

Osman, Louis

From: Mandy Wetherell [REDACTED]
Sent: 24 February 2022 10:55
To: PlanningPolicy Wandsworth
Subject: Wandsworth Local Plan Review - Consultation on the Publication Draft Local Plan
Attachments: Representation Cover Form.pdf; Wandsworth Local Plan Reg 19 Representations.pdf

Dear Sir/Madam

Please find attached our response to the Publication Draft Local Plan consultation. I look forward to receiving confirmation of receipt in due course.

Kind regards

Mandy Wetherell

Administrator

DPDS Consulting Group | Old Bank House, 5 Devizes Road, Old Town, Swindon, SN1 4BJ

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Local Plan Review

Consultation on the Publication Draft Local Plan

10 January to 28 February 2022

RESPONSE FORM

The Council is inviting comments over a seven-week period on the Publication version of the Local Plan.

The Draft Local Plan sets out a vision and spatial strategy to guide the development of the borough from 2023, when the Plan is anticipated to be adopted, to 2038. It sets out key objectives for the borough, which are supported by planning policies, area strategies, and – at the smallest scale – detailed guidance for the development of specific sites. Collectively, these identify where development should be targeted and set out how the borough's neighbourhoods and places will change over the next 15 years.

This consultation is the final opportunity to comment on the Local Plan before it is submitted to the Secretary of State for independent 'examination in public'. At this stage in the plan-making process, in accordance with the national guidance, consultation responses should focus on whether the Local Plan has been developed in compliance with the relevant legal and procedural requirements, including the duty to cooperate, and with the 'soundness' of the Plan. Further detail on these concepts is provided in the accompanying guidance notes provided at the end of the form.

How to respond

Please read the consultation documents and other background information made available on the Local Plan website: <http://www.wandsworth.gov.uk/draft-local-plan-publication>

You can respond by completing this form, either electronically using Word or as a print out, and sending it to the Council by:

- Email to planningpolicy@wandsworth.gov.uk
- Post to Planning Policy and Design, Environment and Community Services, Town Hall, Wandsworth High Street, Wandsworth, SW18 2PU.

Alternatively, you can also make comments on the draft Local Plan online via our Consultation Portal, which is accessible at the website listed above.

All responses must be received by **11.59pm on Monday 28 February 2022**. The consultation is open to everyone; however please note that responses will not be treated as confidential and those submitted anonymously will not be accepted.

Part A: Personal Details		
	1. Personal details*	2. Agent's details (if applicable)
Title	Mr	Mr
First name	Stuart	Vickesh
Last name	Gulliver	Rathod
Job title (where relevant)		Principal Planner
Organisation (where relevant)		DPDS Consulting Group
Address		Old Bank House 5 Devizes Road Old Town Swindon
Postcode		SN1 4BJ
Telephone		██████████
E-mail address		██████████

*If an agent is appointed, please complete only the title, name and organisation boxes for the respondent and complete the full contact details for the agent.

Part B: About You...		
3. Please tell us about yourself or who you are responding on behalf of.		
Do you live in the borough?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Do you work in the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Do you run a business in the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Are you a student in the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Are you a visitor to the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Data protection

Information provided in this form will be used fairly and lawfully and the Council will not knowingly do anything which may lead to a breach of the General Data Protection Regulation (GDPR) (2018).

All responses will be held by the London Borough of Wandsworth. They will be handled in accordance with the General Data Protection Regulation (GDPR) (2018). Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details like address, phone number or email address will be removed.

For further details regarding your privacy please see the Council's information published at:

www.wandsworth.gov.uk/privacy

Part C: Your Response		
4. Do you consider the Local Plan is:		
4.1 Legally compliant	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
4.2 Sound	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
4.3 Complies with the duty to co-operate	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Further information on these terms is included within the accompanying guidance note, which can be found at the end of the response form.		
If you have entered 'No' to 4.2, please continue with Q5. Otherwise, please go to Q6.		
5. Do you think the Local Plan is <u>unsound</u> because it is <u>not</u>: <i>(Please tick all that apply)</i>		
5.1 Positively prepared	<input checked="" type="checkbox"/>	
5.2 Justified	<input checked="" type="checkbox"/>	
5.3 Effective	<input checked="" type="checkbox"/>	
5.4 Consistent with national policy	<input type="checkbox"/>	
6. Please give details of why you think the Local Plan is not legally compliant and/or is unsound and/or fails to comply with the duty to co-operate.		
Please make it clear which consultation document your comments relate to and, where applicable, please include the relevant policy name/number, the site allocation name/reference, the Policies Map change, and/or the paragraph number. Please be as precise as possible.		
If you wish to provide comments in support of the legal compliance and/or soundness of the Local Plan, or its compliance with the duty to co-operate, please use this box to set out your comments.		
<i>Please note your response should provide succinctly all the information, evidence and supporting information necessary to support / justify the response. After this stage, further submission will only be at the request of the Inspector, based on the matters and issues they identify for examination.</i>		
Please refer to enclosed DPDS document titled 'Representations in respect of Wandsworth Local Plan Publication Version (Regulation 19)'.		

Please continue on a separate sheet / expand the box if necessary.

7. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, when considering any legal compliance or soundness matter you have identified at 5 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination.

You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please note your response should provide succinctly all the information, evidence and supporting information necessary to support / justify the suggested change. After this stage, further submission will only be at the request of the Inspector, based on the matters and issues they identify for examination.

Please refer to enclosed DPDS document titled 'Representations in respect of Wandsworth Local Plan Publication Version (Regulation 19)'.

Please continue on a separate sheet / expand the box if necessary.

8. If you are seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? (Please tick box as appropriate)

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Mr Gulliver wishes to participate in the hearing sessions as he has a home in the Borough which is located in a 'focal point of activity' and has been allocated as a suitable location for tall buildings of up to 12 storeys. Mr Gulliver wishes to have the opportunity to comment on specific policies and allocations relating to Tall and Mid-Rise Buildings which would have an impact of the amenity and livelihood of his family and other residents of the local area.

Please continue on a separate sheet / expand the box if necessary.

If you are not on our consultation database and you respond to this consultation, your details will be added to the database. This allows us to contact you with updates on the progression of the Local Plan and other planning policy documents.

If you do not wish to be added to our database or you would like your details to be removed, then please tick this box.			<input type="checkbox"/>
Signature: <i>For electronic responses a typed signature is acceptable.</i>	V. Rathod (agent)	Date:	24 th February 2022



Local Plan Publication Consultation

Guidance Notes to accompany the Representation Form

Introduction

1. The plan has been published by the Local Planning Authority [LPA] in order for representations to be made on it before it is submitted for examination by a Planning Inspector. The Planning and Compulsory Purchase Act 2004, as amended [PCPA] states that the purpose of the examination is to consider whether the plan complies with the relevant legal requirements, including the duty to co-operate, and is sound. The Inspector will consider all representations on the plan that are made within the period set by the LPA.

2. To ensure an effective and fair examination, it is important that the Inspector and all other participants in the examination process are able to know who has made representations on the plan. The LPA will therefore ensure that the names of those making representations can be made available (including publication on the LPA's website) and taken into account by the Inspector.

Legal Compliance

3. You should consider the following before making a representation on legal compliance:

- The plan should be included in the LPA's current Local Development Scheme [LDS] and the key stages set out in the LDS should have been followed. The LDS is effectively a programme of work prepared by the LPA, setting out the plans it proposes to produce. It will set out the key stages in the production of any plans which the LPA proposes to bring forward for examination.
- The process of community involvement for the plan in question should be in general accordance with the LPA's Statement of Community Involvement [SCI] (where one exists). The SCI sets out the LPA's strategy for involving the community in the preparation and revision of plans and the consideration of planning applications.
- The LPA is required to provide a Sustainability Appraisal [SA] report when it publishes a plan. This should identify the process by which SA has been carried out, and the baseline information used to inform the process and the outcomes of that process. SA is a tool for assessing the extent to which the plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.
- The plan should be in general conformity with the London Plan.
- The plan should comply with all other relevant requirements of the PCPA and the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended [the Regulations].

Duty to Co-operate

4. You should consider the following before making a representation on compliance with the duty to co-operate:

- Section 33A of the PCPA requires the LPA to engage constructively, actively and on an ongoing basis with neighbouring authorities and certain other bodies over strategic matters during the preparation of the plan. The LPA will be expected to provide evidence of how they have complied with the duty.
- Non-compliance with the duty to co-operate cannot be rectified after the submission of the plan. Therefore, the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector cannot recommend adoption of the plan.

Soundness

5. The tests of soundness are set out in paragraph 35 of the National Planning Policy Framework (NPPF). Plans are sound if they are:

- Positively prepared – providing a strategy which, as a minimum seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring authorities is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective - deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the NPPF.

6. If you think the content of the plan is not sound because it does not include a policy on a particular issue, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy (or the London Plan)? If so, does not need to be included?
- Is the issue with which you are concerned already covered by another policy in this plan?
- If the policy is not covered elsewhere, in what way is the plan unsound without the policy?
- If the plan is unsound without the policy, what should the policy say?

General advice

7. If you wish to make a representation seeking a modification to the plan or part of the plan you should set out clearly in what way you consider the plan or part of the plan is legally non-compliant or unsound, having regard as appropriate to the soundness criteria in paragraph 5 above. Your representation should be supported by evidence wherever possible. It will be helpful if you also say precisely how you think the plan should be modified.

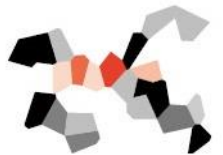
8. You should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification. You should not assume that you will have a further opportunity to make submissions. Any further submissions after the plan has been submitted for examination may only be made if invited by the Inspector, based on the matters and issues he or she identifies.

9. Where groups or individuals share a common view on the plan, it would be helpful if they would make a single representation which represents that view, rather a large number of separate representations repeating the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

10. Please consider carefully how you would like your representation to be dealt with in the examination: whether you are content to rely on your written representation, or whether you wish to take part in hearing session(s). Only representors who are seeking a change to the plan have a right to be heard at the hearing session(s), if they so request. In considering this, please note that written and oral representations carry the same weight and will be given equal consideration in the examination process.

**Representations in respect of
Wandsworth Local Plan Publication
Version (Regulation 19)**

On behalf of Mr Stuart Gulliver



February 2022

C12388



Representations in respect of Wandsworth Local Plan Publication Version (Regulation 19)

On behalf of Mr Stuart Gulliver

Client: Mr Stuart Gulliver

Reference: C12388

Version: 1

Status: Final

Author: VR

Checked: LMD

Approved: LMD

February 2022

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1.0 Introduction

- 1.1 DPDS Consulting Group [DPDS] has been instructed by Mr Stuart Gulliver [‘the client’] to prepare and submit written representations on his behalf to the Wandsworth Local Plan Pre-Publication (Regulation 19) consultation.
- 1.2 The client owns a property at Albion Riverside and has a specific interest in potential development allocations or policy designations at the riverside location around Battersea Bridge (circled red at **Figure 1** below), as development in this area will have an impact on the future amenity of his property.

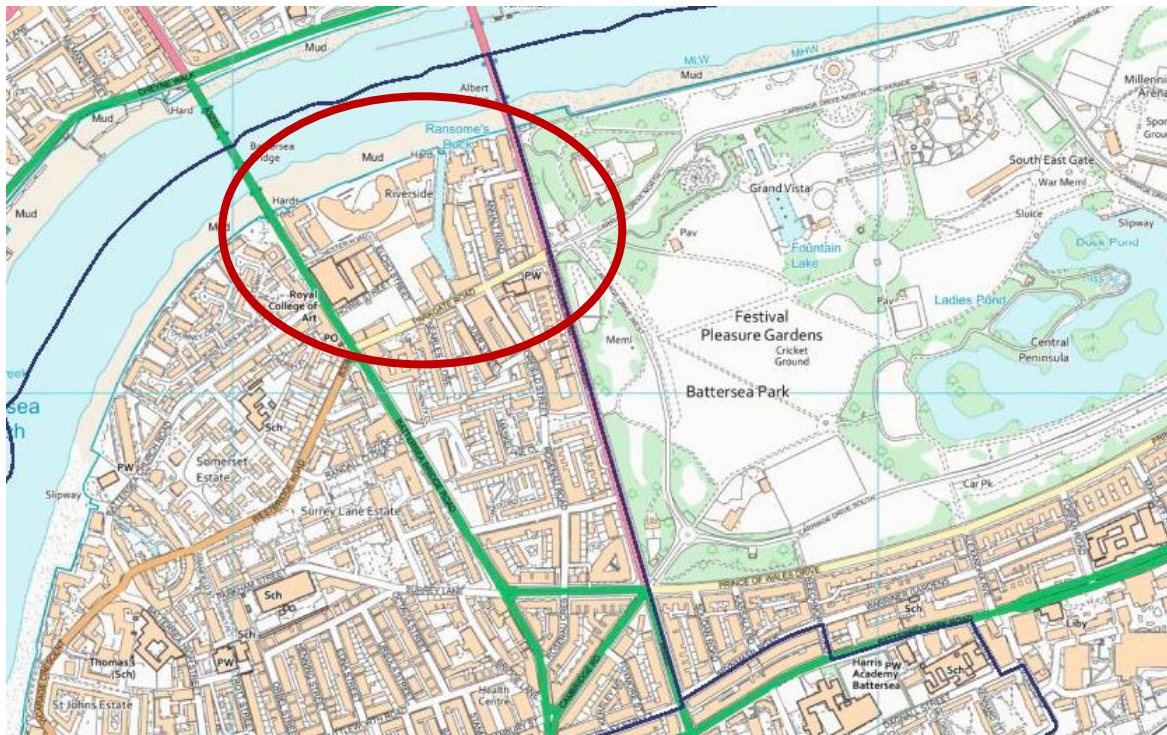


Fig 1. Client’s location of interest circled red (*Wandsworth Council online interactive map*)

2.0 Summary of Regulation 18 Representations

2.1 DPDS were also instructed by the client to prepare representations in respect of the 'Pre Publication' (Regulation 18) Draft Local Plan which was published for consultation in early 2021.

2.2 A summary of the representations made is listed below:

- The client agreed with the location of interest (i.e. the riverside area around Battersea Bridge) being considered a 'focal point' and having 'valued views and vistas' both from and towards the area.
- With regards to the 'smart growth' sub-section of Policy PM9 (Wandsworth's Riverside), the client agreed with approach that any residential-led development should be of a small scale which is appropriate to serving local needs.
- With regards to the 'placemaking' sub-section of Policy PM9, the client strongly agreed that new development along the riverside should conserve and enhance the quality of the built and natural environment including architectural quality of buildings and preservation of important local views and vistas.
- The client did suggest, however, that more could be done through the wording of Policy PM9 to ensure that any new development is also required to be compatible with existing/surrounding land uses and not have a detrimental impact on the amenity of the area (including existing properties and businesses), both through construction and operational phases.
- Representations were also made on Policy LP4 ('Tall Buildings') and the client welcomed that there is a specific policy for developments of this nature which has been informed by an Urban Design Study.
- The client agreed that any proposal for buildings of 5 storeys or more in the location of interest should be considered 'tall' and subject to scrutiny against relevant tall building policies.
- With regards to the sub-section of Policy LP4 titled 'Tall Buildings Near the River Thames Frontage', the client suggested that due consideration must be given to the impact that massing of a tall building would have with respect to all immediate surroundings (not just front and back relative to the river), and a particular emphasis should be made on addressing and mitigating impact on existing adjacent land uses, especially existing residential properties.
- The client welcomed the sub-section of Policy LP4 concerning 'Microclimate and Lighting' but suggested that specific reference also needs to be made to consider the impact of wind patterns on tall buildings and their surroundings on the riverfront where, by definition, there are no other structures to break the wind. This is particularly important given the greater frequency of severe weather arising from climate change.

3.0 Comments on Local Plan Publication Version

- 3.1 This section sets out the clients comments on policies and allocations which may have an impact on the amenity of their property. In some cases the comments reaffirm or elaborate on those made at the Regulation 18 consultation stage.

Section 11 – Area Strategy for Wandsworth’s Riverside

- 3.2 The policy is supported by an Overarching Spatial Area map (Map 11.1) which, as per the Draft (Regulation 18) Plan, identifies the client’s location of interest as a ‘Focal Point of Activity’. The area is also identified as holding some ‘Valued views and vistas’ which the client agrees with and supports the protection of these views (both from and towards the area) through appropriate development management policies.
- 3.3 Paragraph 11.1 of the Plan states that *“Wandsworth’s Riverside continues to play an important role in defining the distinctive character of the borough by offering places to gather, rest, play, work, and enjoy the views of the Thames”*.
- 3.4 It is noted that the Plan allocates 11 sites for development in the general riverside area, with the nearest to the client’s location of interest (approx. 350m south-west) being ‘RIV11 – Battersea Church Road/Crewkerne Court Garage’ which is allocated for residential development with the provision of play and parking facilities. In terms of height, the allocation identifies the site as suitable for a 6-8 storey development (maximum). The client has no particular objection to this allocation given that it is well set back from the riverside, but would have concerns regarding any large-scale allocations or tall building development proposals any closer to the river frontage around Battersea Bridge as this could compromise the role of the riverside as set out at paragraph 3.2 above. The client’s view in this respect is discussed further in subsequent paragraphs of this representation.
- 3.5 It is acknowledged that there are a cluster of site allocations relatively close to the riverfront further south-west of the client’s property (York Road/Lombard Road area), however in many cases these are on existing or former industrial or commercial sites.
- 3.6 We have also reviewed representations made by interested parties to the Regulation 18 consultation and wish to comment specifically on Comment Number 1644 which was made on behalf of the freeholder of The Glassmill, 1 Battersea Bridge Road. The Glassmill is located immediately adjacent to the client’s property.
- 3.7 The comment suggests that *“the Site should be allocated in the Draft Local Plan for residential-led development to provide circa 150 residential units, with potential for commercial uses at ground floor level”*.
- 3.8 Wandsworth Council’s response to this comment is that *“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”*. The client wholly agrees that the site is not appropriate for a site allocation.

- 3.9 Comment 1644 also notes that *“Owing to its position at a key gateway into the borough, it is considered that the Site would be a suitable location for delivery of a tall building, in line with Draft Policy LP4”*. The Council has not specifically responded to this part of the comment, however the client strongly disagrees with this part of comment 1644.
- 3.10 Whilst it is acknowledged that Battersea Bridge does provide an entrance into Wandsworth Borough from the north, the client does not consider redeveloping just its eastern side to constitute the creation of a successful gateway. Rather, it would create a lopsided townscape as one enters the Borough and would appear akin to a gate with just a single gatepost – not making any visual or functional sense.
- 3.11 The client also has concerns with the potential appearance and functionality of any tall building redevelopment of The Glassmill site in isolation. The relatively small existing footprint of The Glassmill would result in a tall, narrow structure which would be at complete odds with the existing townscape and character of the area. The desirability of use of the ground floor by commercial operators would also be significantly reduced owing to the limited footprint, and this in turn would have a detrimental impact on the vibrancy of this part of the riverside. From a practical view there would also be constraints concerning car parking, servicing and circulation space given the limited footprint. Overall, any allocation of The Glassmill site would be piecemeal and premature given the above two observations. In any case, as per the Council’s response to comment 1644, a redevelopment allocation at The Glassmill would also not promote sustainable development given that is of a fairly recent build.
- 3.12 The above observations are made directly in response to comment 1644 of the Regulation 18 consultation and are not supporting or suggesting any allocation at The Glassmill or any adjacent sites. Further comments in respect of the overall policy approach to tall buildings, particularly in the area around Battersea Bridge, are made in subsequent paragraphs of this representation which address Policy LP4 (Tall and Mid-Rise Buildings).
- 3.13 In terms of strategy, the client supports the aim of Policy PM1 (Area Strategy and Site Allocations Compliance), particularly in the context of the Glassmill site, which states that *“Proposals which do not comply with the relevant development plan policies, Area Strategy and Site Allocations will be resisted unless it is clearly evidenced that an alternative type of development can be justified...”* [our emphasis].

Policy PM9 – Wandsworth’s Riverside

- 3.14 Within the ‘Placemaking’ sub-section of the policy, paragraph 1 states that:
- “New development should conserve and enhance the elements and existing features that contribute to Putney Riverside’s strong character, distinctive sense of place and high-quality townscape”*.
- The client supports this policy approach but suggests that it should be applied across the entirety of Wandsworth’s Riverside and not just Putney.
- 3.15 The policy also states that development proposals will be required to respect and enhance the views and vistas established in the Urban Design Study (2021). The client supports this approach.
- 3.16 The policy adds states that development proposals for tall or mid-rise buildings in Wandsworth’s Riverside will only be supported in specifically identified zones at Appendix 2 of the Plan and that

they will need to address the requirements of Policy LP4 (Tall and Mid-rise Buildings) as well as other policies in the Plan as applicable. The client welcomes that there is a specific policy and supporting studies to guide and control any potential tall or mid-rise building proposals in Wandsworth. This is commented on in more detail later on in this representation.

- 3.17 The ‘Inclusive Growth’ sub-section of Policy PM9 promotes residential-led development in the Focal Points of Activity, alongside a mixture of uses to increase activity and vibrancy along the riverside. The policy adds that such proposal should be of a small-scale [our emphasis] which is appropriate to serving local needs. The client supports this approach.
- 3.18 Overall the client supports the general aims of Policy PM9, however they feel that more could be done through policy requirements to ensure that any new development on Wandsworth’s Riverside is compatible with existing/neighbouring land uses and would not result in a detrimental impact on the amenity of neighbouring properties, both through construction and operational phases. This might be achieved through a specific reference to compliance with Policy LP2 (General Development Principles) which sets out appropriate criteria in this respect.

Policy LP4 – Tall and Mid-Rise Buildings

- 3.19 The client welcomes a specific policy which concerns proposals of this nature (i.e. tall or mid-rise buildings) and supports a more restrictive approach to tall buildings in the Borough.
- 3.20 The client agrees with paragraph A of the policy, which states that any building which is 7 storeys (or 21m) or more will be treated as a ‘tall building’.
- 3.21 The client supports the policy requirements which are set out to address ‘Visual Impacts’ of tall and mid-rise buildings, in particular paragraphs 2 and 3 which state the following:
- *“The proposed location of the tall building(s) must avoid creating substantial visual interruptions in areas with otherwise very consistent building heights and/or roof lines [our emphasis]”; and*
 - *“Proposals should be designed to reflect and respond to an analysis of relevant key view corridors towards the site to ensure the location, form, detailing and prominence of the tall building(s) are appropriate within the wider context [our emphasis]”.*
- 3.22 The client also welcomes the policy requirements concerning ‘Spatial Hierarchy’, in particular paragraph 7 which states that:

“The massing of any proposed tall buildings should be proportionate to the local environment, including when taking into consideration the width of publicly accessible areas adjacent to the proposed building(s) as well as the proximity to public open spaces, parks and watercourses, and should be designed so as not to create an overbearing impact having regard to its context [our emphasis]”.

The client is of the view that ‘massing’ and ‘overbearing’ are especially important considerations, not only in the context of outdoor spaces but also when assessing the impact of tall or mid-rise building proposals on existing residential properties or employment locations. There is an opportunity for the policy to be reworded to reflect this.

3.23 The client welcomes a specific sub-section of the policy concerning ‘Tall Buildings near the River Thames Frontage’. Paragraph 9 states that:

“Tall buildings should not result in the creation of development which would impede the outlook and/or amenity of occupiers of existing buildings [our emphasis] or users of public spaces having regard to their relationship with the river frontage”.

The client strongly supports a specific policy requirement which requires tall building proposals to consider and assess impact on the outlook and amenity of occupiers of existing neighbouring buildings. There is, however, an opportunity to further enhance this policy by providing a definition of what constitutes amenity, as this might comprise a number of different elements such as light spill/pollution, access to natural light, overshadowing, privacy or noise nuisance. Alternatively, specific reference could be made to Policy LP2 (General Development Principles) which sets out appropriate policy criteria in this respect.

3.24 Access to natural light is of particular importance in the context of the aforementioned Glassmill site, where presence of a taller building would have a significant detrimental impact on nearby affordable homes which are likely to be occupied by young families or elderly people.

3.25 With regards to paragraph 10 of the policy, the client is of the view that the policy should be reworded to ensure that due consideration is also given to the impact that massing of a tall building would have with respect immediate surroundings in all directions (not just the north-south relationship between the river and land) and a particular emphasis should be made on addressing and mitigating impact on existing adjacent land uses, especially residential properties.

3.26 The client welcomes that such suggested approach does appear to have been incorporated into paragraph 12 which concerns ‘Microclimate and Lighting’ and states that:

“The design of any tall building should avoid including lighting features which adversely impact on the occupiers of surrounding buildings (particularly those in residential use) [our emphasis], as well as on night-time vistas and panoramas and fauna”.

3.27 The client also welcomes the policy approach concerning light spill at Paragraph 13, which states that:

“The design and glazing of any proposed tall building should take into account its use at night, minimise light spill that would result in light pollution and avoid creating unacceptable solar glare onto any publicly accessible areas or where it would have an adverse effect on the amenity of occupiers of adjoining buildings [our emphasis]”.

3.28 Notwithstanding reference to ‘environmental impacts’ and relevant London Plan Policy D9 (Tall Buildings), the client is disappointed that no specific reference to wind impact, as suggested at the Regulation 18 stage, has been incorporated into the wording of Policy LP4. The client strongly suggests that explicit reference is made to wind impact to ensure that developers give sufficient consideration to such impact when putting forward any proposals for tall buildings. Consideration needs to be given not only to the direct impact of wind on potential new buildings, but also the ensuing impact of vortex shedding on adjacent buildings, circulation spaces and public spaces at all heights. This is a public safety concern and particularly important consideration on the riverfront where, by definition, there are no other structures to break the wind. The greater frequency of severe weather arising from climate change in recent times only adds to the strong justification for

including an explicit reference to consideration of wind impacts in Policy LP4, rather than relying on developer interpretation and cross-referencing of policies.

Tall Building Zones

3.29 In terms of defining locations suitable for tall building development, paragraph B of Policy LP4 states that:

“Proposals for tall buildings will only be appropriate in tall building zones identified on tall building maps included at Appendix 2 to this Plan, where the development would not result in any adverse visual, functional, environmental and cumulative impacts.”

3.30 Paragraph C adds that *“Proposals for tall buildings will not be permitted outside the identified tall building zones”* and Paragraph D states that:

“Proposals for tall buildings should not exceed the appropriate height range identified for each of the tall building zones as set out at Appendix 2 to this Plan. The height of tall buildings will be required to step down towards the edges of the zone as indicated on the relevant tall building map unless it can be clearly demonstrated that this would not result in any adverse impacts including on the character and appearance of the local area”.

3.31 Policy LP4 is supported by Map 14.1 ‘Tall Buildings’ which identifies the client’s location of interest as being a ‘Tall Building Zone’ and some peripheries of the area as being a ‘Mid-rise building zone’ (see **Figure 2** below).

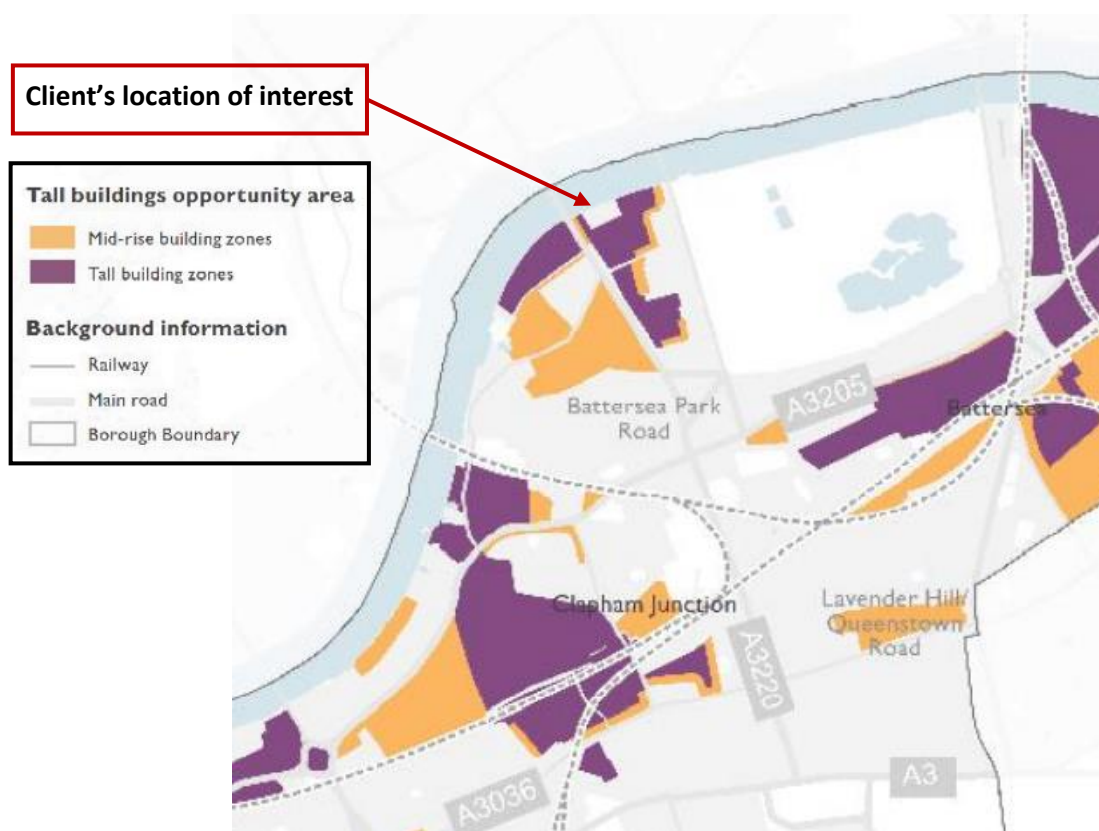


Fig 2. Extract from Map 14.1 showing Tall Building zones

- 3.32 It must be highlighted, however, that the definition of a ‘tall building zone’ does not give developers carte blanche to apply speculatively for tall buildings of any nature in these zones. As set out in paragraphs B and D of Policy LP4, the proposals should not exceed the appropriate height range identified for each of the tall building zones as set out at ‘Appendix 2’ of the Plan. For absolute clarity, the client suggests that Appendix 2 is given a named title which can be properly referred to within the policy text, as some may consider the nature of an appendix to be supplementary guidance whereas in this case Appendix 2 sets out important policy criteria.
- 3.33 Notwithstanding the above suggestion, there is some concern with regards to the specific content of Appendix 2, in particular the identified ‘prevailing’ and ‘appropriate’ heights of buildings in the Battersea Bridge area.
- 3.34 The overall tall building zones for Battersea are identified within Appendix 2 at page 445 of the Local Plan (see **Fig 3** below).



Fig 3. Battersea ‘Tall Building Zones’ (Appendix 2 of Reg 19 Local Plan)

3.35 The client’s location of interest is labelled as ‘TB-B2-04’ and an inset map for this area, along with an adjacent area labelled ‘TB-B2-03’ is provided at page 447 of the Plan (see **Fig 4** below).



Fig 4. Tall Building Zones for client’s location of interest (*Appendix 2 of Reg 19 Local Plan*)

3.36 For the areas TB-B2-03 and TB-B2-04, Appendix 2 defines the existing prevailing height of buildings in the general area as being '3-18 storeys'. No specific reference is provided as to which existing buildings are at the upper limit of this threshold (18 storeys), but it is assumed by the client to refer to the recent riverfront development at 100 Battersea Church Road (also known as the Montevetro Building) and the two older high-rise apartment buildings located east of Battersea Church Road (circled in purple at **Fig 5** below). These buildings are located specifically in the TB-B2-03 area, approx. 400m south-west of the client's specific location of interest (see **Fig 5** below).

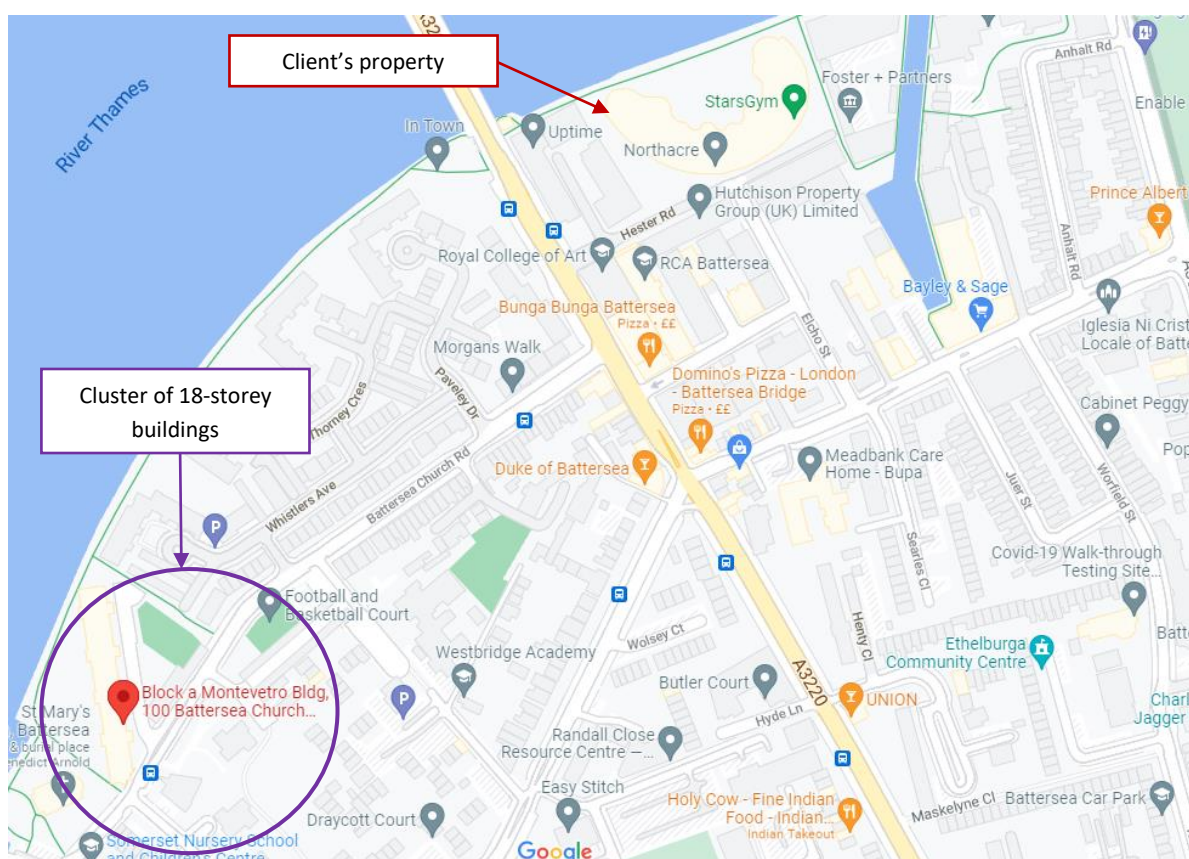


Fig 5. Map showing cluster of 18-storey buildings relative to client's property (*Google Maps*)

3.37 There are no buildings of a comparable height to 18 storeys on the river frontage around Battersea Bridge. Going westward from Battersea Bridge, the nearest building of such height is the previously mentioned Montevetro Building, approx. 400m south-west of the client's property. Going eastwards from Battersea Bridge, one would need to travel well over a mile to the Battersea Power Station redevelopment area before seeing buildings comparable in height to 18 storeys. Given the scale of the existing Power Station building, this is considered a more suitable location for a cluster of development of this scale.

3.38 Indeed the Albion Riverside development at 8 storeys is the highest existing building in the Battersea Bridge vicinity, with all other buildings at an equal or lower height on this part of the riverside. The definition of a 'prevailing height' of 18 storeys as set out in Appendix 2 is therefore misleading for area TB-B2-04 and, if at all, only applicable to the cluster at the south-western most

part of TB-B2-03 (see **Fig 5**). Appendix 2 also defines what would be an ‘appropriate height’ for new buildings in these areas (TB-B2-03 and TB-B2-04) and provides a suggestion of ‘7-12 storeys’. Again, the upper threshold of 12 storeys is considered to be a misleading appropriation for the area around Battersea Bridge where prevailing heights of existing buildings are at a maximum of 8 storeys down to 3 storeys. Application of Appendix 2 therefore currently leads applicants/developers towards a direct conflict with paragraph 2 of Policy LP4, which states that:

“The proposed location of the tall building(s) must avoid creating substantial visual interruptions in areas with otherwise very consistent building heights and/or roof lines...” [our emphasis].

- 3.39 The client therefore strongly suggests that the descriptions at Appendix 2 of ‘prevailing’ and ‘appropriate’ heights for the areas immediately adjacent to Battersea Bridge (both east and west) are explicitly differentiated from the area further south which does indeed have a cluster of 18-storey buildings. It is clearly demonstrated by **Fig 6** below that the riverside area around Battersea Bridge has an established low-medium rise character ranging from a maximum of 8 storeys on the east side down to just 3 storeys on the west side. The current blanket description of 12 storeys being an appropriate height in this location is wholly misleading and inappropriate.

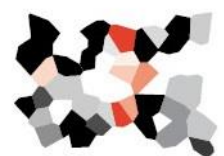
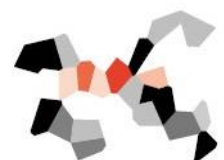


Fig 6. Photograph looking southwards from Battersea Bridge Road showing prevailing character (Google Street View – taken January 2021)

- 3.40 The client suggests that the prevailing and appropriate heights for the area around Battersea Bridge are specifically and more appropriately defined to reflect the established consistent character of this part of the riverside with regards to height.
- 3.41 The client would support a revision to Appendix 2 of the Plan which defines the riverside immediately east and west of Battersea as having a prevailing height of 3-8 storeys (as clearly demonstrated by **Fig 6** above) and allowing for a maximum appropriate height of 8 storeys for any new development or redevelopment which may come forward on this part of the riverside. These suggested heights are considered to be suitable, taking into account the established character and townscape of the area, environmental impacts and amenity of existing residents.

4.0 Summary and Conclusions

- 4.1 This representation has been drafted by DPDS Consulting Group on behalf of Mr Stuart Gulliver of Albion Riverside.
- 4.2 Overall, the client supports a restrictive approach to new buildings in Wandsworth Borough, however they have some specific concerns and suggestions regarding the soundness of certain policies in their current form.
- 4.3 The client supports the Council's decision not to allocate The Glassmill at 1 Battersea Bridge Road for redevelopment as a tall building. An allocation would be inappropriate given the recency of construction of the existing building and the fact that any redevelopment of the site would be piecemeal and premature. A tall building in this location would result in a lopsided townscape on the riverside location around Battersea Bridge, where prevailing building heights range from 3-8 storeys.
- 4.4 On this basis, the client strongly suggests that an amendment is made to Appendix 2 of the Local Plan, as referred to in Policy LP4 (Tall and Mid-Rise Buildings), which defines prevailing and appropriate heights for buildings in various zones across the Borough. As can be clearly seen from **Fig 6** above, the riverside both east and west of Battersea Bridge has a clear low to medium-rise character; this continues for approx. 400m either side of the bridge. It is therefore considered wholly inappropriate and unjustified for the Local Plan to encourage new buildings at a height of 50% taller than the maximum existing height at this section of the riverside. This also directly contradicts paragraph 2 of Policy LP4, which states that the proposed location of tall buildings must *"avoid creating substantial visual interruptions in areas with otherwise very consistent building heights and/or roof lines"*. This contradiction means that the content of Appendix 2, as drafted in its current form, is not effective.
- 4.5 Appendix 2 of the Local Plan, as referred to in Policy LP4, should be amended such that the appropriate height at the riverside location around Battersea Bridge is capped at 8 storeys, allowing the existing townscape character of the area to be maintained. This would result in the content of Appendix 2 being justified and effective.
- 4.6 The client also has serious concerns regarding the absence of an explicit reference to wind impact in Policy LP4. The Plan is not considered to be positively prepared or effective in this respect. An explicit reference would ensure that developers give sufficient consideration to such impacts, not only for the direct benefit of new tall buildings but also to protect amenity and safety of adjacent buildings and open spaces.
- 4.7 We trust that these representations will be given due consideration during the examination of the Wandsworth Local Plan, however the client would appreciate the opportunity to attend the Examination in Public so they are able, if required, to provide further clarification on any of the comments raised in these representations.



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