

JD/AC/P7120
26 October 2022

London Borough of Wandsworth
C/O Banks Solutions
80 Lavinia Way
East Preston
West Sussex
BN16 1DD

Via Email: bankssolutionsuk@gmail.com

Dear Sir/Madam,

**Examination of the Wandsworth Local Plan (November 2022)
Hearing Statement submitted on behalf of Downing
Main Matters 3, 13 and 16**

This Hearing Statement has been prepared by Rolfe Judd Planning on behalf of the Downing in reference to the hearing sessions for the examination of the Wandsworth local Plan (“WLP”) which are due to commence on the 15th November 2022.

The Statement principally responds to the following matters set out within the Inspector’s Matters, Issues and Questions (“MIQs”) for Examination:

- **Main Matter 3:** Wandsworth Town (Policies PM2, WT1 to WT22)
- **Main Matter 13:** Achieving High Quality Places (Policy LP1 – LP9)
- **Main Matter 16:** Providing Housing (Policies LP23 to LP32)

We understand that LB Wandsworth will be providing a response to all of the questions raised. Our response is intended to provide additional clarity/information to particular questions within Matters 3, 13 and 16.

This Statement builds on the previous representations submitted on behalf of Downing to the earlier rounds of public consultation on the emerging Wandsworth Local Plan. Downing have a significant interest in the Site Allocation WT4: Gasholder Cluster, in particular the land at 2 Armoury Way, SW18 1SH (“the site”) at the southern end of the site allocation. These representations principally focused on the following matters in relation to the site:

- **Policy LP4:** Tall and Mid-rise buildings
- **Site Allocation WT4:** Gasholder Cluster
- **Policy LP28:** Purpose Built Student Accommodation

The Local Plan Publication version will directly influence and impact the future development of this site and as such are keen to discuss the impact of the policies with the Council to ensure these are

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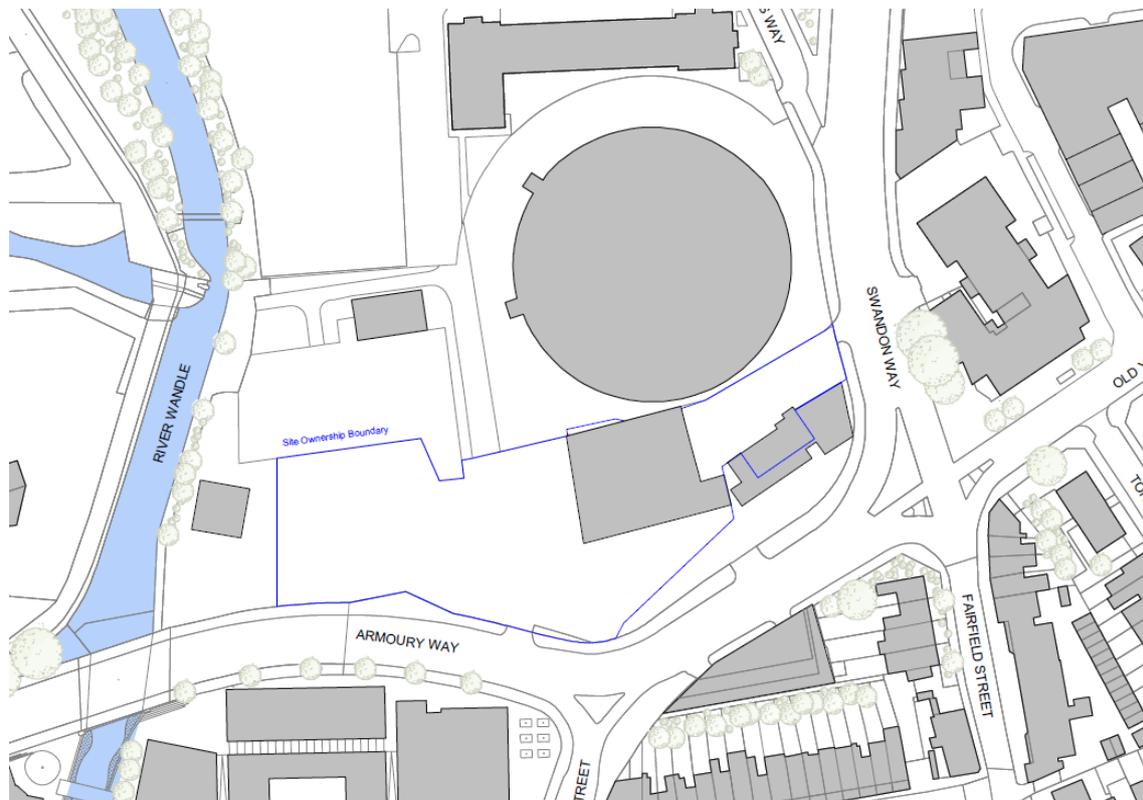
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appropriate to the area. Downing are currently exploring development options for the site, and have been in pre-application discussions with the London Borough of Wandsworth.

For ease, the site (known as 2 Armoury Way) within the ownership of Downing is outlined below in blue:



Statements and Attendance

Appended to this letter are the Statements relating to the three matters.

We look forward to the opportunity to attend the EiP and discuss these matters further at the forthcoming hearing sessions on Matters 3, 13 and 16 in November 2022

Should you have any questions, please do not hesitate to contact the undersigned.

Yours faithfully

Jan Donovan

For and on behalf of
Rolfe Judd Planning Limited

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Matter 3: Wandsworth Town (Policies PM2, WT1 to WT22)

- **Question 1:** *Is the area strategy and are the site allocation policies for Wandsworth Town justified by appropriate available evidence, having regard to national guidance, local context, and are they in 'general conformity' with the LP?*

The Site at 2 Armoury Way is located within Site Allocation WT4 (Gasholder Site).

The site allocation recognises the significance of the site for comprehensive redevelopment to bring forward a mix of uses including residential and intensified economic uses to support Policy PM2. Overall, Downing are supportive of the inclusion of the Site Allocation WT4 within the Local Plan Publication Version and Downing are committed to continue working with the Council and the adjoining landowners in developing a masterplan for the cluster and deliver the overall aims for the allocation. However, the proposed amendments to the site allocation are not considered to be justified.

Height

Site allocation WT4 locates the site within a 'tall building zone' in Appendix 2 and is therefore considered suitable for tall buildings, subject to addressing the requirements of Policy LP4. However, the Allocation WT4 sets a maximum appropriate height range of 7 to 10 storeys in this zone, with taller buildings anticipated centrally on the allocated site.

The height range imposed by this site allocation and the tall building maps (Appendix 2) are considered to be unduly restrictive and unfounded and will not support the Council's other aspirations for this site. The height range of 7-10 storeys as a maximum would not be in line with the other developments coming forward in the immediate area, including the 36 storey tower immediately south of the site within the Ram Brewery and the Gasholder site to the north.

The suggested maximum heights are grossly underestimating the potential of this site and the investment required to remediate these contaminated industrial sites for redevelopment whilst delivering the significant number of benefits the Council require for the wider site allocation, including public open space, pedestrian routes, river frontage improvements, gyratory realignment- all of which will reduce the developable land to fund and or facilitate these site benefits. . The aspirations for this site allocation coupled with the maximum appropriate height range places a significant financial burden on the proposed developments and there is no evidence to state this has been subject to financial viability testing. It is considered that these sites will not come forward for redevelopment and deliver the aspirations of the allocation unless higher densities than currently suggested can be supported. The policies set out in this plan should be applied flexibly to ensure that the site is viable and deliverable in the context of the significant decontamination, enabling and remediation costs associated with bringing the site forward. These constraints are recognised within the Wandle Masterplan SPD and should therefore be referenced in the Allocation WT4 for soundness.

The allocation states that the height of developments within the tall building zone should not exceed the heights of, and be in accordance with, the tall building maps in Appendix 2. Whilst it is appropriate for policy to establish locations for tall buildings for each area within the tall building zone, this should not be an absolute maximum as this allows very little flexibility for a design-led contextual response to site development, and buildings higher than the draft 'appropriate height range' should not automatically be considered inappropriate.

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It is also noted within Policy PM2: Wandsworth Town that developments in the area of the Wandsworth Gyratory will be required to provide funding, land or complementary measures to support its implementation. Map 4.1 outlines the area for 'potential land required for the realignment of the Wandsworth one-way system'. This area would potentially take away a significant portion of the southern element of Downing's site (2 Armoury Way). We do not consider that it is viable to deliver the significant public benefits the site allocation requires (notwithstanding the significant remedial work to bring this industrial site forward) without increasing the height and density of this site.

Paragraph 125 of the NPPF states that plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate.

Overall, we do not consider that the Site Allocation provided proper justification for the building heights specified and fails to optimise a large brownfield site which is capable of bringing forward residential development in a highly accessible location, contrary to national policy.

- **Question 2:** *Do the housing land site allocations in Wandsworth Town show how they will contribute to the achievement of the WLP's overall housing requirement of at least 20311 new homes and its timescale for delivery?*

Policy PM2(B) states that Wandsworth Town has capacity to provide 3,079 homes by 2032/2033 over the first 10 years of the Plan period to help meet the borough's housing target. This figure varies from the capacity stated in Policy SDS1 'Spatial Development Strategy' which states that Wandsworth Town has capacity for 3,510 new homes.

Notwithstanding the erroneous housing targets stated across the policy wording for Wandsworth Town Area, it is unclear how these capacities have been derived and what the indicative site capacity is for Site WT4, and what density has been applied.

The Armoury Way site has a PTAL of 5 which indicates a good level of accessibility to public transport, reflective of the site's location in Wandsworth Town Centre and proximity to Wandsworth Town station (5 minutes' walk). The site is also one of the only major and available developable sites in Wandsworth Town Centre and represents a key allocation for supporting the Borough's housing and economic needs during the plan period. When drafting local plans, Council's are encouraged to set a range of densities that reflect the accessibility and potential of different areas (Para 125 of the NPPF). In this case, the Council's own evidence base document (Urban Design Study (2021)), identifies the site as having 'low sensitivity' and a high 'probability of change' for development coming forward. It is therefore considered that the allocation should encourage higher site capacities on the site, as evidence would suggest that the site is capable of accommodating high density development.

The appropriate density of a site should be arrived at through a design-led approach, taking account of the site context and infrastructure capacity. The Wandle Delta Masterplan SPD indicates a density of 481 homes (177 dwellings per hectare) across buildings at 4-10 storeys, which is not considered to be reflective of the development potential evidenced in the Council's Urban Design Study.

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Downing seek the promotion of increased housing capacity for Allocation WT4 to better support the overall intentions and strategy for Wandsworth Town, to better contribute to the overall WLP's housing targets.

Further, whilst Downing support the Site Allocation requiring a mix of residential uses on the site, further confirmation within the Local Plan is required to ensure all types of residential can be provided. The London Plan recognises that Purpose Built Student Accommodation (PBSA), build to rent, and large-scale purpose-built housing/co-living and specialist older housing all contribute to the Boroughs and wider London to deliver a variety of accommodation to meet local and strategic needs. The completion of new PBSA therefore contributes to London's overall housing need and is not in addition to this need (Paragraph 4.15.1 of the London Plan). It is therefore considered that the Site Allocation should explicitly state that all types of residential would be supported.

Recommendation

The allocation should:

1. Amend section 4.46 "Context" of Allocation WT4 to recognise the significant financial constraints the redevelopment of this former industrial site will incur, which will result in significant densities for the site allocation area to come forward and deliver the public benefits.
2. Amend section 4.5.1 "Building Heights" of Allocation WT4 to remove reference to *maximum* building heights and instead acknowledge that heights should be developed in broad accordance with Policy LP4.
3. Amend the wording to reference the opportunity for increased site capacities to deliver higher density residential development.
4. Amend the wording so that the residential uses on the site can include all types of residential accommodation including PBSA, Build to Rent, Older Living and Large-Scale Purpose Built Accommodation/Co-living.