individual plots will depend on specific characteristics of the site. Tall building guidance provided is intended to help steer selection of appropriate sites and development of suitable building proposals, including in the context of consideration of the cumulative impact of tall buildings.*

*An area being designated as a tall building zone does not mean it has capacity to receive tall buildings within the appropriate range across the whole extent. Every new development will need to consider the specific context of the plot, existing buildings surrounding the plot and any other development proposals in the area including those going through planning, consented schemes and buildings under construction.*

- 2.4 The relevance of this is twofold. Firstly, the acceptability of tall buildings on individual sites will depend on the specific characteristics of the site, and its context. The Urban Design Study obviously is not intended to assess the suitability of specific proposals for specific sites, and therefore additional information is required to make such an assessment, and judgements about acceptability and appropriateness. The relevance is that further, detailed study is necessary – beyond that of the Urban Design Study which, at the level of detail produced, can only be taken to be broad guidance, rather than fixed parameters.
- 2.5 Secondly, where an area has been designated as a tall building zone, that does not mean it has capacity to receive tall buildings within the ‘appropriate range’ across the whole extent of the allocated zone. Every new development will need to consider the specific site context and circumstances that apply. The ‘appropriate range’ identified in the Urban Design Study across the various sites has equally not been tested in a site-specific way to cover all eventualities. It is not the purpose of the Urban Design Study to do that. However, as a consequence, there may equally be flexibility for increased heights on specific sites, for example, which go beyond the ranges identified in the Urban Design Study.
- 2.6 Equally, it may be possible, on a site specific basis, to deviate from the broad guidance in the Urban Design Study. Given that different scenarios for individual sites have not been tested or considered in the Urban Design Study, and there is no detailed assessment on a site-by-site basis, a degree of flexibility is necessary to avoid the broad findings of the Urban Design Study being applied in an unnecessarily restrictive way on the basis of a study of this kind. Whilst the Urban Design Study can be regarded as a useful reference point for borough-wide guidance, and the identification of opportunity areas for tall buildings, it cannot meaningfully be used not a set of absolute parameters.
- 2.7 Further assessment on site-by-site basis is necessary to establish such parameters. It is clear, therefore, that the height ranges in the Urban Design Study are useful as a general guide, but not as a set of maximum parameters. Indeed, there is an extant consent on the draft allocation for the site that includes Havelock Terrace (the Battersea Design and Technology Quarter Site Allocation; TB-B3a-01), which very clearly demonstrates this.
- 2.8 This recent decision (for a development known as Palmerston Court, approved on 8 March 2021 under ref. 2020/2837) was for a development that comprises 4 buildings of up to 21 storeys in height. The maximum height identified in the Urban Design Study is 13 storeys. The consent has demonstrated the acceptability of a development that is no less than 8 storeys taller than the maximum height guidance for the site provided in the

Urban Design Study. This, in itself, very clearly illustrates the flawed logic of transposing the guidance on likely acceptable heights as per the Urban Design Study, into restrictive absolute maximum heights enshrined in policy (see below).

- 2.9 This example clearly demonstrates that the evidence base, the Urban Design Study, provides only broad guidance on appropriate heights for tall buildings in the draft allocations. The extant consent provides proof that it would be incorrect to use the guidance in the Urban Design Study as absolute maximum parameters, or to use the guidance on heights as inflexible maximum heights.
- 2.10 Applying the Urban Design Study in that way would result in an overly restrictive approach to height, which is neither based on the evidence of a detailed site-specific assessment, nor would it accommodate the necessary flexibility in emerging proposals for these sites.

### **The relationship between the Urban Design Study and the emerging Local Plan policy**

- 2.11 The application of approximate height ranges in the Urban Design Study becomes problematic when these guides to heights are restrictively applied in the way that they are presently in emerging Policy LP4 "*Tall and Mid-rise Buildings*". Part D of the policy states that proposals for tall buildings should not exceed the appropriate height range identified for each of the tall building zones as set out at Appendix 2, which are replicated directly from the Urban Design Study.
- 2.12 The maps at Appendix 2 then show the locations of tall and mid-rise building zones, and "*appropriate height (ranges) for each zone*". In other words, the broad 'appropriate ranges' established as a broad guide in the Urban Design Study then become restrictively enshrined in policy as absolute maximum height criteria, absent of any detailed, site-specific analysis that supports the conclusion of maximum heights at a detailed, granular level.
- 2.13 It is for this reason that it is submitted that Policy LP4 should be reworded to allow the necessary flexibility, with any deviations in the 'appropriate range' to be supported by detailed analysis and justification. This could be worded similarly to the latter part of Part D of Policy LP4, which seeks ensure a stepping down towards the edges of tall building zones "*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*".

### **3.0 HAVELOCK TERRACE - ALLOCATION TB-B3a-01**

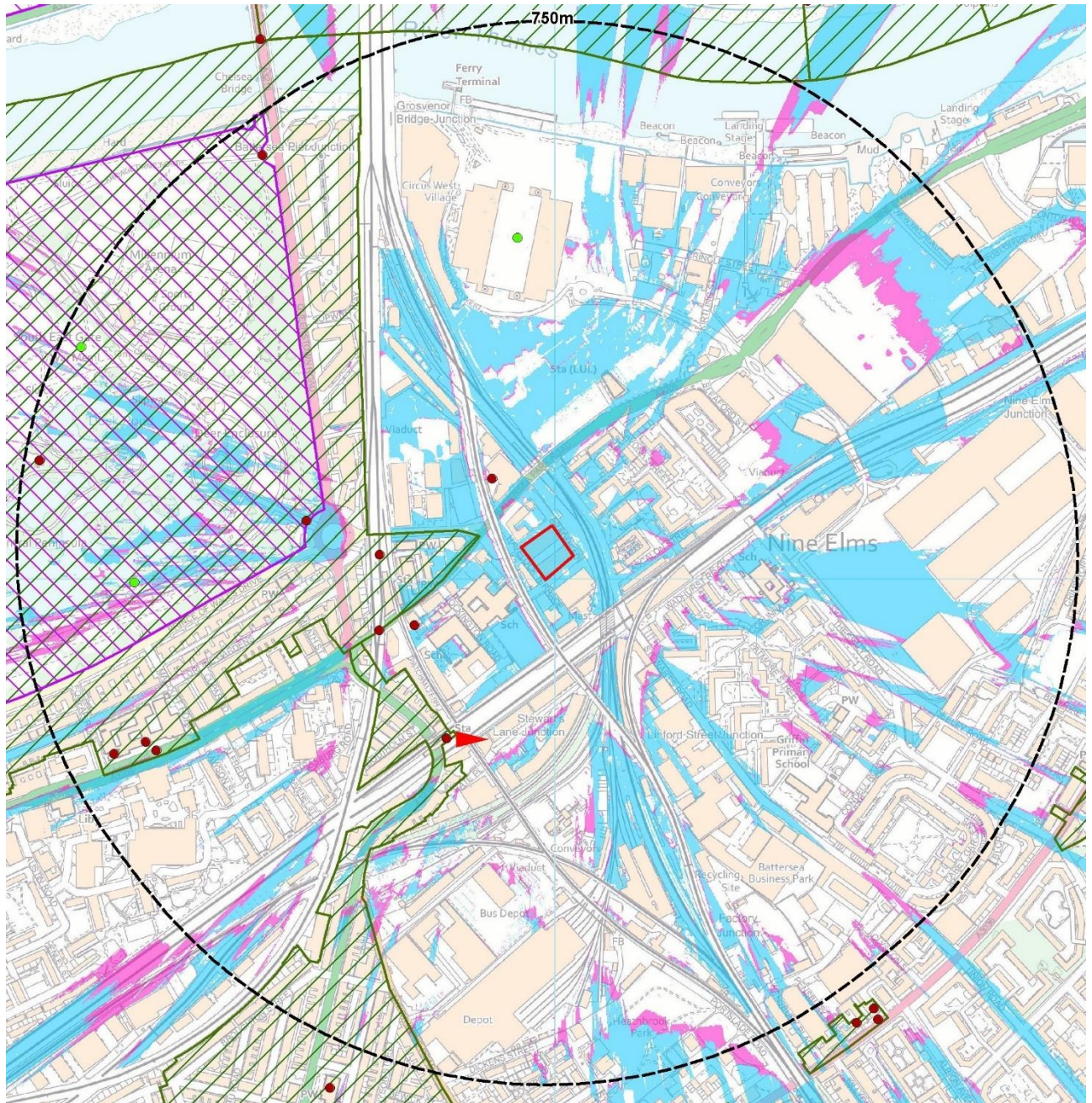
- 3.1 Havelock Terrace falls within the “*B3 Nine Elms Mixed Use*” character area of Battersea, as identified in the Urban Design Study. The strategy for this area, as identified in the Urban Design Study, is to transform the area. It is in an area of low sensitivity and with a high probability of change.
- 3.2 The Urban Design Study, on page 183, describes the TB-B3a-01 allocation, starting with the existing prevailing height (2-12 storeys) and providing the appropriate height range at 7-13 storeys. It notes there is capacity for tall buildings along the railway corridors – i.e. in the location of 5-7 Havelock Terrace – but development requires careful placement to preserve views towards Battersea Power Station.
- 3.3 Views towards Battersea Power Station have been tested in relation to the location of 5-7 Havelock Terrace, including the local views identified in the Urban Design Study, and the following views in the Local Views SPD (February 2014):
- i. View 3: Downstream from Albert Bridge
  - ii. View 4: Battersea Power Station from Chelsea Bridge
  - iii. View 5: From Queenstown Road to Battersea Power Station; and
  - iv. View 6: Battersea Power Station from Battersea Park
- 3.4 Development on the site at 5-7 Havelock Terrace of up to 16 storeys would neither block views of Battersea Power Station, nor be seen behind it (bearing in mind the emerging development around the station).
- 3.5 The Urban Design Study notes existing buildings of relatively modest in scale nearby, and the need to ensure appropriate stepping down to these where retained. However, it is well-established that such a stepping is not a necessary prerequisite for all tall buildings or all sites, and a development that does not incorporate such a stepping in height could be entirely acceptable in its own right. In any event, the Palmerston Court development immediately to the north of 5-7 Havelock Terrace was approved on 8 March 2021 (ref. 2020/2837) and comprises 4 buildings of up to 21 storeys in height. A site at the suggested maximum height of 16 storeys on the site of 5-7 Havelock Terrace would constitute a stepping down. There is notably also scope within the Havelock Terrace site to incorporate stepped forms on the site, and the draft allocation to the south of 5-7 Havelock Terrace would allow for a further stepped height. There is, therefore, plenty of scope to achieve the objective of a stepped form.



- 3.6 The Urban Design Study notes that the tallest buildings within this zone are likely to be most suited to the north of the area where elevated railway infrastructure means additional height would sit most comfortably. 5-7 Havelock Terrace is in this location.
- 3.7 According to the Urban Design Study, tall buildings will need to respond positively to the adjacent Parktown Estate Conservation Area and the nearby Battersea Park Registered Park & Garden and Conservation Area. The permission for the Palmerston Court development immediately to the north of 5-7 Havelock Terrace has demonstrated how that is possible – with buildings of up to 21 storeys in height. It cannot reasonably be argued that a lower development on the immediately adjoining site would cause unacceptable impacts, and that has been confirmed by a careful study of the Heritage Townscape and Visual Assessment (HTVIA) for that development.
- 3.8 Appendix 2, at A.3.10 on page 243 onwards of the Urban Design Study, provides further detail of how the heights in the draft allocation were arrived at. The section concludes by stating that the building heights shown “*are considered to be broadly appropriate in principle [added emphasis]*”. That is certainly not the same as laying down a maximum height parameter that should or could be enshrined in absolute terms in policy. It is also of course highly relevant that, as a matter of fact, a proposal for 21 storeys – 8 storeys taller than the allocation – within this same area has been found to be acceptable on its own merits.
- 3.9 This development is very briefly referred to in the following statement in the Urban Design Study:
- “There is a consented scheme at the northern tip of this part of the zone which rises to 61m (approximately 18 storeys [that is incorrect, as the development is in fact for 21 storeys following approval of a revised application]) which sits alongside taller development to the west within zone TB-B3-01. However, due to the proximity of Battersea Park Registered Park & Garden and Conservation Area, the heights shown in the scenario are considered appropriate and further new development should not exceed these.”*
- 3.10 Firstly, it should be noted that the consented Palmerston Court scheme is in fact approximately 30m closer to the Battersea Park Registered Park & Garden and Conservation Area, as well as being 5 storeys taller than the suggested maximum height for 5-7 Havelock Terrace. Two views from Battersea Park were tested in the Palmerston Court HTVIA, and it is clear from both that the lower height suggested for the 5-7 Havelock Terrace would have no visibility in the same views. Insofar as there could be

some visibility elsewhere, it would generally been seen alongside the Palmerston Court development, stepping down away from the park.

- 3.11 There is no evidence in the Urban Design Study that would support limiting the height of development on the site of 5-7 Havelock Terrace to 13 storeys instead of the suggested 16 storeys.
- 3.12 A differential ZTV has been produced as part of this Note, which shows degree to which there would be a difference in seeing the heights of a 13 storey building (the maximum height according to the Urban Design Study) and a 16 storey building. This can be seen overleaf at **Figure 1**. It should be noted that the ZTV represents a crude extrusion of the whole site to heights of 13 and 16 storeys for illustrative purposes. It is important to note that the OS base map on which the ZTV is based is already out of date, which means with recently completed or commenced developments, visibility would be considerably reduced in some areas.



**Key**

- Site Boundary
- Local View
- View of Interest
- Grade II\* Listed Building
- Grade II Listed Building
- Registered Park / Garden
- Conservation Area
- ZTV - Additional Visibility of 16 Storey (48m) Building
- ZTV - 13 Storey (39m) high Building Visible

**NOTE:**

When taking into account recently completed or commenced developments, visibility as shown on the ZTV would be considerably reduced in some areas.

**Fig 1:** A differential ZTV, showing the extent to which an additional 3 storeys would add visibility of development on the Havelock Terrace site.

- 3.13 The differential ZTV shows that a 16 storey building would have a very marginal increase in visibility from small parts of the nearby conservation areas. The part of Battersea Park from where there would be a theoretical increase in visibility is the perhaps the least sensitive location in the park: the car parking area to the south. It should also be noted that from this are the closer, and taller, consented development at Palmerston Court would also be more visible. Other areas with increased visibility are of low sensitivity, e.g. the railway line, and the former open site to the east of New Covent Garden Market, which is now developed, as is the Sleaford Street area to the east.
- 3.14 Whilst there would be a degree of greater visibility over longer distances, no heritage assets or especially sensitive areas would be affected, and at such distances the development would become a more distant presence. It is also relevant that in the longer views from the south (and north), the consented Palmerston Court development would be taller and therefore break the skyline, rather than any 16 storey development on the site of 5-7 Havelock Terrace.
- 3.15 In conclusion, the consent of the 21 storey Palmerston Court development directly contradicts the maximum 'appropriate' height for allocation TB-B3a-01 in the Urban Design Study. If a 21 storey development was recently found to be acceptable, as a matter of fact, then there could be no objective rationale for limiting maximum heights on the same allocation area to 13 storeys. There is no additional evidence in the Urban Design Study that would support limiting the height of development to 13 storeys. At a qualitative level, there are no indications of unacceptable townscape or heritage impacts that would arise from increasing the allocation to 16 storeys.

#### **4.0 MORIE STREET STUDIOS – ALLOCATION TB-G1d-03**

- 4.1 Morie Street Studios falls within the "*G1 Wandsworth Town and Riverside*" character area of Wandsworth Town and Common, as identified in the Urban Design Study. The strategy for this area, as identified in the Urban Design Study, is to restore the area. However, Morie Street Studios falls within Sub area (d), which is a planned area of change. It is in an area of low sensitivity and with a high probability of change.
- 4.2 The Urban Design Study, on page 197, describes the TB-G1d-03 allocation, starting with the existing prevailing height (4-8 storeys) and providing the appropriate height at 7-15 storeys.

- 4.3 The broader draft allocation area is described primarily as a riverside zone which has opportunities for tall buildings in keeping with the scale of the River Thames. Therefore the tallest buildings within this draft allocation area should generally step away from the river and be more focused towards the elevated railway line and the gyratory, which could become a focus for development.
- 4.4 The Urban Design Study states that development closest to Swandon Way must respect the small scale character of Old York Road Conservation Area<sup>1</sup>, a small local centre around Wandsworth Town train station. The heights 'heat map' for TB-G1d-03 on page 197 of the Urban Design Study, which is copied in Map 23.25 at Appendix 2 of the draft Local Plan, shows taller elements to the NE of the Morie Street Studios and closer to the Old York Road Conservation Area than the Morie Street Studios site. It is, therefore, wholly illogical for a requirement to step down heights on the Morie Street Studios site because of the proximity to the Old York Road Conservation Area.
- 4.5 Appendix 2 of the Urban Design Study, at A.8.5 from page 294 onwards, provides further detail of the draft allocation. This reiterates the principle of the tallest buildings being located closest to the elevated railway line and the Wandsworth gyratory on Swandon Way. The Morie Street Studios site is located immediately adjacent to both the railway line and the Wandsworth gyratory and so it therefore can accommodate greater height.
- 4.6 The Urban Design Study again reiterates that development closest to Swandon Way must respect the small scale character of Old York Road Conservation Area, and it is again worth noting that the map for draft allocation TB-G1d-03 on page 197 of the Urban Design Study shows the greatest height to the NE of the Morie Street Studios site, and closer to the conservation area.
- 4.7 The Urban Design Study states that by placing buildings up to 15 storeys close to the railway and Swandon Way, the draft allocation should not give rise to adverse effects on wider sensitive receptors, including Wandsworth Town Conservation Area to the south and Wandsworth Park Registered Park & Garden to the west.
- 4.8 The Urban Design Study states that the Morie Street Studios site has capacity for buildings no taller than 8 storeys due to the proximity to Old York Road Conservation Area; this has already been addressed above. It should also be noted that Wandsworth Town Conservation Area to the south itself includes some large scale buildings, and draft allocation TB-G1-03 for up to 10 storeys in the northern part of the conservation area,

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<sup>1</sup> The Old York Road Conservation Area is not shown on the Council's conservation areas map and there is no information on the Council's website about this conservation area.

and TB-G1d-02 up to 10 storeys on the land to the west of the Morie Street Studios site, meaning in both cases there would be something of a transition between the Morie Street Studios site and the areas to the south and west.

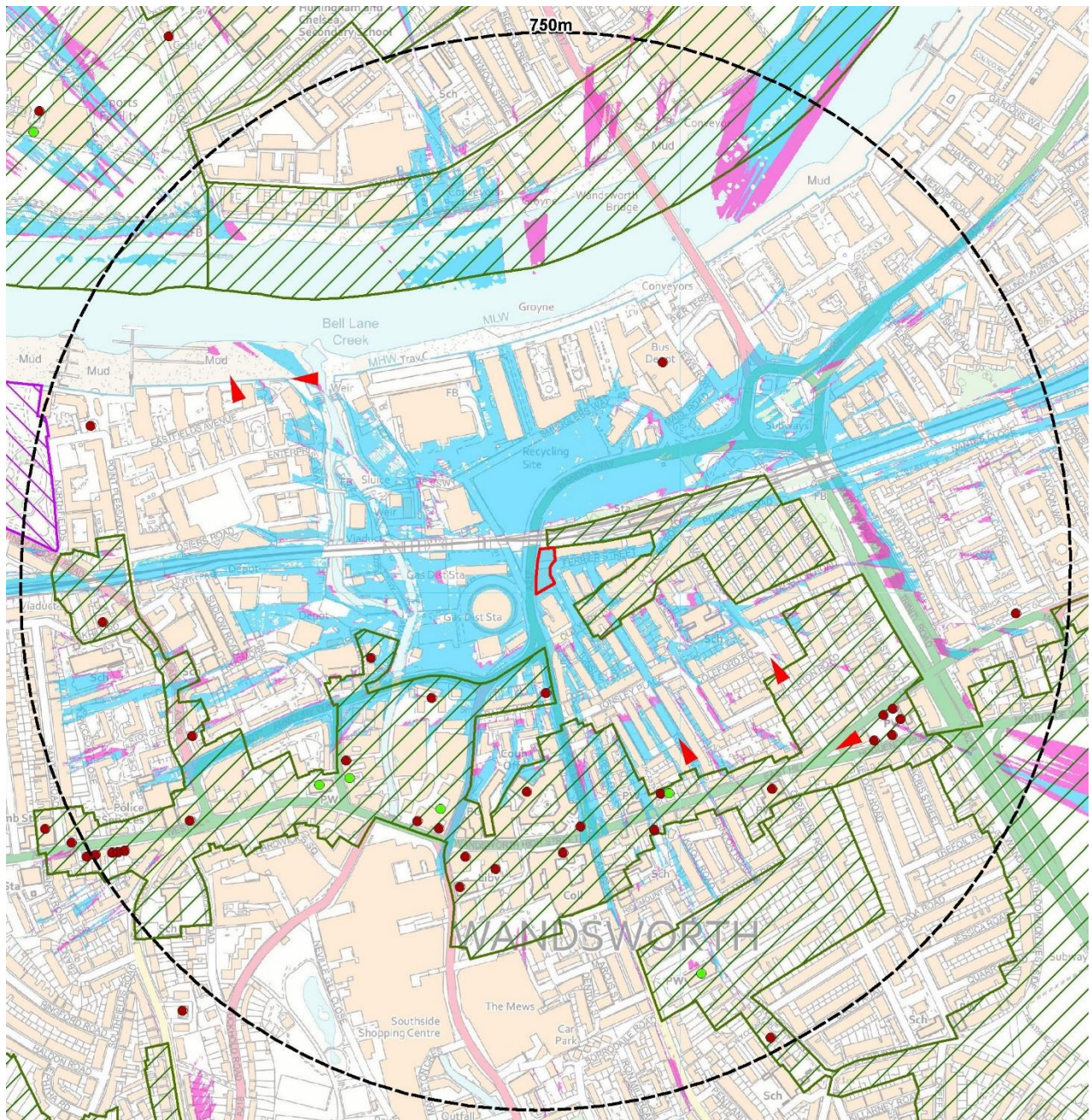
4.9 Finally, it should be noted that the Urban Design Study states categorically that:

*"Additional height beyond 15 storeys [on draft allocation TB-G1d-03] would risk adverse effects on the character of the nearby conservation areas, the River Thames character itself and sensitive features on the north bank of the Thames [added emphasis]."*

4.10 The above statement identifies a potential risk, but that does not exclude the potential for buildings taller than 15 storeys being acceptable. The acceptability of such height would of course need to be tested on a site-specific basis, and justified if brought forward. There is no issue in the Urban Design Study identifying such potential risks and cautioning against greater heights. However, there is an issue when the cautious, risk-averse approach in the Urban Design Study is then directly translated into fixed parameters in the draft local plan, and this is why there is an issue with the way in which the tentative and broad findings of the Urban Design Study are translated into hard policy, without any nuance or flexibility.

4.11 As before, a differential ZTV has been produced as part of this Note, which shows the degree to which there would be a difference in seeing the heights of an 11 storey building (below the 15 storey maximum height according to the Urban Design Study) and a 14 storey building (the suggested potential height for the Morie Street Studios site). This can be seen overleaf at **Figure 2**. It should be noted that the ZTV represents a crude extrusion of the whole site to heights of 11 and 14 storeys for illustrative purposes. In reality, a development on this site would have a more slender, and probably stepped form, which means ultimately its visibility would be more limited. The OS base map on which the ZTV is based is already out of date, which means with recently completed or commenced developments, visibility would be considerably reduced in some areas.

4.12 Also, the ZTV does not show any development on the remainder of the draft allocation, or the adjacent draft allocation sites. Of particular relevance is the increased visibility that can be seen at the SE of the ZTV – this needs to be placed in the context of the tallest development on the draft allocation being located to the NE and NW of the Morie Street Studios, and taller buildings on both of these sites would have greater visibility in the same locations, which means there would not be a perceived increase in the visibility of tall buildings in the distance from here due to a height increase on the Morie Street Studios site. Such a perceived increase on visibility of tall buildings in the distance from this area is implicit in the draft allocation.



**Key**

- Site Boundary
- ▶ View of Interest
- Grade II\* Listed Building
- Grade II Listed Building
- Registered Park / Garden
- Conservation Area
- ZTV - Additional Visibility of 14 Storey (42m) Building
- ZTV - 11 Storey (33m) high Building Visible

**NOTE:**

When taking into account recently completed or commenced developments, visibility as shown on the ZTV would be considerably reduced in some areas.

**Fig 2:** A differential ZTV, showing the extent to which an additional 3 storeys would add visibility of development on the Morie Street Studios site.

- 4.13 The differential ZTV shows quite clearly that the sensitive townscape areas, especially the conservation areas and listed buildings, would not experience any notable differential visibility when the different heights are compared. The differential ZTV also shows that no identified local views (in either the Local Views SPD or the Urban Design Study) would be affected.
- 4.14 In conclusion, the Morie Street Studios site lies in exactly the right location for height as identified in the Urban Design Study (i.e. adjacent to the railway line and the Wandsworth gyratory). The tallest heights are shown to be accommodated closer to the Old York Road Conservation Area in the Urban Design Study, and so this could not be an issue. There is a buffering gap between the Morie Street Studios site and the Wandsworth Town Conservation Area, where the Morie Street Studios site would form part of a new urban quarter. There are also large scale buildings in the closest part of the conservation area, and a draft allocation for up to 10 storeys in the northern part of the conservation area, and up to 10 storeys on the land to the west of the Morie Street Studios site. This indicates that there would be an adequate transition to the Morie Street Studios site. The differential ZTV does not highlight any issues with increased height on the Morie Street Studios site. There is no additional evidence in the Urban Design Study that would support limiting the height of development on the Morie Street Studios. At a qualitative level, there are no indications of unacceptable townscape or heritage impacts that would arise from increasing capacity for up to 14 storeys on the Morie Street Studios site, or alternatively to reword the policy requirements to provide flexibility in heights, subject to demonstrating that would not give rise to any unacceptable impacts.

## **5.0 CONCLUSIONS**

- 5.1 The Urban Design Study is a sound basis to produce *broad guidance* about *likely acceptable heights* for tall buildings on the allocated sites. However, the document has inherent limitations; the breadth of assessment means that no one site is assessed in any great detail. Whilst the conclusions are sound on a very broad and general basis, the document neither purports to assess individual sites or areas in any great detail, nor does it contain such assessments. Whilst useful as a broad evidence base, there is paucity of detailed assessment for individual sites. This creates limitations in using the Urban Design Study to set absolute height parameters.
- 5.2 Further, detailed study – beyond that of the Urban Design Study – is necessary to determine acceptable heights on a site-by-site basis. It is not the purpose of the Urban Design Study to do that. At the level of detail produced, the Urban Design Study can only be taken to be broad guidance, rather than fixed parameters. As a consequence, there may be flexibility for increased heights on specific sites, for example, which go



beyond the ranges identified in the Urban Design Study. That is clearly demonstrated in the extant consent for the 21 storey Palmerston Court development directly contradicts the maximum 'appropriate' height for draft allocation TB-B3a-01 in the Urban Design Study.

- 5.3 This Townscape Note has demonstrated the capacity for greater height on draft allocation TB-B3a-01 (which includes the site of 5-7 Havelock Terrace), and for greater flexibility in terms of the height distribution on draft allocation TB-G1d-03 (which includes the site of Morie Street Studios). That could be achieved by a more flexible wording to Policy LP4 (D) of the emerging Local Plan (Regulation 19 version, January 2022). As it stands, the wording of the policy is demonstrably too restrictive, and based on a rigid interpretation of guides to appropriate (not maximum acceptable) heights in the Urban Design Study.

## Appendix II: Havelock Terrace 'Pre-Publication' Representations

Our Ref: 02C100079  
Your Ref: Pre-Publication Draft Local Plan



01 March 2021

By email only: [planningpolicy@wandsworth.gov.uk](mailto:planningpolicy@wandsworth.gov.uk)

Dear Sir/ Madam,

### **Representations to the Draft Local Plan: Pre-Publication Version**

We write on behalf of our client, Workspace PLC, to provide representations on the London Borough of Wandsworth (LBW) Draft Local Plan: Pre-Publication version.

This representation is made in relation to 5-7 Havelock Terrace (the site), which is included within the draft Battersea Design and Technology Quarter (BDTQ) site allocation. Please note that a separate representation has also been submitted on behalf of Workspace PLC in relation to the Morie Street Studios site, which is included within the draft Ferrier Street Cluster site allocation.

This representation starts by providing comments on the draft site allocation, before providing comments on a number of relevant policies within the draft Plan.

### **Battersea Design and Technology Quarter Site Allocation**

The draft site allocation is supported in principle and Workspace can confirm that the site is deliverable in the short to medium term as confirmed through pre-application discussions held with the LBW.

Notwithstanding this, a number of suggested amendments to the proposed wording of the site allocation are included below to ensure that the site can provide the maximum quantum of sustainable development in line with planning policy.

The below comments are made following the structure of the draft allocation. The proposed revisions to the text are highlighted on a tracked change version of the draft site allocation which is included at **Appendix I**.

#### Development Considerations – Uses

The text should clearly set out that office space (Use Class E) would be supported at above ground level. The current wording seeks to protect and provide industrial uses within ground floor units, however, there is no reference to the other uses which are supported within this location. It is therefore suggested that the text is strengthened to ensure that it is clear that office space can be delivered here.

### Public Transport

The wording requires proposals within the Havelock Terrace site to provide road space with financial contributions towards TfL's Nine Elms Corridor proposal. It is suggested that more flexibility is added so that proposals "may" be required to provide road space to acknowledge that this may not be possible for all development proposals.

### Active Travel

This seeks contributions to upgrade pedestrian routes and improve accessibility, however, it is suggested that the wording should be updated to note that they 'may' be required on the basis that any obligation will need to meet the relevant lawful tests i.e. a suitable scheme may not be identifiable or deliverable at the time of any future application being submitted.

### Design Requirements – Built Form

This suggests that building frontages should be provided on to Bradmead, Palmerston Way and Havelock Terrace, which is supported, however, greater flexibility should be provided where site constraints do not allow this. Therefore, "where possible" should be added to the wording to ensure that proposals can still be supported where it is not possible to provide frontages across the three roads.

### Movement

The draft allocation wording states that connections to the Havelock Terrace site across Battersea Park Road should be enhanced. It is suggested that this wording should be amended slightly to ensure that opportunities to enhance connections are explored as it may not be possible for each site along Havelock Terrace to enhance connections across Battersea Park Road. Similarly, the requirement for future development to improve accessibility and connections to Queenstown Road Station should be more flexible, as there may not be opportunities to improve accessibility. Instead, it is suggested that the wording should encourage development to aim to improve accessibility, where appropriate.

### Tall Buildings

The wording of the allocation should be updated to clearly demonstrate that the site is suitable for a tall building. This is critical given the changes to the Publication London Plan Policy D9 which requires that tall buildings are located in locations identified as being suitable within a development plan.

## **General Comments on Policies**

This section provides further comments on the draft policies. Suggested amendments to policies are provided as tracked changes, where ~~Strikeout Red~~ = suggested deletion and Underlined Blue = suggested addition.

### Policy LPI I Energy Infrastructure

The policy currently states that new development will be expected to connect to any existing decentralised energy network (DEN). This does not account for the potential cost and technical challenges associated with providing a connection. As such, it is suggested that the wording is updated as follows to provide further flexibility:

#### LP11 Energy Infrastructure

A. New development will be expected to connect to any existing decentralised energy network (DEN) unless it is not technically feasible or the most energy efficient solution. Where networks do not exist, developments should make provision to connect to any future network that may be developed, having regard to the possibility for this to come forward.

### LP13 Waste Management

The policy currently states that developers will be expected to reuse, recycle or recover 95% of construction and demolition waste and find beneficial uses for 95% of excavation waste. The ambition to support a circular economy is welcomed. However, this wording does not provide any flexibility in situations where these figures are not feasible and it is suggested that further flexibility is therefore introduced as follows:

#### LP13 Waste Management

J. Developers will be expected to reuse, recycle or recover 95% of construction and demolition waste and find beneficial uses for 95% of excavation waste unless it is not technically feasible.

### LP37 Managing Land for Industry and Distribution

The policy strongly encourages the intensified use of sites for industrial purposes which is fully supported. The support for SME office accommodation and research and development uses on upper floors within the BDTQ is also supported.

However, it is suggested that the requirement provide at least the full replacement of existing industrial floorspace is not consistent with the Publication London Plan, which was updated following modifications proposed by the Secretary of State to remove a requirement to ensure “no net loss of industrial uses” on the basis that it may not be realistic and would therefore fail the “effective” test of soundness. On this basis, it is proposed that further flexibility is introduced to ensure that the plan is consistent with the Publication London Plan and the NPPF.

It is therefore suggested that the following amendments are made to the wording:

#### LP37 Managing Land for Industry and Distribution

##### Strategic Reservoir of Industrial Land

B. 2. The redevelopment of sites ~~must~~ should aim to provide at least the full replacement of existing industrial floorspace, in accordance with those uses identified in Part A, unless it can be demonstrated that full replacement is not feasible.

#### LP40 Requirements for New Economic Development

The policy sets out requirements for new economic development to achieve a high standard of workspace which is supported. However, the policy is currently too prescriptive in relation to requirements for industrial uses which should be managed by market requirements that are constantly changing. It is therefore suggested that the following amendments are made to the wording:

##### LP40 Requirements for New Economic Development

B. In addition to the requirements in Part A, proposals for industrial uses **must ensure** [should seek to provide](#):

1. the provision of adequate servicing and loading facilities including access bays and service yards;
2. floor to ceiling heights of 3.35 metres (or as appropriate to the specific use, where this can be justified);
3. that sufficient space is provided on site for the servicing and parking of commercial vehicles; and 4. goods lifts for multi-storey developments, with a minimum loading of 500kg.

#### LP41 Affordable, Flexible and Managed Workspace

In the experience of Workspace, the provision of affordable workspace has been most efficient where the applicant is given the opportunity to manage the space directly and flexibility is provided to decide on the location of the affordable workspace post-determination.

The option to provide affordable workspace as managed or open workspace is supported in general. It is noted that the supporting text to the policy states that if an applicant wishes to manage the space themselves, they will need to demonstrate how they will meet the requirements of Policy LP 41 (Affordable Workspace), and how they will accommodate the features of managed workspace set out above.

It is suggested that the wording of the policy should be amended as follows to introduce a workspace management plan to be secured by condition where details including the operation and location of managed workspace can be provided post-submission to provide further flexibility through the detailed design stage of development.

##### LP41 Affordable, Flexible and Managed Workspace

Provide a proportion of 'open workspace', equivalent to 10% of the gross economic floorspace and no less than 400 sqm (whichever is greater), [with details provided through an Affordable Workspace Management Plan secured by condition](#), which includes a wide range of features that minimise overhead and upfront investment costs and provide business support for micro- and small-businesses, especially early stage businesses; or



**Summary**

We look forward to reviewing further iterations of the Local Plan as it progresses and thank you for the opportunity to provide comment.

We would appreciate it if you could provide confirmation that the response has been received. Please let us know if you have any questions.

Yours faithfully



**Laura Jenkinson**  
**Director**

**For and on behalf of Avison Young (UK) Limited**

# Appendix I: Suggested Revisions to the Draft Site Allocation

~~Strikeout Red~~ = suggested deletion

Underlined Blue = suggested addition



## **BATTERSEA DESIGN AND TECHNOLOGY QUARTER**

The Battersea Design and Technology Quarter Cluster comprises three sites. In order to support the implementation of the policies of the plan and the vision and objectives of the Nine Elms Area Strategy this cluster has been identified as a group of sites where the development should be brought forward in accordance with a Cluster Masterplan which is endorsed by the Council. Such an approach does not preclude the delivery of development coming forward in a phased manner but ensures that in doing so the proper planning of this part of Nine Elms is not prejudiced.

The Cluster contains three site allocations:

- NE6 Havelock Terrace, SW8
- NE7 Ingate Place, SW8
- NE8 Silverthorne Road, SW8

### **Site Allocation**

A mix of workshops and studio uses, office space for SMEs, open space, and industrial uses including yard space and amenity space. Further information is set out within the BDTQ Economic Appraisal and Development Framework (EADF) document (2020).

### **Site Description**

This cluster is south of Battersea Power Station and south east of Battersea Park. It is adjacent to and bisected by several railway lines that connect Battersea and Nine Elms to central London. The northern end of the site is bounded by Battersea Park Road and

the southern edge runs along Silverthorne Road and also a bus depot. To the east of the site are railway lines and industrial land. To the west is residential and industrial land. The cluster is used for industrial, commercial, parking, and transport uses.

Site Area – 11.82ha

### **Development Considerations**

**Uses** – Industrial uses must be provided within ground floor units, unless specified within the BDTQ EADF document (e.g. hub sites). Existing B2 industrial uses (such as the Tarmac and London Concrete sites) and the bus depot should be retained and protected, which can include their re-provision within the SIL in order to provide more efficient site use and access. **Office space (Use Class E) will be supported above ground floor levels.** Beyond the Palmerston Court site, within Havelock Terrace (NE6), which lies outside of the designated SIL and has an existing permission in place for the provision of student housing, residential uses are not permitted in any areas of the site allocation.

**Open Space** – Provide open space with high quality green features in the centre of Ingate Place (NE7).

**Access** – Keep service routes close to the building line in the Ingate Place site (NE7) and recess service access points within building footprints. Reduce access point and servicing at Queenstown Road junction for the Silverthorne Road site (NE8). Create clear servicing routes and access points to the rear of buildings, this will help reduce potential conflict between vehicles,

pedestrians and cyclists at the junction with Queenstown Road.

**Public Transport** – Opportunities should be taken to enhance bus journey times especially on Battersea Park Road-Nine Elms Lane and Queenstown Road corridors. Proposals within Havelock Terrace site (NE6) **will** **may** be required to provide road space along with financial contributions to design and construct TfL's Nine Elms Corridor proposal that will deliver consistent bus infrastructure, whilst the Ingate Place and Silverthorne Road sites (NE7, NE8) will be expected to contribute to any proposals to improve bus journey times along Queenstown Road.

**Active Travel** – Contributions to upgrade pedestrian routes to/from Battersea Park Station and Queenstown Road Stations and improve accessibility to the new Northern Line station at Battersea Power Station, currently expected to open in Autumn 2021, **may be required**.

**Relevant Management Plans** – The BDTQ Economic Appraisal and Design Framework (2020) provides detailed guidance for this cluster of site allocations, which proposals should adhere to.

**Planning Permissions** – It is recognised that the Havelock Terrace site (NE6) has planning permission for a mixed use development on the northern part of the site. For more information see planning application reference 2016/5422.

## **Design Requirements**

**Built Form** – For the Havelock Terrace site (NE6), proposals should provide active frontage to Havelock Terrace and positive frontage to working yards and amenity spaces. **Where possible, Bbuilding** frontages should be provided on to Bradmead, Palmerston Way and Havelock Terrace. Locate working yards by the railway lines to create amenity spaces at the centre of large plots.

**Built Form** – For the Ingate Place site (NE7), proposals should position frontages of workshops, studios and light industrial spaces to support and activate a shared amenity space.

**Built Form** – For the Silverthorne Road site (NE8), building frontages will be required on to Silverthorne Road, the access road off Silverthorne Road and new street frontages. Entrances to buildings should be directly accessible from streets. Blocks structured around working yards and amenity spaces with active and positive frontage to amenity spaces and Queenstown Road.

**Built Form** – A high quality public realm is required in accordance with the Nine Elms Public Realm Design Guide and the BDTQ Economic Appraisal and Design Framework (2020).

**Movement** – A permeable network of streets needs to be formulated using perimeter block principles. The Havelock Terrace site (NE6) lies opposite the Battersea Power Station underground station and **connections to this site across Battersea Park Road should be enhanced opportunities to enhance connections to this site across Battersea Park Road should**

be explored. Future development ~~will need~~ ~~should aim~~ to improve accessibility and connections to Queenstown Road Station. The Council will support the creation of a pedestrian and cycling tunnel between Havelock Terrace (NE6) and Ingate Place (NE7), subject to feasibility.

### **Identity and Architectural Expression –**

The buildings fronting on to Battersea Park Road will need to be distinctive in architectural expression to act as a marker or gateway to the BDTQ and should incorporate a hub space to invite permeability. Proposals will need to deliver well designed marker buildings at the junction of Queenstown Road and Ingate Place to improve legibility and navigation to the BDTQ. Architectural Expression should denote the use of the quarter as a place for production, creativity and innovation.

**Tall Buildings** ~~–In accordance with the Urban Design Study and the tall buildings maps in Appendix 2 the site is located in an area which has opportunities for tall buildings within a local context,~~ The site is located in a location where tall buildings are suitable, and the height at which buildings will be considered as ‘tall’ is 8 storeys. Development proposals for tall buildings will be assessed in accordance with Local Plan Policy LP 4.

## **Appendix III: Morie Street Studios 'Pre-Publication' Representations**

Our Ref: 02C100110  
Your Ref: Pre-Publication Draft Local Plan



01 March 2021

By email only: [planningpolicy@wandsworth.gov.uk](mailto:planningpolicy@wandsworth.gov.uk)

Dear Sir/ Madam,

### **Representations on the Draft Local Plan: Pre-Publication version**

We write on behalf of our client, Workspace PLC, to provide representations on the London Borough of Wandsworth (LBW) Draft Local Plan: Pre-Publication version.

This representation is made in relation to the Morie Street Studios site (the Site), which is included within the draft Ferrier Street Cluster site allocation. Please note that a separate representation has also been submitted on behalf of Workspace PLC in relation to Havelock Terrace, which is included within the draft Battersea Design and Technology Quarter (BDTQ) site allocation.

This representation starts by providing comments on the draft site allocation, before providing comments on a number of relevant policies within the draft Plan.

### **Ferrier Street Cluster Site Allocation**

The Morie Street Studios site is located within the Ferrier Street Cluster site allocation, which carries forward the previous site allocation (ref 42C) from the adopted Local Plan: Employment and Industry Document 2018.

The draft site allocation is supported in principle and Workspace can confirm that the site is deliverable in the short to medium term as confirmed through pre-application discussions held with the LBW.

Notwithstanding this, a number of suggested amendments to the proposed wording of the site allocation are included below to ensure that the site can provide the maximum quantum of sustainable development.

The below comments are made following the structure of the draft allocation. The proposed revisions to the text are highlighted on a tracked change version of the draft site allocation which is included at **Appendix I**.

#### Site Allocation

The site allocation description makes reference to a new pedestrian/cycle bridge connecting over Swandon Way to the Hunts Trucks/Gas Holder site (ref WT4). It is not feasible, deliverable nor beneficial to provide a bridge in this location due to the gradients required to make a bridge accessible, and therefore this wording should be deleted.

Indeed, this has previously been demonstrated as not being feasible through pre-application discussions with LBW. Further evidence in this regard is provided as part of this representation in the form of a Feasibility Report prepared by Steer, which is included at **Appendix II**.

**In summary, this report** demonstrates that a bridge in this location is not feasible and would preclude the redevelopment of the site, which was accepted by officers. Further comments are made in relation to the potential provision of a new pedestrian/ cyclist crossing that would provide a direct and safe connection to Old York Road and Wandsworth Town rail station in the 'Movement' section below.

As set out in detail below, following a robust testing in terms of design, transport, noise and air quality it is clear that a route through the site is not feasible. However, there is potential to provide a route to the south of the site and the allocation should be updated to reflect these findings to ensure that it is deliverable and therefore meets the relevant tests.

The description notes that there is some capacity for food and drink businesses to the east of the site where it adjoins Old York Road. It is suggested that further flexibility is provided in this regard to enable ancillary food and drink uses to come forward on sites in the west to provide active frontages and contribute towards the vitality of the area as a whole.

#### Uses

The allocation notes that redevelopment of the site should provide at least a 25% increase in the amount of industrial (use classes E/B2/B8/SG) and office (use class E). This requirement is not consistent with the Publication London Plan, which was updated following modifications proposed by the Secretary of State to remove a requirement to ensure "no net loss of industrial uses" on the basis that it may not be realistic and would therefore fail the "effective" test of soundness. On this basis, it is proposed that further flexibility is introduced to ensure that the plan is consistent with the Publication London Plan and the NPPF. Furthermore, the allocation should be updated to make it clear that the target provision of industrial floorspace should be across the wider site rather than on a site by site basis to enable better placemaking.

The use of 'Class E' here should be more specific, referring to the relevant sub uses within the use class to avoid the unnecessary protection of a broader range of uses.

Notwithstanding the above comments, the requirement should also be to provide at least a 25% increase in the amount of industrial (use classes E/B2/B8/SG) or office (use class E) to provide greater flexibility and avoid precluding the redevelopment of the site.

The site allocation requires consolidation and increases in industrial floorspace, with additional floorspace for SME businesses, as well as contributing to public realm uses around Wandsworth Town railway station should also be provided. This should be broadened to include E(gi) office floorspace on the basis that it doesn't fall under the definition of industrial uses but is included within the list of uses which should be increased by 25% as noted above.

#### Open Spaces

This section suggests that public realm improvements around the station 'will' be required. This should be amended to 'may' be required to ensure that any future obligations will meet the relevant lawful tests i.e. a suitable scheme may not be identifiable or deliverable at the time of any future application being submitted.

### Public Transport

The allocation requests contributions to public transport infrastructure and services. As highlighted above, the wording that redevelopment 'should' be provided should be amended to 'may' to avoid any potential issues with meeting the relevant lawful tests.

### Movement

As highlighted above, this representation is supported by a feasibility study prepared by Steer, included at **Appendix II**. The feasibility study demonstrates that a connection through the Morie Street Studios site is not feasible and would risk precluding the future redevelopment of the site.

The feasibility study provides a review of four different potential routes through the site and assesses their suitability in terms of design, viability, acoustics, light, air quality, safety, and service of desire lines.

As a result of the significant level changes between the site and Swandon Way at the centre and the north of the site, any link through the site will take up a disproportionate quantum of ground floorspace which would have significant adverse impacts on both design and viability. There are also issues in relation to noise and security, leading to low quality routes with any potential options through the centre of the site.

There is, however, potential to provide a route to the south of the site. This represents the best option when considered in the round as demonstrated by the diagram included at **Appendix III** and for the following reasons:

- It would minimise the impacts upon the Morie Street studio site's ground floor layout by allowing one building to be provided and not splitting the site into two buildings. The route makes natural use of the desire to have a building that is set back from the southern boundary to facilitate windows along the elevation.
- Would be less disruptive to the building entrances and common facilities.
- Would make best use of available natural daylight compared to other options, with no building on the neighbouring boundary.
- The configuration of the building and the adjacent ground floor units would promote natural surveillance.
- Although the Metropolitan Police would prefer to see no new route, the southernmost route would be the most acceptable to them as it would be less likely to result in creating conditions which would encourage criminal activity.
- It would provide a direct and gently-graded step-free route, with no ramps or stairs required.
- It could be designed to a high quality incorporating soft landscaping and street furniture.

It is strongly recommended that the proposed site allocation is updated to reflect this to avoid precluding the future redevelopment of the site and ensure that the site allocation is deliverable and therefore meets the relevant tests set out in the NPPF.

### Tall Buildings

This notes that in accordance with the Urban Design Study and the tall buildings maps in Appendix 2 the site is located in an area which has opportunities for tall buildings within town centres and along strategic routes, and the height at which buildings will be considered as 'tall' is 5 storeys.

However, as identified in below, a review of tall buildings maps in Appendix 2 of the draft Plan suggests that the site is not located within the relevant area where there are opportunities for tall buildings.



**Figure 1** Extract from Appendix 2 tall buildings maps (Ferrier Street Cluster approximately outlined in red)

The relevant map should be revised to include the site within a location where there are opportunities, however, the wording of the allocation should also be updated to clearly demonstrate that the site is suitable for a tall building in any event. This is critical given the changes to the Publication London Plan Policy D9 which requires that tall buildings are located in locations identified as being suitable within a development plan.

### **General Comments on Policies**

This section provides further comments on the draft policies. Suggested amendments to policies are provided as tracked changes, where ~~Strikeout Red~~ = suggested deletion and Underlined Blue = suggested addition.

### Policy LP4 Tall buildings



As noted above, Map 14.1 and the tall buildings maps included at Appendix 2 of the draft plan and referenced in Policy LP4 need to be updated to accurately reflect the wording of the Ferrier Street Cluster site allocation.

#### Policy LPI I Energy Infrastructure

The policy currently states that new development will be expected to connect to any existing decentralised energy network (DEN). This does not account for the potential cost and technical challenges associated with providing a connection. As such, it is suggested that the wording is updated as follows to provide further flexibility:

##### LP11 Energy Infrastructure

A. New development will be expected to connect to any existing decentralised energy network (DEN) [unless it is not technically feasible or the most energy efficient solution](#). Where networks do not exist, developments should make provision to connect to any future network that may be developed, having regard to the possibility for this to come forward.

#### LP13 Waste Management

The policy currently states that developers will be expected to reuse, recycle or recover 95% of construction and demolition waste and find beneficial uses for 95% of excavation waste. The ambition to support a circular economy is welcomed. However, this wording does not provide any flexibility in situations where these figures are not feasible and it is suggested that further flexibility is therefore introduced as follows:

##### LP13 Waste Management

J. Developers will be expected to reuse, recycle or recover 95% of construction and demolition waste and find beneficial uses for 95% of excavation waste [unless it is not technically feasible](#).

#### LP38 Mixed Use Development on Economic Land

The policy requires that for sites within Economic Use Intensification Areas (EUIAs) where the site accommodates an existing industrial use, or where the site previously accommodated industrial uses, any mixed-use proposal must provide for an increase in industrial floorspace.

As set out above, this is not consistent with the approach taken in the Publication London Plan following modifications required by the Secretary of State. It is suggested that the wording is updated to provide further flexibility on the basis that requiring an increase in industrial uses “may not be realistic” and would therefore fail the test of soundness.

It is suggested that the wording is therefore updated as follows:

##### LP38 Mixed Use Development on Economic Land

2. Economic Use Intensification Areas (EUIAs): Proposals which would result in the intensification of existing economic floorspace will be supported. Where the site accommodates an existing industrial use, or where the site previously accommodated industrial uses, ~~the proposal must~~ [proposals should aim to](#) provide for an increase in industrial floorspace across the EUIA as a whole.

#### LP40 Requirements for New Economic Development

The policy sets out requirements for new economic development to achieve a high standard of workspace which is supported. However, the policy is currently too prescriptive in relation to requirements for industrial uses which should be managed by market requirements that are constantly changing. It is therefore suggested that the following amendments are made to the wording:

##### LP40 Requirements for New Economic Development

B. In addition to the requirements in Part A, proposals for industrial uses **must ensure** should seek to provide, on a site by site basis having regard to existing context:

1. the provision of adequate servicing and loading facilities including access bays and service yards;
2. floor to ceiling heights of 3.35 metres (or as appropriate to the specific use, where this can be justified);
3. that sufficient space is provided on site for the servicing and parking of commercial vehicles; and 4. goods lifts for multi-storey developments, with a minimum loading of 500kg.

#### LP41 Affordable, Flexible and Managed Workspace

In the experience of Workspace, the provision of affordable workspace has been most efficient where the applicant is given the opportunity to manage the space directly and flexibility is provided to decide on the location of the affordable workspace post-determination.

The option to provide affordable workspace as managed or open workspace is supported in general. It is noted that the supporting text to the policy states that if an applicant wishes to manage the space themselves, they will need to demonstrate how they will meet the requirements of Policy LP 41 (Affordable Workspace), and how they will accommodate the features of managed workspace set out above.

It is suggested that the wording of the policy should be amended as follows to introduce a workspace management plan to be secured by condition where details including the operation and location of managed workspace can be provided post-submission to provide further flexibility through the detailed design stage of development.

##### LP41 Affordable, Flexible and Managed Workspace

Provide a proportion of 'open workspace' for major development proposals, equivalent to 10% of the gross economic floorspace and no less than 400 sqm (whichever is greater), with details provided through an Affordable Workspace Management Plan secured by condition, which includes a wide range of features that minimise overhead and upfront investment costs and provide business support for micro- and small-businesses, especially early stage businesses; or

## **Summary**



We look forward to reviewing further iterations of SPD as it progresses and thank you for the opportunity to provide comment.

We would appreciate it if you could provide confirmation that the response has been received. Please let us know if you have any queries.

Yours sincerely



**Laura Jenkinson**  
**Director**

**For and on behalf of Avison Young (UK) Limited**

# Appendix I: Suggested Revisions to the Draft Site Allocation

~~Strikeout Red~~ = suggested deletion

Underlined Blue = suggested addition

## FERRIER STREET CLUSTER

The Ferrier Street Cluster comprises one site. Development should be brought forward in accordance with the policies of the plan, and the vision and objectives of the Wandsworth Town Area Strategy.

The Cluster contains one site allocation:

- WT8 Ferrier Street Industrial Estate, Ferrier Street, SW18

### Site Allocation

Mixed use development including residential, office, industrial and workspace for SME businesses with a loading yard for the industrial uses. There is some capacity for food and drink businesses to the east of the site ~~where it adjoins Old York Road and where they are ancillary to proposed uses and appropriate in size and form.~~ Future provision should be made at the western edge of the site to allow for a future ~~installation of a new pedestrian/cycle connection across Swandon Way - new pedestrian/cycle bridge connecting over Swandon Way to~~ the Hunts Trucks/Gas Holder site (ref WT4). Public realm improvements to the area around the southern entrance to Wandsworth Town station ~~will~~ may be required.

### Site Description

The site lies immediately to the west of the southern entrance to Wandsworth Train Station and is bounded to the north by the railway line serving the station.

To the west of the site is Swandon Way and it is bounded to the south by Old York Road. The site is currently used for commercial, industrial, retail and residential uses.

Site Area - 1.9ha

### Development Considerations

**Uses** - Redevelopment of ~~the site cluster~~ should aim to provide at least a 25% increase in the amount of industrial (use classes E/B2/B8/SG) and office (use class E) floorspace in line with the EUIA designation. Consolidation and increases in industrial floorspace, with additional floorspace for SME businesses, as well as contributing to public realm uses around Wandsworth Town railway station should also be provided. There is potential for some residential use toward the eastern end of the site. The area currently provides floorspace for some food and drink businesses, and adjoins Old York Road where there are a number of specialist and independent food and drink retailers; the development of specialist floorspace for the food and drink sector will be encouraged.

**Open Spaces** - Public realm improvements around the southern entrance to Wandsworth Town station, including through its enlargement and its interface with Old York Road, ~~will~~ may be required.

**Access** - Redevelopment of the site should prioritise the re-provision of purpose-built industrial floorspace, with direct loading access to industrial units and the site arranged to ensure that the use of these industrial units does not conflict with residential units on this or neighbouring sites.

**Public Transport** - A contribution to public transport infrastructure and services ~~should~~ may be provided that could include bus service enhancements and improved access and passenger

comfort, such as platform canopies, to Wandsworth Town station.

**Planning Permissions** – A planning application for the redevelopment of part of the site for a mixed use scheme was granted, subject to the completion of a S106 planning obligation and Community Infrastructure Levy payments. For more information see planning application reference: 2018/5669.

### **Design Requirements**

**Built Form** - The frontages along Ferrier Street, Morie Street and Edgel Street should have a modern industrial and business character, with provision for more attractive streetscapes and active frontages.

**Built Form** – The massing and scale of development should be well integrated with its surroundings and provide articulation and variety to create visual relief along key frontages.

**Movement** - Proposals should ~~allow~~ [explore the feasibility](#) for a connection ~~over~~ [across](#) Swandon Way to the Hunts Trucks/Gas Holder site (WT4) with a new pedestrian/ cyclist crossing that would provide a direct and safe connection to Old York Road and Wandsworth Town rail station. Careful design of proposals adjacent to Swandon Way will be required to accommodate this street level pedestrian connection towards the Hunts Trucks site, ~~potentially arranged as an archway to maximise workspace accommodation and act as a natural buffer to vehicle noise from Swandon Way.~~

**Context** - The scale of development should take into account the historic

character of the buildings fronting Old York Road and the setting of the Old York Road Conservation Area and should consider the residential amenity of these properties, with any taller development located towards the northern parts of the site.

**Massing** - A taller element would be appropriate in the north-western corner of the site adjacent to the railway line [and adjacent to Swandon Way](#).

**Nature** – There is an opportunity to use any roof spaces in new development as green spaces that should enhance biodiversity.

**Tall Buildings** - ~~In accordance with the Urban Design Study and the tall buildings maps in Appendix 2 the site is located in an area which has opportunities for tall buildings within town centres and along strategic routes~~ [The site is located in a location where tall buildings are suitable](#), and the height at which buildings will be considered as ‘tall’ is 5 storeys. Development proposals for tall buildings will be assessed in accordance with Local Plan Policy LP 4.

# Appendix II: Pedestrian & Cycle Route Feasibility Assessment

# Morie Street Studios Redevelopment: Pedestrian and Cycle Route Feasibility Assessment

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Report  
February 2021

# Morie Street Studios Redevelopment: Pedestrian and Cycle Route Feasibility Assessment

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**steer**

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### A Pedestrian Cycle Bridge Option Drawings

# 1 Introduction

## Overview

- 1.1 Steer has been commissioned by Workspace Group PLC to undertake a study of the feasibility of providing a pedestrian and cycle route through the Morie Street site to help facilitate a connection between Morie Street/ Ferrier Street and Smugglers Way.
- 1.2 The report also informs the Workspace Group PLC response to London Borough of Wandsworth's Draft Local Plan (Regulation 18) (November 2020) document.
- 1.3 The proposed link is an important initial consideration for proposals to re-develop the Morie Street Studios site, which will involve the submission of a future planning application.
- 1.4 The report focuses on the feasibility of two options:
  - A pedestrian and cycle link through the site with a footbridge across Swandon Way
  - A pedestrian and cycle link through the site connecting with new at-grade pedestrian and cycle crossings across Swandon Way and Smugglers Way immediately to the north of the Swandon Way/ Smugglers Way junction.

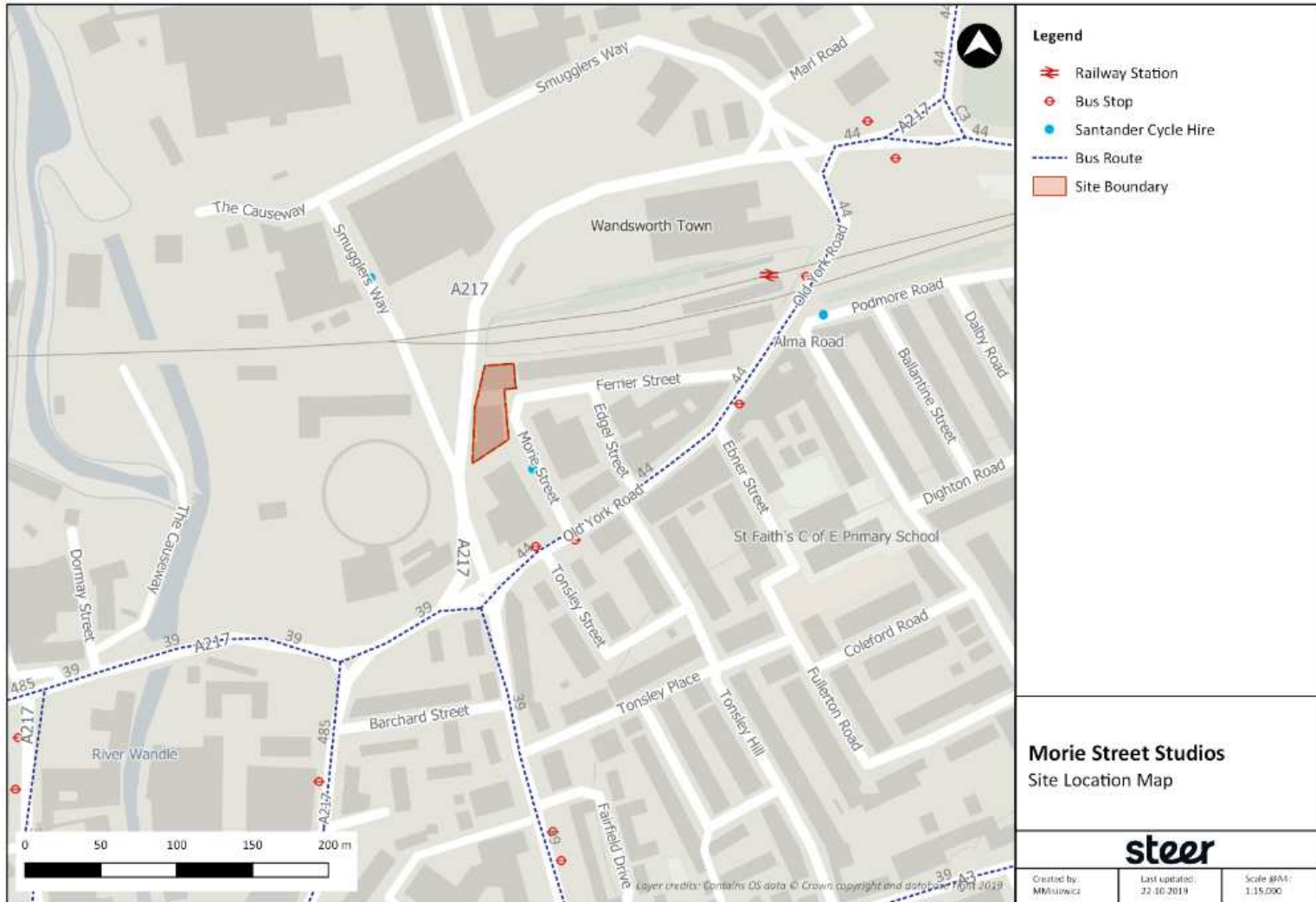
## Site Location

- 1.5 The Morie Street Studios are located on the corner of Morie Street and Ferrier Street immediately to the east of A217 Swandon Way, which connects with A3 Armoury Way and Old York Road to the south. The site is bordered to the north by railway tracks and to the east by Morie Street. The site's full address is 4-6 Morie Street, Wandsworth, London, SW18 1SL. A site location plan is provided for reference in **Figure 1.1**.

## Existing Site Uses and Development Proposals

- 1.6 The existing site includes two 3-storey buildings which provide approximately 2,136m<sup>2</sup> of office floorspace. The existing site has 13 off-street car parking spaces with access from Morie Street.
- 1.7 The proposals are to redevelop the site to provide high quality office space with on-site facilities include a café and meeting rooms. The scheme remains in the early design stages and the building massing is subject to consultation with LBW. However, the scheme is unlikely to be referable to the Greater London Authority. Details of other local site allocations can be found in Chapter 4.

Figure 1-1: Site Location Plan



## Policy Context

- 1.8 The requirement to undertake an initial feasibility study is set out in London Borough of Wandsworth's (LBW) 'Adopted Local Plan: Employment and Industry Document' (adopted December 2018). The proposed Morie Street site falls within the 'Ferrier Street, SW18' Site Allocation.
- 1.9 Site Allocation 42C (Ferrier Street) includes the following requirement for a pedestrian/cycle bridge:
- "Future provision should be made at the western edge of the site to allow for a future installation of a new pedestrian/cycle bridge connecting over Swandon Way to the Hunts Trucks/ Gas Holder site. This route will provide a safe connection to Old York Road and Wandsworth Town rail station."*
- 1.10 The Infrastructure section of the allocations also provides further details on this route:
- "The feasibility of providing a pedestrian and cycle bridge link across Smugglers Way to the gas holder site should be considered."*
- 1.11 The above document also includes Site Allocation 41 for 'Hunts Tucks, adjoining Gasholder, Armoury Way, SW18' for mixed use development including residential and economic uses. This includes the requirement for allowances to be made for new public access connections through the site (including from Swandon Way) and for the Armoury Way, Smugglers Way and Swandon Way frontages to have active building frontages. The following requirement is also stated:
- "The feasibility of providing a pedestrian and cycle bridge link across Smugglers Way to Morie Street/Ferrier Street should be considered."*
- 1.12 Details on other local site allocations can be found in **Chapter 3**.
- 1.13 The emerging LBW Local Plan Local Plan (Regulation 18) document (November 2020) includes emerging Policy 'PM2 Wandsworth Town Place Based Policy - Placemaking'. This references the Wanda Delta area including Ferrier Street, Swandon Way and Hunts Trucks/ Gasholder Site and states that development proposals for sites within this area should create opportunities and embrace the Wandsworth gyratory proposals in terms of connectivity. This document retains the Ferrier Street Industrial Estate as a Site Allocation and states that provision should be made:
- "at the western edge of the site to allow for a future installation of a new pedestrian/ cycle connection across Swandon Way - new pedestrian/cycle bridge connecting over Swandon Way to the Hunts Trucks/Gas Holder site".*

## Report Structure

- 1.14 The remainder of this report is structured as follows:
- Chapter 2: Local Planning Applications and Site Allocations
  - Chapter 3: Local Transport Context
  - Chapter 4: Pedestrian and Cycle Bridge Feasibility Assessment

- Chapter 5: Pedestrian and Cycle Link and At-grade Swandon Way Crossing Feasibility Assessment
- Chapter 6: Conclusion



## 2 Local Planning Applications

2.1 A map of relevant live and consented planning applications and site allocations within the adopted Local Plan is provided in **Figure 2.1**. Further details on these planning applications/site allocations are provided in **Table 2.1**.

**Table 2.1: Relevant Live and Consented Planning Applications**

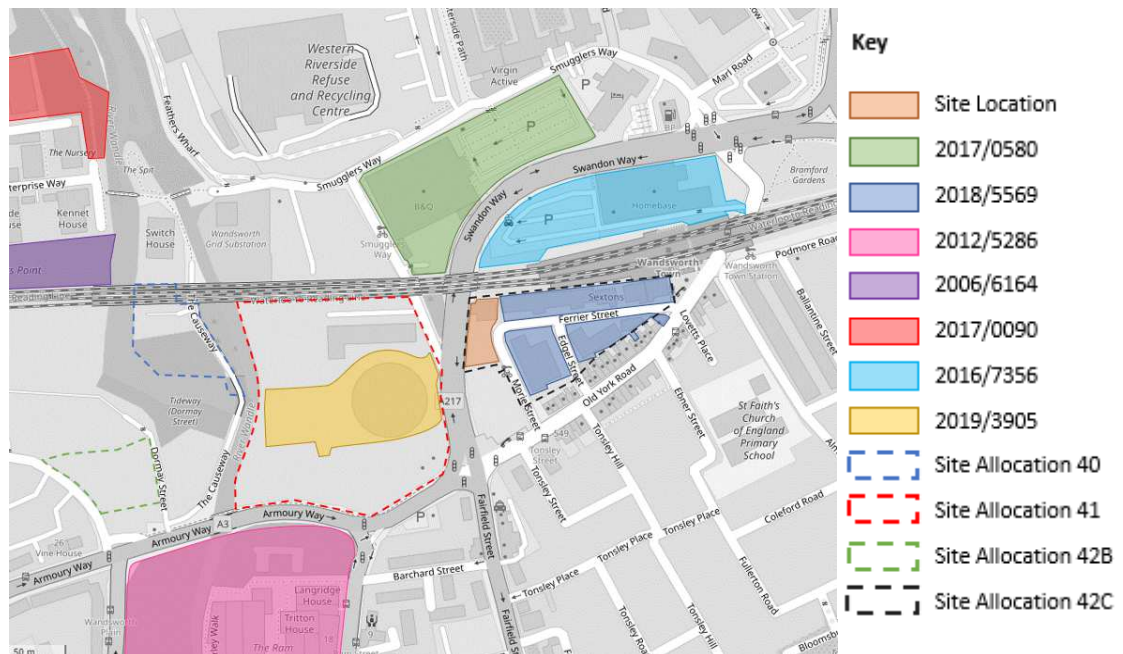
Application Reference	Status	Location	Description
2017/0580	Consented	B&Q Depot Smugglers Way SW18 1EG	Demolition of existing retail buildings and phased construction of 13 residential blocks (with 3 podiums) ranging from 8 to 15 storeys to provide a mixed use scheme including 517 residential units (Class C3), 5160 sq.m. GIA of business (Class B1) and 2969 sq.m. GIA flexible business/retail/restaurant and cafe (Class B1, A1, A2, A3 and A4) with car/cycle parking, associated combined heat and power (CHP), plant and associated works, landscaping, new accesses onto Smugglers Way, and offsite highways works including a new pedestrian crossing of Swandon Way.
2018/5669	Live	Ferrier Street Industrial Estate, 1 Ferrier Street and 332 Old York Road London, SW18	Demolition of existing buildings and construction of mixed-use development ranging from 4 to 10 storeys to provide 5826sqm light industrial (Class B1c) use, 5078sqm flexible business (Class B1) use, 106 residential units (Class C3) use and 213sqm retail use (Class A1/A3). Associated public realm works including on-site playspace, enlargement of the station square and alterations to the Ferrier Street ground floor retail frontage of 332 Old York Road.
2012/5286	Consented	The Ram Brewery Site, Wandsworth High Street, SW18	A mixed-use development comprising alterations and change of use of retained former brewery buildings, demolition of non-Listed Buildings and the construction of new buildings 2-12 storeys in height and a tower of 36 storeys in height. Provision of 10114sqm of retail (Class A1-A4), 661 residential units, continued small scale brewery use (Class B2), museum (Class D1), ancillary gym. The creation of public areas and river walkway; new and repositioned vehicular and pedestrian access points and provision of servicing areas, energy centre and basement car and cycle parking.
2016/6164	Consented	Linton Fuels Site, Osiers Road	Redevelopment of the site to provide a mixed use development in buildings ranging in height between ten and fourteen storeys, linked by a two-storey podium element, to provide 926 sq.m. (GIA) of flexible commercial floorspace (for use for either A1 (retail), A2 (financial and professional services), A3 (restaurant), B1 (business), D1 (non-residential institutions) or D2 (assembly and leisure)), and 109 residential units, together with 20 car parking

Application Reference	Status	Location	Description
			spaces at first floor level (with ramped access from Osiers Road) and 222 cycle parking spaces, with associated amenity space provision, including roof terraces and balconies, together with provision of landscaping/areas of public realm and other associated works.
2017/0090	Consented	Wandsworth Riverside Quarter Phase 3	Erection of a mixed use development in a building ranging between 11 storeys (ground plus mezzanine and 10 upper storeys) on the southern part of the site, rising up to 15 storeys (ground plus mezzanine and 14 upper storeys) at the northern end of the site adjacent to the river Thames frontage (the proposed development is on the site of the previously consented 9 storey building 6B, approved under application ref. 2009/3372). The development is to provide 918sq.m. (GIA) of commercial use on the ground floor, comprising 322 sq.m. of flexible B1 (business)/A1 (retail)/A3 (food and drink) floorspace, 174sqm of A3/A4 (food and drink) floorspace, and 422sq.m. of D2 (assembly and leisure) floorspace, with 172 residential units (of private and affordable tenure) on the upper floors, together with basement levels with 72 car and 340 cycle parking spaces, and associated amenity space provision including roof terraces and balconies, together with landscaping/areas of public realm, including space for outside seating and a riverside promenade.
2016/7356	Consented	Homebase, Swandon Way, SW18 1EW	Demolition of existing retail warehouse building and erection of three buildings ranging from 7 to 15 storeys with basement to provide a mixed use scheme including 343 residential units (Class C3), 597 sq.m. GIA of retail units (Class A1 and/or A2 and/or A3 uses) 164 sq.m. of Community Use (Class D1) and 1647 sq.m. GIA of studio/offices (Class B1), with associated cycle parking spaces and 89 car parking spaces, playspace, landscaping and public realm improvements (including contribution towards the new entrance to Wandsworth Town Station).
2019/3905	Consented	Former Gasworks Armoury Way SW18 1SH	Determination as to whether prior approval is required for dismantling of gasholder and associated structures and restoration of land.
Site Allocation 40		Causeway Island including land to the east	Site Allocation: Mixed use development. Redevelopment should incorporate new connections for the Wandle riverside walk, in particular a bridge crossing to the gas holder site, Dormay Street and the Frogmore depot site, as well as Walking/cycling route links to Wandsworth Town Centre.
Site Allocation 41		Gas Holder Site	Site Allocation: Industrial uses: B1 (c), B2 and B8. Any development should incorporate a link between Thames Riverside and Wandsworth town centre. The proposed riverside walks and frontage to Armoury Way, Smugglers Way and Swandon Way must be defined by active building frontages. The layout of buildings must allow for new connections providing public access through the site as follows:

Application Reference	Status	Location	Description
			<ol style="list-style-type: none"> <li>Public access from Swandon Way west through to the riverside walk;</li> <li>Public access from Armoury Way north through the site and a connection to Smugglers Way by a new access passing under the rail track;</li> <li>A new bridge over the Wandle to the Dormay Street area.</li> </ol> The feasibility of providing a pedestrian and cycle bridge link across Smugglers Way to Morie Street/Ferrier Street should be considered.
Site Allocation 42B		Panorama Antennas	Site Allocation: Mixed use development. Contributions to public transport, walking and cycling links will be expected as part of the site's redevelopment.
Site Allocation 42C		Ferrier Street	Site Allocation: Mixed use development. A contribution to public transport infrastructure and services should be considered which could include bus service enhancements and improved access to Wandsworth Town station. The feasibility of providing a pedestrian and cycle bridge link across Smugglers Way to the gas holder site should be considered. Public realm improvements to the area around the southern entrance to Wandsworth Town station will be required.

2.2 It should be noted that Adopted Plan Site Allocation 41: Gas Holder Site and Site Allocation 42C of relevance to the Morie Street site are retained in the emerging Local Plan as Site Allocation WT8 – Ferrier Street Industrial Estate and Site Allocation WT3 – Hunts Trucks, adjoining sites including Gasholder, Armour Way.

Figure 2-1: Site Allocations and Local live and Recently Consented Planning Applications

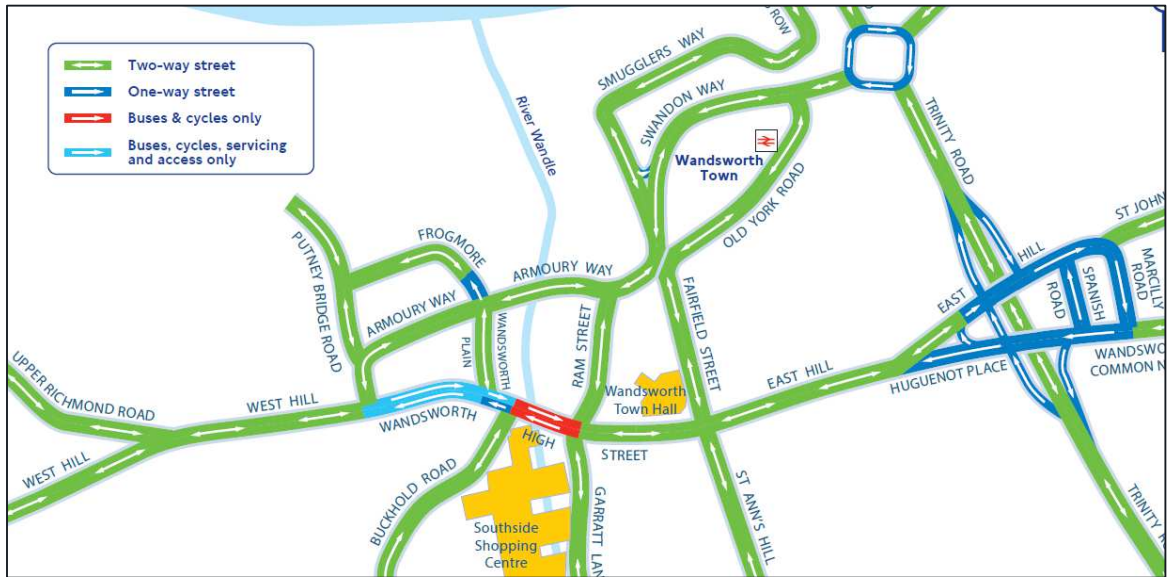


## 3 Site Accessibility

### Local Highway Network and Wandsworth Town Centre Improvements

- 3.1 The site is located on the corner of Morie Street and Ferrier Street immediately to the east of A217 Swandon Way, which connects with A3 Armoury Way and Old York Road to the south. The A217 and A3, as well as the A205, A3205 and A214 which run to the west, south and northeast of the site respectively, all form part of the Transport for London Road Network (TLRN).
- 3.2 Traffic dominance has been recognised as a significant issue in the vicinity of Wandsworth town centre and the site. At present, TfL are proposing a scheme to decrease this along Wandsworth High Street and rejuvenate the town centre; this is currently in development and is planned to commence in 2021. This scheme is anticipated to include the following elements of relevance to the site:
- Reducing through traffic in the town centre, leaving it free for buses, cyclists and local access. This is anticipated to involve the modification of one-way, two-way and bus/cyclist/servicing access only traffic restrictions across central Wandsworth. This may include restricting Wandsworth High Street to buses only and local access traffic, with west bound traffic being re-routed via Armoury Way.
  - Widening footways.
  - Improving the local environment.
- 3.3 A map outlining the proposed direction of traffic flow around the town centre with these improvements in place is illustrated in **Figure 3-1**.
- 3.4 Further engagement with TfL at a meeting on 16 March 2020 and a drawing provided by TfL showing the Draft Layout of the proposed scheme (**Figure 3-2**) have identified that the proposed improvements involve the complete separation of Swandon Way and Old York Road at the existing junction, with two way flows provided on A3 Armoury Way to the east and the removal of the existing one-way system. The proposed TfL scheme also does not currently propose a pedestrian crossing at the junction and instead proposes crossings at the A3 Armoury Way/Ram Street junction and at the Swandon Way/ Smugglers Way junction.
- 3.5 The existing layout of the A217 Swandon Way/ A3 Armoury Way/ Old York Road junction and pedestrian crossing facilities are illustrated in **Figure 3-3** for reference.

Figure 3-1: Wandsworth Town Centre Improvements – Proposed Traffic Flow Direction



Source: TfL Wandsworth Town Centre Consultation - <https://tfl.gov.uk/travel-information/improvements-and-projects/wandsworth-town-centre>

Figure 3-2: Draft TfL Wandsworth Town Centre Scheme and Formal Crossing Configuration



Source: TfL

Figure 3-3: Toucan Crossings at the A217 Swandon Way/ connecting Old York Road/ A3 Junction



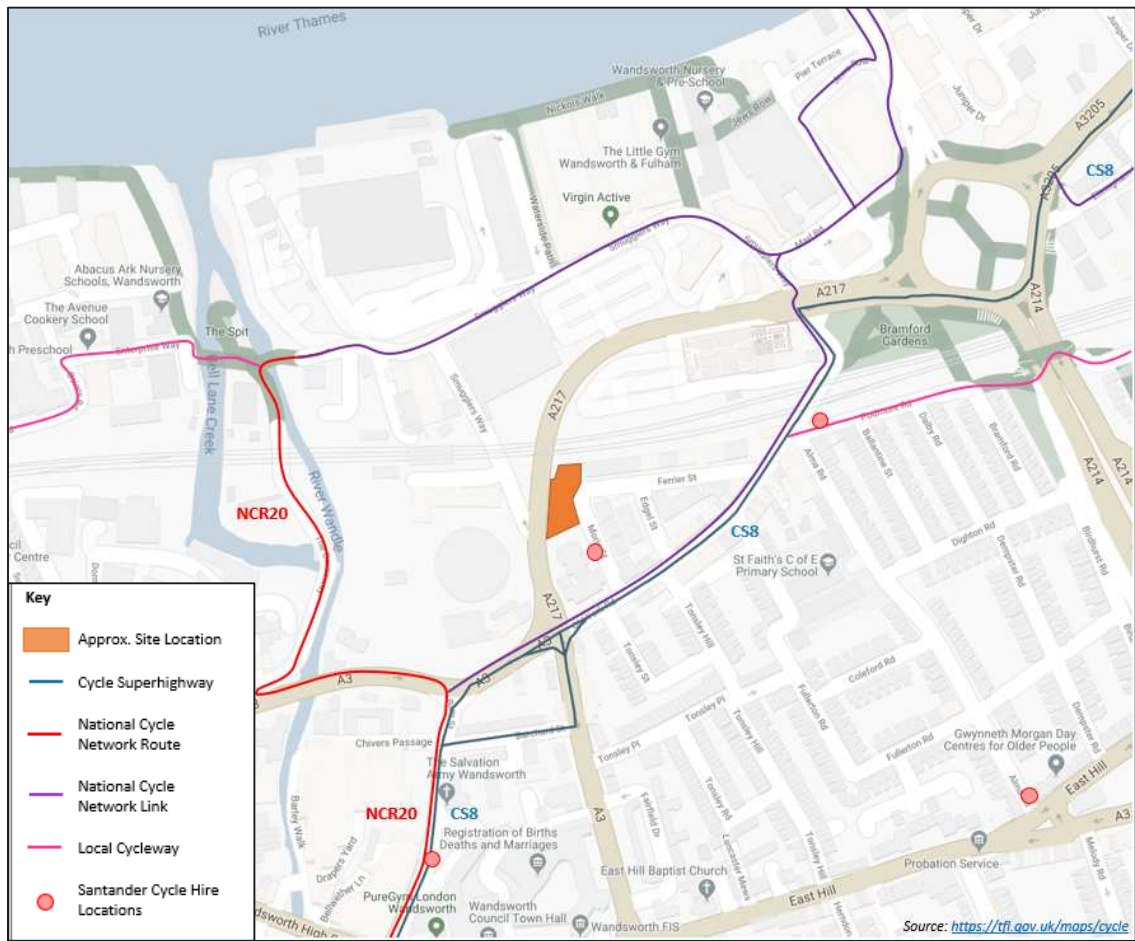
### Public Transport

- 3.6 The site has a Public Transport Accessibility Level (PTAL) rating of 6a, which infers a very high level of accessibility by public transport modes.
- 3.7 Wandsworth Town National Rail station, which is served by South Western Railway, is a two-minute walk to the east. Thirteen bus services are also accessible within a 480m walking distance of the site.

### Active Transport

- 3.8 Pedestrian infrastructure in the vicinity of the site is well-developed; however, there is clear evidence of wear and tear in some locations. Traffic dominance around the town centre, particularly on A roads, acts as a barrier to pedestrian permeability/ ease of access. Crossing provision is considered to be sufficient to support existing pedestrian and cyclists who need to cross the road at the A217 Swandon Way/ connecting Old York Road/ A3 junction.
- 3.9 A map of existing local cycle routes is presented in **Figure 3-4**.

Figure 3-4: Existing Cycle Route Map



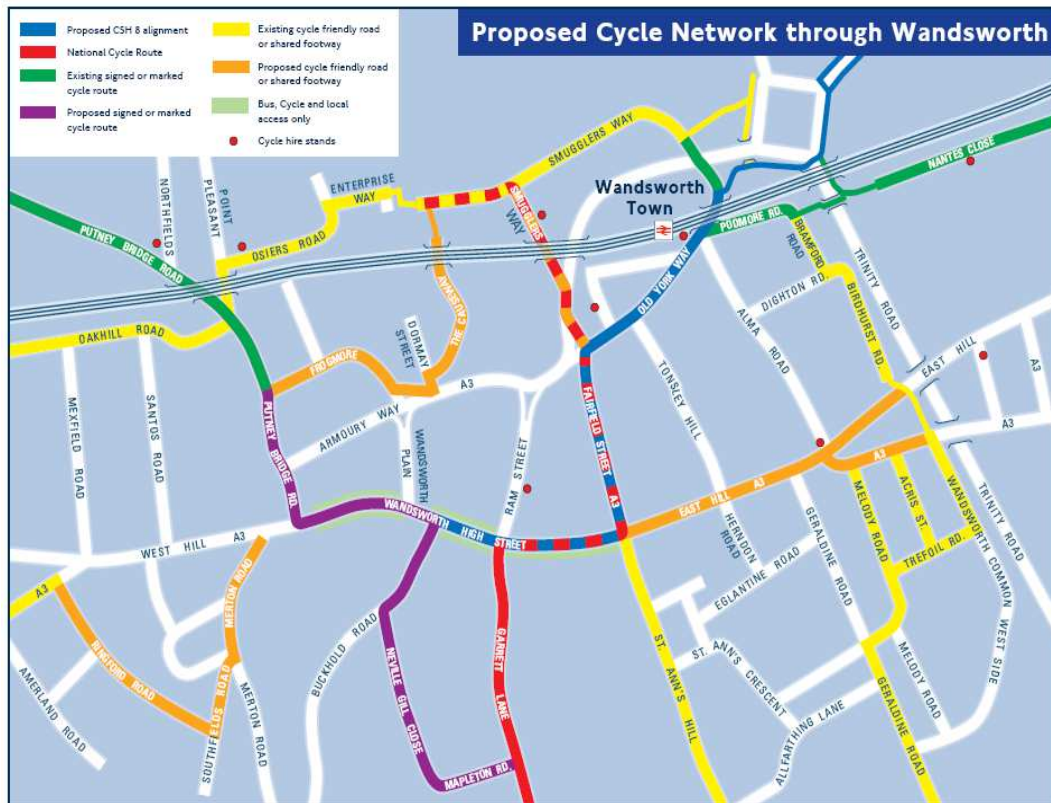
- 3.10 The site benefits from access to the following cycle routes:
- Cycle Superhighway 8 (CS8), which is accessible on Old York Road and Armoury Way 100m southeast of the site. This route connects Wandsworth town centre with Westminster via the A3, A3205, A3216 and A3212;
  - National Cycle Network Route 20 (NCR20), which is accessible on the A3 175m southwest of the site. Subject to completion, this route will connect Wandsworth to Brighton via Crawley and Sussex; and
  - Other national cycle network link routes and local cycleways.

3.11 A 28-space Santander Cycle Hire docking station is located immediately to the southeast of the site on Morie Street.

### Proposed Future Plans

3.12 A map of the proposed cycle network in Wandsworth is shown in **Figure 3-5**.

Figure 3-5: Proposed Cycle Network through Wandsworth



Source: Wandsworth Town Centre Consultation - <https://consultations.tfl.gov.uk/roads/wandsworth-town-centre/#Cycle>

3.13 It should be noted that a foot/cycle bridge crossing from Morie Street to Smugglers Way forms no part of any current or future strategic cycle route and was not referenced as forming part of the proposed cycle network by TfL in their Wandsworth Town Centre consultation.



## 4 Pedestrian and Cycle Bridge Feasibility Assessment

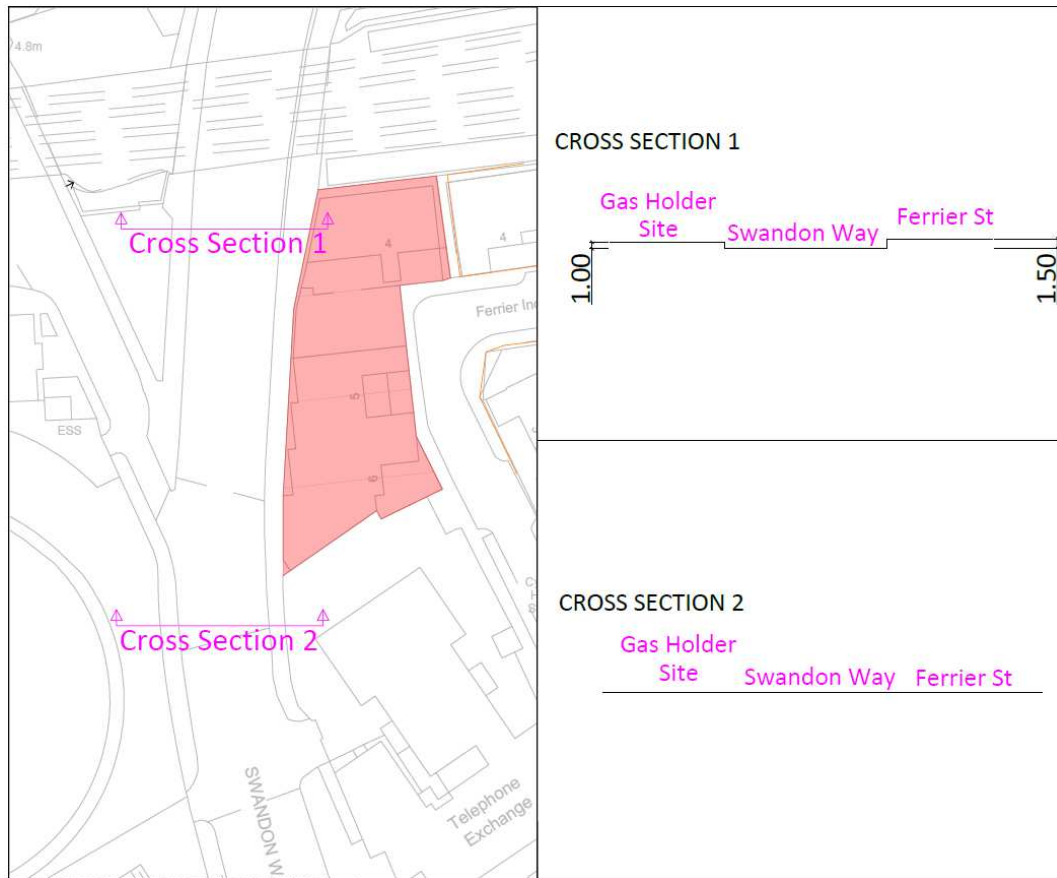
- 4.1 As mentioned in Chapter 1 of this report the LBW 'Adopted Local Plan: Employment and Industry Document' (adopted December 2018) Site Allocations 41 and 42c set out the requirement for the feasibility of providing a pedestrian and cycle bridge link between Smugglers Way and Morie Street/Ferrier Street to be considered. This is retained in the emerging Local Plan (Regulation 18) document (November 2018).
- 4.2 The Draft London Plan (Publication London Plan) 2020 has also recently undergone consultation and is currently being reviewed by the Secretary of State prior to adoption.
- 4.3 This Chapter of the report considers the feasibility of potential design options for the pedestrian and cycle bridge connection.

### Guidelines and Considerations

#### Height Clearance

- 4.4 The Design Manual for Roads and Bridges (DMRB) Vol.1 Section 3 states that highway bridges with a clearance of less than 5.7m, including sag and deflection, must be designed to resist an impact from a heavy goods vehicle. This often results in bulky, aesthetically displeasing concrete bridges. To avoid this, it is appropriate to design foot and cycle bridges with a clearance of at least 5.7m.
- 4.5 In the feasibility study, a minimum clearance of 6m was used over Swandon Way. This was to allow for any sag and deflection, as well as the depth of the bridge deck.
- 4.6 Swandon Way is in a shallow cutting approximately 1-1.5m below Morie Street in order to be able to pass under the railway with sufficient headroom. At the junction with Smugglers Way, Swandon Way is at grade. Due to lack of detailed topographic information, the following cutting depths were assumed along Swandon Way on either side of the proposed Morie Street development, as outlined in **Figure 4-1**. The full drawing is included in **Appendix A**.

Figure 4-1: Assumed cross-section depths along Swandon Way.



- 4.7 Due to the cutting of Swandon Way, the rise needed to meet the 6m clearance above Swandon Way is dependent on the location of the proposed bridge option.

### Stairs, Ramp Slopes and Landings

#### Ramps

- 4.8 The ramps and steps in each option were designed following the Department for Transport Inclusive Mobility guidelines.
- 4.9 The guidance states that ideally ramps should be at a 1:20 slope (5% gradient). The individual ramp flights should be no longer than 10m long and be separated by landings at least 1.5m long. The guidance further states that ideally ramps should not be longer than 50m. Ramps at 5% gradient and longer than 125m may not be practicable, as many wheelchair users would not be able to manage these distances unaided.
- 4.10 Note that the DMRB guidance on foot-and-cycle bridge design allows a slightly less onerous ramp in that at 1:20 gradient, landings are only required every 13m of ramp. This is not considered to make a significant difference to the outcome of this study, and indeed the DMRB guidance refers to the DfT Inclusive Mobility guidance.

**Steps**

- 4.11 The DfT guidance recommends that an individual step should rise in height by 150mm, and have a tread depth of 300mm. Individual flights of stairs should have a maximum number of 12 steps, and be separated by landings at least 1.5m long.

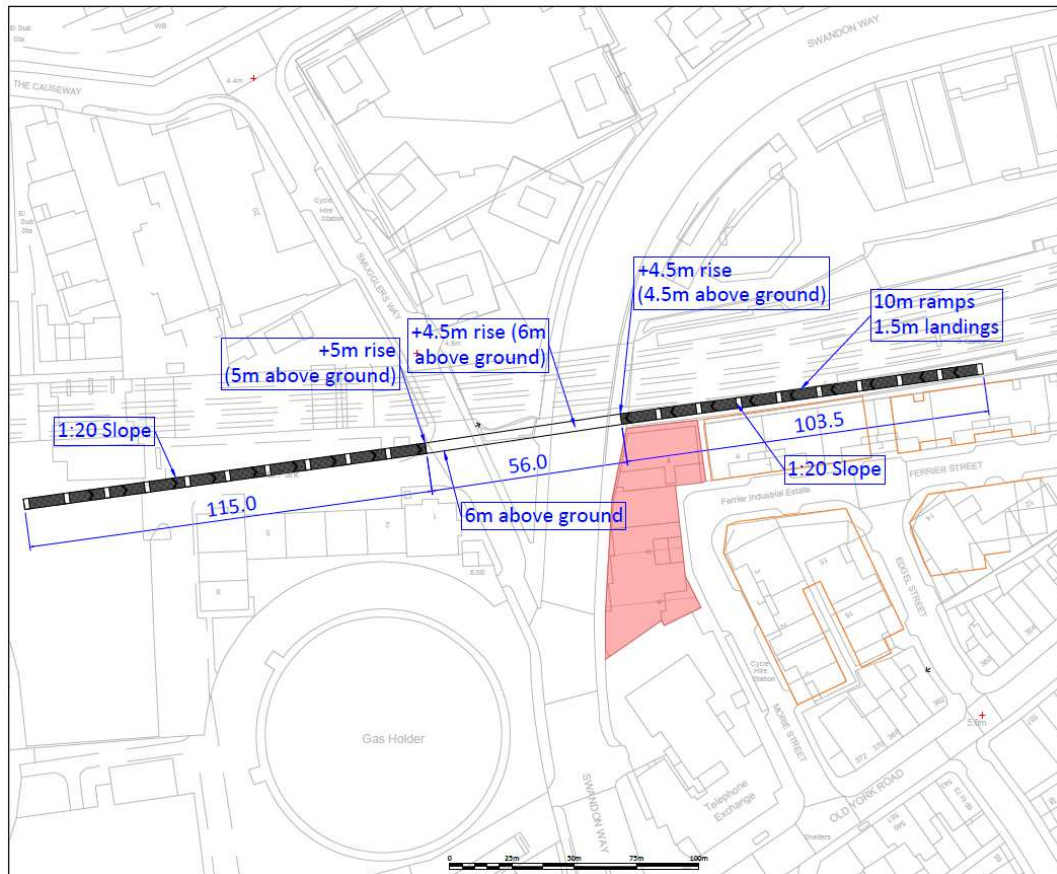
**Lifts**

- 4.12 The lifts were designed using the TfL London Cycle Design Standards for lifts serving cycle parking. The guidance states that lifts must have minimum dimensions of 1.2m by 2.3m, with a minimum door opening of 1000mm.
- 4.13 The lifts used in the design are designed as walkthrough lifts (doors on both sides), and as such have larger dimensions of 2m by 3m.

**Considered Options**

**Option 1: Straight ramp between railway and Ferrier Street buildings**

Figure 4-2: Option 1, straight ramp between railway and Ferrier Street buildings



Full Drawing 23732901-STR-HGN-100-SK-D-02402 in Appendix A.

**Description and Dimensions**

- 4.14 This option considers placing the ramp behind the existing buildings on Ferrier Street, close to the railway bridge. This places the bridge at the location where Swandon Way is at its lowest

level, thus requiring the ramp to provide a smaller rise of 4.5m as opposed to 6m. Ultimately, this allows for the shortest straight ramp possible. This option also has the advantage of being positioned behind buildings and out of sight, thus causing minimal disruption to the streetscape.

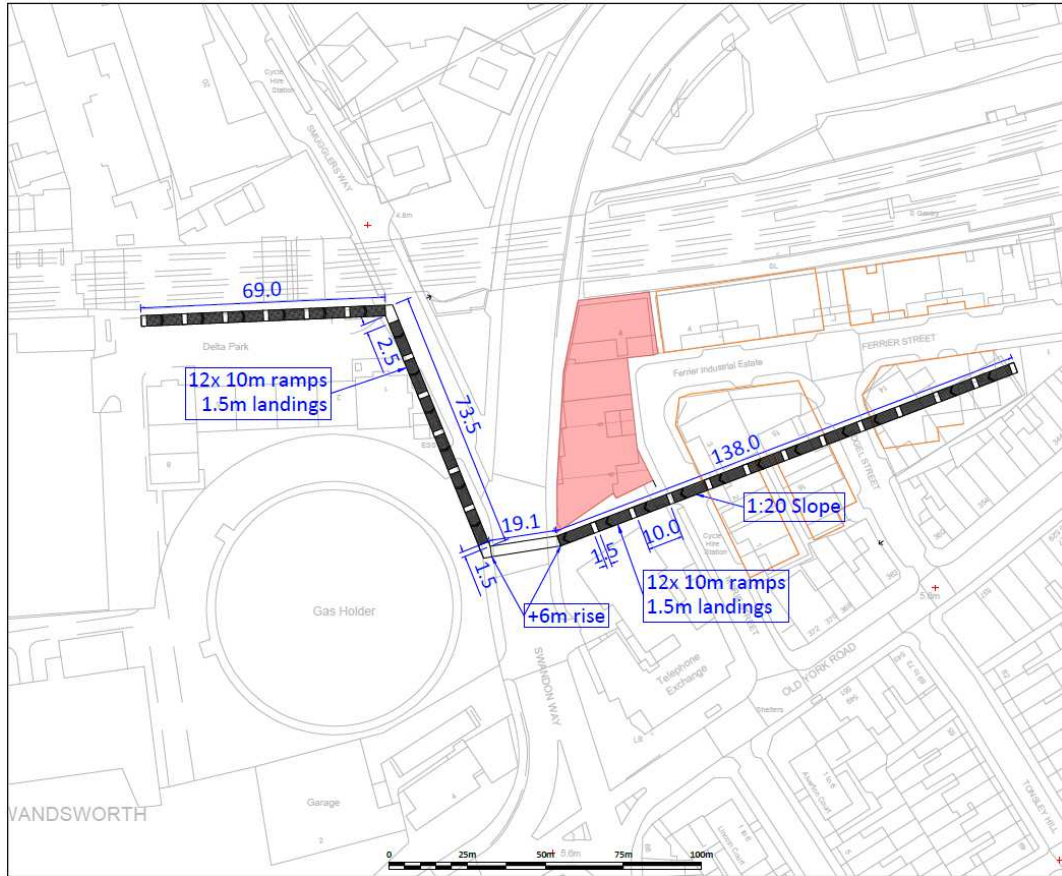
- 4.15 The ramp on the eastern side of Swandon Way would have to be 2m wide and 103.5m long, providing a rise of 4.5m. The ramp has nine flights of 10m ramps and eight 1.5m long landings. Note that this ramp is designed at a 1:20 slope.

#### *Key constraints*

- 4.16 According to the 2018/5569 planning application, the land on which the ramp is positioned is railway land, and therefore the option may not be deliverable without recourse to Compulsory Purchase. Even without compulsory purchase, the different land-ownership agreements required, and the time needed to negotiate them, would significantly lengthen and complicate the construction and delivery of the bridge.
- 4.17 The buildings on Ferrier Street are bordered by the railway embankments to their north. As such, there is a lack of space to build the ramp. Furthermore, no stairs could be built adjacent to the ramp. This can create a safety and security hazard, as the ramp and bridge would act as a long corridor where pedestrians and cyclists could become 'trapped' from both sides.
- 4.18 The ramp is straight and more than 100m long. Such ramps do not discourage cyclists to slow down. Furthermore, according to the DfT guidance, this makes it unsuitable for mobility impaired users, and potentially dangerous for wheelchair users specifically. Indeed, accidents can arise from the mix of pedestrians, wheelchair users, and cyclists travelling at speed. Subject to landowner agreement it may be possible to build in a deflection into the ramp to reduce cycle speeds.
- 4.19 As the bridge is situated immediately adjacent to a live railway, the bridge will be subject to Network Rail's design and approval processes. Furthermore, it will be necessary to agree a track possession in order to be able to safely crane sections of ramp into position. As a result, the bridge will cost significantly more than a similar bridge situated away from the railway and delivery is likely to take longer as a result of timescales for booking track possessions.
- 4.20 This option is also not feasible with the existing building layouts to the north of Ferrier Street as it has not been included in the current planning application which has a resolution to grant.

**Option 2: Straight ramp south of the development site**

**Figure 4-3: Option 2, straight ramp south of development site**



Full Drawing 23732901-STR-HGN-100-SK-D-02403 in Appendix A.

*Description and Dimensions*

- 4.22 The ramp and bridge are located to the south of the development site outside the land ownership of the Morie Street site. The design of the ramp resembles option 1 (straight ramp designed at 1:20 slope). However, as it is placed south of the building and must provide 6m rise, it is 138m long with twelve 10m ramps and eleven 1.5m landings.
- 4.23 The other western ramp follows Smugglers Way and passes underneath the railway bridge.

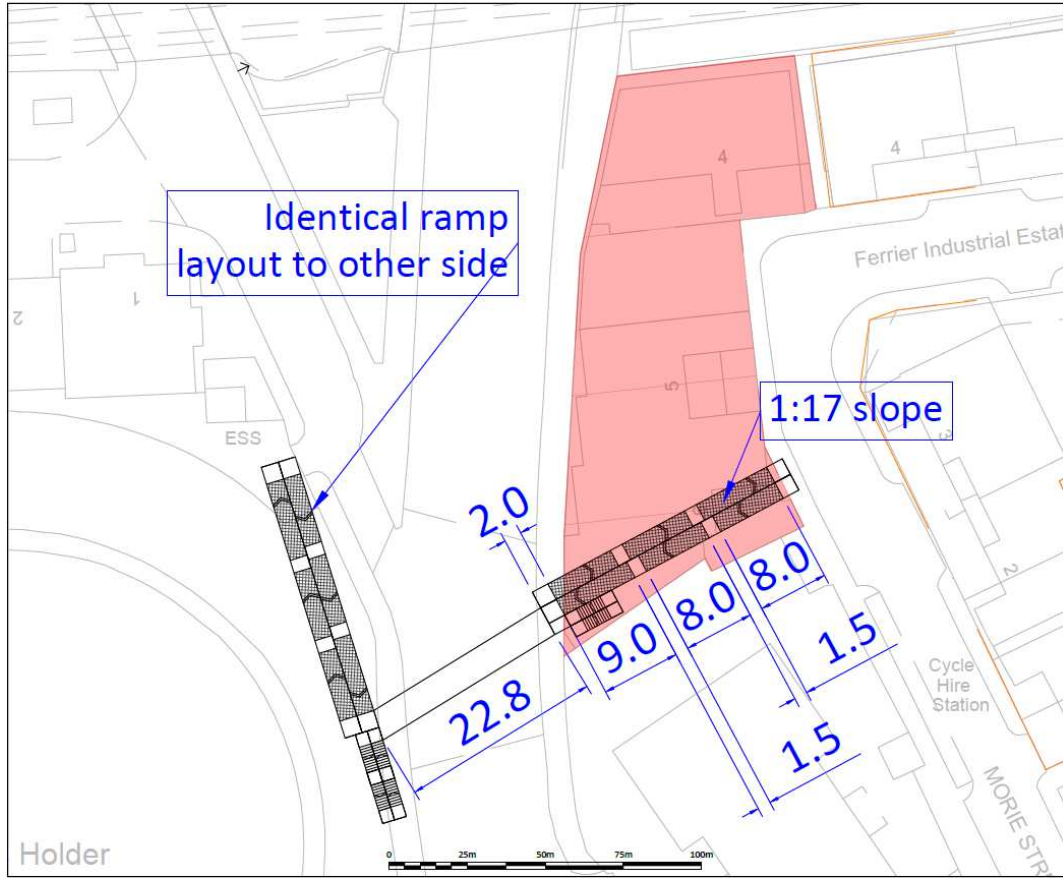
*Key Constraints*

- 4.24 The ramp runs through two existing buildings. To accommodate this ramp, the buildings would need to be rebuilt around the ramp. This assumes that the redevelopment in the area can include provision for this ramp.
- 4.25 The eastern ramp is positioned on private land, whilst the western ramp is possibly on the railway land.

- 4.26 Using land at the eastern end of the ramp on the eastern side of Morie Street is not feasible with the existing building layouts and a ramp has not been included in the current planning application which has a resolution to grant.
- 4.27 There would also be different land-ownership agreements required, and the time needed to negotiate them, would significantly lengthen and complicate the construction and delivery of the bridge.
- 4.28 If the eastern ramp was moved north to fit within the client's ownership, the building size would need to be reduced, but this would not address the issues on the eastern side of Morie Street.
- 4.29 As the western ramp is situated immediately adjacent to a live railway, it will be subject to Network Rail's design and approval processes. Furthermore, it will be necessary to agree a track possession in order to be able to safely crane sections of ramp into position. As a result, the bridge will cost significantly more than a similar bridge situated away from the railway.
- 4.30 The ramp crosses Morie Street and Edgel Street. At the crossing points, the ramp must comply with the 6m clearance required by the DMRB. To do so, the ramp would either have to concertina or start further east. For this reason, the ramp cannot be built as proposed by this option.
- 4.31 It must be noted that any other option proposing that the ramp crosses a street other than Swandon Way will have one of three possible outcomes:
- The ramp must meet the required clearance, thus not requiring a design capable of sustaining collision loads.
  - The ramp does not meet the required clearance. It must thus be designed for collision loads and only small vehicles can be permitted to pass under.
  - The ramp does not meet the required clearance and the street must be closed to through traffic.
- 4.32 Any option proposing for the ramp to cross over a street other than Swandon Way would thus be unfeasible.
- 4.33 The ramp is straight and more than 100m long. Such ramps do not discourage cyclists to slow down. Furthermore, according to the DfT guidance, this makes it unsuitable for mobility impaired users, and potentially dangerous for wheelchair users specifically. Indeed, accidents can arise from the mix of pedestrians, wheelchair users, and cyclists travelling at speed. Subject to landowner agreement it may be possible to build in a deflection into the ramp to reduce cycle speeds.

**Option 3: Concertina ramp at 1:17 slope, within southern part of site boundary**

**Figure 4-4: Option 3, concertina ramp at 1:17 slope, within southern part of site boundary**

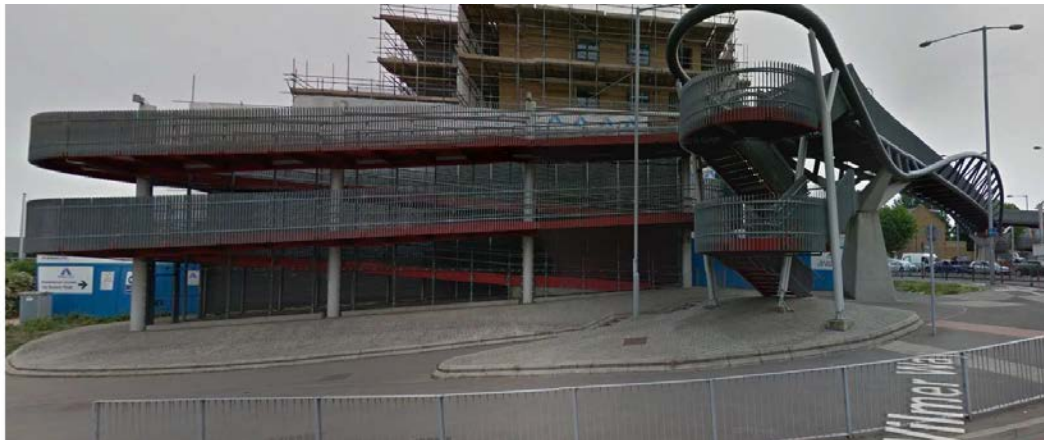


Full Drawing 23732901-STR-HGN-100-SK-D-02404 in Appendix A.

**Description and Dimensions**

- 4.34 The bridge ramp is located to fit the development site footprint. The ramp geometry is based on the Wilmer Way footbridge shown below.

**Figure 4-5: Wilmer Way footbridge ramps, which crosses the North Circular, Enfield.**



- 4.35 The eastern ramps and stairs were designed to fit within the site boundary. The steps and ramps are concertinaed similar to the footbridge shown above (two stacks).
- 4.36 To fit within the site, the ramp was designed at a 1:17 slope, with two flights of 8m length and one flight of 9m length. Each ramp flight is separated by a 1.5m landing. The footprint of this design is smaller than the previous options.
- 4.37 The stairs were designed as four flights of ten steps, with each step having a 300mm tread depth and providing 150mm rise, and landings of 1.5m separating flights of stairs.
- 4.38 Compared to the previous options, this option is more inviting for able pedestrians as stairs are provided.

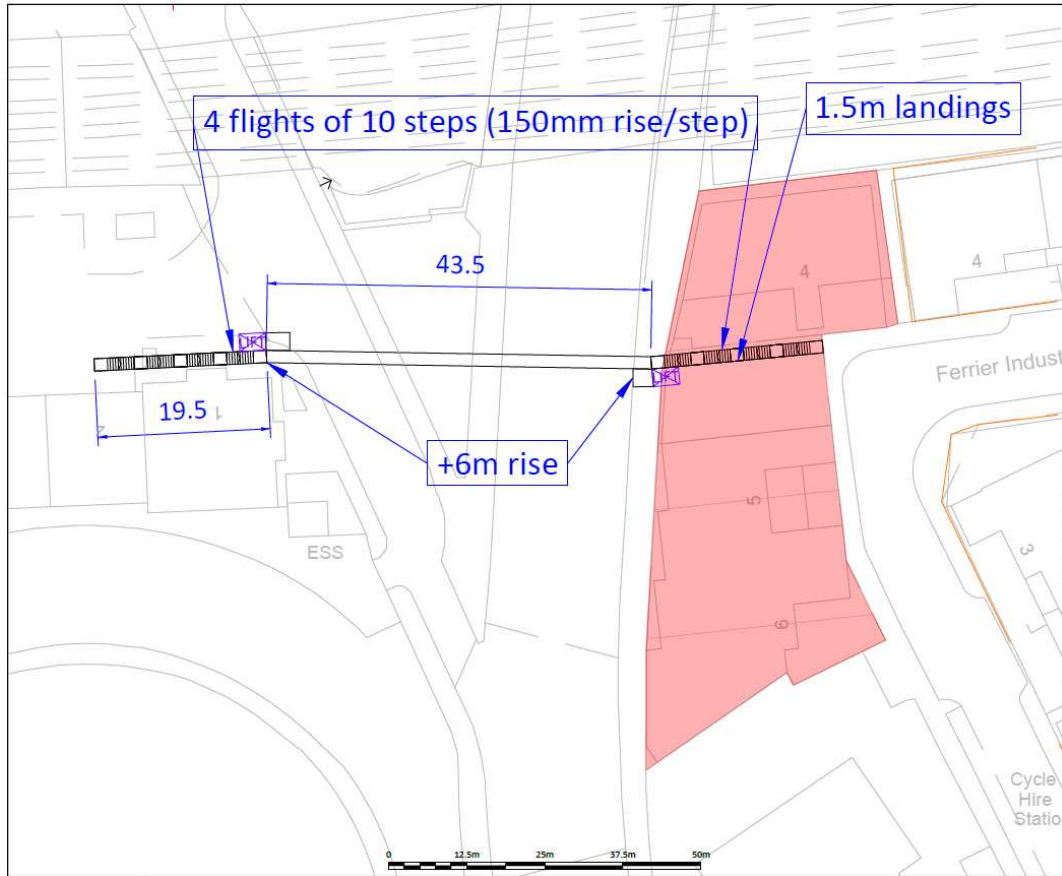
#### *Key constraints*

- 4.39 Whilst the ramp does fit within the site boundary and has a much smaller footprint than the previous options, it precludes the development of the Morie Street Studios on the basis that it would not be possible to make efficient use of the site. Furthermore, the ramp will degrade the potential frontage of the building. Indeed, as shown by the Wilmer Way footbridge, the impact on the streetscape is significant.
- 4.40 Compared to the previous options, this ramp is safer for wheelchair users. However, the ramp is 118m long, making it unsuitable for mobility impaired users.
- 4.41 The ramp in this option is less inviting to cyclists compared to the previous options, as they will need to navigate tight turns. Furthermore, the entrance is on the western end of the ramp, meaning that cyclists will have to turn off the road and onto the pavement to board the ramp.
- 4.42 As the ramps are concertinaed, pedestrians and cyclists would be required to travel additional distances to overcome the level difference.



**Option 4: Stairs and walkthrough lift within site boundary**

**Figure 4-6: Option 4, stairs and walkthrough lift within site boundary**



Full Drawing 23732901-STR-HGN-100-SK-D-02405 in Appendix A.

*Description and Dimensions*

- 4.43 This option provides an alternative to the ramp for cyclists and mobility impaired pedestrians with a 2m by 3m walkthrough lift. The stairs and lift are positioned to be an extension of the northern pavement on Ferrier Street, and thus run through the site boundary.
- 4.44 The stairs were designed as four flights of ten steps, with each step having a 300mm tread depth and providing 150mm rise, and landings of 1.5m separating flights of stairs. This allows for the steps to fully fit within the site boundary. As an alternative to that shown, the steps could be designed as in option 3, taking up a smaller footprint within the building.
- 4.45 The bridge deck widens at the ends to accommodate cyclists and wheelchair users exiting the lift.

*Key Constraints*

- 4.46 The stairs run through the site boundary, effectively separating the development into two smaller plots. This significantly impacts the potential to make efficient use of the site as required by planning policy at all levels and is likely to preclude its future redevelopment.

- 4.47 The Workspace model relies on the provision of active groundfloor reception space. The provision of a ramp in this location will adversely impact on the design of any future redevelopment and the potential to provide active, managed workspace in this location.
- 4.48 In addition, having public stairs near the buildings can detract from the site aesthetics and potential frontage. Indeed, as shown by the Wilmer Way footbridge steps, the impact on the streetscape is significant.
- 4.49 This option may be more attractive for pedestrians, as well as wheelchair users specifically, which would not have to manually push themselves up a 100m long ramp. However, cyclists will not favour this option as it involves either dismounting the bicycle and waiting for the lift or carrying the bicycle up the steps.
- 4.50 The bridge access would need to be segregated from the remainder of the building and presents difficulties in providing secure access from one part of the development to the other because of the need to maintain a publicly accessible route to the bridge.

### Pedestrian and Cycle Bridge Feasibility Conclusions

- 4.51 This Chapter considered the feasibility of four potential design options for a pedestrian and cycle bridge link across Swandon Way, as well as the guidelines used in their design.
- 4.52 Upon review of the four potential bridge options, the following common limitations were identified:
- There is insufficient space for a ramped approach to the foot and cycle bridge. A straight ramp would need to be at least 100 metres long, regardless of where it is placed. This is not feasible for three reasons:
    - Long straight ramps are unsuitable and unsafe for impaired mobility users. Indeed, manually pushing themselves up such a long ramp can represent a physical challenge for wheelchair users. Furthermore, long ramps are long corridors, where pedestrians can be trapped from both sides. This also applies to concertina ramps.
    - A straight ramp of more than 100m in length would require additional work and construction outside the development site boundary. This would require additional contracts and land ownership agreements.
    - Ramps longer than 100m lose their appeal (and thus do not fulfil their purpose) to able pedestrians and cyclists, which can prefer less direct, at grade routes (such as the Old York Rd and Swandon Way junction). This also applies to concertina ramps, especially for cyclists.
  - Using stairs and a lift as the approach to the bridge is slightly more feasible in terms of the physical footprint, although it still significantly detracts from the streetscape and/or the development potential of the site. However, the aim of this report is to study the feasibility of providing a “pedestrian and cycle bridge link across Smugglers Way to Morie Street/Ferrier Street”, and this report does not consider a lift access as an effective link for cyclists.
  - All options presented have a significant adverse impact on the streetscape within Morie Street and would result in elements running close to or through current buildings. Even on new sites, the bridge would have a significant visual impact on the street.

- 4.53 It must be noted that the proposed bridge on the Morie Street site does not serve any strategic cycle route, present or future, as highlighted in **Figure 3.3**.
- 4.54 Ultimately, none of the four bridge options explored are considered feasible.
- 4.55 The footbridge feasibility study undertaken within this chapter was subsequently discussed at a pre-application meeting with LBW on 28 November 2019 and the findings regarding the viability of a bridge were accepted.

# 5 Pedestrian and Cycle Link and At-grade Swandon Way Crossing Feasibility Assessment

## Introduction

- 5.1 This chapter follows on from the feasibility assessment of the pedestrian and cycle bridge link undertaken in Chapter 4 and considers the feasibility of the alternative option involving a pedestrian and cycle link between Morie Street/Ferrier Street and the A217 Swandon Way. This assumes an at grade pedestrian and cycle crossing facility across Swandon Way and Smugglers Way, which is being considered by TfL.
- 5.2 As mentioned in Chapter 3, subsequent engagement with TfL on the proposed Wandsworth town centre scheme, including the meeting on 16 March 2020 and the associated drawing, identifies that the proposed improvements do not include a formal pedestrian crossing across A3 Armoury Way at the Swandon Way/ Old York Road junction and instead propose crossings at the A3 Armoury Way/Ram Street junction and at the Swandon Way/ Smugglers Way junction.
- 5.3 TfL advised that the reason for not providing a crossing across A3 Armoury Way at the Swandon Way/ Old York Road junction was due to traffic modelling assessments identifying that a crossing in this location, combined with the two crossings referred to above would have been too disruptive to traffic flows. TfL also advised that the proposed Wandsworth town centre scheme is anticipated to increase traffic flows along Swandon Way by approximately 50% as a result of the re-direction of traffic flows.

## Pedestrian and Cycleway Options

- 5.4 In light of the above context and a bridge not being considered viable, four pedestrian and cycle link options have been considered between Morie Street/Ferrier Street and the A217 Swandon Way which would integrate with the potential Swandon Way at-grade crossing. The cycle link options are identified in **Figure 5-1** which also includes a potential conceptual design for the Swandon Way and Smugglers Way crossings involving toucan crossings, and potential revisions to the eastern footways on both roads to provide enhanced widths for shared use by pedestrians and cyclists. It should be noted that these designs are conceptual only and TfL have not been consulted on these.
- 5.5 The link options have been designed assuming a maximum gradient of 1:20 and to accommodate both pedestrians and cyclists.

- 5.6 Comments with respect to each option are summarised in **Table 5-1. Figures 5-2 and 5-3** provide a graphical representation of the design implications of route Options 2 (red route) and 4 (green route).
- 5.7 On balance, it is considered that a new route at the southern extremity of the development plot (Option 4 - the green route) would offer the best conditions for providing a new pedestrian/cycle connection between Morie Street and Swandon Way. This is for the following key reasons:
- It would minimise the impacts upon the Morie Street studio site's ground floor layout by allowing one building to be provided and not splitting the site into two buildings. The route makes natural use of the desire to have a building that is set back from the southern boundary to facilitate windows along the elevation.
  - Would be less disruptive to the building entrances and common facilities.
  - Would make best use of available natural daylight compared to other options, with no building on the neighbouring boundary.
  - The configuration of the building and the adjacent ground floor units would promote natural surveillance.
  - Although the Metropolitan Police would prefer to see no new route, the southernmost route would be the most acceptable to them as it would be less likely to result in creating conditions which would encourage criminal activity.
  - It would provide a direct and gently-graded step-free route, with no ramps or stairs required.
  - It could be designed to a high quality incorporating soft landscaping and street furniture.

### Acoustic Consultant and Metropolitan Police Service Comments

- 5.8 General comments from members of the wider Morie Street Studios design team and Metropolitan Police Service (MPS) applicable to all routes are outlined below.

#### Acoustic Comments

- 5.9 Max Fordham (Morie Street Studios acoustic consultant), published a report entitled 'Design Note – Walk Through Noise' which is based on noise survey measurements at the edge of the Morie Street Studios Site. The report concluded that:

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*"mean ambient noise levels of about 77 dB LAeq can be expected at the Swandon Way entrance to an east-west ground floor walk-through. The noise levels will remain high through the walkway, due to the direct line of sight to Swandon Way.*

*For context, we would typically consider that useful/ quality external urban amenity space would be subject to ambient noise levels of up to about 55 dB LAeq (based on guidance BS8233:2014 and WHO Community Guidelines). As noise increases over this level, the usefulness of the space will decrease due to increasing difficulty in holding conversations and general noise-related annoyance. As the noise levels in the walk-through will at times be circa. 20 dB above this 'ideal' upper limit, the walk-through space is*

*unlikely to be useful/attractive for even short term casual dwelling, or as a social/gathering space outside the Morie St Studios building.*

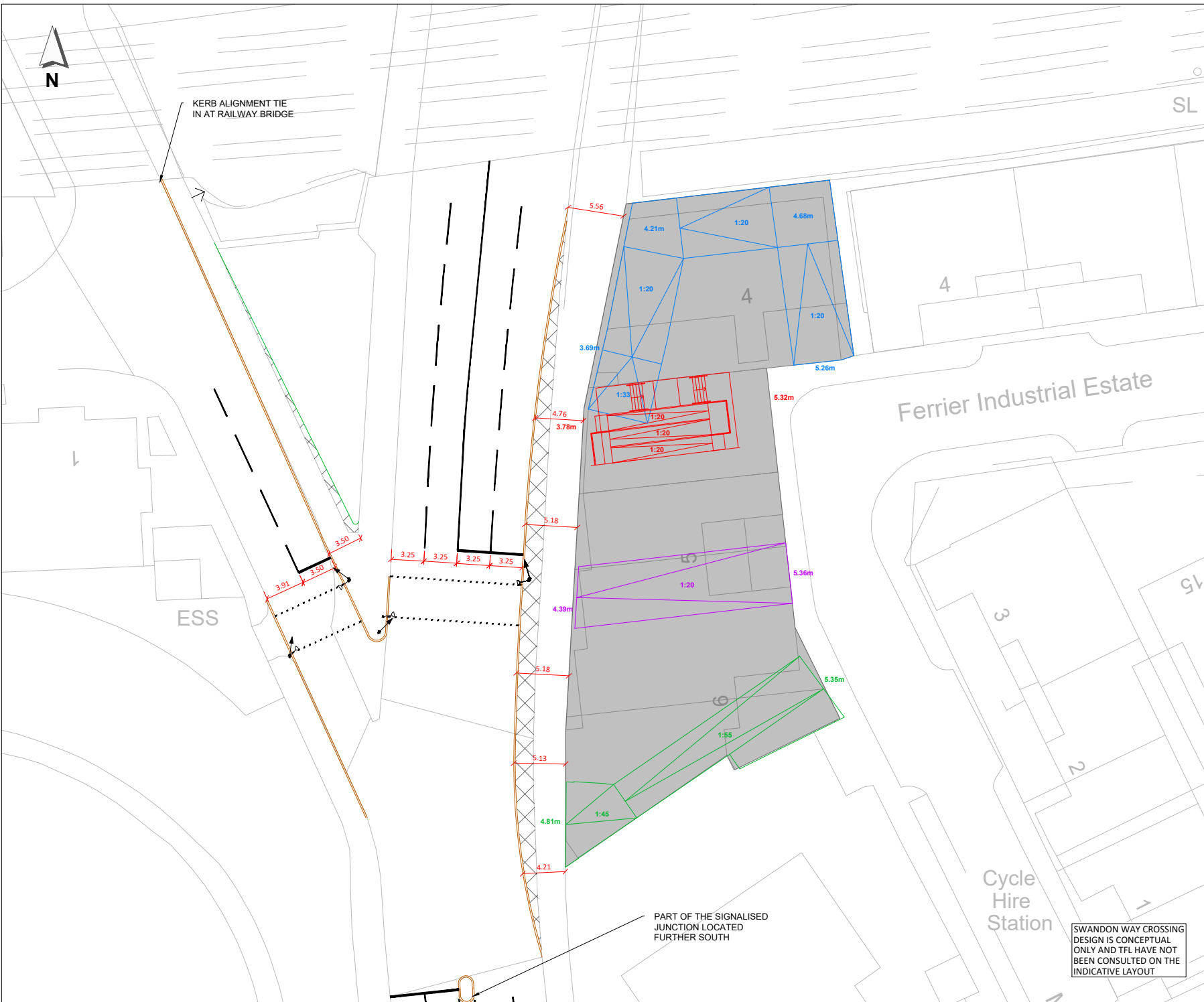
*Changes in proposed building material finishes, or geometry (such as increasing the walk-through soffit height or removing the soffit entirely to leave Morie St Studios as a split site), would not give a significant reduction of traffic noise in the walk-through (likely limited to several dB only), as while reverberant noise levels would reduce with these measures, the dominant direct noise from Swandon Way would not be affected.*

*Conversely, it's noted that introducing a continuous ground floor building/façade with no route through would reduce the direct sound transmission that currently occurs through the site, resulting in reduced noise levels in the vicinity of the Morie St/Ferrier St corner. This would almost certainly be perceived as a qualitative improvement to the noise conditions in that particular area (and along Ferrier St, likely within several tens of metres from the building). Thus, the perceived acoustic quality of the environment on the Ferrier St approach to the new Morie St Studios building entrance, would be very different depending on whether there is a walk-through route, or not. The quieter option (i.e. continuous building without a walk-through), may positively affect the perceived commercial quality of the Morie St Studios facilities".*

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#### **Metropolitan Police Service**

- 5.10 On 18 March 2020, the MPS Continuous Policing Improvement Command Officer Rob Harrison advised that he had strong reservations over a route through the centre of the site from a safety and security perspective as it could become a crime generator and that a route through to the south of the site would be a better option. However, he also stated that no route through the site would be the preferred option and would be strongly recommended by the Police, as with any route it would be very difficult, costly and intensive to mitigate safety and security risks.
- 5.11 The above views were based on a review of local crime data; and experience which suggests that similar alleys and cut-throughs in Wandsworth are the subject of additional complaints and anti-social behaviour, which represent a drain on police resources.



**NOTES:**

- THE RAMP SHOWN ON THESE DRAWING DO NOT FOLLOW THE DOT GUIDELINES WITH REGARDS TO RESTING LANDINGS. AS SUCH, THEY ARE NOT SUITABLE FOR WHEELCHAIR AND IMPAIRED MOBILITY USERS. TO COMPENSATE FOR THIS, LIFTS MUST BE PROVIDED.
- IT WAS ASSUMED THAT SWANDON WAY IS IN CUTTING TO PASS UNDER THE RAILWAY BRIDGE. THIS CUTTING STARTS AFTER THE SOUTHERN LIMIT OF THE SITE.
- THE DRAWING USED FOR AS A BASE WAS PROVIDED BY WWM ARCHITECTS: "191021\_MORIE STREET SITE PLAN.DWG".

- LEGEND:**
- SITE BOUNDARY
  - PROPOSED FOOTWAY WIDENING
  - PROPOSED KERB
  - PROPOSED ROAD MARKING
  - PROPOSED BACK OF FOOTWAY
  - OPTION 1 (PROPOSED BY WWM)
  - OPTION 2 (PROPOSED BY FROST)
  - OPTION 3 (PROPOSED BY WWM)
  - OPTION 4 (PROPOSED BY FROST)
  - TRAFFIC SIGNAL POST
  - PEDESTRIAN SIGNAL POST


P1	25FEB20	OPTION 4 UPDATED	RKO	SDX	MHU
PO	22FEB20	ORIGINAL ISSUE	RKO	SDX	MHU
REV	DATE	DESCRIPTION	DES	CHK	APP



Client: **WORKSPACE GROUP PLC**

Project Title: **MORIE ST**

Drawing Title: **FIGURE 5-1 MORIE STREET PEDESTRIAN AND CYCLE LINK OPTIONS**

Status: **FIT FOR INFORMATION**

Size:	Scale:	Suitability:	Rev.
A4	1:500	S2	P1

Drawing No. **23732901-STR-HGN-100-SK-D-03001**

SWANDON WAY CROSSING DESIGN IS CONCEPTUAL ONLY AND TFL HAVE NOT BEEN CONSULTED ON THE INDICATIVE LAYOUT

PART OF THE SIGNALISED JUNCTION LOCATED FURTHER SOUTH

**Table 5.1: Pedestrian and Cycleway Options – Issues and Constraints**

		Option 1 (Blue)	Option 2 (Red)	Option 3 (Purple)	Option 4 (Green)
Viability Implications	Comments	Would occupy the most significant proportion of the development’s ground. The entrance of the northern block and common facilities (meeting rooms and post facilities) of the blocks would not be constrained by this link configuration.	Would occupy a significant proportion of the development’s ground-floor through the centre of the site as level change would require a long ramp (c 35m) and adjacent steps. The ramp would create a disjointed arrival experience for customers, some amenities and office units would only be accessible by leaving and re-entering the building. Some amenities for the site (meeting rooms and post rooms) would need to be relocated to the first floor of the development due to insufficient space for a main entrance. Would also limit potential main entrance location for northern block.	Would occupy a lesser proportion of the development’s ground-floor. The entrance of the northern block and common facilities of the blocks would be highly compressed by this link configuration as these spaces cannot be split between either side. Likely to constrain the entrance location to the northern block.	Would occupy a lesser proportion of the development’s ground-floor but could be accommodated within the layout and would remove severance. The building entrance and common facilities locations would not be constrained by this link configuration.  This route would also facilitate redevelopment of the site to the south by providing a direct pedestrian/cycle access on its northern boundary.
Morie Street Site Design Implications	Comments	This route would result in a deep and convoluted undercroft access with the building above occupying the same footprint. With the railway embankment to the north, proposed new buildings to the east on Ferrier Street and the application site to the south, the route will rely almost entirely on artificial lighting. The site constraints on this part of the site, with outlook and natural light being so	Visually, this option would be the most imposing, with a series of terraces and walls required where the half landings to the ramp effectively form a barrier to the effective movement of people through the site. The route would result in an entirely hard landscape, used for access only, creating very poor public space. Further, the extent of handrails required for the ramp and the variety of contrasting floor finishes, kerb edges and	The route would form an underpass that would be void of daylight, resulting in very poor public space and with no opportunity for natural surveillance.  The building will be effectively split into two which is not suitable for a functioning business centre that relies on all parts of the building being connected for the convenience of the tenants. The ground floor	Positioned on the south side of the site and with no building on the neighbouring boundary, this route makes the best use of the available natural daylight. Further, due to the configuration of the building and the ground floor units adjacent, incidental natural surveillance is promoted without affecting privacy. Due to the minimal level change, stairs and ramps are not required which means that more space



		Option 1 (Blue)	Option 2 (Red)	Option 3 (Purple)	Option 4 (Green)
		<p>restricted, suggest that this corner would be best suited to plant and back-of-house facilities such as cycle parking, bin stores and plant that would require ground floor access. However, with the access route in this location, the necessary plant and back-of-house facilities would need to be moved to a more valuable part of the site.</p> <p>The remainder of the ground floor at the north end of the site would be poor quality as there would be no opportunity for windows at the perimeter.</p>	<p>retaining walls will result in an uninviting space that will have no space for softer landscape.</p> <p>The building will be effectively split into two which is not suitable for a functioning business centre that relies on all parts of the building being connected for the convenience of the tenants. The extent of ground floor available to communal uses will be compromised resulting in the complimentary uses of the building being separated and restricting the natural flow of the space.</p>	<p>of the business centre will be compromised and will result in poor user experience. Access to the building on both sides of the ramp would require tenants to leave the building and re-enter via the pavement. There is no accessible space within the site boundaries to cross the ramp and therefore will require secondary reception facilities, security and circulation. All of these measures would be contrary to the successful functioning of the business centre.</p>	<p>can be given to soft landscape and street furniture.</p> <p>The building layout would not be affected and the route makes natural use of the desire to have a building that is set back from the southern boundary to facilitate windows along the elevation. These windows will increase the quantity and quality of internal floor space on all levels.</p>
Service of Anticipated Desire Lines	Comments	Indirect route with long ramp would be unattractive to residents.	Not on direct pedestrian desire line and would require extensive switchback ramps to overcome level difference.	Route would be well aligned with the anticipated Swandon Way crossing configuration but offset from anticipated Ferrier Street desire line.	Slightly more indirect route , however, generous width at both ends would enhance connections with the adjoining streets.
Visibility	Comments	Eastern access would not be visible from Ferrier Street. Western access would not be immediately visible from Swandon Way. Indirect route would create a blind alley.	Eastern access would be visible from Ferrier Street. Western access would not relate well to the anticipated Swandon Way crossing location. The ramp and steps would create a visual barrier.	Eastern access not visible from Ferrier Street. Western access visible from Swandon Way.	Eastern access not visible from Ferrier Street. Western access visible from Swandon Way.
Acoustics	Comments	Highway noise levels are high, having recently been recorded at 77 dB in the gap between the two Morie Studios buildings. Predicted increases in traffic along Swandon Way as a result of TfL changes to Wandsworth town centre anticipated to exacerbate this issue. The scope for reducing these noise levels locally by acoustic treatment of walls or ceilings is negligible. Considered likely that this would detract from			

		Option 1 (Blue)	Option 2 (Red)	Option 3 (Purple)	Option 4 (Green)
		link's attractiveness and usage, which would in turn reduce passive surveillance and perceptions of safety, as well as impact on site users and other local individuals.			
Natural Light	Comments	Natural light anticipated to be heavily constrained by indirect route and building above.	Natural light anticipated to be heavily constrained by indirect route and building above.	Natural light conditions would be constrained by building above.	Natural light conditions should be acceptable and better than the other options, although direct sunlight may be constrained by building to the north.
Air Quality	Comments	As all routes are for pedestrians and cyclists only, and taking into consideration local air quality monitoring results, any of the options would be viable and there is no constraint from any air quality perspective.			
Safety and Security	Comments	Indirect route would create a blind alley, reducing the potential for passive surveillance and adding the potential for antisocial behaviour. Opportunities for active frontages along this route would be limited. Considered likely that these would detract from link's attractiveness and usage. Not supported by Metropolitan Police Service (MPS) due to potential for antisocial behaviour and implications for MPS resources.	Indirect route would create a blind alley and building above would reduce the potential for passive surveillance and add the potential for antisocial behaviour. Opportunities for active frontages along this route would be limited. Considered likely that these would detract from link's attractiveness and usage. Not supported by MPS due to potential for antisocial behaviour and implications for MPS resources.	Direct route and good alignment with anticipated crossing configuration would promote natural surveillance, perceptions of safety and potential usage. The provision of some 'active frontages' to the passage potentially enhances the quality of the pedestrian experience. Not supported by MPS due to potential for antisocial behaviour and implications for MPS resources.	Natural surveillance would be elevated by the route's directness and adjacent units. Potential landscaping could be included to enhance the environment. Consideration would need to be given to closing the route overnight, to deter antisocial activities.

Figure 5-2 – Architectural Design Implications of the Option 2 Central Route (Frost Architects)

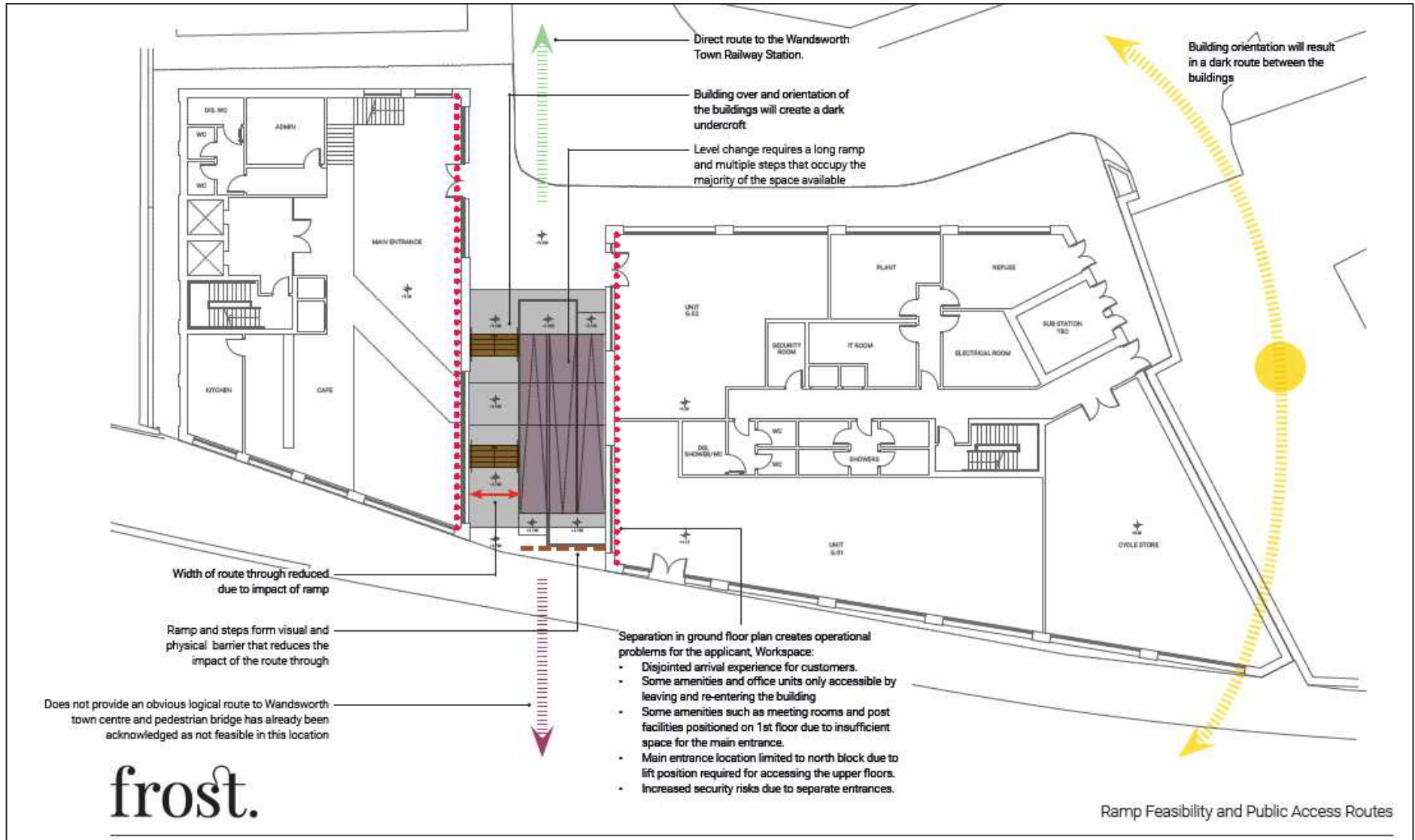
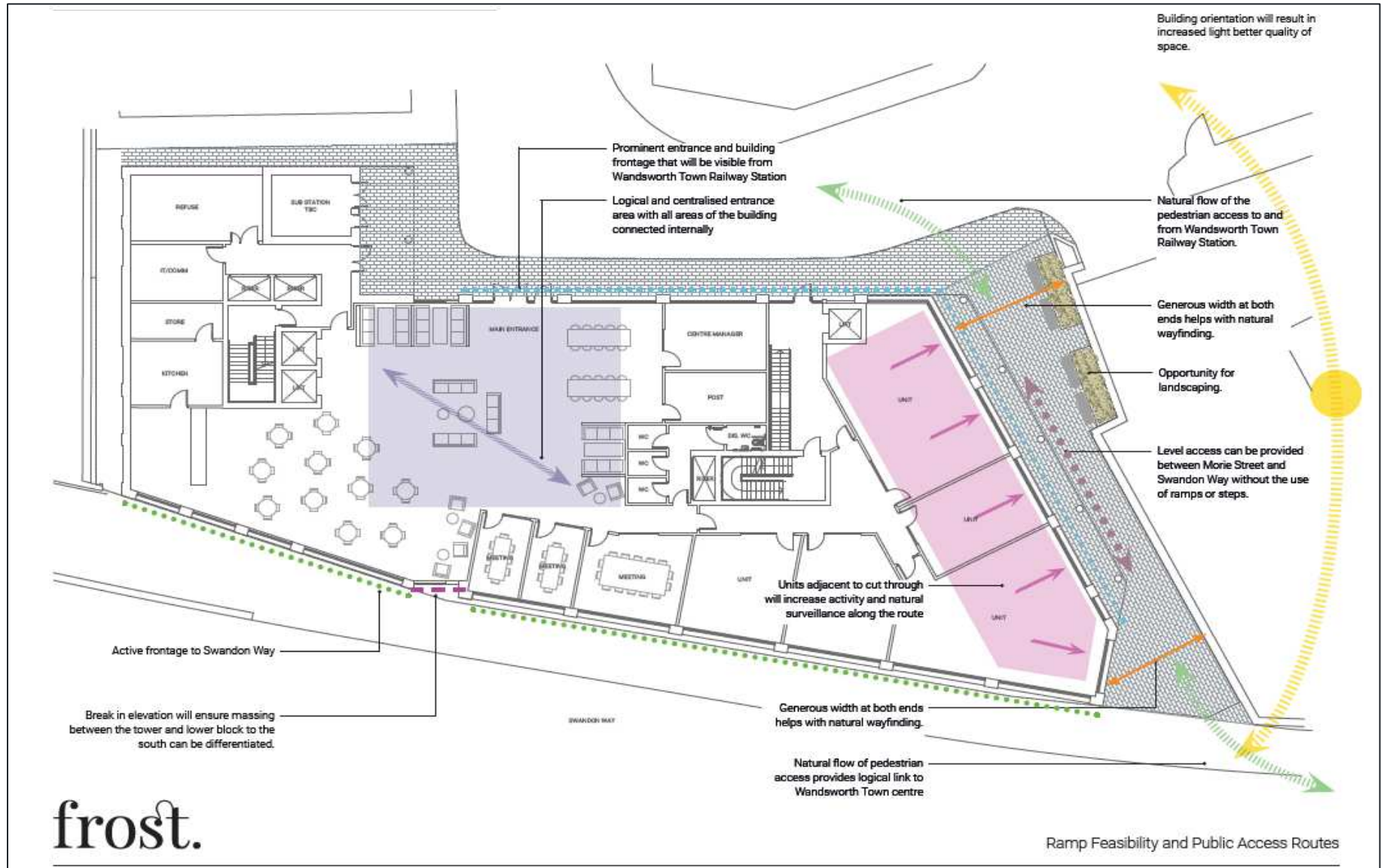


Figure 5-3 – Architectural Design Implications of the Option 4 Southern Route (Frost Architects)



## 6 Conclusions

### Summary

- 6.1 This report has been produced to inform the Workspace Group PLC response to London Borough of Wandsworth's Draft Local Plan (Regulation 18) (November 2020) document and the requirement to deliver a pedestrian and cycle link through the Morie Street site:
- 6.2 The report has assessed the feasibility of the following two options for the link:
- A pedestrian and cycle link through the site and a footbridge across Swandon Way
  - A pedestrian and cycle link through the site connecting with new at grade pedestrian and cycle crossings across Swandon Way and Smugglers Way immediately to the north of the Swandon Way/ Smugglers Way junction.
- 6.3 A potential pedestrian and cycle bridge was not considered to be viable for the following reasons:
- There is insufficient space for a ramped approach to the foot and cycle bridge. A straight ramp would need to be at least 100 metres long, regardless of where it is placed and this is not feasible.
  - Using stairs and a lift as the approach to the bridge is slightly more feasible in terms of the physical footprint, although it would significantly detract from the streetscape. A lift access is not considered to be an effective link for cyclists.
  - Bridge options would have a significant adverse impact on the streetscape within Morie Street and would result in elements running close to or through current buildings. Even on new sites, the bridge would have a significant visual impact on the street.
- 6.4 A pedestrian and cycle link providing a connection with an at-grade pedestrian and cycle crossing on Swandon Way and Smugglers Way could be viable at the southern end of the site, where it would be possible to provide a link with a 1:20 gradient. The southern route would be preferable for the following reasons:
- It would minimise the impacts upon the Morie Street studio site's ground floor layout by allowing one building to be provided and not splitting the site into two buildings. The route makes natural use of the desire to have a building that is set back from the southern boundary to facilitate windows along the elevation.
  - Would be less disruptive to the building entrances and common facilities.
  - Would make best use of available natural daylight compared to other options, with no building on the neighbouring boundary.
  - The configuration of the building and the adjacent ground floor units would promote natural surveillance.

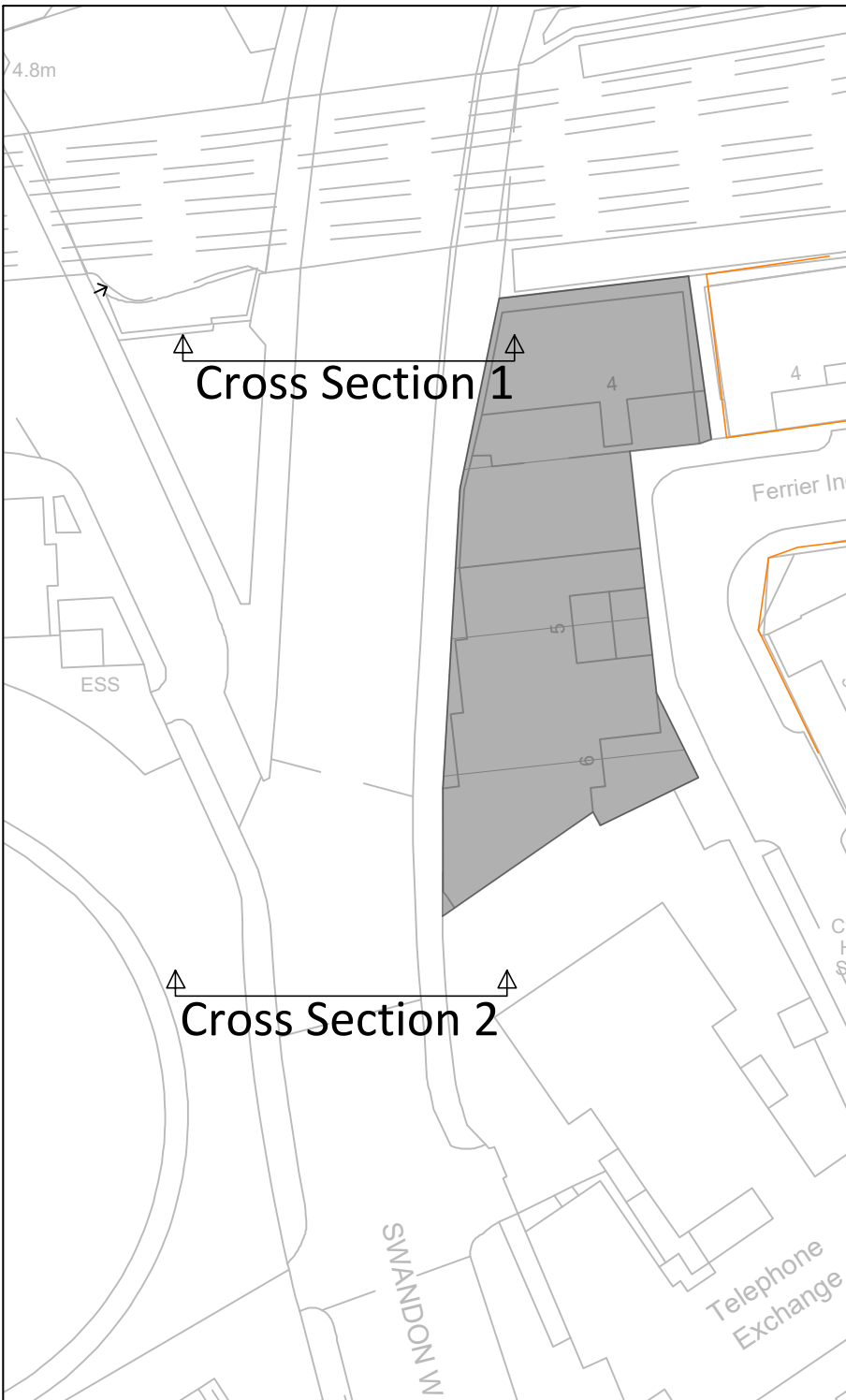
- Although the Metropolitan Police would prefer to see no new route, the southernmost route would be the most acceptable to them as it would be less likely to result in creating conditions which would encourage criminal activity.
- It would provide a direct and gently-graded step-free route, with no ramps or stairs required.
- It could be designed to a high quality incorporating soft landscaping and street furniture.

6.5 There could also be further potential to enhance this route if the telecoms site to the south comes forward for development.

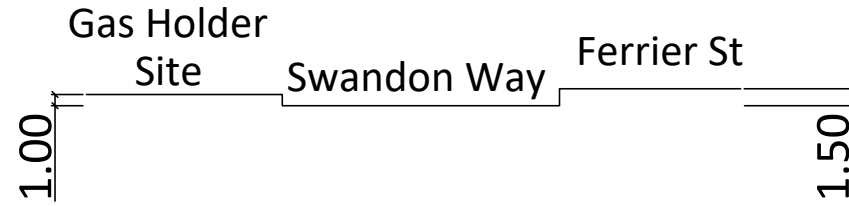
# Appendices

# A Bridge Option Drawings





### CROSS SECTION 1



### CROSS SECTION 2



- Notes:**
- The ramps shown on these drawing do not follow the DoT guidelines with regards to resting landings. As such, they are not suitable for wheelchair and impaired mobility users. To compensate for this, lifts must be provided.
  - It was assumed that Swandon Way is in cutting to pass under the railway bridge. This cutting starts *after* the southern limit of the site.
  - The drawing used for as a base was provided by WWM architects: "191021\_Morie Street Site Plan.dwg".

- Legend:**
- Lifts
  - Ramps
  - Site boundary
  - Proposed Developments

PO	04NOV19	ORIGINAL ISSUE	DBS	SDX	MHU
REV	DATE	DESCRIPTION	DES	CHK	APP

**steer**

www.steergroup.com

Client: **WORKSPACE GROUP PLC**

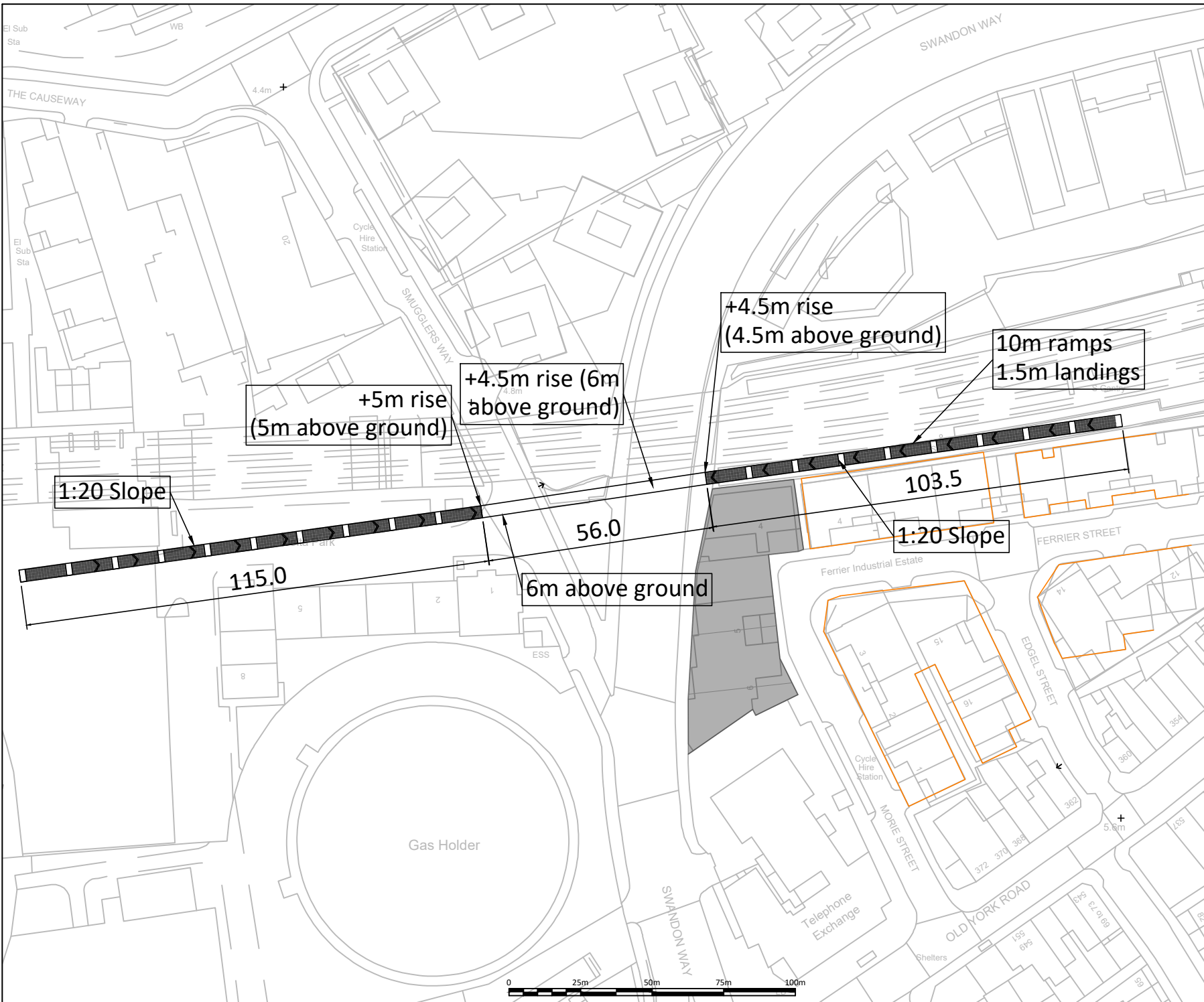
Project Title: **MORIE ST**

Drawing Title:  
**ASSUMED CROSS SECTIONS  
OF SWANDON WAY**

Status: **FIT FOR INFORMATION**

Size: <b>A4</b>	Scale: <b>1:750</b>	Suitability: <b>S2</b>	Rev: <b>P0</b>
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Drawing No.  
**23732901-STR-HGN-100-SK-D-02301**



**Notes:**

- The ramps shown on these drawing follow the DoT guidelines with regards to resting landings and slopes. As such, they are suitable for wheelchair and impaired mobility users.
- It was assumed that Swandon Way is in cutting to pass under the railway bridge. This cutting starts *after* the southern limit of the site. The cutting depths shown on the cross section are an estimate.
- The drawing used for as a base was provided by WWM architects: "191021\_Morie Street Site Plan.dwg".

**Legend:**

- Lifts
- Ramps
- Site boundary
- Existing Buildings

REV	DATE	DESCRIPTION	DES	CHK	APP
P1	12NOV19	ALTERED WEST SIDE	DBS	SDX	
PO	04NOV19	ORIGINAL ISSUE	DBS	SDX	MHU

www.steergroup.com

Client: **WORKSPACE GROUP PLC**

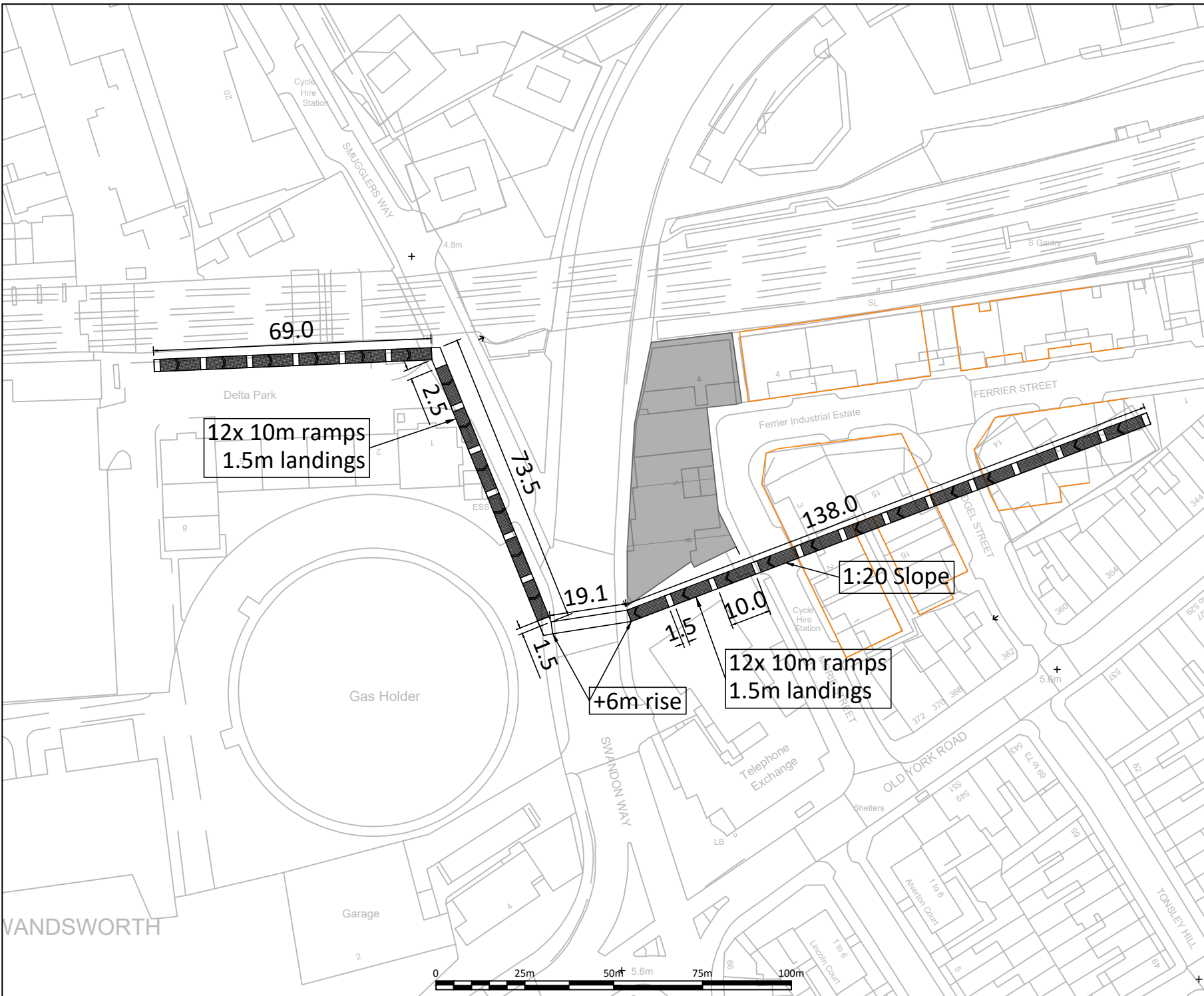
Project Title: **MORIE ST**

Drawing Title: **FOOT-AND-CYCLE BRIDGE: OPTION 1**

Status: **FIT FOR INFORMATION**

Size: <b>A4</b>	Scale: <b>1:1250</b>	Suitability: <b>S2</b>	Rev: <b>P0</b>
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Drawing No. **23732901-STR-HGN-100-SK-D-02402**



- Notes:**
- The ramps shown on these drawing follow the DoT guidelines with regards to resting landings and slopes. As such, they are suitable for wheelchair and impaired mobility users.
  - It was assumed that Swandon Way is in cutting to pass under the railway bridge. This cutting starts after the southern limit of the site. The cutting depths shown on the cross section are an estimate.
  - The drawing used for as a base was provided by WWM architects: "191021\_Morie Street Site Plan.dwg".

- Legend:**
- Lifts
  - Ramps
  - Site boundary
  - Existing Buildings

REV	DATE	DESCRIPTION	DES	CHK	APP
P1	12NOV19	ADDED LANDING AT END OF WEST RAMP	DBS	SDX	
PO	04NOV19	ORIGINAL ISSUE	DBS	SDX	MHU



Client: **WORKSPACE GROUP PLC**

Project Title: **MORIE ST**

Drawing Title: **FOOT-AND-CYCLE BRIDGE: OPTION 2**

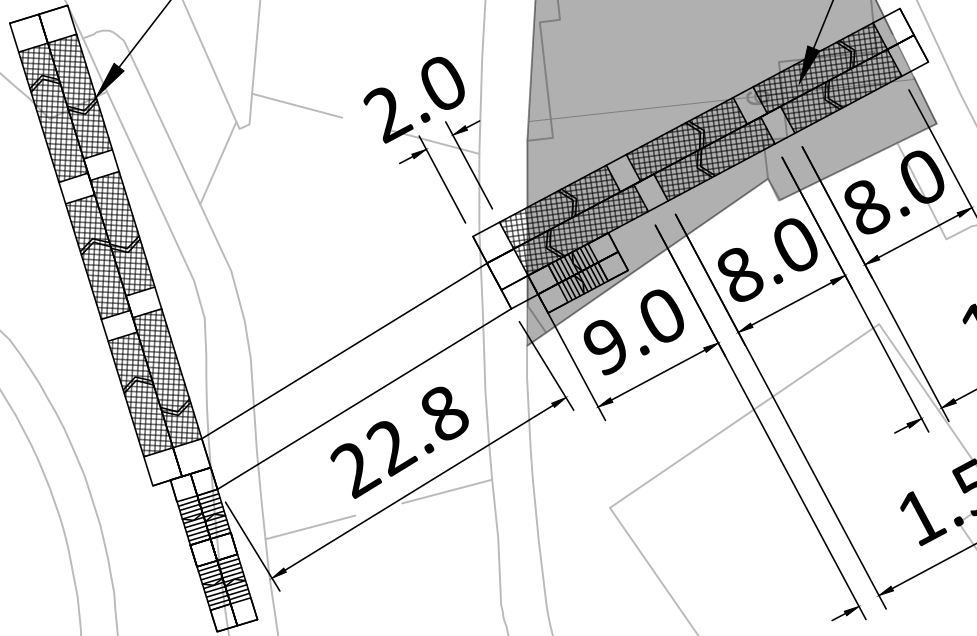
Status: **FIT FOR INFORMATION**

Size: <b>A4</b>	Scale: <b>1:1250</b>	Suitability: <b>S2</b>	Rev: <b>P0</b>
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Drawing No. **23732901-STR-HGN-100-SK-D-02403**

Identical ramp layout to other side

1:17 slope



- Notes:**
- The ramps shown on these drawing follow the DoT guidelines with regards to resting landings and slopes. As such, they are suitable for wheelchair and impaired mobility users.
  - It was assumed that Swandon Way is in cutting to pass under the railway bridge. This cutting starts *after* the southern limit of the site. The cutting depths shown on the cross section are an estimate.
  - The drawing used for as a base was provided by WWM architects: "191021\_Morie Street Site Plan.dwg".

- Legend:**
- Lifts
  - Ramps
  - Site boundary
  - Existing Buildings


PO	12NOV19	ORIGINAL ISSUE	DBS	SDX	MHU
REV	DATE	DESCRIPTION	DES	CHK	APP

**steer**

www.steergroup.com

Client: **WORKSPACE GROUP PLC**

Project Title: **MORIE ST**

Drawing Title: **FOOT-AND-CYCLE BRIDGE: OPTION 3**

Status: **FIT FOR INFORMATION**

Size:	Scale:	Suitability	Rev.
A4	1:500	S2	PO

Drawing No. **23732901-STR-HGN-100-SK-D-02404**

Holder





**Notes:**

- The ramps shown on these drawing follow the DoT guidelines with regards to resting landings and slopes. As such, they are suitable for wheelchair and impaired mobility users.
- It was assumed that Swandon Way is in cutting to pass under the railway bridge. This cutting starts after the southern limit of the site. The cutting depths shown on the cross section are an estimate.
- The drawing used for as a base was provided by WWM architects: "191021\_Morie Street Site Plan.dwg".

- Legend:**
- Lifts
  - Ramps
  - Site boundary
  - Existing Buildings

PO	12NOV19	ORIGINAL ISSUE	DBS	SDX	MHU
REV	DATE	DESCRIPTION	DES	CHK	APP

**steer**

www.steergroup.com

Client: **WORKSPACE GROUP PLC**

Project Title: **MORIE ST**

Drawing Title: **FOOT-AND-CYCLE BRIDGE: OPTION 4**

Status: **FIT FOR INFORMATION**

Size: <b>A4</b>	Scale: <b>1:500</b>	Suitability: <b>S2</b>	Rev: <b>P0</b>
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Drawing No. **23732901-STR-HGN-100-SK-D-02405**



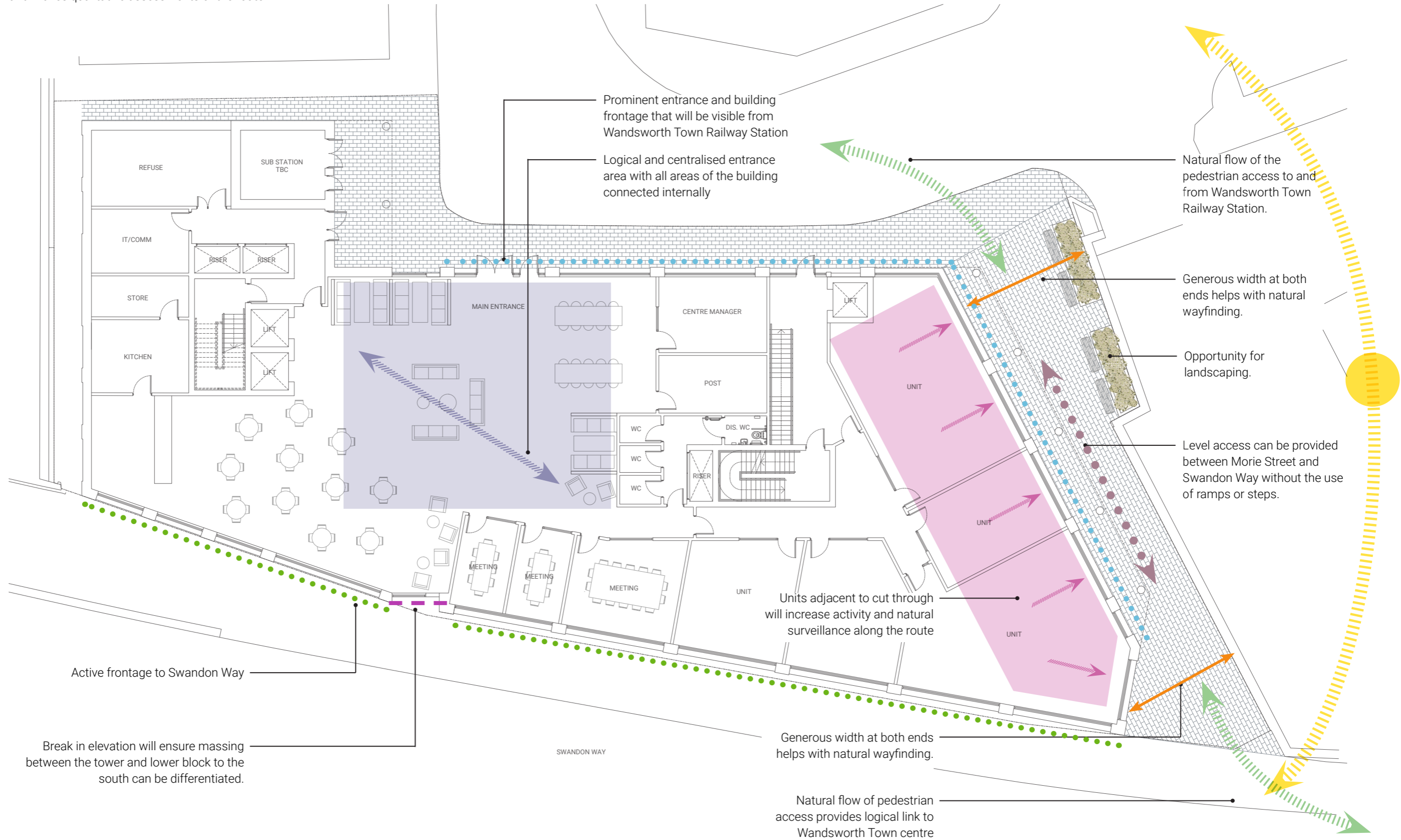


# Appendix III: Proposed Access Route Diagram



# PEDESTRIAN ACCESS ASSESSMENT

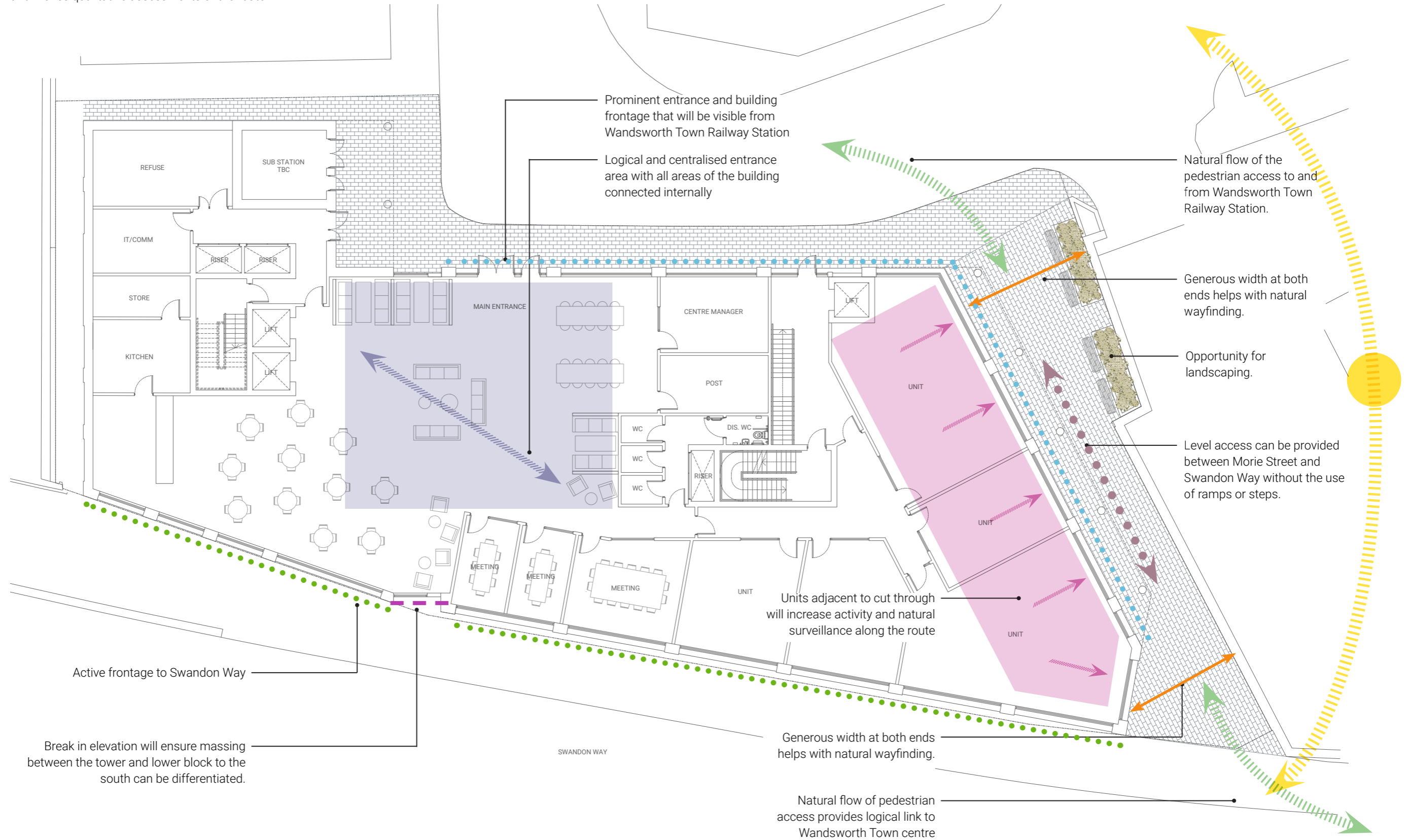
Option 2 looks to provide pedestrian access to the south of the site. The below diagram highlights the feasibility of this access and makes qualitative assessments of the route.



# Appendix IV: Morie Street Proposed Route

# PEDESTRIAN ACCESS ASSESSMENT

Option 2 looks to provide pedestrian access to the south of the site. The below diagram highlights the feasibility of this access and makes qualitative assessments of the route.



frost.

Public Access Route

## Appendix V: Wandsworth Gasholder site

COMMON

MITHERIDGE

SGN Place

# wandsworth gasworks

wandsworth

# parklife

**THE LAST REMNANT OF THE HUGE WANDSWORTH GASWORKS IS BOWING OUT - THE GIANT GASHOLDER THAT HAS PRESIDED OVER THIS PART OF TOWN IS NO LONGER NEEDED.**

**IMPERMEABLE FOR DECADES, AND WILD AND WONDERFUL MARSHLAND BEFORE THAT - WE HAVE A ONCE IN A GENERATION CHANCE TO MAKE SOMETHING GREAT OUT OF THIS FORGOTTEN SITE. WE ARE COMMITTED TO GREENING THIS SPACE, OPENING UP ACCESS TO 200M OF RIVERSIDE, IMPROVING THE BIODIVERSITY VALUE, AND ENCOURAGING NEW CONNECTIONS THROUGH THE SPACE.**

**WE WILL BUILD NEW HOMES ACROSS MULTIPLE TENURES, AND DELIVER WORKSPACE, BARS AND RESTAURANTS TO MAKE THE PLACE BUZZ. WE WOULD REALLY LIKE TO KNOW WHAT YOU THINK OF OUR PROPOSALS.**

# you said, we did

The summary from the public engagement so far

key requirements to date have been:

a public space by the river, play space for children and new housing



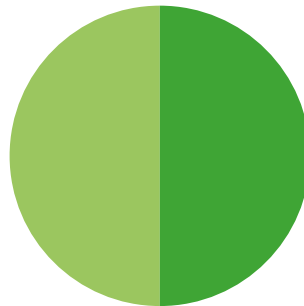
**551**

people interviewed

## TOP 3

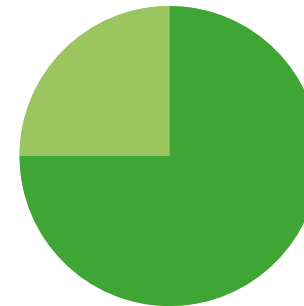
words best sum up how the place should feel are:

**inclusive, welcoming, green**



**50%**

of people engaged with have been connected to the area for more than 10 years



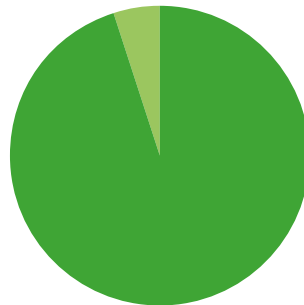
**75%**

said a development like this would be of benefit to the local area with 50% saying very much so, only 9% said it wouldn't be beneficial

## TOP 5

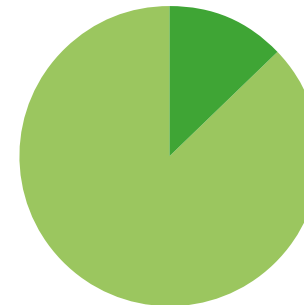
landscaping elements are:

**benches and seating, river side seating, trees, grass area to relax, community planting**



**95%**

of people engaged with say they have been consulted with about the local area "not much" or "not at all"



**13%**

think a new footbridge would **not** be of benefit to the community

# key facts

## living



over  
**600**  
new homes



over  
**70%**  
dual aspect  
apartments



targeting  
**35%**  
affordable housing



commercial space including  
**bars,  
restaurants,  
workspace**



3 reactivated  
**railway  
arches**  
(potential for up to 10)

## amenity



over  
**1500 sqm**  
of doorstep, neighbourhood &  
natural play



residential shared  
**internal  
amenity**  
spaces



over  
**9000 sqm**  
of public open and amenity  
space  
at ground floor



**200 m**  
private aerial exercise loop  
for later living residents



shared residents  
**rooftop  
amenity**  
across all buildings

## environment



by keeping the gasholder  
foundations we save  
**4000 tonnes  
of carbon**  
(106 new homes)



over  
**6,500 sqm** of  
biodiverse habitats  
over  
**370 l/m** of  
naturalised River Wandle



buildings designed with a  
**low  
embodied  
carbon**  
and to be low energy



**carbon zero**  
ready energy centre to power  
site



**restoring**  
a heavily contaminated  
industrial site

## place



over  
**175**  
semi mature trees



site acts as  
**phase 1**  
of proposed  
Bell Lane Creek Park



over  
**500  
people**  
from local community already  
engaged with



three of the UK's  
**best music  
record labels**  
within 1/2 mile



a collective of  
**award-  
winning**  
designers

## connectivity



nearly  
**200 m**  
linear meters of improved  
accessible river frontage



new public  
**footbridge**  
provided to connect  
local residents



**pedestrian  
and cycle**  
focused design



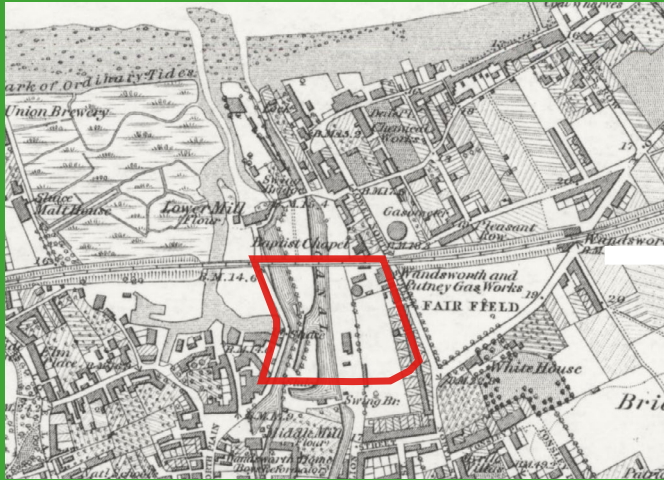
improvements to  
**causeway  
park**  
included



improvement route between  
the **town centre  
+ riverfront**



# regreening an industrial site



open site in 1800s



gasholder



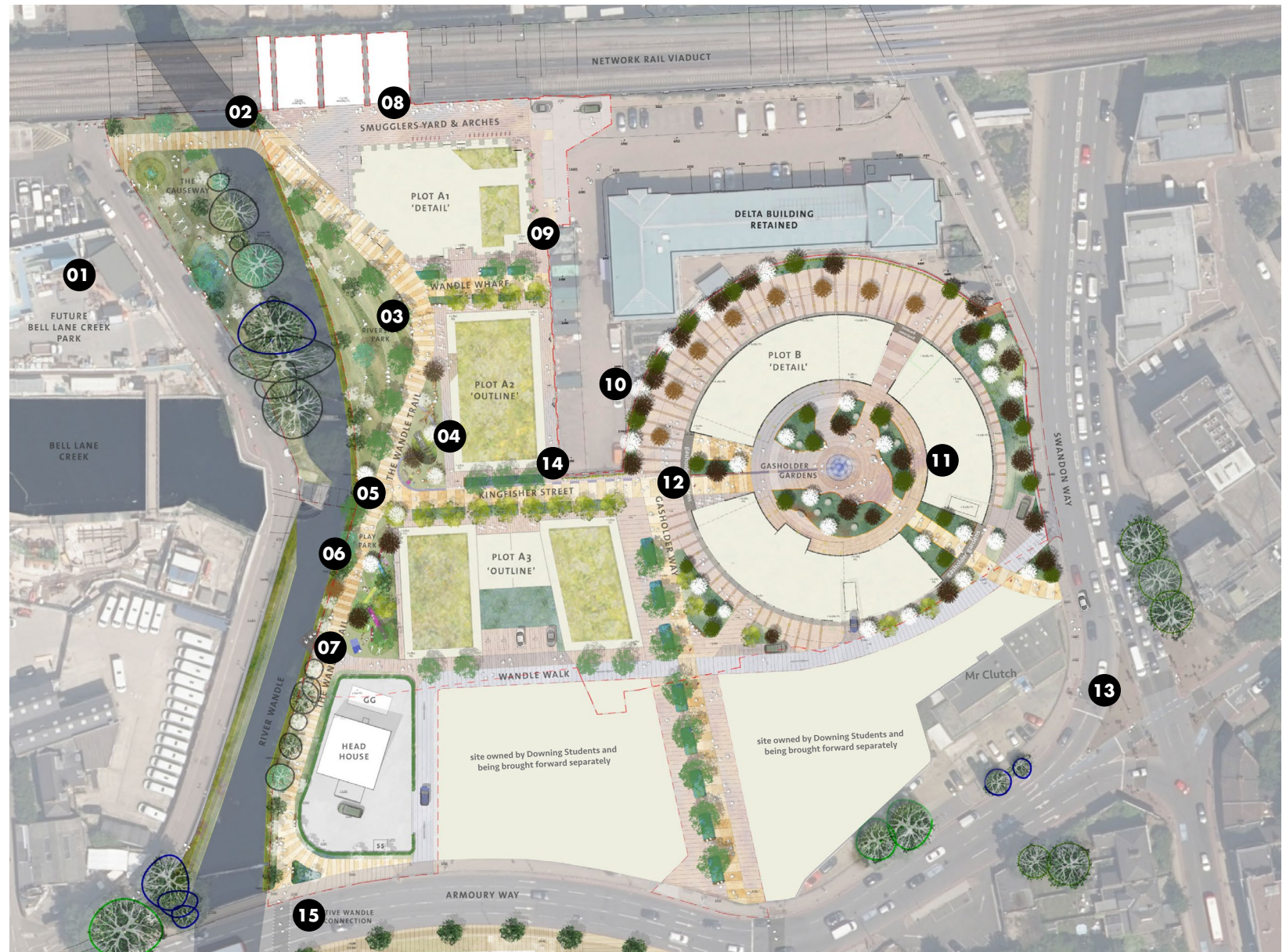
new riverside park

## WE'RE PLANNING TO GREEN THIS BROWNFIELD SITE BY:

- PLANTING LOADS OF TREES (170+)
- CREATING A NEW RIVER FOOTPATH FOR THE PUBLIC (200M)
- NATURALISING AND GREENING THE RIVER BANKS (370M)
- CREATING NEW LARGE AREAS OF BIODIVERSE HABITATS ON A SITE WHICH CURRENTLY HAS LITTLE IN THE WAY OF BIODIVERSITY (6,500M<sup>2</sup>)
- USING RAIN GARDENS AND OTHER SUDS FEATURES TO CONTROL SURFACE WATER ON THE SITE (350M<sup>2</sup>)

# the emerging masterplan

- 01 future bell lane creek park
- 02 new footbridge
- 03 large west facing public park
- 04 new play space and seating
- 05 improved biodiversity
- 06 river wandle
- 07 200m of accessible riverfront
- 08 reactivated rail arches
- 09 new homes and commercial spaces
- 10 sustainable urban drainage
- 11 memory of gasholder reinterpreted
- 12 pedestrian and cycle focused design
- 13 connectivity over armoury way to old york road
- 14 new community room and wc
- 15 proposed crossing on armoury way to continue wandle trail





**rail arches activated**

**new footbridge**

**west facing public park**

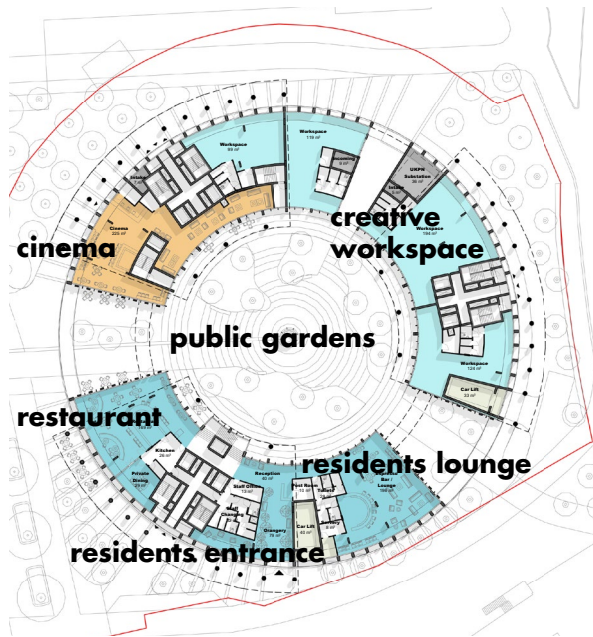
**improvements to causeway park**

**200m of accessible riverfront**

**new cafes and bars**

**new play areas and seating**





**life in the round**



**capturing the carbon from the gasholder**

**view from corner of old york road and armoury way**

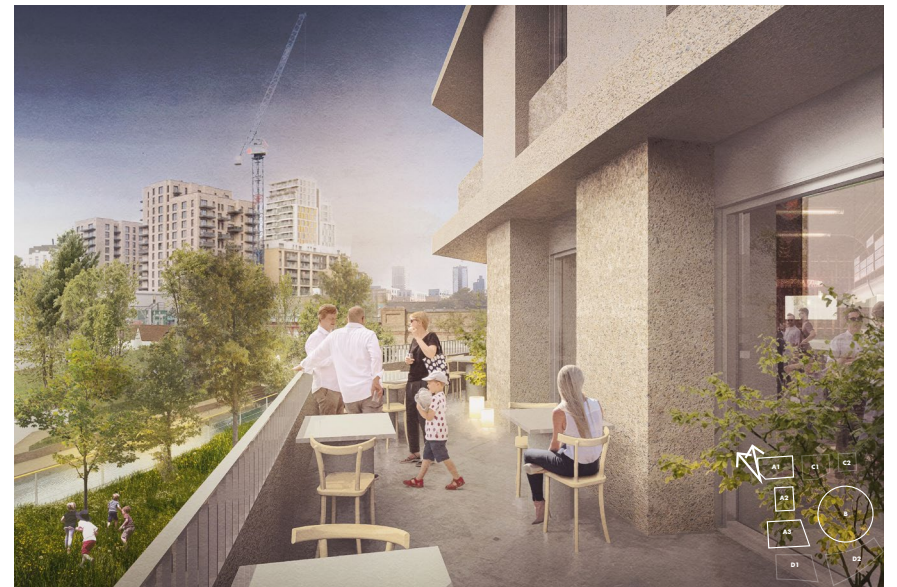




**view south from river wandle**



**new yard space by rail arches**



**public viewing terrace**



# be a part

**WE WANT TO GET THIS AS RIGHT AS WE CAN. NOT EVERYONE WILL LIKE EVERYTHING THAT WE ARE PROPOSING, AND SUCCESSFUL PLACE MAKING IS ALL ABOUT BALANCE - NORMALLY TO DO WITH CREATING ENOUGH VALUE TO PAY FOR THE PUBLIC BENEFITS. WE WOULD REALLY LIKE TO KNOW WHETHER YOU THINK WE'VE GOT THE BALANCE RIGHT, OR CLOSE TO - OR IF YOU THINK WE'RE WAY OFF. NO FEEDBACK IS BAD FEEDBACK.**



## Local Plan Review

### Consultation on the Publication Draft Local Plan

10 January to 28 February 2022

#### RESPONSE FORM

The Council is inviting comments over a seven-week period on the Publication version of the Local Plan.

The Draft Local Plan sets out a vision and spatial strategy to guide the development of the borough from 2023, when the Plan is anticipated to be adopted, to 2038. It sets out key objectives for the borough, which are supported by planning policies, area strategies, and – at the smallest scale – detailed guidance for the development of specific sites. Collectively, these identify where development should be targeted and set out how the borough's neighbourhoods and places will change over the next 15 years.

This consultation is the final opportunity to comment on the Local Plan before it is submitted to the Secretary of State for independent 'examination in public'. At this stage in the plan-making process, in accordance with the national guidance, consultation responses should focus on whether the Local Plan has been developed in compliance with the relevant legal and procedural requirements, including the duty to cooperate, and with the 'soundness' of the Plan. Further detail on these concepts is provided in the accompanying guidance notes provided at the end of the form.

#### How to respond

Please read the consultation documents and other background information made available on the Local Plan website: <http://www.wandsworth.gov.uk/draft-local-plan-publication>

You can respond by completing this form, either electronically using Word or as a print out, and sending it to the Council by:

- Email to [planningpolicy@wandsworth.gov.uk](mailto:planningpolicy@wandsworth.gov.uk)
- Post to Planning Policy and Design, Environment and Community Services, Town Hall, Wandsworth High Street, Wandsworth, SW18 2PU.

Alternatively, you can also make comments on the draft Local Plan online via our Consultation Portal, which is accessible at the website listed above.

All responses must be received by **11.59pm on Monday 28 February 2022**. The consultation is open to everyone; however please note that responses will not be treated as confidential and those submitted anonymously will not be accepted.



Part A: Personal Details		
	1. Personal details*	2. Agent's details (if applicable)
Title	C/O Agent	Mr
First name	C/O Agent	Freddie
Last name	C/O Agent	Clarke
Job title (where relevant)		Planner
Organisation (where relevant)	Workspace PLC	Avison Young
Address		65 Gresham Street London
Postcode		EC2V 7NQ
Telephone		██████████
E-mail address		████████████████████

\*If an agent is appointed, please complete only the title, name and organisation boxes for the respondent and complete the full contact details for the agent.

Part B: About You...		
3. Please tell us about yourself or who you are responding on behalf of.		
Do you live in the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Do you work in the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Do you run a business in the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Are you a student in the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Are you a visitor to the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

#### Data protection

Information provided in this form will be used fairly and lawfully and the Council will not knowingly do anything which may lead to a breach of the General Data Protection Regulation (GDPR) (2018).

All responses will be held by the London Borough of Wandsworth. They will be handled in accordance with the General Data Protection Regulation (GDPR) (2018). Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details like address, phone number or email address will be removed.

For further details regarding your privacy please see the Council's information published at:  
[www.wandsworth.gov.uk/privacy](http://www.wandsworth.gov.uk/privacy)

<b>Part C: Your Response</b>		
<b>4. Do you consider the Local Plan is:</b>		
4.1 Legally compliant	Yes <input type="checkbox"/>	No <input type="checkbox"/>
4.2 Sound	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
4.3 Complies with the duty to co-operate	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Further information on these terms is included within the accompanying guidance note, which can be found at the end of the response form.		
<b>If you have entered 'No' to 4.2, please continue with Q5. Otherwise, please go to Q6.</b>		
<b>5. Do you think the Local Plan is <u>unsound</u> because it is <u>not</u>:</b> <i>(Please tick all that apply)</i>		
5.1 Positively prepared	<input checked="" type="checkbox"/>	
5.2 Justified	<input checked="" type="checkbox"/>	
5.3 Effective	<input checked="" type="checkbox"/>	
5.4 Consistent with national policy	<input type="checkbox"/>	
<b>6. Please give details of why you think the Local Plan is not legally compliant and/or is unsound and/or fails to comply with the duty to co-operate.</b>		
<p><b>Please make it clear which consultation document your comments relate to and, where applicable, please include the relevant policy name/number, the site allocation name/reference, the Policies Map change, and/or the paragraph number. Please be as precise as possible.</b></p> <p><b>If you wish to provide comments in support of the legal compliance and/or soundness of the Local Plan, or its compliance with the duty to co-operate, please use this box to set out your comments.</b></p> <p><i>Please note your response should provide succinctly all the information, evidence and supporting information necessary to support / justify the response. After this stage, further submission will only be at the request of the Inspector, based on the matters and issues they identify for examination.</i></p>		
Please refer to the submitted reps.		
<i>Please continue on a separate sheet / expand the box if necessary.</i>		

**7. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, when considering any legal compliance or soundness matter you have identified at 5 above.**

**Please note that non-compliance with the duty to co-operate is incapable of modification at examination.**

**You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

*Please note your response should provide succinctly all the information, evidence and supporting information necessary to support / justify the suggested change. After this stage, further submission will only be at the request of the Inspector, based on the matters and issues they identify for examination.*

Please refer to the submitted reps.

*Please continue on a separate sheet / expand the box if necessary.*

**8. If you are seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? (Please tick box as appropriate)**

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

**9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

To discuss the proposed amendments to the draft allocations as set out in our reps, subject to further changes made prior to the hearings.

*Please continue on a separate sheet / expand the box if necessary.*

**If you are not on our consultation database and you respond to this consultation, your details will be added to the database. This allows us to contact you with updates on the progression of the Local Plan and other planning policy documents.**

If you do not wish to be added to our database or you would like your details to be removed, then please tick this box.

Signature:

Freddie Clarke

*For electronic responses a typed signature is acceptable.*

Date:

28/02/2022





## Local Plan Publication Consultation

### Guidance Notes to accompany the Representation Form

#### Introduction

1. The plan has been published by the Local Planning Authority [LPA] in order for representations to be made on it before it is submitted for examination by a Planning Inspector. The Planning and Compulsory Purchase Act 2004, as amended [PCPA] states that the purpose of the examination is to consider whether the plan complies with the relevant legal requirements, including the duty to co-operate, and is sound. The Inspector will consider all representations on the plan that are made within the period set by the LPA.

2. To ensure an effective and fair examination, it is important that the Inspector and all other participants in the examination process are able to know who has made representations on the plan. The LPA will therefore ensure that the names of those making representations can be made available (including publication on the LPA's website) and taken into account by the Inspector.

#### Legal Compliance

3. You should consider the following before making a representation on legal compliance:

- The plan should be included in the LPA's current Local Development Scheme [LDS] and the key stages set out in the LDS should have been followed. The LDS is effectively a programme of work prepared by the LPA, setting out the plans it proposes to produce. It will set out the key stages in the production of any plans which the LPA proposes to bring forward for examination.
- The process of community involvement for the plan in question should be in general accordance with the LPA's Statement of Community Involvement [SCI] (where one exists). The SCI sets out the LPA's strategy for involving the community in the preparation and revision of plans and the consideration of planning applications.
- The LPA is required to provide a Sustainability Appraisal [SA] report when it publishes a plan. This should identify the process by which SA has been carried out, and the baseline information used to inform the process and the outcomes of that process. SA is a tool for assessing the extent to which the plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.
- The plan should be in general conformity with the London Plan.
- The plan should comply with all other relevant requirements of the PCPA and the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended [the Regulations].

#### Duty to Co-operate

4. You should consider the following before making a representation on compliance with the duty to co-operate:

- Section 33A of the PCPA requires the LPA to engage constructively, actively and on an ongoing basis with neighbouring authorities and certain other bodies over strategic matters during the preparation of the plan. The LPA will be expected to provide evidence of how they have complied with the duty.
- Non-compliance with the duty to co-operate cannot be rectified after the submission of the plan. Therefore, the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector cannot recommend adoption of the plan.

## Soundness

**5.** The tests of soundness are set out in paragraph 35 of the National Planning Policy Framework (NPPF). Plans are sound if they are:

- Positively prepared – providing a strategy which, as a minimum seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring authorities is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective - deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the NPPF.

**6.** If you think the content of the plan is not sound because it does not include a policy on a particular issue, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy (or the London Plan)? If so, does not need to be included?
- Is the issue with which you are concerned already covered by another policy in this plan?
- If the policy is not covered elsewhere, in what way is the plan unsound without the policy?
- If the plan is unsound without the policy, what should the policy say?

## General advice

**7.** If you wish to make a representation seeking a modification to the plan or part of the plan you should set out clearly in what way you consider the plan or part of the plan is legally non-compliant or unsound, having regard as appropriate to the soundness criteria in paragraph 5 above. Your representation should be supported by evidence wherever possible. It will be helpful if you also say precisely how you think the plan should be modified.

**8.** You should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification. You should not assume that you will have a further opportunity to make submissions. Any further submissions after the plan has been submitted for examination may only be made if invited by the Inspector, based on the matters and issues he or she identifies.

**9.** Where groups or individuals share a common view on the plan, it would be helpful if they would make a single representation which represents that view, rather a large number of separate representations repeating the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

**10.** Please consider carefully how you would like your representation to be dealt with in the examination: whether you are content to rely on your written representation, or whether you wish to take part in hearing session(s). Only representors who are seeking a change to the plan have a right to be heard at the hearing session(s), if they so request. In considering this, please note that written and oral representations carry the same weight and will be given equal consideration in the examination process.