

AC/P08029
27 October 2022

London Borough of Wandsworth
C/O Banks Solutions
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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 Peabody and Mount Anvil Ltd
Main Matters 5 and 13

This Hearing Statement has been prepared by Rolfe Judd Planning on behalf of Peabody and Mount Anvil Ltd 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 5** – Clapham Junction and York Road/Winstanley Regeneration Area (Policies PM4, CJ1 to CJ7)
- **Main Matter 13:** Achieving High Quality Places (Policy LP1 – LP9)

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 for Main Matters 5 and 13.

This Statement builds on the previous representations submitted on behalf of Peabody and Mount Anvil Ltd to the earlier rounds of public consultation on the emerging Wandsworth Local Plan. This hearing statement is written with specific reference to Site Allocation CJ6: Peabody Estate, St John's Hill, which was included as a site allocation in the WLP through Regulation 18 consultation submissions.

The site currently benefits from an extant planning permission approved in January 2019 (LPA ref: 2017/5837). Overall, the development scheme involves the construction of five new buildings up to 12 storeys in height, providing a total of 599 residential units (284 private and 315 affordable units), 530 sqm of community space, and 569 sqm of commercial space.

A planning application was however submitted under Section 73 in December 2022 (LPA ref:

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2021/5678) and is pending approval from the LPA following a resolution to grant at planning committee in April 2022. The minor material amendments primarily involved changes to Phase 3 of the approved development, including an uplift of 59 units, minor adjustments to building massing and design, alterations to play space and landscape design, servicing arrangements, cycle parking and provision of plant.

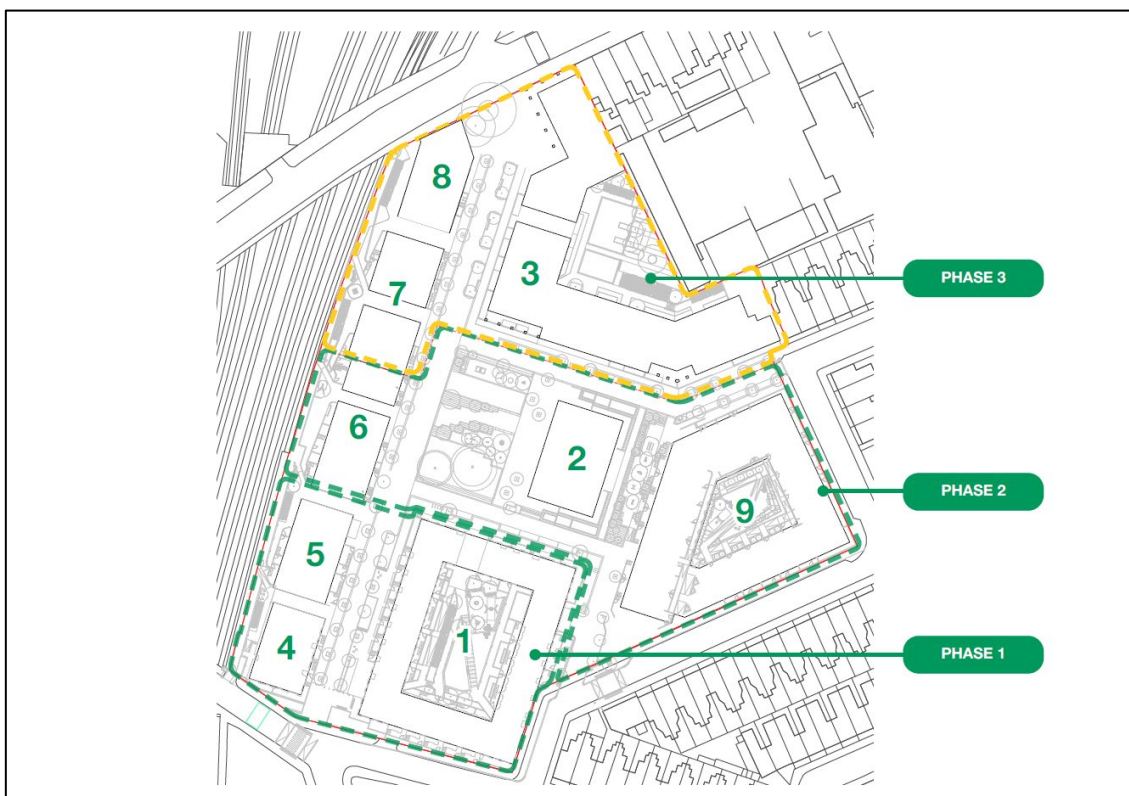
Peabody own and manage the Peabody Estate and have brought Mount Anvil on as a joint venture partner to help deliver the final phase of the development (Phase 3). This hearing statement is therefore made on behalf of this joint partnership.

The previous representations principally focused on the following matters in relation to the site:

- **Tall Buildings Zone**
- **Policy LP4:** Tall and Mid-rise buildings
- **Site Allocation CJ6:** Peabody Estate, St John's Hill
- **Town Centre Boundary**

Although planning permission has already been approved to deliver high density residential development with supporting commercial and community uses on the site, construction of Phase 3 has not yet started (Phase 2 currently under construction), which is due to deliver a number of significant benefits for the site.

For ease, the Peabody Estate site (Site Allocation CJ6) and the relevant development phasing is outlined below:



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Summary of Statements

Appended to this letter are the Statements responding to the Inspector's questions on Main Matters 5 and 13 as it relates to Site Allocation CJ6 'Peabody Estate'.

It is intended for these statements to be tabled as written representations during the forthcoming hearing sessions on the Examination in Public of the Wandsworth Local Plan in relation to Matters 5 and 13 in November 2022.

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

Yours faithfully



For and on behalf of
Rolfe Judd Planning Limited

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Main Matter 5: Clapham Junction and York Road/Winstanley Regeneration Area (Policies PM4, CJ1 to CJ7)

- **Question 1:** *Is the area strategy and are the site allocation policies for Clapham Junction and York Road/Winstanley Regeneration Area justified by appropriate available evidence, having regard to national guidance, local context, and are they in 'general conformity' with the LP?*

The site has been given the Site Allocation CJ6 "Peabody Estate, St John's Hill". Peabody and Mount Anvil are supportive of the re-inclusion of this site allocation in the Local Plan Publication Version and are committed to continue working with the Council to deliver the overall aims for the allocation.

Paragraph 6.74 - Uses

Peabody and Mount Anvil support the recognition of the site allocation to deliver a mix of residential units as part of a higher density development to the north of the site, with mixed-use development fronting St John's Hill frontage. This is consistent with the current Site Specific Allocation 64 under the adopted Local Plan, and reflects the current development scheme being considered by the LPA (ref: 2021/5678).

The allocation refers to "retail units" anticipated at ground floor fronting St John's Hill. This does not provide the flexibility envisaged for these spaces to respond to the needs of the community and is not consistent with the range of uses permitted by the extant permission (including former Use Classes A1-5 and B1), nor is it reflective of the sites inclusion within the Clapham Junction Town Centre, which envisages a range of appropriate Town Centre Uses.

The Council's Site Allocations Methodology Paper acknowledges the location of the site in the Town Centre, and therefore it is unclear where the justification is to limit the proposed uses to retail only, particularly considering the inclusion of retail within the wider Use Class E which allows for a wide range of commercial uses. The London Plan further encourages a diverse range of uses within Town Centre locations.

It is therefore sought that this wording is amended to "commercial units" to enable a wider range of appropriate Town Centre Uses, in alignment with the extant permission and the site's location in the Town Centre.

Paragraph 6.80 – Building Heights

Peabody and Mount Anvil support inclusion of the site within the Tall Building Zone TB-B5-02 as the site is characteristically suitable for tall buildings due to its highly sustainable and accessible location, its position on a strategic route and within the Clapham Junction Town Centre.

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. Appendix 2 sets out an 'appropriate height' range in terms of number of storeys (7 to 12 storeys) and in metres above ground level (21-36m). For the subject site, the height in metres is very specific and does not allow for any flexibility for the height to exceed this, even if complying with the number of storeys. For instance, the approved planning permission for the site (reference 2017/5837) includes a 12 storey building (Plot 7) which has a building parapet height of 38.9m, with roof plant to 41.1m above ground

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level.

The inclusion of a height range in metres is overly onerous and provides very little flexibility in the building design, particularly with regards to floor-to-floor heights, and the inclusion of plant and servicing, or lift overruns. Specification of the appropriate number of storeys is considered to be sufficient to guide development in these Tall Building Zones, which is consistent with the London Plan.

We therefore seek for the appropriate height range of “21-36m” to be struck from Appendix 2 Tall Building Zone TB-B5-02. This has been reiterated in the hearing statement for Main Matter 13.

Recommendation

The allocation should:

1. Amend section 6.74 “Uses” of Allocation CJ6 as follows:
 - **Uses:** The street block fronting on to St John’s Hill should include a mixed-use development with ~~individual retail units to~~ commercial uses at ground floor.
2. Amend Appendix 2 Tall Building Zone TB-B5-02 to remove reference to the maximum above ground height “21-36m” for the Peabody Estate.