



1. Introduction

- 1.1. Savills has been instructed by Promontoria Battersea Limited (PBL) to prepare this statement and participate in the forthcoming examination of the London Borough of Wandsworth (the LBW) Local Plan.
- 1.2. PBL exchanged contracts to purchase 1 Battersea Bridge Road ('the site') in 2021, an unallocated site within the Ransomes Dock Area of Focal Activity, with the aim of bringing it forward for residential-led mixed-use redevelopment. The site is a significantly under-utilised office building that is not built for modern use. The building occupies a highly sustainable, well-located site and therefore presents an excellent opportunity to help the LBW deliver a number of policy ambitions, in particular making a significant contribution towards market and affordable housing.
- 1.3. We understand that the Inspectors are not assessing the merits of omission sites as part of this Examination process. As such, reference made to the site in this hearing statement seeks to demonstrate, by example, the deficiencies of the Draft Plan's evidence base, concluding that the Draft Local Plan is not sound.¹
- 1.4. This statement seeks to respond to Matter 2 (Spatial Development Strategy) which queries whether the Spatial Development Strategy 2023 - 2038 for the LBW is justified by appropriate available evidence, having regard to national guidance, and local context, including the London Plan. Specifically, this statement will address the following Inspectors questions:
 - ***Is Wandsworth's spatial strategy and the distribution of development as set out in Policies SDS1 and PM1 (Area Strategy and Site Allocations Compliance) supported by robust and up to date evidence and otherwise soundly based?***
 - ***In setting a minimum requirement of 20,311 new homes for the plan period 2023 – 2038, does WLP Policy SDS1 make adequate provision to meet Wandsworth's housing needs and does the plan clearly set out a delivery trajectory that is achievable?***

¹ See PBL's Matter 1 Hearing Statement.

2. Executive Summary

2.1. This statement outlines why the Spatial Development Strategy and housing delivery target of 20,311 homes over the plan period, as outlined in Draft Policy SDS1, is **unsound** on the following grounds:

- The housing delivery target of 20,311 homes cited in Draft Policy SDS1 represents a significant shortfall against the objectively assessed local housing need figure (LHNF, 2020) of 2,537 homes per annum or 45,666 homes between 2019 and 2037, as set out in the LBW's Local Housing Needs Assessment² (LHNA, 2020). As such, the Draft Local Plan:
 - Does not accord with paragraph 35 (a) of the NPPF which states that plans should be positively prepared and provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs;
 - Conflicts with the recommendation made in the LHNA which states that *"The Council should consider its objectively assessed need for housing to be 2,537 dwellings per annum and seek to meet this as much as possible."*; and
 - By simply adopting the London Plan housing target, the Draft Local Plan has no regard to the fact that a review of the London Plan should be undertaken at the earliest opportunity where all identified housing need is not being met to ensure the plan in place reflects current national policy (as noted in the letter written to Mayor of London from the then Secretary of State for Housing, Communities and Local Government, James Brokenshire, dated 27 July 2018³).
- The methodology used to determine the supply of deliverable and sustainable land across the borough, and in turn inform the Draft Local Plan housing delivery target of 20,311, fails to recognise the development potential of well-connected, brownfield sites, such as 1 Battersea Bridge Road, to deliver much needed market and affordable housing. It therefore conflicts with the London Plan which emphasises and encourages optimising brownfield sites in sustainable locations through a design-led approach. As such, the Draft Local Plan does not accord with paragraph 35 (a) and (d) of the NPPF in that it is neither positively prepared or consistent with national planning policy.
- When read as a whole, the Draft Local Plan effectively sterilises the development potential of 1 Battersea Bridge Road by:
 1. Not positively planning for housing growth;
 2. Not properly considering the site against LBW's own Site Allocations Methodology; and
 3. Including a tall buildings policy (LP4) which renders any redevelopment of the site unviable⁴.

² Wandsworth Local Housing Needs Assessment (December 2020).

https://www.wandsworth.gov.uk/media/8015/local_housing_needs_assessment_december_2020.pdf

³ Letter to Mayor of London from the then Secretary of State for Housing, Communities and Local Government, James Brokenshire (dated 27 July 2018)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/730327/20180727_Letter_from_Secretary_of_State_to_the_Mayor_of_London_on_the_London_Plan_and_the_NPPF.pdf

⁴ See Representation submitted on behalf of PBL in respect of Matter 13.

2.2. For the reasons set out above, we consider the Draft Local Plan to be **unsound**.⁵

3. Main Representation

Policy SDS1 – Spatial Development Strategy 2023-2038

3.1. Draft Policy SDS1 sets out the overarching Spatial Development Strategy for the Draft Local Plan that seeks to address the long-term needs of the borough, including maximising the opportunities that exist to provide new homes. It states the following:

“Within the period 2023 – 2038 the Local Plan will provide for a minimum of 20,311 new homes. This includes the provision of a minimum of 1,950 new homes per year up until 2028/2029, including on small sites.”

3.2. Draft Policy SDS1 proposes an annual housing target of 1,950 new homes until 2028/29, which aligns with the LBW’s ten year housing target of 19,500 homes identified in Table 4.1 of the London Plan. However, the Council’s own LHNA (2020), published as part of the Draft Local Plan evidence base, cites that the objectively assessed LHNF within the LBW is 2,537 homes per annum or 45,666 homes between 2019 and 2037. Whilst aligning Draft Local Plan Policy SDS1 with the ten year London Plan housing target seeks to ensure “general conformity”⁶, it has no regard to the need to undertake an early review of the London Plan given that the identified annual housing need of 66,000 homes is not being planned for. The need for such a review is highlighted in the letter written to the Mayor of London by the then Secretary of State James Brokenshire (dated 27 July 2018) which states that:

“It remains crucial however that you bring forward a revised London Plan that has regard to new national policies at the earliest opportunity. You will want to note paragraph 33 and annex 1 of the revised NPPF, which sets out that the Government expects plans to be reviewed early where all identified housing need is not being met and to ensure a plan is in place which reflects current national policy. I would therefore expect you to review the London Plan to reflect the revised National Planning Policy Framework immediately once the London Plan has been published.”

3.3. Since the publication of the London Plan in 2021, the “Planning for London Programme” has been established, which seeks to start gathering evidence, capturing the views of stakeholders and identifying the issues and options to inform a review of the London Plan. This demonstrates a clear intent to undertake a review of the London Plan in the near future. One of the key objectives of this review will be to maximise housing delivery across London and surpass the housing requirement in the London Plan 2021.

3.4. Notwithstanding the above, we understand that the LHNF figure is ‘unconstrained’ and does not necessarily reflect the extent to which the Council can meet housing need over the plan period. As such, the Council has the option to consider the plausibility of arriving at an alternative LHNF using demographic evidence and existing local and regional policy. However, the PPG states that where a plan-making authority seeks to do this, it must be justified “using robust evidence, that the figure is based on realistic assumptions of demographic growth”. The LBW’s LHNA, which forms part of the Draft Local Plan evidence base, demonstrates a clear trajectory for population growth within the LBW between now and 2037, citing the following increases by age category:

⁵ See PBL’s Matter 1 Hearing Statement.

⁶ Section 24 (1) (b) of the Planning and Compulsory Purchase Act 2004.

- Those aged 20 – 64 are forecast to increase by 44,872;
- Those aged 65 - 69 are forecast to increase by 5,920;
- Those aged 75 – 79 are forecast to increase by 3,341; and
- Those aged 85 + are forecast to increase by 2,988 people.

3.5. As such, the Draft Local Plan evidence base does not robustly justify deviating from the LNHF so significantly. In fact, it does the opposite in recommending that the Council should consider its objectively assessed need for housing to be 2,537 dwellings per annum and seek to meet this as much as possible.

3.6. As stated previously, there is a significant discrepancy between the LNHF and the housing target identified in Draft Policy SDS1 which is not supported by the Draft Local Plans evidence base and has no regard to the recommendation to meet the boroughs LNHF outlined in the LHNA. Therefore, we consider that the Draft Local Plan is **unsound** on the grounds that it is not:

- **Positively prepared** in that it does not provide a strategy which, as a minimum, seeks to meet the areas objectively assessed need;
- **Justified** in that it is not based on proportionate evidence; or
- **Effective** in that it does not plan to deliver the needs of the borough over the plan period.

3.7. In order for the Draft Local Plan to satisfy the NPPF test of soundness⁷, it should have due regard to the evidence base in seeking to meet its own identified housing need figure rather than defaulting to the London Plan 10-year housing target which is informed by an out-of-date evidence base and likely to undergo a review.

3.8. In addition to the LBW's housing delivery target being unjustifiably low, we note that a number of site allocations which have been identified as having the ability to contribute towards this target are considered to be undeliverable, as stated in some of the Regulation 19 representations submitted in respect of the Draft Local Plan.

3.9. As such, we consider that the Draft Local Plan is not only unsound on the grounds that it does not positively plan to meet housing need, but it also fails to set out an effective Policy framework to facilitate the delivery of housing on allocated sites.

Site Selection Methodology

3.10. The LHNA (2020) notes that whilst the Council should consider its objectively assessed need for housing to be 2,537 dwellings per annum and the Draft Local Plan should seek to meet this as much as possible, this is subject to there being a sufficient supply of deliverable sites identified across the Borough. In order to be consistent with the NPPF, such sites need to help meet the borough's identified development needs alongside the infrastructure required to support growth, renewal and regeneration.

3.11. As part of the Draft Local Plan's evidence base, the LBW published a Site Allocations Methodology Paper (January 2022)⁸ which outlines the process undertaken to determine the supply of land across the Borough and establish the capacity, availability and deliverability of sites. The Site Allocations Methodology Paper should robustly justify the extent to which the Borough can seek to meet their objectively assessed housing need by demonstrating the amount of land available for redevelopment over the lifetime of the Draft Local Plan.

⁷ As set out in PBL's Matter 1 Hearing Statement.

⁸ https://www.wandsworth.gov.uk/media/10144/site_allocation_assessment_methodology_paper.pdf

3.12. The Site Allocations Methodology Paper identifies 73 Site Allocations, the majority of which are located in an Area Strategy location, which includes the broader area of Wandsworth's Riverside within which the site is located. The Site Allocation Methodology is broken down into three stages, set out below:

- **Stage 1:** *The identification of 'large' sites – those over 0.25ha or with a capacity to deliver 10 or more houses;*
- **Stage 2:** *Location assessment - sites located within an Opportunity Area; Thames Policy Area; Focal Points of Activity; Town Centre; Regeneration Area or Economic Use Intensification Areas; and*
- **Stage 3:** *A qualitative assessment of sites against the following criteria:*
 - *Context;*
 - *Development Capacity;*
 - *Potential to address the Sustainability Appraisal;*
 - *Availability; and*
 - *Heritage.*

3.13. The site is not allocated for development in the Draft Local Plan. During the Regulation 18 Consultation on the Draft Local Plan in early 2021, the previous owners of the site requested that the site be allocated given that it represents an excellent redevelopment opportunity. Their representation outlined the following:

- *The site is located within the designated Area Strategy for LBW's Riverside (Policy PM9) within which a number of sites present opportunities for targeted growth;*
- *The site is located within a designated Focal Point within which residential-led development should be promoted;*
- *The site is an underutilised brownfield site in a highly prominent location adjacent to the river at a key gateway location. As such, it is a suitable location for a tall building; and*
- *The site has significant development capacity, with scope to deliver c.150 residential units and commercial uses.*

3.14. The Council did not allocate the site. Their justification is set out below.

The Glassmill, 1 Battersea Bridge Road

The site extends to approximately 0.23ha and has a PTAL of 3 which does not place it in a highly sustainable location. Due to the recency with which the existing building was developed it is considered to be unsustainable to allocate the site for redevelopment.

As well, it is considered that the Local Plan policies provide sufficient guidance if any proposals were to come forward.

The Glassmill, 1 Battersea Bridge Road does not require a site allocation.

Figure 1: Paragraphs 26, 27 and 28 of The LB of Wandsworth's Site Allocation Methodology Paper (January 2022) that forms part of the Draft Local Plan Evidence Base.

3.15. Essentially, the Draft Local Plan does not allocate the site for development on the following grounds:

- *The site is 0.23ha;*

- *The site has a PTAL of 3, meaning the Council do not consider it to be a highly sustainable location; and*
- *The recency with which the existing building was developed.*

3.16. As outlined in paragraph 1.3, we acknowledge that the Inspectors are not assessing the merits of omission sites as part of this EIP. As such, our assessment of the site below seeks to demonstrate the deficiencies in the Draft Local Plans evidence base, Site Allocation Methodology and that, when read as a whole, the Draft Local Plan is **unsound**.

3.17. In the table below, we set out our high-level assessment of the site against the LBW's Site Allocations Methodology. This demonstrates how the site satisfies all of the criteria and should therefore be allocated for development in the Draft Local Plan. It also demonstrates how the Council's reasons for not allocating the site, set out in paragraph 3.15, do not align with the Site Allocation Methodology (in particular, discounting the site due to the recency of the existing building) and are therefore unjustified.

Site Allocation Methodology Criteria	1 Battersea Bridge Road
Stage 1 – Identification of 'large' sites	The site objectively has the capacity to deliver 10 or more houses ⁹ .
Stage 2 - Location	The site is located within the Ransomes Dock area of Focal Activity.
Stage 3 – Qualitative Assessment: <ul style="list-style-type: none"> • <i>Context;</i> • <i>Development Capacity;</i> • <i>Potential to address the Sustainability Appraisal;</i> • <i>Availability; and</i> • <i>Heritage.</i> 	<p>Context (with specific reference to the Urban Design Study (UDS, 2021)):</p> <ul style="list-style-type: none"> • Page 63 of the UDS notes that some of the 1960s-70s residential developments are low-rise and provide a poor address to the riverfront. • Figure 74 of the UDS identifies the site as being located within an area of Battersea Riverside that has a low sensitivity to change with potential for targeted growth. • Policy H1 2 (a) of the London Plan states that suitable and available brownfield sites with existing or planned PTAL levels of 3-6 should be optimised for housing delivery. • 13 Site Allocations within the Draft Local Plan have a PTAL level of 3. • Not allocating the site on the grounds that it has a lower PTAL level (albeit an appropriate level according to London Plan Policy H1) reflects a binary approach to assessing the context of a site. <p>Development Capacity (according to the development capacity matrix):</p> <ul style="list-style-type: none"> • According to the map on page 10 of the UDS, the site is located in an area with lower sensitivity to change.

⁹ Statement of Consultation Regulation 18 (January 2022)

https://www.wandsworth.gov.uk/media/10152/draft_local_plan_consultation_statement_appendix_5.pdf

- The principle of a 26-storey building on the site was considered acceptable, in principle, by LBW officers during pre-application discussions with the previous owners of the site (See Appendix 1).

Potential to address the Sustainability Appraisal:

- Conserve and where appropriate enhance heritage assets and their settings, and the wider historic environment - Any proposal would be robustly tested against these criteria, with due regard to the areas heritage credentials.
- Enhance the benefits to all from biodiversity and ecosystem services and establish and retain inter-connected multifunctional green infrastructure - Any proposal would have to meet other plan policies in this regard.
- Minimise the generation of waste in accordance with the principals of the resource efficiency hierarchy – Good design would seek to achieve this.
- Minimise flood risk in the borough and elsewhere and promote the use of SuDS – Any proposal would seek to minimise flood risk and have due regard to the need to provide sustainable infrastructure.
- Provide more housing opportunities for Wandsworth residents and workers – The site presents an excellent opportunity for residential-led mixed use redevelopment to help deliver market and affordable housing.
- Ensure people have access to essential community services and facilities, including open space – The site is located within the vicinity of many local amenities with good access to Battersea Park and the riverside.
- Address Council aspirations within priority neighbourhoods – Any proposal would seek to support the Councils policy objectives of encouraging healthy and active lifestyles.
- Protect and improve public health – Any proposal would have due

	<p>regard to the councils public health objectives.</p> <ul style="list-style-type: none"> • <u>Encourage the growth of sustainable transport</u> – Any proposal would seek to encourage active travel and enhance the sustainable travel network. <p>Availability The site was acquired with the intention of timely redevelopment. PBL are in pre-application discussions with the LBW to bring forward a residential-led scheme and there are no legal or ownership impediments to prevent development coming forward on the site.</p> <p>Heritage: Figure 70 of the UDS (2021) demonstrates that, apart from the Grade II listing of Battersea Bridge, there are no listed buildings within the vicinity of the site. The listing of Battersea Bridge does not affect the suitability of the site for redevelopment.</p>
--	---

3.18. Given that the LBW has a high objectively assessed LHNF which the Draft Local Plan should seek to meet, it is unjustifiable to discount the ability of the site, an available and deliverable site with an owner who is committed to redevelopment, to help deliver that figure. As such, the site should be allocated for development within the Draft Local Plan. This modification is required, alongside other modifications set out in PBL's Hearing Statements for Matters 13, 14 and 16, if the Draft Local Plan is to be considered sound.

4. Conclusion

4.1. This Hearing Statement outlines that the Draft Local Plan is **not sound** for the following reasons:

- The Draft Local Plan sets an unjustifiably low housing target of 20,311 homes across the plan period which falls significantly short of the objectively assessed housing need;
- The Draft Local Plan fails to acknowledge the ability of the site to contribute towards the delivery of housing within the Borough, despite the site clearly satisfying the Site Allocation Methodology criteria; and
- When read as a whole, the Draft Local Plan effectively sterilises the development potential of the site by:
 1. Not positively planning for housing growth;
 2. Not properly considering the site against LBW's own Site Allocations Methodology; and
 3. Including a Tall Buildings policy (LP4) which renders any redevelopment of the site unviable. PBL's Matter 13 Statement evidences why the height caps

cited in Draft Local Plan Policy LP4 would sterilise the development potential of the site (an unallocated site). Further to this, we note that landowners of sites which are allocated within the Draft Local Plan also consider them undeliverable due to the height caps set out within Draft Policy LP4. As such, the Draft Local Plan not only fails to allocate all available sites within the Borough, but those that it does allocate are rendered undeliverable due to an unjustified and overly restrictive Draft Tall Buildings policy.



Wandsworth Council

Environment and Community Services
Department
The Town Hall
Wandsworth High Street
London SW18 2PU

David Shiels
DP9 Ltd on behalf of Lockguard Ltd
100 Pall Mall
London
SW1Y 5NQ

Please ask for/reply to: Thomas Wilson
Telephone: 020 8871 6000
Direct Line: 020 8871 7646
Email: twilson@wandsworth.gov.uk
Web: www.wandsworth.gov.uk

Our ref: WD\2018\ENQ\00812
Date: 09/11/2018

Dear Mr Shiels,

PRE-APPLICATION ADVICE – The Glassmill 1 Battersea Bridge Road SW11 3BZ

Thank you for your pre-application request received on 25th September 2018. In accordance with the below policies and guidance this letter will advise you on the acceptability of the works you propose to carry out at the above property in order to aid the submission of any future planning application. The advice has been based on the drawings received and the meeting held at the Council's offices.

Site:

The Glassmill is a part five-storey, part six-storey building located on the east side of Battersea Bridge Road. The building was built in the 1980's and its glazed curtain wall façade is typical of that era.

The main access to the building is provided from a stepped entrance on Battersea Bridge Road. There is a basement level car park that is accessed from a private road to the rear that connects with Hester Road.

The site is bound to the north by the River Thames and to the rear by Hester Road and the Royal College of Art. A five-storey residential building is situated to the immediate east, with the nine-storey Albion Riverside Building situated beyond.

The property is not listed, nor is it located within a Conservation Area, although it is located adjacent to Battersea Bridge which is a Grade II Listed Building.

Relevant planning history:

Bridge House Wharf, Battersea Bridge Road/Hester Road
1981 (81/N/2441): p.p. for erection of mixed development comprising 3810sq.m offices and 17 flats.

The Glassmill

1995 (95/N/0477): p.p. for use of part of fifth floor as a dental surgery (Class D1).
2004 (2004/3608): appeal allowed for installation of telecommunications equipment on the roof of the building, comprising six panel antennae, four dish antennae, and an equipment cabinet.
2007 (2007/0722): p.p. for alterations to entrance on Battersea Bridge Road frontage replacing revolving doors with swing doors, and construction of access ramp.

2014 (2014/4843): p.p. for replacement of four existing plant units to the roof with six new units and associated acoustic screen.

2018 (2018/1212): Approved determination as to whether prior approval is required for change of use from offices on first, second, third, fourth and fifth floors (Class B1(a)) to residential (Class C3) to provide 13 x 1-bedroom, 14 x 2-bedroom, 1 x 3-bedroom and 1 x 4-bedroom flats with associated basement bin/cycle storage and 23 parking spaces.

2018 (2018/1311): Approved determination as to whether prior approval is required for change of use from offices on first, second, third and fourth floors (Class B1(a)) to residential (Class C3) to provide 13 x 1-bedroom, 14 x 2-bedroom and 1 x 3-bedroom flats with associated basement bin/cycle storage and 23 parking spaces.

Albion Wharf Hester Road SW11 – Now No. 6 Hester Road

Erection of a six-storey building to provide 585 sq.m. of retail floorspace on the ground floor, and 45 residential flats (affordable housing units) on the upper floors.

Constraints:

Flood Zone 2: Medium flood risk zone

Flood Zone 3a: High flood risk zone - 1 in 100 or greater probability of flooding each year

Wandsworth Thames Policy Area

Ransome's Dock Focal Point of Activity

Archaeological Priority Area

Proposal:

The pre-application enquiry is for the following:

- Erection of 26-storey building (north block) fronting the River Thames and Battersea Bridge Road and 8-storey building (south block) fronting Hester Road and Battersea Bridge Road with a potential 6-storey addition. There are two design options for the north block that incorporate different recesses to the lower storeys (tiered or a consistent stagger).
- The two blocks would be above a podium that due to the change in levels would appear as a single-storey fronting the river and two-storeys fronting Hester Road.
- Lower ground floor level to comprise plant and car park with a commercial unit fronting Hester Road
- Ground level podium and the remaining 7-storeys within the south block would be in commercial use totalling a GIA of 3,500sq.m, 4,140sq.m when including the additional 6-storey element.
- The north block above podium level would be in residential use comprising 115 residential units of which 40 (35%) would be affordable.
- The main entrances would be off Battersea Bridge Road. Access to the car park would be at the rear via the existing service road.
- Public realm improvements to the riverfront and Battersea Bridge Road.

Planning policy:

National Planning Policy Framework (2018)

London Plan (2016) Draft 2017

Core Strategy (2016)

PL2 – Flood risk; PL6 – Meeting the needs of the local economy; PL9 – River Thames and the riverside; IS1 – Sustainable Development; IS2 – Sustainable design, low carbon development and renewable energy; IS3 – Good quality design and townscape; IS4 – Protecting and enhancing environmental quality; IS7 – Planning obligations

Development Management Policies Document (2016)

DMS1 – Sustainable urban design; DMS2 – Managing the historic environment; DMS3 – Sustainable design and low-carbon energy; DMS4 – Tall buildings; DMS5 – Flood risk management; DMS6 – Sustainable Drainage Systems; DMI3 – Thames Policy Area; DMI4 – Provision of flexible employment floorspace; DMH3 - Unit mix in new housing; DMH4 - Residential development including conversions; DMH6 - Residential space standards; DMH7 - Residential gardens and amenity space; DMH8 - Implementation of affordable housing; DMTS14 Offices; DMO5 – Trees; DMO8 – Focal points of activity; DMT1 – Transportation impacts; DMT2 – Parking and Servicing;

Planning Obligations SPD (2015)

Refuse and Recyclables in Development SPD (2014)

Housing SPD (2016)

Employment and Industry Document (EID) (proposed submission version March 2017)

Comments:

The main material planning considerations to the proposal are listed below:

- Principle of development;
- Housing Mix
- Design and Layout
- Neighbours' amenity;
- Future Occupants
- Highways, transportation and waste;
- Waste and Refuse
- Flood risk and Sustainable urban drainage systems (SUDS);
- Environmental health (noise, air quality and contaminated land);
- Sustainability;
- Archaeology;
- Impacts on the heliport;
- Planning obligations.

Principle of the proposed land use

Spatial strategy

The site is within the Ransome's Dock Focal Point and Thames Policy Area where mixed use development with appropriate Town Centre uses will be encouraged.

The site is identified in the wider Area Spatial Strategy for Ransome's Dock, although does not have a site specific allocation.

Within the Site Specific Allocations Document (2016) the site is part of the Ransomes Dock Area Spatial Strategy, the relevant considerations from this are:

- This area has been identified for a wider mixture of uses, including restaurants cafes, bars and small-scale retail uses and the provision of attractive public spaces with good access to them.
- There is scope to develop a vibrant riverside quarter with the dock as the focus of the area.
- Improved system of public routes through the area.
- Achieve a high quality of design and landscaping
- Create a safe environment which is accessible to people with disabilities

- The area is sensitive to tall buildings. Buildings that front the River Thames are considered tall at 9-storeys and above.

The SSAD acknowledges that redevelopment to include residential use is acceptable in principle, and policy DMI3 states that residential development will be appropriate in the Thames Policy Area as part of a mixed use development.

Both the adopted plan and the emerging EID protect offices for change of use in the Thames Policy Area (DMI3 adopted plan) and in Focal Points (EI2 of the EID), requiring there to be no net loss of office floorspace in redevelopments. The submitted plans show a re-provision of the existing office space, which would therefore meet this objective and enhance the overall acceptability of the proposal. Were the development not to meet this requirement the Council would take a view as to the weight they would afford the option to implement the prior approval to convert most of the existing building from offices to residential use.

Policy EI4 requires development of more than 1000sq.m of economic floorspace to either provide a proportion of office floorspace at affordable rent in perpetuity, or an element of managed workspace that minimise overhead and upfront investment costs.

Policy EI4 supports workspace for specialist sectors, notably cultural workspace. Within the locality there are already a number of innovative and creative businesses including the RCA (Royal College of Art), Vivienne Westwood Studios, Foster and Partners offices, commercial galleries and a photographic studio.

The nearby RCA currently runs a successful start-up business programme. Prospering businesses from this programme will inevitably need to expand and move-on to larger premises. The proposal offers an attractive opportunity to provide the next step for these businesses. You are encouraged to contact the RCA to explore the likely needs of these businesses and tailor the office space accordingly. Any new office floorspace should be high quality as set out in EI5.

Within Focal Points the amount of retail Class A1 space is limited to 300sq.m. This amount is likely to have already been reached given the presence of the Co-op on Battersea Bridge Road and Bayley & Sage on Parkgate Road. The provision of any A1 retail is therefore discouraged. A restaurant/café fronting the riverside (Class A3) would be acceptable and would help activate that part of the river walk. Battersea Bridge Road should have an active frontage or frontage demonstrating activity.

Design and Layout

Mass and height

The site lies within the area spatial strategy for Ransome's Dock. The trigger point for a tall building assessment is 9-storeys within the site, which the 26-storey north block would meet. The presence of a tall building would require the proposal to address the 15 criteria under policy DMS 4/4a, as justification for the height of the building in this area.

The existing building is a dated 1980's office block clad in reflective glass and with a significant amount of unattractive visual clutter at roof level. The building detracts from the setting of the listed bridge and the Battersea Bridge Road streetscene. The

proposal offers an opportunity to replace it with a building of much greater architectural quality.

During the pre-app discussions the massing of the building has evolved and shifted. It was generally agreed that the site should contain two blocks with a taller element fronting the river and a reduced height facing Hester Road and Battersea Bridge Road.

A tall building in this location next to Battersea Bridge - a gateway to the borough - would act as a landmark and reference point. This location is therefore considered appropriate for a tall building.

The proposed 26-storey height of the building is significant in the existing context, with the tallest building at 11-storeys (Albion Wharf). It is noted within the wider context there are taller buildings, notably the Montevetro Building and Chelsea Waterfront opposite.

The configuration of the site ensures that when viewed head-on the building would retain a slender profile. It is considered necessary to explore 'sliming-down' the taller building along the Battersea Bridge Road elevation so that it has a narrower profile. At present it is considered broad, which combined with the proposed height and given the prominent location and the surrounding roofscape context would result in massing which would accentuate the tall building.

The smaller south block is considered appropriate in scale and mass. The building would be reasonably wide so would need to be visually broken up through appropriate articulation.

Battersea Bridge is listed and therefore its setting is a consideration, given the close proximity of the proposal site.

Section 66 of the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990 states: "In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."

The setting of the listed bridge is currently diminished by the presence of the existing building. The proposed building, even with greater height than the existing, if well designed together with an enhanced public realm could improve the setting of the bridge. If the proposals were found to cause harm to the listed building or any other heritage asset, then the degree would lie within the less than substantial spectrum and would need to be weighed against the public benefits of the proposal in accordance with the relevant NPPF tests.

In order for a building of this scale in this location to be supported and meet the objectives of DMS4, it would need to be of the highest design quality, deliver significant planning benefit that is commensurate to its scope and nature, re-provide the existing amount of commercial floorspace, and provide affordable housing in accordance with the Mayors 'Fast Track Route'.

A potential benefit the proposal could deliver would be improvements to access to the river walk in front of the Glassmill Building. This section is convoluted and simplifying and enhancing the layout should be explored as a potential public benefit. Activating

the river frontage and Battersea Bridge Road frontage would enhance the public realm. The Battersea Bridge Road frontage needs careful consideration when managing the changing levels.

Affordable Housing

London Plan Policy 3.12 seeks the maximum reasonable amount of affordable housing to be provided. The Mayor's Affordable Housing and Viability SPG has now been adopted (August 2017) and this establishes a minimum London threshold level of 35% affordable housing (without grant) with an overall strategic target of 50%. Wandsworth requires viability testing for less than 50%.

In the event that a less than 50%, tenure compliant scheme is presented a full viability report will need to be submitted to the Council and this will need to be independently assessed by a viability consultant at a cost to the applicant.

Details of the affordable housing offer should be fully discussed with the Council and the Council's preferred Registered Providers prior to submission of any application.

Housing Mix

It should be noted that the mix should comprise of no more than 20% one-bedroom units (5% for one-person/studio) and at least 5% three-bedroom units, although this can be applied flexibly in light of individual site circumstances, including location, site constraints, sustainable design, the need to provide mixed and balanced communities, viability and the availability of public subsidy.

If affordable housing is offered, then the unit mix for the different tenures can be found within Table 3.1 within Policy DMH3.

Neighbour Amenity

As a result of the proposed building heights, there could be potential loss of sunlight / daylight and overshadowing experienced at neighbouring properties. A daylight / sunlight and overshadowing assessment would need to be provided, and the results would be a material consideration for assessing any proposals for a tall building at the site. Both VSC and NSL tests in accordance with BRE guidelines should be undertaken along with sunlight impacts to neighbours.

The development of the south portion of the site would likely result in significant harm to the daylight and outlook of the east facing windows of the residential units within No. 6 Hester Road, which serve living rooms. It is therefore suggested that the option that extends over the south portion of the site is not progressed further.

Given the separation distances and the presence of the existing building, it is unlikely that the additional mass of the building would cause harm to the outlook of the No. 6 Hester Road units.

It is thought that the Thameswalk Apartments are orientated to face the river with the rear windows serving corridors.

Future occupants of residential accommodation

Policies DMS1, DMH4, DMH6, DMH7 and the Housing SPD set out the Council's requirements for new housing. All proposed dwellings would need to meet the floor areas required by the Nationally Described Space Standards for the range of dwellings

proposed. Furthermore, the room sizes and ceiling heights will need to comply with the Nationally Described Space Standards.

A daylight report will demonstrate the residential accommodation would meet ADF requirements.

The residential units should be dual aspect and only single aspect north facing rooms should be avoided.

Each one and two bedroom unit would ordinarily require a minimum 10sqm of private amenity space and a 3+ bedroom unit would require 15sqm of private amenity space. The London plan requires balconies and terraces to have minimum depths of 1.5m. Shortfalls in dedicated private amenity space due to architectural detailing purposes can be compensated through a suitably sized, sited and landscaped communal space.

Both roofs of the buildings present possibilities to be used as roof terraces. The South Block would appear to have sufficient space to accommodate a play area.

Highways and Transportation

The PTAL is 3 and car parking provision is low. Further details are needed about car parking / disabled and EVCP provision, cycle parking and provision for deliveries / refuse collection.

It is recommended that you contact TfL as Battersea Bridge Road is on the TfL network.

Any application will require a Transport Assessment, Travel Plan, Delivery and Servicing Plan, Construction Management Plan and Car Park Management Plan.

Waste and Refuse

You are advised to read the Council's Refuse and Recyclables in Development SPD and ensure sufficient waste storage is provided within the site for all the residential and commercial units.

Key points to note for residential units:

- Developments with 5 or more flats are required to use communal wheeled bins of at least 660 litres, wheeled bins smaller than this will not be serviced. This is also preferable for developments with three or four flats, although they can use ordinary dustbins where it is not practicable.
- At least 150 litres refuse capacity plus 70 litres for mixed recycling per flat must be provided.
- Collection vehicles must be able to wait legally within 10m of the wheeled bin locations and within 25m for dustbins.
- An allowance of 150mm is recommended between bins / bins and walls etc.

It is advised that you calculate the likely volume of commercial waste arising based on the British Standard for waste management in buildings and propose refuse & recycling storage capacity and collection frequencies on that basis.

Flood risk and Sustainable urban drainage systems (SUDS)

As the site is in flood zones 2 and 3a, a detailed flood risk assessment would be required, which would be subject to consultation with the Environment Agency. The relevant criteria as set out in policy DMS5 of the local plan would need to be met.

SuDS should be provided in accordance with policy DMS6.

Environmental health (noise, air quality and contaminated land)

The applicant's attention is drawn to policies DMS1 and IS4 as well as relevant national and London-specific guidance such as the Mayor's Guidance 'The Control of Dust and Emissions during Construction and Demolition' SPG.

Draft London Plan Policy SI1 'Improving air quality' and London Plan policies 5.3 and 7.14 aim to ensure that new developments are designed and built to improve local air quality and reduce the extent to which the public are exposed to poor air quality. The development is located in an area where it is understood that air quality limits are being exceeded and therefore appropriate mitigation measures should be included.

Further advice from the Council's Environmental Health officers should be sought in relation to the noise and air quality environment on Battersea Bridge Road.

Sustainability

The proposal will need to be designed in accordance with the sustainability standards contained in policies IS2, DMS3 or such equivalent standards that replace them, as well as policy 5.2 of the London Plan.

Any application would need to be accompanied by a preliminary assessment report demonstrating how the relevant standards will be met. Design-stage and post-construction reviews will generally be required by conditions.

The possibility of future proofing the development with the capacity to connect to a future heating network should be explored.

The NPPF requires local authorities to support the move to low carbon futures by planning for new development which reduces greenhouse gas emissions; actively support energy efficiency improvements to existing buildings and expect new developments to attempt to minimise energy consumption through landform, layout, building orientation, massing and landscaping.

Core Strategy policy IS1 covers sustainable development including mitigating and adapting to climate change and promoting a sustainable relationship between development and transport. Policy IS2 covers sustainable design, low carbon development and renewable energy.

Policy DMS3 of the DMPD provides direction regarding information requirements to demonstrate compliance with the Core Strategy Policies.

The emission reduction targets set in the London Plan for major developments are zero carbon (as set out in Policy 5.2 of the London Plan and Standard 35 of the Mayor's Housing SPG) for residential development and 35% below Part L 2013 for commercial development. Minor residential development should achieve a 19% carbon dioxide reduction. For major residential development at least a 35 per cent reduction in regulated carbon dioxide emissions (beyond Part L 2013) should be on-site. The remaining regulated carbon dioxide emissions, to 100 per cent, are to be off-set through a cash in lieu contribution. The Council is currently considering the approach to implementing the London Plan zero carbon and carbon offsetting policy.

The residential development should achieve a maximum water use of 105 litres per person per day (plus 5 litres for outside use) in line with the Water Efficiency Calculator for new dwellings from the Department of Communities and Local Government.

In regard to the commercial element of the proposal, DMPD policy DMS3 requires that this element of the proposal meets BREEAM rating Excellent until the end of 2018 or Outstanding at the beginning of 2019 and onwards.

The applicant is encouraged to explore energy saving measures as well as incorporating a range of renewable energy sources within the development.

In any future application, Climate Integrated Solutions (CIS) (the Council's external sustainability consultants) would be consulted and require a fee to be paid by the applicant.

Archaeology

As the site lies within an archaeological priority area, the applicant is encouraged to engage with Historic England's Greater London Archaeological Advisory Service (GLAAS).

In accordance with policy DMS2 of the local plan, any application will need a desk-based archaeological assessment and may also require field evaluation. The recording and publication of results will be required and in appropriate cases, the Council may also require preservation in situ, or excavation.

Impacts on the heliport

The application site is located in an area where any development above 30m is subject to consultation with the London Heliport. The applicants are encouraged to engage with the London Heliport. Any proposals for the site would need to demonstrate that the heliport would not be adversely affected by the building height proposed.

Planning Obligations

The applicants should review the Council's Planning Obligations SPD, as any planning permission granted would be subject to obligations secured through a Section 106 agreement. These are likely to include amongst other things:

- Highways improvements
- Provision of affordable housing and workspace
- Arts and Cultural Plan or contribution
- Employment and Skills Plan and contribution
- Open Space provision or contribution
- Connection into any future district heat network.

Conclusion

The proposed development has the opportunity to replace a poor quality building with one of the highest quality to visually sign-post this gateway to the borough.

Within the proposed development appropriately sized and managed office spaces can help further regenerate this emerging cultural quarter within this part of the borough.

It is considered that the width of the taller building needs further analysis to reduce its impacts upon the roofscape and streetscene. At present, it is considered that the broad width combined with the height could give the building an overly emphasised physical

presence within its context. A more slender building would be appropriate for such a tall building in this prominent location.

Furthermore, to justify a building of such height in this location it would need to be of the highest design quality, deliver significant planning benefit including significant public realm improvements, re-provide the existing amount of commercial floorspace, and provide affordable housing in accordance with the Mayor's 'Fast Track Route'.

It is anticipated that the design and articulation of the buildings would be of the highest quality befitting of such a prominent building.

You are encouraged to seek the views of the GLA as the proposal would be referable to the Mayor, and TfL as Battersea Bridge is on the TLRN.

It would be expected that the applicants would enter into a Planning Performance Agreement with the Council prior to the submission of a formal planning application.

Submission documents

In any formal submission for planning permission you are advised to submit the following:

- Application Form & CIL Form
- Air Quality Assessment
- Air Quality Neutral Report
- Archaeological Assessment
- Contaminated Land Report
- Design & Access Statement
- Energy Statement
- Flood Risk Assessment
- Heritage Assessment
- Noise Assessment
- Planning Statement
- Statement of Community Involvement
- Sunlight/Daylight Assessment
- Sustainability Statement
- Tall Building Assessment
- Transport Assessment
- Travel Plan

The Mayor of London's CIL charge in Wandsworth is £50/sqm of internal floorspace. Wandsworth's own CIL came into operation on 1st November 2012 with the rate being £250/sqm of additional internal residential floorspace, in addition to the Mayor's charge. Further details about CIL are available from the CIL team at cil@wandsworth.gov.uk.

I trust this letter clarifies the position of the Council with regard to your proposal. The information provided is an overview of your proposal and the observations and comments contained in this letter are for general guidance purposes only and are not binding on the Council. I would like to make it clear that the observation and guidance contained in this letter are primarily Officer's views and in order for planning permission to be granted, any subsequent application may need to gain the approval of the Planning Applications Committee. The information contained within this letter is valid for the period of one year. Any substantial changes to the proposal would also affect

the relevance of this letter. The issues raised within the body of this letter are not an exhaustive list and other unforeseen issues may arise during the assessment of any future application.

Yours sincerely,

Thomas Wilson

Senior Planning Officer
for Assistant Director of Planning and Development