



[hghconsulting.com](http://hghconsulting.com)

45 Welbeck Street  
London W1G 8DZ  
020 3409 7755  
[info@hghconsulting.com](mailto:info@hghconsulting.com)

[hghconsulting.com](http://hghconsulting.com)

**FAO: Adam Hutchings MRTPI**

Planning Policy  
Environment and Community Services  
London Borough of Wandsworth  
Town Hall  
Wandsworth High Street  
London  
SW18 2PU

Via email: [planningpolicy@wandsworth.gov.uk](mailto:planningpolicy@wandsworth.gov.uk)

19 April 2022

Dear Sir/Madam,

**Re: London Borough of Wandsworth Regulation 19 Local Plan  
Submission of Local Plan Representation**

We act on behalf of Chelsea Cars, who hold two protected tenant long leaseholds at 59-61 Armoury Way, Wandsworth, known as the 'Chelsea Car and KwikFit site' within the emerging Local Plan (the site). Our client has asked that we review and submit representations in connection with the London Borough of Wandsworth's (LBW) Publication Regulation 19 Draft Local Plan (2023 - 2038), which is due to be submitted to the Secretary of State for independent examination at the end of April 2022. This representation should be read in conjunction with our previous representations made to the Regulation 18 Draft Local Plan in March 2021.

**Introduction**

*Site overview and context*

As set out in our previous representations, the site is made up of the Chelsea Cars showroom and neighbouring land parcels. It is in the northern part of Wandsworth town centre with the A3 highway running along its northern, western and southern boundaries; the road names being (in order) Armoury Way, Putney Bridge Road and Wandsworth High Street.

The site is formed of predominantly commercial use buildings ranging from 1 to 4 storeys in height. Current services occupying the area include a number of car garages and showrooms (Chelsea Cars, Kwik Fit Plus, Wandsworth Car Wash & Valeting Centre); a tattoo parlour; a public house/restaurant and a takeaway restaurant. An area of hard standing space used for car parking associated with the car showrooms is in the western section. A small portion of the Site contains residential dwellings.

The site is an 11-minute walk from Wandsworth Town Rail Station served by the South Western Railway providing regular travel into London Waterloo, Kingston, Hounslow via Richmond and Weybridge. A number of bus stations serve the area including buses 37, 170, 337, 670, 220, 270 and 485. Additionally, the area benefits from the A3 road connections. The site has a PTAL rating of 6a and 4.

*Opportunity for development*

**Planning, Environment &  
Development  
Services**

hgh Consulting is a trading style  
of Hepar Grincell Limited etc.  
Registered in England & Wales: 9340687  
Registered address: Henwood House,  
Ashford, Kent TN24 8DH



hghconsulting.com

As identified above, the site is allocated within a PTAL range of 6a to 4. The site is therefore considered a highly sustainable location and provides an opportunity for the mixed-use development of the site, as demonstrated by the site's current allocation in the Site Specific Allocation Documents (2016), site reference 35A.

The site's corner location and inclusion within the Town Centre boundary provides an opportunity to create a high-quality high-density development to maintain the economic use of the site, whilst introducing residential development to this site. The site, which lies within an area characterised by a number of tall buildings offers the potential to create a distinctive development that optimises the opportunity to deliver a new gateway into the heart of the Town Centre.

### Draft policy specific comments

*WT1: Chelsea Cars and KwikFit (site allocation)*

The continued allocation of the site for residential-led development is strongly supported. However, as it is currently worded, the draft allocation will constrain the redevelopment of the site and fail to allow the full potential this important regeneration opportunity to be optimised.

Firstly, the draft allocation requires:

*"Redevelopment of the site should provide a mixed use residential and commercial scheme with at least a 25% increase in the amount of existing economic floorspace..."*

This is too onerous particularly in the context of the challenges being faced by town centres, not least as a result of the pandemic. To ensure an effective and deliverable policy is included in the Plan, this part of the draft allocation should be revised to include an ambition to retain economic/active ground floor uses as appropriate where it can add to a sustainable and viable mixed-use approach for the site to account for 'market conditions at the time of any application submission'.

This revision will allow the delivery of an appropriate amount of economic floorspace at the site (in line with draft policy LP33: Promoting and Protecting Offices), but also protect against the creation of floorspace that cannot be occupied and that will fail to activate the ground floor frontages (contrary to draft policy LP1: The Design-led Approach).

It is noted that the site is located within but on the edge of the Town Centre boundary (as identified by the draft Policies Map). Rather than required the increased provision in edge of centre locations, it is prudent to target economic development towards the more central Town Centre locations with core shopping frontages (as defined by Appendix 3 of the draft Local Plan), such as The Ram Quarter and Southside Shopping Centre. The focused creation of economic floorspace in the centre of the Town Centre will boost vibrancy and activity within this central location.

Secondly, the reference to mid-rise buildings within this draft allocation is considered to be inconsistent with both the New London Plan (NLP) and National Planning Policy Framework (NPPF) policies in regard to optimising site capacity through a design-led approach. The NLP requires all development to make the best use of land to optimise the capacity of sites (policy D3), including site allocations. NLP policy D9 outlines that tall buildings are appropriate in principle, taking account of:

- The visual, functional, environmental and cumulative impacts of tall buildings;
- Their potential contribution to new homes, economic growth and regeneration; and
- The public transport connectivity of different locations.



hghconsulting.com

Given the site's location within the Town Centre boundary and the site's high PTAL range between 6a and 4, the draft allocation should reflect the NLP policy D3 and D9 with the site's identification as an appropriate location for taller buildings. The scale of any redevelopment of the site should not be constrained by overly restrictive policy requirements that will adversely impact on viability and most likely deter any development proposals from coming forward. Instead, the scale of development should be optimised, given the site's central urban location, with the focus being on design quality and placemaking (as required by draft policy LP1).

Chelsea Cars is supportive of the reference to the more comprehensive redevelopment of the wider area, incorporating properties on Wandsworth High Street and Putney Bridge Road currently outside of the draft allocation boundary. However, the draft allocation also includes reference to the "TfL scheme" to improve the Wandsworth Gyratory:

*"Parts of these properties [included within the allocation and on Wandsworth High Street and Putney Bridge Road] will be required to implement the TfL scheme programmed to be implemented by 2024 - and will be acquired by TfL."*

At present, there is no evidence of any deliverable proposals for the "TfL scheme". In the most recent update published by the Council on 10<sup>th</sup> March 2022, a cabinet member for the Strategic Planning and Transportation Committee confirmed the delays to the work were due to lack of funding *"for one reason or another"* with TfL expected to seek funding from the Department for Transport. This confirms the undeliverability of the TfL scheme, and by association further compromises the deliverability of this site allocation, which directly impacts the soundness of the Plan.

In line with the above, Chelsea Cars seeks the amendment of the draft site allocation, removing the too restrictive reference to the increase in economic floorspace and the limitations proposed for building heights, in addition to removing reference to the TfL scheme, given the lack of evidence to confirm its deliverability. Greater flexibility in the allocation would better reflect the positive contribution any redevelopment could have for the Wandsworth Town area through the delivery of a viable and well-designed scheme. Such amendments will ensure that the site allocation is justified, positively prepared and consistent with national policy.

#### *Draft policy LP4: Tall and Mid-rise Buildings*

Further consideration of NPPF paragraph 119 (effective use of land) and 124 (achieving appropriate densities) as well as the NLP policies D3 (optimising site capacity) and D9 (tall buildings) are required to ensure that this draft policy is compliant with the regional and national planning narrative.

As currently drafted, Appendix 2 of the draft Local Plan identifies zones for tall and mid-rise buildings and includes the site within a "mid-rise building zone" at map 23.36: Wandsworth Town and Common. There is also reference to the site capability to accommodate 5 storeys. However, as stated above, such an approach fails to optimise the potential of this key regeneration opportunity. The Local Plan should be seeking to make the best use of this sustainable and accessible town centre location to optimise site capacity with a design led approach. This will assist in ensuring the Local Plan is consistent with the NPPF, is positively prepared and is sound and deliverable.

In considering the development of the site in line with the proposed on-site requirements and uses set out in the draft site allocation, if the development was limited to 5 storeys, it would be difficult to create any articulation of building height and massing within the surrounding and existing street scene. With a limit of 5 storeys, the urban design opportunities are stifled, with the inability to create a distinctive, high-quality development in this town centre location, contrary to the design-led approach set out at draft policy LP1.

By ensuring consistency with NLP Policy D9 and by enabling the use of tall buildings in appropriate locations, the Local Plan would allow the development of sites to achieve high-quality design and more viable schemes to assist



[hghconsulting.com](http://hghconsulting.com)

in meeting the wider, overarching objectives of the emerging Local Plan. This flexibility will protect the principles of the Local Plan, whilst allowing sites to be tested on a site-by-site basis during the planning application process.

Chelsea Cars seeks the amendment of this draft policy to ensure that it is justified and does not limit the prospect of achievable development of sites, such as site allocation WT1. Specifically to:

- adjust the existing reference to increasing commercial floorspace to allow for a more realistic market led approach for the redevelopment of the site;
- remove the reference of the site within a mid-rise location as is likely to stifle regeneration and fail to optimise the redevelopment opportunity arising; and
- remove reference to the 5 storey limit for the reasons set out above and to encourage a more design led approach to delivering a high quality redevelopment to form an appropriate gateway to the town centre.

### **Conclusion**

On behalf of our client Chelsea Cars, we have set out our representations objecting to the emerging LB Wandsworth Local Plan (Regulation 19) as currently drafted. This includes a number of considerations that would both assist with facilitating the positive redevelopment of our client's site and also with the creation of a 'sound' Local Plan and would ensure that the policies are future proofed and consistent with the adopted regional and national policy narrative.

Thank you for the opportunity to submit the above representations and we would be grateful if you could acknowledge receipt. We would welcome the opportunity to meet with Officers at the earliest opportunity to discuss the points raised. If you have any questions or wish to discuss any of the enclosed in further detail, please do not hesitate to contact me or my colleague Ellie Fowler.

Yours sincerely

**Patrick Grincell**

**Director**