

AC/P08029  
27 October 2022

London Borough of Wandsworth  
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**Via Email:** [bankssolutionsuk@gmail.com](mailto: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 15<sup>th</sup> 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.

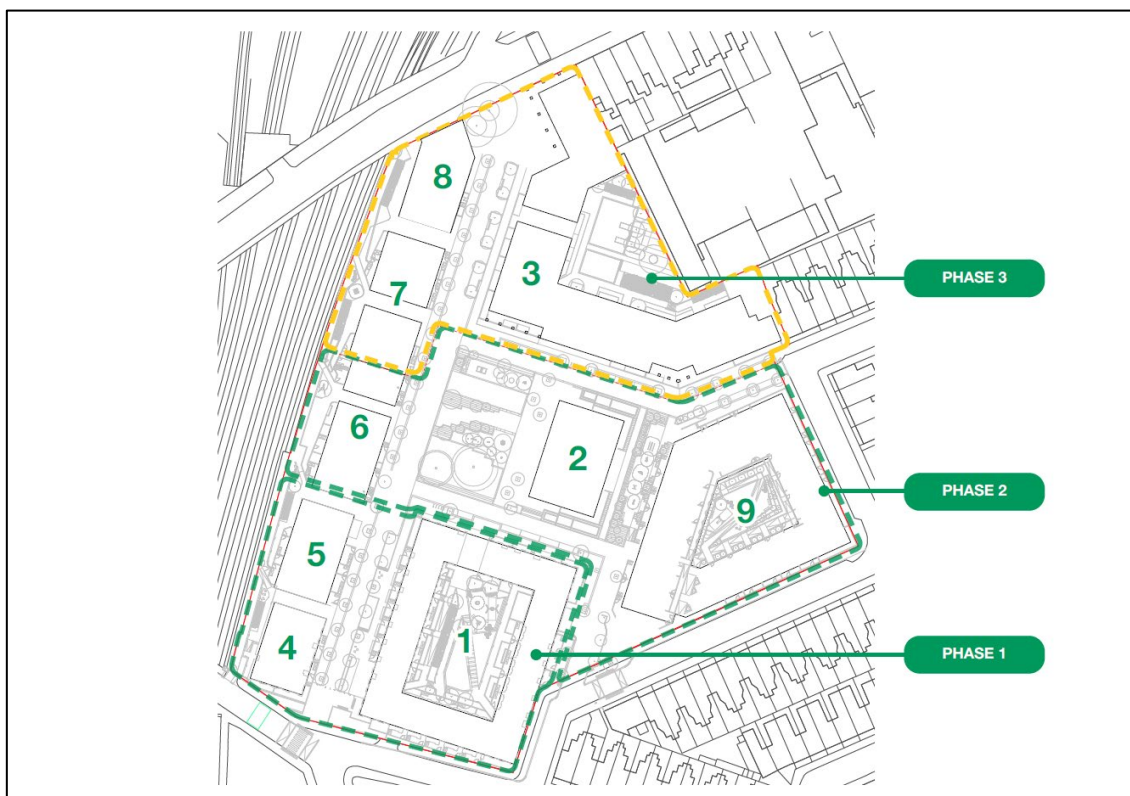
Peabody own and manage the Peabody Estate and have brought Mount Anvil on as a joint venture partner to help deliver the final phase of the development (Phase 3). This hearing statement is therefore made on behalf of this joint partnership.

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 13: Achieving High Quality Places (Policy LP1 – LP9)**

- **Question 2: Policy LP4 (Tall Buildings) - Is the policy consistent with Policy D9 of the London Plan?**

The site is located within the Tall Building Zone (TB-B5-02) which indicates appropriate heights of 7-12 storeys or 21-36m. Peabody and Mount Anvil support the inclusion of the site within the tall buildings zone, however the maximum height in metres above ground.

Policy LP4 sets out the criteria for the appropriateness of tall buildings and the areas for which tall buildings are considered to be appropriate (Appendix 2). The Policy specifically states that proposals for tall buildings will only be appropriate in identified zones and they will be assessed against the criteria set out in Part B. Part D states that buildings should not exceed the appropriate height range identified for each of the tall building zones.

Appendix 2 sets out an 'appropriate height' range in terms of both number of storeys and in metres above ground level. It is considered that a maximum 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 Peabody Estate 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 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 strongly recommend that Wandsworth amend Policy LP4 and Appendix 2 to remove reference to building heights in metres to allow for flexibility in design development.

**Recommendation**

Amendments sought as follows:

1. Remove reference to building heights in metres (above ground) from Tall Building Zones (Appendix 2).