

**Wandsworth
Design Review Panel
C/o Wandsworth Council**

Environment and Community Services
Department
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Our ref: ECS/
Your ref:
Date: 4 April 2022

Sam Stackhouse
Montagu Evans LLP
70 St Mary Axe
London
EC3A 8BE

Dear Sam,

**Wandsworth Design Review Panel:
Booker BMW site, 41-49 and 49-59 Battersea Park Road, SW8 5AL**

The Panel is grateful to you and your development team for submitting your proposal to the Wandsworth Design Review Panel (WDRP) on 16 March 2022. In light of the Government restrictions following the coronavirus outbreak the Panel was not able visit the site and meet your team in person, however the Panel provided feedback in a virtual open session with the applicant present to hear the Panel's views. We therefore thank the applicant team and, in particular the architects, Glen Howells, for a clear and comprehensive presentation. This letter will remain confidential until a formal planning application has been submitted, whereupon it will be uploaded to the application website.

The site lies on the western end of the Vauxhall Nine Elms Battersea (VNEB) opportunity area and has an area of 0.81ha. Historically the site provided residential terraced houses with its current commercial use established in the 1970s. The site falls within in a built-up area, with the majority of it covered by building footprint. There are six mature trees at the front of the site. These are all subject to a Tree Preservation Order (TPO) and comprised a mix of four London Plane and two Lime Trees.

The northern part of the site fronting Battersea Park Road is currently occupied by Booker Cash & Carry which is a retail warehouse club totalling 3,209m² (GIA). The Booker warehouse is a large and corrugated orange metal building on a brick base which provides a double height space.

The southern part of the site adjacent to the railway line is occupied by a BMW service centre totalling 1,224m² (GIA) of a Sui-Generis use class. The BMW maintenance garage is accessed by the New Covent Garden Market access road, which is the only one point of access.

General Principles

This is an important and very challenging site within the Nine Elms and Battersea Opportunity Area. The site is a small but critical piece in the jigsaw as part of the overall vision for the area, providing an important link from the new developments around the Battersea Power Station and newly opened Battersea underground, to the Nine Elms Park and New Covent Garden Market area.

The Panel appreciates the design team's overarching vision. We generally support the height and massing proposed and welcome the use of high-quality pre-cast for these buildings. However, we think that at this point it seems that some fundamental issues are not adequately explored or justified and would therefore not support a planning application submission until some of these issues are addressed. Our comments centred around three main subjects: sustainability, landscaping, and architectural treatment.

The detailed comments of the Panel have been collated as follows:

Sustainability

In light of the Council's green agenda and aspiration to achieve net-zero carbon by 2030, it is important to consider this aspect from the onset as they are difficult to retrofit into a design. We therefore fully support the sustainability aspirations for the scheme, but while we appreciate the clarity and target expressed in the presentation, we would have expected to see more technical studies to identify the implications at this stage, as we think there is a lack of coordination between the architecture and the aspiration on the sustainability aims. We therefore raise concern that the architectural design is not supported by technical evidence. The technical aspects should be well integrated into the design overall, but at this stage it seems there are some significant omissions.

- We would fully endorse a Passivhaus certified solution for the scheme, particularly as this is a whole-building approach with clear, measured and deliverable targets. We question how the scheme would implement only aspects of it and think this is a misleading use of the Passivhaus label. We also suggest the scheme will need reviewing in light of the new Building Regulations due in June and the GLA uplift on these.
- We note that no outline energy strategy has been presented in anticipation of what will be needed for any planning application and referral to the GLA.
- We are concerned that daylight and wind impacts have not been taken on board in the landscape and in the architectural design. As for overheating avoidance, the fenestration layout may need to respond to different amounts of light and solar exposure given the proximity of tall buildings. We would have expected to see contour analysis of daylight and sunlight exposure on the façades, defining a strategy whereby fenestration sizes change over the height of the façade for areas of daylight deficiency and overheating excess. Within the fenestration framing modules, the extent of glass would be expected to change across a façade.
- We did not see analysis of the wind impact on ground floor, roof amenity areas and balconies and question whether this has been assessed against the newly published Corporation of London Wind Microclimate Guidance. With prevailing winds being distorted by high buildings, the guidance now refers to testing 36 different wind directions. It also introduces a new lower wind speed criteria for seating areas. The analysis may warrant adjustments to some building corners, downdraft canopies or

colonnades at ground floor as mitigation measures. We note that other than very mature trees, vegetation as mitigation measures is rarely effective.

- We are concerned about the acoustic issues related to the lorry movement, particularly overnight, on the road on the Covent Garden Market side and there was no evidence to support that acoustic passive mitigation has been considered in the design of the elevations. One possible solution might be to incorporate inset balconies configured as acoustic attenuation chambers to allow the natural ventilation purge without adding air-conditioning for the critical overheating avoidance periods. This would have an impact on the architectural design and provide an opportunity to break up the rigid pattern of the façades. It could also add a layering effect as the acoustic mitigation measures gradually reduce beyond the lower storeys.
- With regard to the natural ventilation window side panels, we note various of the room views show access across the bed location. This should be reviewed in terms of access for less able occupants and opening clearance over the sleeping position.
- Given the site flood risk designation, we note there are operationally critical electrical installations on the ground floor. While life safety habitable rooms may be addressed, Storm Sandy showed that buildings may be out of use for many months if critical installations are not also appropriately located.
- We support the proposal for sedum roofs, but it is unclear how this would be integrated with what may well be extensive areas needed for any air source heat pumps and associated equipment located on the roofs. There is no plan showing this additional massing and how this will be balanced with the vegetation. The GLA will also be pressing for roof PV areas and while these could be integrated with planting and amenity areas below them, consideration should be given to extra planting depth to avoid overheating the roots.

Landscape and Public Realm

The Panel finds the way the landscape and architecture are integrated interesting but thinks this could be a truly landscape-led approach and calls for a much stronger narrative between landscape and architecture. We would have wished to see more technical details and the use of relevant precedents.

- The site location is at a focal point where there is a diagonal desire line for pedestrian movement from the Linear Park to Battersea Power Station as well as along Nine Elms Lane. We did not see evidence of discussions with Transport for London about the pedestrian connections and that desire lines have been adequately considered.
- We question the decision to remove the category B and C trees along Battersea Park Road. These are high quality trees protected by a Tree Preservation Order and have significant life expectancy. Their retention would strengthen the concept of verdant frontage onto Battersea Park Road.
- We challenge the idea that wind mitigation can be achieved by use of trees in the landscaping. Our opinion is that this is best achieved through architectural design.
- We feel you should consider planting trees along the frontage to the Covent Garden Market Access Road as this will be a harsh environment for pedestrians and will help to improve the Urban Greening Factor for the site.
- We are not convinced about the location of a sensory garden between Plots 01 and 02 as it would appear that it would be overshadowed for most of the afternoon and evening hours.
- We express concern about the children's play area located near the service access route for cycles, refuse and delivery vehicles. We feel greater consideration needs to be

given to the needs of children using this route to school, along with cycles and refuse vehicles and how children would navigate through to and cross the Coven Garden Market Access Road.

- There seems to be a lack of amenity space from level 8 to the top. We suggest a greater use of the rooftop spaces for outdoor amenity perhaps using adjacent rooms to further promote the use of the terraces.
- We like the idea of the ribbon through the landscape spaces and would like to see it closely integrated with the buildings.
- We encourage the preparation of a landscape management and maintenance plan for the public and private spaces.

Design Response

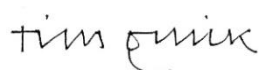
Overall, we are comfortable with the scale and massing of the buildings and support the use of pre-cast concrete as a principal material for the façades. However, while we do understand the architectural language that has been adopted, we do feel that the regular grid is quite 'unrelenting' over such large areas of the proposed elevations and fails to respond to the variety of environmental conditions on different parts of the façades.

- We would have expected a greater variety in the architectural expression between the residential and student accommodation component. In our view more diversification would result in a richer architecture.
- Again, while we understand the architectural language, we regret the choice not to express the cores on certain buildings which in our view would have introduced more variety in these very large expanses of façades.
- We encourage connections with the Peabody scheme to the west of Plot 03 but were unclear how the buildings connect at podium level.
- As the scheme is aimed at a student community, we would expect the scheme to cater more for cyclists and suggest this is explored further.

Moving Forward

The Panel appreciates that a great deal of good work has been done to date by the design team to progress the scheme. However, we were very concerned by the apparent lack of technical substantiation of the architectural design as well as the landscape. We feel that a more thorough analysis would not only reassure the Council that the design is robust but also result in a richer architectural response. We therefore question whether the design is ready for submission and would suggest that the consultant team is given more time to develop the scheme. As a Panel, we would value the opportunity to review the scheme again in the light of the above.

Yours sincerely



Tim Quick

Director, Formation Architects
Chair, Wandsworth Design Review Panel

Panel Members

Vinita Dhume	Associate Director, Levitt Bernstein
Chris Twinn	Principal, Twinn Sustainability Innovation
Angie Jim Osman	Director, Allies & Morrison
Deborah Nagan	Head of Place & Nature, Future Homes Hub
Marcus Claridge	Director, Claridge Architects

Panel Admin

Barry Sellers	Principal Planner and Panel Secretary
Daniela Lucchese	Senior Urban Designer and Panel Coordinator

Applicant Team

Jonathan Morris	Watkin Jones	Client
Simon Lovell	Watkin Jones	Client
Rob King	Glenn Howells	Architect
Josh Allington	Glenn Howells	Architect
Andy Robinson	Future City	Culture and Place-making
Tessa O'Donnell	Exterior Architecture	Landscape architect
Bernie Carr	Atelier Ten	Energy and Sustainability
James Ainsworth	Montagu Evans	Planning

Attendees (invited to observe)

Mark Hunter	Head of Strategic Developments
Janet Ferguson	Planning Manager
Sharon Molloy	Principal Urban Design Officer
Joanna Chambers	Senior Planner