

Wandsworth Council

**Stage One Urban Design Statement
– Tall Buildings**

September 2009

**Prepared as part of the Evidence Base for the
Wandsworth Core Strategy by the Wandsworth Planning Service**

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Introduction

- 1.1 Best practice guidance published by English Heritage (EH) and Commission for Architecture and the Built Environment (CABE) advises that local authorities should carry out a detailed urban design study to inform the process of identifying locations where tall buildings would and would not be appropriate. Wandsworth's approach has been to formulate the Core Strategy policy for tall buildings on the basis of a high level urban design analysis.
- 1.2 By reason of the strategic level of the study, broad areas or 'nodes' have been identified as potentially being appropriate for tall buildings. Exact boundaries have not as yet been identified, nor have appropriate heights been established. Not all sites within these broad areas will necessarily be suited to a tall building. More detailed work will follow in the Stage Two Urban Design Statement as part of the preparation of the Development Management Policies Document (DMPD) and the Site Specific Allocations Document (SSAD). This will further test and refine the assessment of those areas where tall buildings may be appropriate, providing locational guidance for tall building development within these broad locations. This work will feed into the identification of sites which may be suitable for tall buildings in the SSAD. The Stage Two study will also set out guidance and application checklists to raise the standard of tall building development in Wandsworth. This will guide policy to be included in the DMPD and will relate to matters such as form, massing, design quality, sustainability, visual impact and the relationship with the transport network. The Stage Two study will also consider the prevailing height of development in the rest of the borough, i.e. where tall buildings are likely to be inappropriate, in order to determine what will be considered a 'tall building' in different contexts.
- 1.3 The Council has drawn on a range of urban design material in drafting the Core Strategy policy on tall buildings, including, but not exclusively, those that refer specifically to locations that may be appropriate for tall buildings. The purpose of this report is to clarify the relevant information that was used to inform the policy identifying firstly areas where tall buildings will not be appropriate, and secondly those areas where tall buildings may be appropriate, subject to more detailed consideration. Due to the nature of the analysis, some documents will be referred to in both sections as they provide commentary in relation to where tall buildings both may and may not be appropriate.
- 1.4 The documents that have helped to inform the Council's approach come in various forms. Some of them, such as the Development Briefs for Ransome's Dock and Brewhouse Street, cover specific sites; some, such as the Conservation Area Character Appraisals cover specific geographic locales; the Urban Design Framework for the Wandle Delta covers the extensive hinterland between Wandsworth Town Centre

and the river; the Riverside Design Guide covers the entire 8km sweep of the borough's river Thames frontage and adjacent sites; the Guidance on Important Local Views covers the whole of the borough.

- 1.5 Each of these studies either establishes the genesis of a specific element of Core Strategy Policy relating to where and in what circumstances tall buildings may be considered appropriate, or contributes to the characterisation and urban design analysis of the borough that underpins the overall rationale, which is that generally throughout Wandsworth, tall buildings are unlikely to be considered appropriate.
- 1.6 This report sets out an extended summary of the documents, describing how their content has influenced the Council's approach. The summary also shows how the documents relate to the topics of study identified in CABE/EH guidance (at paragraph 2.7 of the EH/CABE guidance). The report concludes with comment on the Core Strategy approach, including recommended amendments to the Core Strategy policy, and notes further detailed work to be carried out as part of the preparation of the DMPD and SSAD.

Wandsworth's Vision for Tall Buildings

- 1.7 Tall buildings have always played a role in the townscape of Wandsworth. From the earliest times, buildings with community significance, such as churches, and more especially in Victorian and Edwardian times, schools, town halls and libraries, have always been larger and more imposing than the houses whose residents they served. Most of these early tall buildings survive within the borough and many are now listed buildings.
- 1.8 Town centres such as Wandsworth and Clapham Junction evolved historically as the natural location for buildings of community significance. At first religious buildings such as All Saints Church were pre-eminent architecturally. Then later civic buildings, such as the former Battersea Town Hall (Battersea Arts Centre) and commercial buildings, such as the Arding & Hobbs department store, aspired to be the most significant buildings locally, with public houses making up in exuberance what they lacked in sheer size. More recently, the office blocks in Upper Richmond Road, and even residential buildings, such as those above and adjacent to the Southside (Arndale) shopping centre, began to rival and overtake them, in terms of size, if not in terms of architectural distinction. The term "iconic" is over-used in arguments about tall buildings. It is still considered relevant to the visual and functional character of town centres, where it is national policy to concentrate large-scale shopping, commercial, civic and recreational activity, at least some of which will be within architecturally ambitious buildings. For reasons set out below, Wandsworth believes that some of these town centre ambitions may be met by tall buildings.

- 1.9 In the 1950s, 1960s and 1970s tall residential blocks were promoted as the solution to solving the housing problem by providing large numbers of homes set within generous open space. Some of these (the slab and point blocks of the Alton Estates) are now Grade II and II* listed buildings within a conservation area, being recognised as exemplars of their time. Some of these, such as much of the high-rise housing in Battersea are not so highly regarded. The latest generation of taller buildings has evolved along the riverside, within the Thames Policy Area.
- 1.10 While acknowledging the role these tall buildings played in their time, Wandsworth's view is that tall buildings are not now to be considered the universally applicable model for new high density housing initiatives, or the provision of large-scale offices or other commercial floorspace. Tall buildings will have a part to play in the future of the borough's contribution to the life of London, but usually as part of mixed use schemes and only where they can demonstrate a suitably positive balance between impacts and benefits, at least proportionate to their visual and functional prominence.
- 1.11 The areas that have been identified as having the most potential for tall buildings are those where regeneration objectives require high intensity development to provide infrastructure improvements. There are major transport infrastructure objectives at Wandsworth and Clapham Junction town centres. Only large-scale development is considered likely to provide the scale of investment needed to achieve these objectives. Both centres lack open space of civic scale and significance. Characteristically, tall buildings have the potential to release site area for public realm benefits, while still achieving the high intensity.
- 1.12 It is for these reasons that the vision for tall buildings does not completely rule them out in these town centres, even though they are also important conservation areas. In fact part of the essential character of these areas, worthy of conservation, is the richness and diversity of building types, ages and styles, including some of the biggest, most ambitious schemes.
- 1.13 Tall buildings in the areas identified can be considered positive as they have the potential to provide the investment that is vital to support existing businesses and generate new ones, maintain historic fabric and create good quality new buildings and spaces. Any harmful impacts may be acceptable where they are limited rather than widespread and the benefits created outweigh the costs.
- 1.14 In terms of the defining visual character of the borough, Wandsworth will continue to place the greatest emphasis on the traditional family housing with gardens in tree-lined streets that characterises so much of the borough. By selecting a limited number of well-defined areas where tall buildings may bring an acceptable balance of positive change, a

clear message is being sent that tall buildings are not considered appropriate across the great majority of the borough. Where existing tall buildings impinge on areas not identified as suitable for tall buildings in the current LDF Policies and Urban design Guidance, the simple existence of such buildings will not give them the status of exemplars. Wherever opportunities arise for unsuitable tall buildings to be replaced by lower development, these will be fully investigated.

Part I - Safeguarding the Borough's Existing Special Quality

Historic Environment Characterisation

- 2.1 The Planning Service has built up a comprehensive, detailed understanding of the character of the borough of Wandsworth based on a thorough knowledge of the historic development of the centres of settlement and their associated civic and religious functions, commerce and industry. This detailed understanding has informed firstly the Adopted Unitary Development Plan (UDP) and subsequently, taking account of the EH/CABE Guidance and the London Plan, the Core Strategy policies for places and the overall policy for the location of tall buildings.
- 2.2 There is a wide range of material published on the Planning Service website that explicitly sets out the important features of the borough, all of which emphasises that what people value about Wandsworth is its distinctive residential neighbourhoods, its historic centres and its commons and other green spaces. As stated in paragraph 1.2 of the EH/CABE Guidance, by virtue of their size and prominence, tall buildings can harm the qualities that people value about a place. In a borough like Wandsworth, where so much is characterised as pleasant, residential streets with parks and commons of metropolitan significance, tall buildings are, by definition, potentially harmful to the established character. This does not mean that tall buildings are inappropriate throughout the borough. The character of the borough presents both constraints and opportunities. It is therefore fundamental that proposals for tall buildings should be justified in terms of the positive contributions they can make, taking account of their potential adverse effects. To be acceptable, any new tall building should produce more benefits than costs to the lives of those affected by it.
- 2.3 In Wandsworth, while the costs may principally be judged in terms of visual impact, the likely benefits will principally be measured in terms of regeneration, including public realm improvements within centres of mixed use activity. Whether a building becomes an eyesore or an icon can depend as much on what it delivers at ground level and in the uses within it as what it looks like at a distance. There is often an inverse relationship between distance and impact; the closer one gets to a tall building, the more likely it is to be hidden from pedestrian-level view by closer buildings or trees and the more likely that the public realm and activity benefits delivered at the destination will be accessible. The further away one is from a tall building, the more likely that the impact on the view will seem more important to the viewer than the benefits delivered on the ground.
- 2.4 Because tall buildings impose themselves on the public perception of a place, in order that this relationship between impacts and benefits can stand a chance of being positive and acceptable, they must have public relevance within that place and deliver public benefits that outweigh

their public impact. In order to formulate, clarify and justify this high level distinction between the generality of the borough, where high buildings are considered unlikely to be appropriate, and the centres of activity, where they may be appropriate, subject to evaluation, the character of the borough has been analysed according to published guidance.

- 2.5 The CABE/EH guidance advises that an urban design study should “*take into account the historic context of the wider area through the use of historic characterisation methods.*” The chief formal source of such material arises from conservation area designation and appraisal. Conservation areas not only directly cover some 30% of the borough (Conservation areas together with Metropolitan Open Land and the River Thames account for 44% of the borough), but their identification has been based on a thorough survey and evaluation of the whole of the borough, in particular in May 1989, when a comprehensive re-survey, drawing on suggestions from all local amenity groups and local Councillors, as well as specialist planning officers, led to the designation of 10 new conservation areas and nine extensions.

Conservation Areas

- 2.6 Each of the borough’s 45 conservation areas has a Character Statement, prepared in 1998. These are now being reviewed and revised to conform to best practice guidance from English Heritage. The five year programme is now in Year 5 and there are revised Appraisals and new Management Strategies for 35 Conservation Areas. The revised documents have each been subject to Committee approval and extensive public consultation, including a public meeting.
- 2.7 Two conservation areas cover two of the most important historic centres in the borough, Clapham Junction and Wandsworth Town, both classified as Major Town Centres in the London Plan. These town centres are also well served by public transport and both have long-standing major infrastructure and regeneration objectives. These two locations were therefore identified at an early stage as having both the potential for tall buildings and a high degree of sensitivity, requiring further detailed analysis. Part II of this report deals with evidence used in determining locations which may be appropriate for tall buildings. The town centres are discussed there in further detail.
- 2.8 Appraisal of the other, predominantly residential conservation areas, has informed the general policy position, that, in the majority of the borough, tall buildings are not likely to be considered appropriate. The reasoning here has been simple, given the principles set out in the introductory paragraphs above. The public realm and infrastructure benefits of tall buildings simply will not accrue in residential areas whilst the harmful visual impact on streets of two and three storey terraced houses is self-evident.

- 2.9 In some parts of the borough, it is clear that existing, arbitrarily located, tall blocks detract from the appearance of the area without contributing anything by way of public benefit. The quality of the built environment in some locations has been eroded in a number of ways including, large-scale redevelopment which rejected traditional layouts and styles, large-scale buildings divorced from the surrounding area, and anonymous architectural styles applied regardless of context and obscuring local identity. There has been increasing public concern about these trends and a growing awareness of the need to identify and preserve important parts of the built heritage and to ensure a high quality in new development.

Listed Buildings and the Historic Development of the Borough's Distinctive Neighbourhoods

- 2.10 The conservation area character appraisals deal with relatively small, mostly residential locales. The Planning Service website pages on listed buildings¹ prepared by the Conservation, Design and Development Team not only record everything on the borough's statutory list, but also provide summaries of the historical development of its distinctive neighbourhoods, with specific reference to listed buildings for; Balham and Tooting, Battersea, Clapham Junction, Putney, Roehampton and Wandsworth. This information is summarised below and a full list of Conservation Areas is contained in Appendix 1.

Context

- 2.11 Two hundred years ago the present borough of Wandsworth did not exist, either as an administrative area, or as a place that any current resident would recognise. The land was characterised not by buildings, but by fields and woods and the natural topography of the three river valleys of the Wandle, Beverley and Falcon Brooks meandering to the River Thames. The present character of Wandsworth has only really developed over the past two centuries. The enormous growth at the end of the 19th century transformed small hamlets into town centres. Five town centres were established at Balham, Clapham Junction, Putney, Tooting and Wandsworth. More recently the industrial riverside has been undergoing immense change with the emergence of new riverside quarters.

Balham and Tooting

- 2.12 Balham and Tooting developed as settlements along the old coach route out of London to the south and west. Nos. 68-72 Upper Tooting Road are rare examples of early Georgian development, some of the earliest domestic buildings in the borough. Development only really burgeoned following the opening of railways in 1863. Balham's parish

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<http://www.wandsworth.gov.uk/Home/EnvironmentandTransport/PlanningService/Conservation/listedbuildings.htm>

church, St. Mary's, was built in 1808 whilst Tooting's St. Nicholas was re-built in 1833. St. Luke's Church in Ramsden Road was built in 1889 to serve the growing population. Other notable late 19th-century buildings include houses at 69-79 Nightingale Lane, richly decorated in terracotta, and 81-95 a classically inspired terrace with ground floor shops. Clapham South, Balham, Tooting Bec and Tooting Broadway Underground stations, all by Charles Holden, were opened following the extension of the Northern Underground Line in 1926.

Battersea and Clapham Junction

- 2.13 Battersea district grew from a few hamlets such as Battersea village and settlements along former coach routes. A church at Battersea was referred to in a Papal Bull in 1157. This church was replaced in 1775 by a new one, incorporating a stained glass window from 1630. Now listed grade I the Church of St. Mary forms the focus of the surviving remnants of Battersea Village set around Battersea Square. The bridge of 1772 was replaced by the current Battersea Bridge dating from 1890. The nearby Albert Bridge was opened in 1873. It was the development of the railways after 1840 that transformed the area with the population increasing from 6,600 in 1841 to 169,000 by 1901. Battersea Power Station by Sir Giles Gilbert Scott was built in 1932 to supply electricity to London.
- 2.14 As the railway companies built their network of lines through the 1840s, 1850s and 1860s, Clapham Junction became and remains the busiest railway interchange in the country. The Station Master's House of around 1840 and Battersea Park Railway Station of 1865 were joined by a variety of buildings that sprang up to serve the growing population including civic buildings such as the former Battersea Town Hall, now Battersea Arts Centre (grade II*) of 1892 and Battersea Reference Library built in 1924; leisure buildings, such as the Grand Theatre of 1900, the former Granada Cinema (grade II*) built in 1937 and the Falcon Hotel, a late 19th-century public house and the borough's most famous department store, Arding & Hobbs Store of 1912,

Putney

- 2.15 Putney grew up as a crossing point on the River Thames, the bridge of 1729 replacing a ferry and this was part of an old coaching route frequently used by the Royal Family on their travels to the West of England. The current Putney Bridge of 1884 by Sir Joseph Bazalgette, widened in 1933, is well-known for its boat race associations. St. Mary's Church, (grade II*) was re-built in 1836, although it retains its medieval tower and chapel. Putney expanded rapidly after the opening of the railway to Richmond in 1846 and the Underground in 1887 - the White Lion public house bears this date.

Roehampton

2.16 Roehampton emerged as a favoured residential suburb of the eighteenth and nineteenth centuries following the opening of Putney Bridge in 1729 and the development of a number of large private estates from which several of the original houses survive. Roehampton House (grade I) by Thomas Archer was built between 1710-12 and enlarged by Sir Edwin Lutyens in 1910. Parkstead House (grade I) built in 1750 for the Second Earl of Bessborough, now forms part of the University of Roehampton. Mount Clare (grade I) built in 1772 for George Clive, cousin of Lord Clive, also forms part of the University of Roehampton, along with Grove House (grade II*), built originally for Sir Joshua Vanneck in 1777. 'Capability' Brown is reputed to have laid out the grounds. Nearby Downshire House (grade II*) was built in 1770 and soon occupied by the Marquess of Downshire. Roehampton Village has retained something of its Georgian charm, best exemplified by the King's Head Inn, at the foot of Roehampton High Street and the Montague Arms, Medfield Street, both 17th century in origin. Dramatic change came to Roehampton when the London County Council built the massive Dover House Estate of the 1930s and the Alton East and West Estates of the 1950s. At Highcliffe Drive on Alton West, the LCC essentially retained the Georgian landscape and placed within it five ultra modern slab blocks: Binley, Winchfield, Dunbridge, Charcot and Denmead Houses, (all grade II*) inspired by Le Corbusier's Unite d'Habitation.

Wandsworth

2.17 Wandsworth grew up as a crossing point on the River Wandle where originally horse-drawn coaches would ply between central London and the West of England. All Saints Church (grade II*) was begun in 1630. During the 17th and 18th centuries the Huguenots settled in Wandsworth attracted by its cloth mills on the Wandle and developed a hat industry for which Wandsworth was once famous. The Old Burial Ground contains a number of listed tombs commemorating the Huguenots. Young's Brewery developed in Wandsworth due to the availability of water for brewing. Wandsworth has a selection of fine Georgian buildings, from the town houses at 1-6 Church Row (grade II*) of 1723 and 70 Wandsworth High Street, circa 1740, to the early 18th-century pair of cottages at 140-142, and the Friends' Meeting House of 1778. The Town Hall was opened in 1937 as the administrative offices of Wandsworth Borough Council and built to designs by EA Hunt.

Summary

2.18 While this represents a significant body of detailed characterisation, certainly sufficient to support a high level policy on tall buildings that is generally restrictive, it has always been recognised that fuller definition

of sites within the areas considered to have potential and the design considerations which will be central to the suitability of tall buildings in these locations will require further work, which it is intended will follow as part of the DMPD and SSAD.

Recognition and Promotion of Local Distinctiveness – Development of the UDP and Core Strategy

- 2.19 The recognition of the distinct characteristics of the borough's neighbourhoods underpins and permeates the whole of the Core Strategy. As the first Development Plan to be prepared under the title of "Spatial Planning" it is perhaps more specifically focussed and obvious in its framing and language, but essentially the Core Strategy draws on the same recognition of the value of distinctive character and heritage that was evident in the UDP and summarised in UDP Policy GEN6, which states; *"The Council will protect, conserve and enhance the existing varied character and heritage of the borough."*
- 2.20 This objective is restated in Core Strategy Policy PL1 - Attractive and distinctive neighbourhoods and regeneration initiatives, which states: *"The local distinctiveness of the various neighbourhoods which together make up the borough of Wandsworth will be promoted, building on their cherished existing character and attractiveness."*
- 2.21 The Core Policies for Places in the Core Strategy (PL 8, PL 9, PL 11, PL 12, PL 13, PL 14) and the Policy IS3 - Good quality design and townscape, all seek to recognise and promote the distinction to be made between these neighbourhoods.
- 2.22 In commenting that the London Plan Density Matrix and its characterisation of areas is "relatively coarse grained", paragraph 4.131 of the Core Strategy stresses the test of compatibility with local context. It states *"Wandsworth's approach" [is to relate] "the scale and density of development to the character of the surrounding area"*. Paragraph 4.129 comments that *"The quality of much of Wandsworth's built environment, with 45 conservation areas, many listed buildings, distinct areas that have maintained an individual character and its open spaces, are principal reasons why it is such an attractive place to live."* It goes on to stress that, as a consequence *"Conservation of existing quality and character may restrict the extent of new development opportunities"* (emphasis added) *"but to do otherwise could easily devalue the quality of the environment and this would be unsustainable"*.
- 2.23 This demonstrates clear evidence of historic characterisation and urban design analysis within the Core Strategy itself. As already stated, the policies in the Core Strategy were not produced on a fresh sheet, rather they have been produced with the benefit of an in-depth knowledge of the borough's distinctive characteristics derived from the character assessments and listed building analysis discussed above.

As this report has stressed, this is what has led to the policy position that tall buildings are unlikely to be considered appropriate in the majority of the borough.

Specific Guidance on High Buildings (Adopted UDP) - Restrictive Policy Elements – Protection of Views

- 2.24 Significant work was undertaken prior to the production of the UDP focussing on the identification of those locations where tall buildings might be appropriate and this resulted in a two-part policy, dealing with both positive and negative locational criteria.
- 2.25 Within the UDP there are three separate policies on High Buildings, Views and Skylines, including: TBE6, TBE 7 and TBE8. Policy TBE6 deals with the positive criteria, stating that “*High buildings*”....“will only be permitted” (emphasis added) “*where the site has certain characteristics*”. These will be dealt with separately, in Part II below. Policy TBE7 refers to protection of defined strategic views. The greatest level of spatially specific detail included in the UDP was on the criteria for preserving the borough’s special character. Policy TBE8 is a Wandsworth-specific exposition of the types of local views that should be protected from “material harm”, namely:
- views towards central London landmarks;
 - views towards skylines on the Wimbledon and Clapham ridges, particularly across the Wandle Valley;
 - views upstream and downstream from bridges over the River Thames and River Wandle;
 - views of listed buildings, other buildings of local interest and landmarks;
 - views of and views from the perimeters of the Commons and other areas of Metropolitan Open Land;
 - views of major areas of open space from approach roads;
 - views of historic landscapes; or
 - views along “Green Chains”.

Supplementary Planning Guidance on Important Local Views (pursuant to TBE 8)

- 2.26 All of the spatially specific policies on Important Local Views set out in TBE8 were based on an in-house analysis of the borough’s natural topography, significant views of skylines, landmark buildings and areas, (parameters now listed in the subsequent EH/CABE Guidance - paragraph 2.7). Views from Thames bridges, to and from the Commons and the Wimbledon and Clapham ridges, particularly reflect the identification of the key features that define the essential character of Wandsworth. The detailed analysis underpinning the policies was explained and illustrated both with photographs and a series of

borough-wide maps in a booklet, which was published as non-statutory 'Supplementary Planning Guidance on Important Local Views' in November 2003.

- 2.27 The study was informed by useful, comprehensive submissions by many of the borough's amenity societies who are represented on the Wandsworth (Conservation Area) Advisory Committee, (notably the Wandsworth Society and the Battersea Society). The Guidance is comprehensive in expanding on the categories of view set out in the UDP policy. Of particular note in terms of the borough's built heritage is the list of 26 Views of Listed Buildings, other buildings of local interest and landmarks. The Riverside Design Guidance also contains urban design analysis resulting in the definition of important views. As this is also central to the definition of Riverside Focal Points of Activity, this document is described in detail in Part II of this report.

London Plan Protected Views

- 2.28 The London Plan designates views which affect Wandsworth including a Linear View from King Henry VIII's Mound towards St Paul's Cathedral and River Prospects from Golden Jubilee/Hungerford Footbridges, Westminster Bridge and Waterloo Bridge towards the Palace of Westminster, a World Heritage site. The view towards St Paul's Cathedral affects minor areas of West Putney, Roehampton and Thamesfield and tall buildings are not considered appropriate in these locations. The views towards the Palace of Westminster affect the Vauxhall/Nine Elms area. The London View Management Framework SPD 2007 acknowledges that the Palace of Westminster is the single most prominent building punctuating the skyline when viewed from Hungerford Bridge. Development proposed along the river frontage must therefore respond to the character and appearance of existing buildings and should not encroach on this World Heritage site. There are several other listed buildings along the river which may limit opportunities for development.
- 2.29 The draft revised London View Management Framework SPG protects the same views which impact on the borough whilst acknowledging that new clusters of tall buildings may emerge in the Vauxhall/Nine Elms Opportunity Area, and that tall buildings proposals in this area should be designed to relate to and strengthen the composition of the emerging cluster of tall buildings. The SPG notes that these developments offer the potential opportunity to significantly improve the background townscape and skyline, and developments in this area will need to be of the highest quality. Development opportunities in the Vauxhall/Nine Elms area will however be limited by the protection of the silhouette of the Palace of Westminster.

Part II: Positive Criteria for the Location of Tall Buildings

Specific Guidance on High Buildings - Adopted UDP

- 3.1 This report has so far set out the evidence in relation to the restrictive approach to tall buildings in the majority of the borough. Part II now moves on to analysis that has been used to identify where tall buildings may be appropriate.
- 3.2 Returning to the first part of UDP Policy TBE6, this defines high buildings as “*those which significantly exceed the prevailing height of surrounding buildings*” and states that, “*High buildings will only be permitted where the site*” has one (or more) of the following positive criteria:
- a) *has a high level of public transport accessibility;*
 - b) *is at a focal point of activity;*
 - c) *has the potential to enhance existing, or create new, views and vistas.”*

TBE6 Criterion (a) High Level of Public Transport Accessibility

- 3.3 Tall buildings involve a high density which is only achievable at locations with good public transport accessibility. The standard measure of public transport accessibility is the PTAL rating, based on analysis by Transport for London. All of Wandsworth’s town centres have a high PTAL rating (level 6 or above). Criterion 4.1.4 of the EH/CABE guidance deals with the relationship to transport infrastructure and the importance of having both accessibility and capacity, due to the intensity of use that tall buildings represent.
- 3.4 Putney Wharf is also at level 6, but some of the other Riverside Focal Points of Activity are currently less well served by public transport, so the aspirations for intensity of development are either of a lesser scale or dependent on securing appropriate improvements as part of the schemes. The detail of these factors will be covered in the DMPD and the SSAD documents.
- 3.5 The Wandle Delta and Wandsworth Riverside Quarter Focal Points are benefiting from improved links to Wandsworth Town Centre, bus services and Wandsworth Town railway station, as well as specific travel plan requirements within each development (car clubs; new bus services). Major improvements to linkages are earmarked for all new development sites within the Delta.
- 3.6 Battersea Power Station Focal Point falls within the London Plan Vauxhall, Nine Elms, Battersea Opportunity Area, where major public transport infrastructure improvements are being promoted.

TBE6 Criterion (b) Focal Points of Activity – Derivation & Evolution

3.7 The detailed urban design analysis that led to the definition of the Focal Points of Activity (originally shown on Map 2 in the UDP, now shown in evolved form on Map 9, “Thames Riverside”, in the Core Strategy) is in three parts: firstly, the individual Development Briefs that were prepared for each of the locations; secondly, the comprehensive Riverside Design Guide, published in 1990; and most recently, the Urban Design Framework for the Wandle Delta, published in 1999.

Development Briefs

3.8 Development briefs were prepared for individual riverside sites where the former industrial and commercial uses had either ended or were known to be coming to an end. The detailed work on these sites, their context and their potential, has all been incorporated over time into the Council’s development plan documents. The following sites which are now identified as within Thames riverside Focal Points or Proposed Focal Points were all the subject of development briefs.

- Ransome’s Dock
- Brewhouse Street /Putney Wharf
- Shell site (Wandsworth Riverside Quarter)
- Battersea Power Station

3.9 Not every riverside site has been earmarked as a potential focal point and some that were in the UDP are not in the Core Strategy. Briefs were also written for the following riverside sites and knowledge of these sites, their potential and their context, has informed the selection of the focal points.

- Elcho Street
- Feathers Wharf
- Guinness/Charringtons site
- Riverside Wharf

3.10 While useful in feeding into broader strategies, development briefs are, by their nature, a piecemeal approach to new development. It was therefore acknowledged that a more comprehensive approach to planning for these locations was required, which led to the preparation of the riverside design guidance.

Riverside Design Guidance

3.11 In recognition that the changes in the economy and the departure of much of the old riverside uses presented both a major opportunity and a major challenge, the Council decided to produce a comprehensive Riverside Urban Design Policy. In 1990 the Council published ‘*Guidelines for Thames Riverside Development in Wandsworth*’, produced by the Borough Planner’s Conservation and Design Team.

The first section sets out a Riverside Urban Design Policy and guidelines covering:

- public access,
- layout and form,
- views,
- uses,
- building design,
- landscape and lighting; and
- conservation.

3.12 This document is included within Part II of this analysis because it specifically explains the derivation of the Riverside Focal Points of Activity. It could equally well be included in Part I for the advice it provides on the protection of important views. However, to avoid a fragmented approach and to demonstrate the integration of all aspects of the analysis it embodies, it is dealt with wholly within this part of the report.

3.13 The guidance places high value on the existing historic environment recognising that the protection of the distinctive character of riverside areas and buildings of architectural quality and historic interest provides a context for new development. The urban design guidelines note that the value of certain riverside areas has been recognised by the designation of Conservation Areas at Putney Embankment, Deodar Road, Battersea Square and Battersea Park. A number of listed buildings are also located on the riverside such as St Mary's Church Battersea, Battersea Power Station and Prospect House. The guidance states that *"New developments should preserve or enhance the character of riverside conservation areas, respect the scale, proportions and materials of neighbouring buildings and enhance the visual image of the areas as seen from the river and from both banks"*.

3.14 In relation to layout and form it states; *"Buildings on the riverside should be of sufficient height to frame the edge of the riverside from the opposite bank. Within each reach buildings should not be higher than their neighbours unless benefits to the townscape can be demonstrated."* (see paragraphs 26 and 27 about the siting of high buildings with respect to views).

3.15 Paragraph 20 explains, *"Riverside sites can be viewed from a long distance. It is important that buildings are of sufficient scale to make an impact and form a backdrop to the river. However, some parts of the riverside, particularly west of the Wandle, have a more domestic character and new development should reflect this scale and character. Proposed guidelines for building heights in each section of the river are included in Section Two. Individual landmark buildings in appropriate parts of the riverside (see section Two) will need to be justified"*.

- 3.16 In relation to views it advises, among other things, that *“Important riverside views should be protected not only from development which might intrude in the foreground, but also from development which might loom behind and mar the backcloth. In this context the protection of skylines and distant ridges is particularly important.”* It continues, *“On convex bends of the river, high buildings (i.e. noticeably higher than the prevailing height of buildings) will generally be unacceptable”.*
- 3.17 The Policy principles explained in Section One are then applied in detail in Section Two, where the document describes the distinctive character of each reach of the river, identifying important views and giving guidance on building heights for each one. There are separate plans and analysis for: Barn Elms Reach, Wandsworth Reach, Battersea Reach, Chelsea Reach, Nine Elms Reach.
- 3.18 Each reach is described in relation to its assets and amenities, conservation, listed buildings, views and building heights. Focal points are noted as assets and amenities where the underlying principle is established that *“Mixed uses and activities like pubs and restaurants should be concentrated at focal points, such as landmarks like the bridges, around squares or docks, or in areas with good links to existing focal points such as town centres and railway stations.”*
- 3.19 Potential focal points of activity were identified (see list below) and these have been the basis for the maps that appeared in the UDP and the Core Strategy. Focal points identified in the Riverside Design Guidelines include:
- Brewhouse Street (Now Putney Wharf Core Strategy Focal Point)
 - Calor Gas Site (Now within the Wandsworth Riverside Quarter Focal Point)
 - Feathers Wharf and adjacent to the Ship Public House (Now within the Core Strategy Wandle Delta Proposed Focal Point)
 - Wandsworth Bridge (Now within the Core Strategy Wandle Delta Proposed Focal Point)
 - Former Price’s Candles site
 - Grove Wharf
 - Vicarage Gardens & Battersea Square
 - Ransome’s Dock (Now a Core Strategy Focal Point)
 - Battersea Wharf
 - Battersea Power Station (Now a Core Strategy Focal Point)
 - Tideway Estate
- 3.20 This comprehensive study provided the shortlist for Focal Points of Activity included in the UDP and the Core Strategy (some smaller scale examples such as Battersea Square were omitted from the UDP, being

considered unsuitable for major development and tall buildings and the list was again reviewed for the Core Strategy).

- 3.21 The Riverside Guidelines also provided key policies, subsequently included in the Council's 1994 UDP and carried through and strengthened in the adopted UDP of 2003, including the designation of a Wandsworth Thames Policy Area.

Urban Design Framework for the Wandle Delta

- 3.22 Some of the riverside focal points were covered by another detailed urban design study, leading to the preparation of the Wandle Delta Urban Design Framework, commissioned by the Wandsworth Challenge Partnership and drafted by a team of consultants: Patel Taylor, Ove Arup, Armstrong Bell and Michael Kalmer. The Options and Recommendations report was published in March 1999.

- 3.23 The options were based on the issues and desires identified in the Stage 1 Evaluation, Analysis and Community Expectations work. The Urban Design Strategy, present options for *“creating a new network of routes, public spaces, urban form and landscape”*; a framework within which specific projects can be inserted. It also looked at *“potential uses and attractions that could become live development projects bringing the Wandle Delta new homes, businesses and leisure facilities”*. The Framework is the result of a comprehensive, in-depth study and analysis of the swathe of underdeveloped land between Wandsworth Town Centre and the River Thames, including the potential for redevelopment and for better connecting the emerging Wandsworth Riverside Quarter with the centre.

- 3.24 The framework sets out principles for development of a coherent urban grain including routes, public open spaces and tall landmark buildings, with landmarks essentially working to define and reinforce routes and to create vistas, centred on open spaces. Suggested locations for Tall Landmarks along the Thames frontage, confirming the work of the Riverside Design Guidelines, have now been carried forward into the Core Strategy as Wandsworth Riverside Quarter Focal Point and Wandle Delta Proposed Focal Point. The Wandle Delta Urban Design Framework is referred to in the UDP and also at paragraph 4.91 of the Core Strategy – the supporting paragraphs for Policy PL 12.

TBE6 Criterion (c) Potential to Enhance Existing, or Create New, Views and Vistas.

- 3.25 This views based criterion was originally drafted to allow for opportunities to create views across sites by removing existing low rise buildings and replacing them with high buildings with a smaller footprint, within an undeveloped space. This principle of advocating a scheme with less ground coverage has evolved and been subsumed into the broader, more demanding criterion (b) of Core Policy IS 3,

which deals with the creation of good quality public spaces, rather than simple views through, which better equates to criterion 4.1.1 - Relationship to Context, within the EH/CABE Criteria for Evaluation.

The Town Centre Conservation Areas

- 3.26 A great deal of detailed work has already been carried out, both in connection with historic area characterisation and in identifying and addressing regeneration objectives. As the EH/CABE guidance says *“In the right place, tall buildings can make positive contributions to city life... In the right place they can serve as beacons of regeneration and stimulate further investment”* (Paragraph 1.1). Wandsworth has identified this fundamental principle as being particularly relevant to Wandsworth Town and Clapham Junction. The work described in the following paragraphs of this report has begun to bring together different policy strands into spatially specific analyses, such as the protection of historic context with promotion of regeneration objectives.
- 3.27 There are up-to-date Appraisals for Wandsworth Town and Clapham Junction Conservation Areas, which have been particularly relevant in testing the principle of identifying town centres as locations where tall buildings may be appropriate, subject to evaluation of the impact of specific proposals on the historic environment (as described and analysed in these Appraisals).
- 3.28 As already stated, these two conservation areas are two of the most important historic centres in the borough, both classified as Major Town Centres in the London Plan. Both are also well served by public transport and both have long-standing major infrastructure and regeneration objectives.
- 3.29 Like all historic centres of activity, they have always attracted higher status buildings, including churches, town halls, libraries, court buildings, department stores, theatres, cinemas, headquarters and office buildings. Many of these buildings, through their scale and architectural treatment, have demonstrated the significance of the location as a focus for commercial, civic and religious activity. Wandsworth also already has a legacy of tall residential blocks, ranged along the line of the Wandle Valley.
- 3.30 Again, these two locations were therefore readily identified at an early stage as having both the potential for tall buildings and a high degree of sensitivity, requiring further detailed analysis. Both of these town centre conservation areas have been the subject of detailed appraisals of heritage assets and regeneration objectives in connection with successful bids for Single Regeneration Budget (SRB) funding and joint English Heritage or Heritage Lottery Fund partnership schemes. Wandsworth Town Centre benefited both from SRB funding and a Conservation area partnership jointly funded by English Heritage, in each case based on thorough appraisal of the area’s character.

- 3.31 The Conservation area partnership Scheme for Wandsworth Town ran for three years from April 1996, with English Heritage and the Council each allocating £60,000 per year. The work focussed on the repair and enhancement of listed and non-listed buildings of historic or architectural importance. The role of historic buildings in defining the character of the area and their potential for leading enhancement and investment was fundamental to the Partnership Scheme. Many important historic buildings were given a new lease of life and confidence in the future of the centre boosted. The SRB project established many of the regeneration objectives for Wandsworth Town Centre that have been carried forward into the urban design analysis of the Core Strategy.
- 3.32 While never attempting to define or pre-judge the specific form of future developments, work at this time clearly signposted the significance of traffic conditions as a constraint on investment and the need to harness contributions from private schemes to achieve major infrastructure improvements.
- 3.33 The Conservation Area Partnership Scheme for Clapham Junction was jointly funded by the Heritage Lottery Fund, with expert guidance from English Heritage. An Urban Design Framework/Action Plan was published for public consultation in January 1998. The grant scheme started in 1998 with funding of £450,000 over the three years to 2001, resulting in the restoration of a number of traditional style shop fronts. Major schemes for two of the most important listed buildings, the Clapham Grand and Arding & Hobbs were drawn up but not taken forward by the owners.
- 3.34 In the context of Core Policy IS3, one of the key elements of the urban design framework was the identification of Landmark Buildings (see Clapham Junction Town Centre Newsletter Public Consultation Special Edition and Clapham Junction Town Centre Area Urban Design Framework/Action Plan 1998). The current Conservation Area Appraisals for Clapham Junction and Wandsworth Town Centres provide full, up-to-date analysis of the factors cited in EH/CABE Guidance (paragraph 2.7 of the EH/CABE guidance). Taken together the conservation area character appraisals and the associated urban design frameworks highlight both the historic precedent for and appropriateness of large-scale buildings that signal the importance of a major town centre and simultaneously the sensitivity of the existing historic townscape to the introduction of new tall buildings; and the major regeneration objectives and infrastructure requirements that call for large-scale investment. This work therefore justifies the identification of these town centres as locations where tall buildings may be appropriate, subject to further detailed assessment.
- 3.35 The town centres at Putney, Balham and Tooting are not themselves, conservation areas; however, there are individually important listed and

locally listed buildings within them. In the case of Putney Town Centre, there is a small overlap between the town centre and Putney Embankment Conservation Area as well as incidental overlaps with Oxford Road and West Putney residential conservation areas. The town centre is also immediately bordered by the residential conservation areas of Deodar Road, Charlwood Road/Lifford Street, Parkfields and East Putney. Balham Town Centre includes incidental parts of two residential conservation areas, Nightingale Lane and Old Devonshire Road. Tooting Town Centre has a small common boundary with the Totterdown Estate Conservation Area. Putney Wharf Focal Point of Activity lies partly within Putney Embankment conservation area and the boundary will be reviewed when the conservation area appraisal is updated.

- 3.36 As stressed in guidance, tall buildings raise special issues because of the impact they have beyond their individual sites. In reaching the broad conclusion that all the borough's town centres have at least some potential as locations for tall buildings, a large body of relevant, detailed characterisation of the residential hinterlands has been available and the possible impact considered. It is also worth stressing that a proper understanding and appreciation exists of all the town centres, including the ones not designated as conservation areas, since they have all been evaluated for possible designation. While detailed appraisals have not, therefore, been published, for the purposes of a high level analysis they are well understood.

Part III – Current Policy

Specific Guidance on Tall Buildings – LDF Core Strategy

- 4.1 This report has presented urban design analysis in two parts. Part I has dealt with the basis for the generally protective policy approach, recognising in some detail the distinctive historic context and spatial characteristics of the borough. Part II has dealt with the positive criteria for the location of tall buildings; that is, the requirements without which tall buildings are unlikely to be considered appropriate. Accepting the premise in EH/CABE guidance that tall buildings, by virtue of their size and prominence can harm the qualities that people value about a place, Part II has gone into significantly more detail than Part I, while still acknowledging that more detailed work must follow.
- 4.2 The Core Strategy tall buildings philosophy, which sits within the Policy on Good quality design and townscape, seeks to balance the need to direct and promote new development with the need to protect the existing attractive environment. As this report shows, it is based upon a detailed knowledge and thorough analysis of the borough's existing character, both built and un-built, with particular reference to the rich historic context.
- 4.3 The urban design analysis encouraged in the EH/CABE guidance has been undertaken as part of several stand-alone studies, which have been brought together in this report to provide a justification of the tall buildings policy in the Core Strategy. It was always intended that the policy should be construed as self-contained, integrating both the pros and cons for tall buildings in one place, starting with the overarching statement at point (a) that *“The Council will protect and reinforce the existing varied character and heritage of the borough.”* By continuing with other constraints and requirements before identifying areas within which tall buildings might be appropriate it was intended that locations not identified were to be regarded as not even having the potential to be appropriate. However, for the avoidance of doubt the following is a suggested re-wording of the Policy outlined below.
- 4.4 It is also recommended that the policy is amended to make it explicit that tall buildings will not only have to justify themselves in terms of the benefits they may bring, but that they also take account of potential effects on the existing historic context.

Revised Policy wording

- 4.5 It is recommended that Policy IS3 d - Tall buildings, is amended to read:

“Tall buildings, that is those which significantly exceed the prevailing height of surrounding buildings, may be appropriate in locations which are well served by public transport, such as the town centres and Nine

Elms near Vauxhall, or at other defined focal points of activity, providing they can justify themselves in terms of the benefits they may bring for regeneration, townscape and public realm and their effect on the existing historic environment. Tall buildings are likely to be inappropriate in other areas.

Detailed criteria for the assessment of tall buildings and consideration of the appropriateness of tall buildings on individual sites will be contained in the Development Management Policies Document and Site Specific Allocations Document.”

- 4.6 A map has now been prepared showing all the locations in the borough where tall buildings may be appropriate (and, by definition, those not so identified, as inappropriate). These were originally shown on the Core Strategy maps relating to: Town and local centres, The Thames riverside (focal points) and Nine Elms and north-east Battersea.

Conclusions and Commentary - Compliance with EH/CABE Guidance

- 5.1 This report demonstrates how the Core Strategy Policies that refer to tall buildings have been informed by urban design analysis that conforms to the good practice advice in EH/CABE guidance. Paragraph 2.7 of the guidance advises that a study should “*take into account the historic context of the wider area through the use of historic characterisation methods*” and, “*carry out a character appraisal of the immediate context, identifying those elements that create local character and other important features and constraints, including:*

- *Natural topography;*
- *Urban grain;*
- *Significant views of skylines;*
- *Scale and height;*
- *Streetscape;*
- *Landmark buildings and areas and their settings, including backdrops and important local views, prospects and panoramas”.*

- 5.2 Natural topography: consideration of the natural topography of the borough was an essential part of the preparation of the Supplementary Planning Guidance on Important Local Views. Whilst the borough has no outstanding topographical features, the topography of the borough plays an important part in the impact of tall buildings on the surrounding neighbourhoods which is considered as part of this report. Both Clapham Junction and Wandsworth Town Centres are in relative low points, being located in the Falcon Brook and River Wandle valleys respectively.

- 5.3 Urban grain: consideration of the urban grain of the borough is an essential part of much the analysis referred to in this report including the character statements, development briefs and the various Urban Design Frameworks. In generality, the residential areas in the east of the borough are more urban in nature, with a predominance of high

density Victorian and Edwardian housing. The west of the borough is more suburban in nature, with lower density housing outside existing town and local centres, where higher density mixed development prevails. In some areas of the borough extensive development/redevelopment took place in the 1960s and 1970s in the form of large-scale municipal housing schemes; although different in form, the density of development on estates reflects the areas in which they are located, with high densities in the east, including north Battersea and lower densities in the west, most notably the parkland development of the Alton Estate in Roehampton.

- 5.4 Significant Views and skylines: significant views and skylines have been considered both as part of the London Plan Protected Views and the work undertaken as part of the Supplementary Planning Guidance on Important Local Views. The most significant view which impacts on the borough is the view of the Palace of Westminster from Hungerford Bridge.
- 5.5 Scale and height: consideration of scale and height is an integral part of the work undertaken on character statements, development briefs and the various Urban Design Frameworks. Throughout much of the borough two to four storey buildings prevail. At first religious buildings were pre-eminent locally, followed by municipal and commercial buildings. In the 1960s and 1970s considerable high-rise municipal housing development took place. Recent taller developments have been concentrated on the riverside.
- 5.6 Streetscape: important streetscape features are considered as part of the character statements, development briefs and various Urban Design frameworks. These include consideration of the special features of town centres and the importance of boundary treatments and setting as part of the conservation area character appraisals.
- 5.7 Landmark buildings and areas and their settings, including backdrops and important local views, prospects and panoramas: the identification of landmark buildings is a key feature of the character statements and various Urban Design Frameworks. The Supplementary Planning Guidance on Local Views, includes a separate section on 'Views of listed buildings, other buildings of local interest and landmarks', the most prominent landmark building in the borough being Battersea Power Station. The guidance identifies 26 views of listed buildings, other buildings of local interest and landmarks. The Guidelines for Thames Riverside Development also analyse views and vistas and the London View Management Framework has been taken account of in relation to its effect on the Vauxhall Nine Elms Opportunity Area.
- 5.8 Historic context: In addition to the topics identified in the EH/CABE guidance, considerable consideration has been given to local character and historic context. General character appraisal, identifying the elements of local character, permeates the whole of the Core Strategy.

The recognition and protection of the distinctive character is fundamental to the spatial planning approach. Recognition and understanding of historic context is demonstrated through published appraisals of listed buildings and conservation areas. Conservation areas not only directly cover some 30% of the borough, but their identification has been based on a thorough survey and evaluation of the whole of the borough, in particular in May 1989, when a comprehensive re-survey, drawing on suggestions from all local amenity groups and local Councillors, as well as specialist planning officers, led to the designation of 10 new conservation areas and nine extensions. As set out above, the programme for revising Character Appraisals to conform to EH best practice guidance is nearing completion. The work has included review of adjacent areas leading to some revision of boundaries. As noted above, the boundary of many conservation areas is relevant to four of the borough's five Town Centres.

- 5.9 Much of the analysis outlined above predates the consultation draft of EH/CABE guidance. The principles in the guidance are, however, well established and well understood by the specialist urban design and conservation staff at Wandsworth. While much of the analysis originates from initial UDP research, it is still relevant and has demonstrably informed the identification of the broad locations where tall buildings may be appropriate in the Core Strategy. This report has demonstrated how several of the EH/CABE criteria have been considered in relation to Core Strategy policy, including the relationship to context and the effect on historic context. The Stage Two urban design assessment will further consider the remaining more detailed criteria for evaluation, such as sustainable design and construction, the architectural quality of buildings and so on, contained in section 4 of the EH/CABE guidance.
- 5.10 The identification of broad locations, rather than specific sites, which *may* be appropriate for tall buildings is considered the most appropriate level of detail for a Core Strategy which is essentially the high level spatial strategy, setting out the Council's vision and guidance principles for planning in Wandsworth.
- 5.11 This study will be built upon in further detail in a stage two urban design study which will be used to identify the sites within these broad locations where tall buildings may be appropriate, subject to the considerations set out in Policy IS3 and areas which are particularly sensitive to tall buildings. The stage two study will undoubtedly draw on the detailed background material referred to in this report and will be prepared in line with EH/CABE guidance.

Appendix 1 - Full List of Conservation Areas

1. Bathgate Road
2. Battersea Park
3. Battersea Square
4. Charlwood Road/Lifford Street
5. Clapham Common
6. Clapham Junction
7. Coalecroft Road
8. Culverden Road
9. Deodar Road
10. Dinsmore Road
11. Dover House Estate*
12. East Putney
13. Garrads Road
14. Heaver Estate*
15. Landford Road
16. Latchmere Estate*
17. Magdalen Park
18. Mellison Road
19. Nightingale Lane
20. Old Devonshire Road
21. Oxford Road
22. Parkfields
23. Parktown Estate
24. Putney Embankment
25. Putney Heath
26. Putney Lower Common
27. Roehampton Village
28. Rusholme Road
29. St John's Hill Grove
30. Shaftesbury Park Estate*
31. Streatham Park
32. Sutherland Grove
33. Totterdown Fields*
34. Town Hall Road
35. Victoria Drive
36. Wandsworth Common
37. Wandsworth Town
38. Westbridge Road
39. West Hill Road
40. Westmead
41. West Putney
42. Wimbledon North
43. Wimbledon Park Road
44. Three Sisters
45. Alton Estate

* Area Article 4 Direction in force

Appendix 2 - Documents Referred to in Report

- Development briefs for riverside sites (Various)
- Wandsworth Unitary Development Plan, Adopted August 2003
- Supplementary Planning Guidance on Important Local Views, November 2003
- Guidelines for Thames Riverside development in Wandsworth 1990
- Urban Design Framework for the Wandle Delta, March 1999
- Clapham Junction Town Centre Conservation Area (CLTCCA) Urban Design Framework/Action Plan, January 1999
- CJTCCA Town Centre Public Consultation Newsletter, May 1999
- CJTCCA Character Appraisal and Management Strategy, 2008
- Wandsworth Town Centre Conservation Area Character appraisal and Management Strategy, 2006