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Planning Policy  
Environment and Community Services  
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Dear Sir/Madam

**Sent via email – [planningpolicy@wandsworth.gov.uk](mailto:planningpolicy@wandsworth.gov.uk)**

Dear Sir/Madam,

**London Borough of Wandsworth Draft Regulation 19 Local Plan Public Consultation – comments submitted on behalf of Safestore PLC.**

### **Introduction**

This written representation is submitted by Savills (UK) Limited ('Savills') in response to the London Borough of Wandsworth Council's ('LBW') invitation to submit comments in respect of a public consultation on the Regulation 19 draft of the new Local Plan. These comments are submitted on behalf of Safestore PLC ('Safestore').

Safestore are the owners of three sites within the London Borough of Wandsworth (LBW): Ingate Place in Battersea, 19 Lombard Road in Battersea and 1 Bendon Valley on Garrett Lane. This letter of representation will relate to the two Sites in Battersea, Lombard Road and Ingate Place. Safestore maintain their commitment to exploring the redevelopment potential of these Sites with the LBW in order to contribute to the wider growth of the Borough.

Savills has made representations on behalf of these Sites during previous policy consultations. The most recent representations were made in response to the Regulation 18 Wandsworth Draft Local Plan: Pre-Publication version (November 2020). Prior to this, Savills has also made representations on the draft WeMadeThat Battersea Design and Technology Quarter Masterplan, the Wandsworth Local Plan: Full Review Issues Document (Regulation 18, December 2018) and GVA in response to the Employment and Industry Review (Proposed Submission and Policy Options Consultation Document, March 2017 and October 2016 respectively).

Historically, there has been good dialogue between Safestore and the LBW, and we now look forward to continuing this extensive and productive engagement with the LBW and other key stakeholders on this important document.

In addition to the observations set out, this representation is accompanied with the following:



Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS.

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- Urban Design & Townscape Analysis – prepared by Montagu Evans;
- Indicative Development Options Designed – prepared by Collado Collins;
- Legal Opinion – prepared by Shoosmiths LLP; and
- Financial Viability Appraisals for Indicative Development Options – prepared by Savills Viability.

These documents have helped us to understand the implications of the draft policy on the redevelopment opportunities of either sites. These are included under separate cover, but referenced within this note.

### **Executive Summary**

- The Reg.19 Plan seeks to shape growth and change in Wandsworth over the next 15 years as the borough seeks to meet a pressing need for new housing and recover from the economic effects of the global pandemic.
- The draft plan identifies indicative parameters of heights across the borough, effectively introducing maximum building caps. For Ingate Place, this set at 6 storeys; for Lombard Road, this is between 7-10 storeys.
- Overall, we have concerns that these height caps will effectively block development coming forward that is able to deliver the wider strategic objectives of the local plan. Furthermore, these parameters do not appear to be underpinned by sound evidence base, nor reflect the existing townscape context of their respective areas. Therefore it is considered that this plan is not justified.
- Moreover, married with stringent site allocation on Ingate Place, the proposed policy framework will effectively curtail any policy compliant redevelopment coming forward, thereby making development proposals unable to deliver the wider ambitions of the Battersea Design and Tech Quarter ('BDTQ'). This is supported through a viability exercised undertaken by Savills Viability.
- As currently drafted, the plan risks rendering the redevelopment of both Ingate Place and Lombard Road sites as unviable, meaning it would also risk achieving wider objectives of its plan through a strong local economy at Ingate Place and the delivery of houses at Lombard Road. Therefore, it is not considered effective.
- As drafted, it is our contention that the Reg. 19 Plan could not be considered 'sound' in accordance with Paragraph 35 of the National Planning Policy Framework (NPPF) given it is not, as a whole, positively prepared, justified, effective or consistent with national policy.

**Contents**

**Context**

NPPF.....4  
 Safestore.....4  
     Ingate Place.....5  
     Lombard Road.....5  
 Regulation 18 draft Local Plan .....6

**Regulation 19 Site Allocation Comments**

*Policy SDS1 – Spatial Development Strategy 2023-2038*.....7  
*Wandsworth Site Allocations* .....8  
*Site Allocation - Policy PM3, Nine Elms* .....8  
*Site allocation – Policy NE7, Battersea Design and Tech Quarter*.....11  
*Site Allocation - Policy PM9, Wandsworth’s Riverside (19 Lombard Road)* .....12

**Regulation 19 Policy Comments**

*Policy LP1 – The Design Led Approach*.....12  
*Policy LP3 – Historic Environment*.....13  
*Policy LP4 – Tall and Mid-rise Buildings*.....13  
     *Ingate Place*.....13  
     *Lombard Road* .....14  
*LP6 – Basements and Subterranean Developments*.....15  
*LP10 – Responding to the Climate Crisis*.....16  
*LP23 – Affordable Housing*.....16  
*LP33 – Promoting and Protecting Offices*.....16  
*LP34 – Managing Land for Industry and Distribution*.....17  
*LP35 - Mixed-Use Development on Economic Land*.....17  
*LP37 - Requirements for New Economic Development*.....18  
*LP38 – Affordable Workspace*.....18  
*LP51 – Parking, Servicing and Car Free Development*.....19

**Overall effects of the draft Plan**

*Methodology*.....19  
*Townscape*.....19  
*Viability*.....20

**Conclusion** .....21

## **National Policy Context**

Paragraph 35 of the National Planning Policy Framework ('NPPF', July 2021) states that for an emerging Local Plan to be found "sound", it must satisfy the below four criteria:

1. **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 areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
2. **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
3. **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
4. **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.

Further to the four tests above, local plans in London are also required to be in "**general conformity**" with the London Plan.

## **Context**

### **Safestore PLC**

Safestore provides self-storage solutions to businesses and the public. Self-storage is an increasingly popular and important service which complements modern living and business needs. Nationally, just over half of Safestore's space is occupied by residential customers with the remainder occupied by businesses.

The businesses which use Safestore tend to be small and medium-sized and are attracted by the all-inclusive and flexible terms. These terms make the product an affordable and desirable option compared to traditional warehousing. Businesses can increase or decrease unit size at short notice without charge and can exit the facility with less than one month's notice.

To fully understand how Safestore sites support small and independent businesses, Savills Economics has surveyed how Safestore's business customers use their storage facilities and the economic benefits associated with this. The results show that Safestore self-storage units perform an important function for micro and small-medium sized enterprises.

It is therefore apparent that many existing businesses within LBW rely on Safestore as a viable and cost-effective place from which to operate and/or use for storage as an essential component of each business and their operations. Safestore wish to grow and make their businesses more efficient within the LBW through the redevelopment of both sites.

Safestore's operational requirements mean that the Safestore business will remain a critical component of the future of both sites. Therefore, Savills make representations to LBW with good faith that the local business and residential population will benefit should these comments be taken into consideration

### **Ingate Place**

Ingate Place is currently home to a B8 self-storage facility and an Class E SME business centre. The site is not intensively used and we consider that the existing warehouse building falls short of its potential to create place. Particularly given its public transport accessibility and proximity to Queenstown Road station.

Despite being allocated as Strategic Industrial Land (SIL), the site only contributes 4.8% (2ha) of the total 41ha Queenstown Road SIL designation and is not a contributor towards the effectiveness of London's strategic industrial capacity. The Site is extremely isolated from the surrounding strategic industrial functions, being surrounded by railway lines and physically separated from the surrounding SIL, making the area distinct from the surrounding reservoir of industrial use. Safestore Ingate Place primarily serves a number of local business and domestic functions only. It is our view that as currently drafted, the draft local plan is not accurate in its assessment that Ingate Place functions as a Strategic Industrial Location (SIL).

Nonetheless, the site is a highly successful element of Safestore's estate and the B8 storage and distribution centre has the potential to be more intensively used should the right policy framework permit it. This ambition wholly aligns with the NPPF and we consider the LBW Local Plan presents an exciting opportunity for Safestore and the Council to work collaboratively to deliver against this vision of Ingate Place.

Ingate Place is allocated within the draft Local Plan as site NE7 'Battersea Design And Technology Quarter'. The allocation is for: *'a mix of workshops and studio uses, office space for SMEs, open space, and industrial uses including yard space and amenity space'*.

The site also lies within the Battersea Design And Technology Quarter ('BDTQ'), of which We-Made-That have drafted the Battersea Design And Technology Quarter Masterplan ('BDTQM'), which has the intention of informing development proposals in this area. In lieu of any formal consultation process, Savills have written to both We-Made-That and LBW regarding the draft BDTQM. Via our letter dated 29th June 2020, we have expressed Safestore's significant concern with regards to the lack of consultation on the BDTQM, which has now gone on to form an extensive length to inform the spatial policy of this plan.

At the time of writing, Safestore are also engaging with PRD regarding a review of the WeMadeThat document, and look forward to engaging in a collaborative process.

We therefore suggest there is further scope within LBW policy to engage with Safestore regarding the BDTQM and create a positive framework, able to capture the potential of the area.

### **Lombard Road**

Safestore has been trading from Lombard Road since July 2002. The Site is currently home to 11,421 sqft of B8 storage and distribution floorspace.

The Site neighbours Fraser & Ellis, a plumbers merchant. These two sites are allocated within the emerging local plan for development incorporating replacement economic floorspace and residential use under site allocation: *'RIV8 19 Lombard Road, 80 Gwynne Road'*. The site also lies within the wider Lombard Road/ York Road Riverside Focal Point.

The two landowners have historically sought pre-application advice regarding the comprehensive redevelopment of the two sites, the most recent being a part 22, part 18 storey development, stepping down from the nearby 28 storey Lombard Wharf.

Safestore remains committed to exploring the redevelopment opportunities at 19 Lombard Road and 80 Gwynne Road. The Site presents an opportunity to deliver a high quality mixed-use scheme, creating a significant amount of homes and employment floorspace. As currently drafted, the policy seeks to introduce a maximum building height of part 7/10 storeys across this Site, which would effectively curtail any viable redevelopment opportunity.

We consider the height cap placed on this Site will sterilise the future redevelopment opportunities of both Lombard Road and Ingate Place. This is explored in more detail within this note.

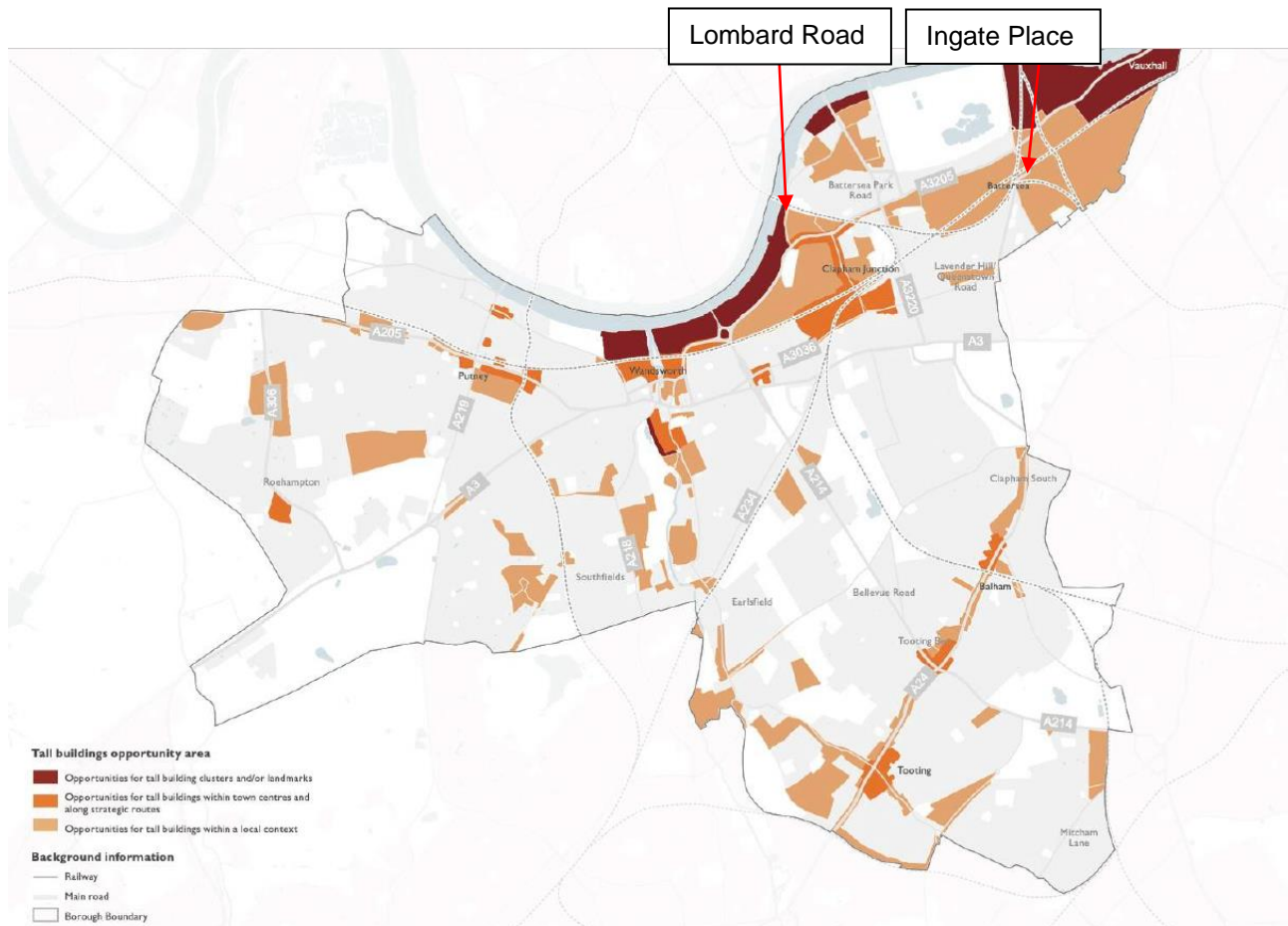
### **Regulation 18 Draft Local Plan**

The LBW undertook its Regulation 18 consultation of the draft plan (Reg.18 Plan) in early 2021. Within the Reg 18 Plan, Ingate Place was located in an area which has opportunities for tall buildings within a local context, and the height at which buildings will be considered as 'tall' was proposed as 8 storeys.

Lombard Road was also located in an area which has opportunities for tall buildings within a local context, and the height at which buildings will be considered as 'tall' is 5 storeys.

This is illustrated in the image below. For clarity, the key in the image outlines the following:

- Burgundy – Opportunities for tall building clusters and/or landmarks
- Deep orange – Opportunities for tall buildings within town centres and along strategic routes
- Pale orange – Opportunities for tall buildings within a local context



Since the publication of the Reg.18 Plan we do not consider there to have been any change on or near the Site which would materially change site conditions in environmental or townscape regard. Further, we note that the neither the draft Reg 19 plan or its supporting evidence base points to any chance in circumstances in this regard.

The remainder of this note outlines our comments on the draft regulation 19 version of the local plan. It should be noted that where policies are not discussed directly in this note, Safestore is in broad support of the content.

### Regulation 19 Site Allocation Comments

#### *Policy SDS1 – Spatial Development Strategy 2023-2038*

The draft policy proposes a housing target of 1,950 new homes annually until 2028/29, which aligns with LBW’s housing target identified in the London Plan. However, the Council’s own Local Housing Need Assessment (2020), published as part of the local plan evidence base, outlines that LBW Objectively Assessed Need (‘OAN’) is 2,537 dwellings per annum.<sup>1</sup>

<sup>1</sup> Paragraph 6.32 of Local Housing Needs Assessment

Whilst aligning the housing target in the draft plan with the London Plan ensures its general conformity, it also fails to consider Robert Jenrick's (the then Secretary of State for the Ministry of Housing, Communities and Local Government) letter to the Mayor requiring the now adopted London Plan's housing targets be immediately reviewed following its adoption.<sup>2</sup> As such, given that LBW has objectively identified itself a greater need for housing the plan would fail to deliver against this basic requirement. We suggest that a positively prepared plan would meet its own identified needs rather than adopting an out-of-date position informed by an out-of-date evidence base from the London Plan.

Therefore, we consider that there is a discrepancy between the evidence base housing target and the housing target identified in draft policy, meaning this policy was **not positively prepared** and **would not be effective** in delivering the needs of the borough and is therefore not justified.

#### *Site Allocation - Policy PM3, Nine Elms (Ingate Place)*

We are pleased to see that LBW recognises the potential of Nine Elms as an area able to achieve substantial growth and competitiveness. We believe that there is an ongoing appetite for redevelopment around Nine Elms catalysed by the introduction of Apple at the Battersea Power Station. The plan has recognised this and we support this in principle

The draft plan distinguishes the BDTQM as an area with the potential to agglomerate small and medium-sized enterprises. Married with its location within the Nine Elms Opportunity area, we are pleased to see that the potential for growth around Ingate Place has been recognised.

However, any emerging strategic and/or non-strategic spatial-based policy must acknowledge and reflect the ambition of landowners around the site to deliver this untapped growth, in order to create a policy framework that is capable of achieving the strategic aims of the plan. As currently drafted, Policy PM3 is overly prescriptive, not responding to the temporal market context for development, which is constantly evolving. The overly prescriptive spatial strategy across Ingate Place, married with the introduction of acceptable height parameters (respectively explored later within this note), has the potential to curtail viable development opportunities. The redevelopment of Ingate Place has been effectively paused because of the uncertainties around the BDTQM. This uncertainty could effectively compound with the introduction of further policy constraints.

The 2019 BDTQM document, completed by 'We Made That', has had a significant role in draft policy PM3. However, to date there has been no formal public consultation process inviting landowners to provide comments on this document. Any SPD would need a statutory 4-6 weeks of public consultation and due alterations before adoption. Therefore, significant weight cannot be placed upon the BDTQM in the draft Local Plan before this process has been undertaken. The draft Local Plan should not go through public consultation while incorporating the spatial-based policy of the BDTQM, that is yet to go through the necessary adoption processes. This is supported by the accompanying letter from Shoosmiths LLP. The weight given to the BDTQM within the draft local plan without the necessary due consultation is therefore **unsound**.

With regard to the prescriptive nature of the local plan, point A(1) of policy PM3 outlines the need for proposals to deliver place-making through public realm improvements. Safestore recognise the importance of delivering a betterment in public realm through development. However, as a business Safestore place huge value on the

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<sup>2</sup> Page 1 of Letter to Mayor of London from Secretary of State for Housing, Communities and Local Government (27 July 2018)



Site as a self-contained, secure unit. Having an increased footfall through the site would be problematic to the operations of the Safestore. We consider it to be impractical and overly prescriptive to suggest that all development proposals within the BDTQ should deliver and/or fund placemaking improvements, such as amenity yards, public realm in tunnels and underpasses, walking and cycling access. Later on in the plan, draft Policy LP20 (New Open Space) sets out that financial contributions can be placed by developers to enhance public opens space where it can be demonstrated that on-site provision is not feasible. This flexibility should be applied to point A(1), as the current requirement for public realm improvements to be delivered on private land is overly onerous.

Point 3 of policy PM3 outlines that development proposals for tall or mid-rise buildings in Nine Elms will only be supported in zones identified in Appendix 2. Any proposal for a tall or mid-rise building 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 height parameters of Ingate Place is explored in further detail later in this note, but introducing policy that only permits mid-rise buildings of 6 storeys will effectively block the redevelopment of Ingate Place being able to deliver substantial planning benefits and positive growth.

#### *Ingate Place - Strategic Industrial Land*

Ingate Place is designated as Strategic Industrial Land, as outlined in paragraph 5.70 of policy PM3. Within SIL, development is limited to industrial and related capacity uses, including general and light industrial uses, logistics, waste management and environmental industries (such as renewable energy generation), utilities, wholesale markets and some transport functions. The implications of Ingate Place's SIL designation is expanded on in more detail in Policy 34.

Paragraph 18.26 of the draft Local Plan outlines that Strategic Industrial Land (SIL) is defined within London Plan Policy E5 as *'forming London's main reservoir of land for industrial, logistics and related uses, and is given strategic protection because these sites are considered critical to the effective function of London's economy'*. However, paragraph 18.26 of the draft Local Plan fails to consider the paragraphs 6.5.1 and 6.5.2 of the London Plan, which outline that SILs *'can accommodate activities which - by virtue of their scale, noise, odours, dust, emissions, hours of operation and/or vehicular movements - can raise tensions with other land uses, particularly residential development [...] providing relatively low-cost industrial space for SMEs and located close to the strategic road network.'* The characteristics listed here are not representative of the characteristics at Ingate Place.

Therefore, the London Plan's definition of SIL attributes four main characteristics to them:

1. Critical to the effective function of London's economy;
2. Accommodate activities which have the potential to raise tensions with other land uses;
3. Providing relatively low-cost industrial space; and
4. Located close to the strategic road network.

Safestore strongly object to the characterisation of Ingate Place as an area suited as SIL when considered in context of the above characteristics.

Firstly, the site only contributes 4.8% (2ha) of the total 41ha Queenstown Road SIL designation and is not a contributor towards the effectiveness of London's economy. The Site is extremely isolated, being surrounded by railway lines, physically separated from the surrounding SIL, making the area distinct from the surrounding

reservoir of industrial use. Safestore Ingate Place primarily serves a number of local business and domestic functions only. In its current context, the area is not critical to the effectiveness of London's economy.

In relation to the second SIL characteristic, the existing activities on site do not raise any potential amenity impacts onto other land uses. Paragraph 18.30 of the draft Local Plan outlines that the *'nature and by-products of industrial activities, which include the generation of noise, odours, dust, emissions, traffic (including HGVs) and the requirement for operation across a 24 hour period, can often result in conflicts being raised with other uses'*. Safestore, Ingate Place does not portray these aforementioned characteristics. The site is principally used for self-storage purposes with an element of office and workshop space within the business centre, with no intense industrial operations on-site. Safestore facilities already co-locate alongside a variety of uses without detrimental impact around London. Ingate Place is therefore not an area that produces by-products of industrial activities, making it an appropriate area for a larger variety of land uses than just industrial.

The distinctness of Ingate Place from the wider SIL is reinforced by the fact the area was designated as an Industrial Business Park (IBP) and not a Preferred Industrial Location (PIL) by the London Borough of Wandsworth in 2016 through the Employment and Industry Review. The site was designated as an IBP as the land uses on site were demonstrably different from the more industrial PIL land uses. The New London Plan does not currently recognise IBP within its SIL designation and therefore at a regional level, the site will be allocated as SIL without distinction. However, there is currently a significant amount of office use within Ingate Place that would not currently be supported as being suitable within a SIL in policy terms. Considering the quantum of office use that exists within Ingate Place, the area does not function as an area designated as SIL and should not be designated as such.

In regard to the third characteristic, paragraphs 6.5.2 of the new London Plan (2020) outlines that SILs should provide low-cost industrial floorspace for SMEs. The site is currently occupied by high-value uses and not fit to be part of the wider Queenstown SIL designation. Due to the high value uses, the site will only be commercially viable by incorporating a variety of land-uses which contribute to the wider function of the BDTQM. Therefore, it's clear that designating the site as SIL could act as a deterrent to any redevelopment opportunities on site, which is principally against the overarching objectives of the wider BDTQM and Battersea and Nine Elms Opportunity Area.

Lastly, paragraph 6.5.2 of the New London Plan outlines that SILs should be well-located *'close to the strategic road network'*. The Site is extremely isolated, being surrounded by railway lines, physically separated from the surrounding SIL. It also lies over a mile away from the strategic road network of the A3. The isolated nature of the site means it is not able to significantly contribute to the surrounding parcel of SIL. The removal of Ingate Place from SIL would therefore enable the site to make a greater contribution to the LBW.

The NPPF requires that, for a local plan to be declared sound, it must be effective, meaning it must be deliverable. The allocation of the site as SIL means that the context of the site is misunderstood and it should be recognised that the likelihood of the Council achieving SIL uses on this site is extremely unlikely. As such, the plan as drafted is effectively stifling the opportunity for investment in the site ensuring that the status quo will remain until there is a change in policy context.

#### *Site allocations – Policy NE7, Battersea Design and Tech Quarter*

Map 5.4 outlines the wider spatial area map of the BDTQ. This is included below, for your reference:



As a key landowner within Site 12, Safestore raise concerns regarding the deliverability of the Site allocation as currently drafted and would suggest that LBW consider the ambitions of Safestore and the operational requirements of the existing self-storage unit.

Map 5.4 currently proposes a potential underpass underneath the railway arch to the north-east of the Site. Safestore would ask whether a sound feasibility and viability assessment has been carried out by LBW for this railway arch, considering the substantial cost and operational implications of such construction on the railway network. Delivering such a route within any development proposal would not be viable or an attractive proposition for Safestore, considering the substantial benefit of the site being secure, and we suggest this is removed from the Spatial Area Map prior to adoption to ensure the proposals are indeed deliverable.

Map 5.4 also proposes 'other open space' where the operating Safestore unit is located. The provision of open space in any development proposal on Ingate Place is also reiterated in paragraph 5.71 of Ingate Place's site allocation, which outlines proposals should '*provide open space with high-quality green features in the centre of Ingate Place (NE7)*'. Safestore would question the introduction of the open space designation. This type of open space is not suitable for working sites. Additionally, Safestore occupiers value the ability to park vehicles on site so they can service their customers. This masterplan approach should be brought forward having had significant consultation undertaken with landowners prior to adoption, and we would encourage further engagement to ensure that the proposals sought by the LBW aligns with the aspirations of stakeholders around Ingate Place.

Paragraph 5.79 of site allocation NE7 outlines that the maximum appropriate height for the area is 6 storeys, in accordance with the mid-rise building maps in Appendix 2. It also notes that development proposals for tall buildings within NE7 will not be supported. As noted, capping building heights within Ingate Place has the potential to sterilise any viable redevelopment opportunity of the Site, thereby preventing the delivery of the strategic aims of the BDTQM. This is discussed in further detail later within this note.

We consider that the current site allocation is unduly prescriptive, inflexible and restrictive, constraining any future redevelopment opportunities of Ingate Place and the ability of development proposals to deliver significant planning benefits that the draft Plan seeks to achieve. As currently drafted, the framework is not in general conformity with the national policy, specifically paragraph 11 of the NPPF, which seeks to ensure plan policy is sufficiently flexible. We would strongly encourage LBW to engage with landowners around Ingate Place to deliver a site allocation that has the potential to be delivered and meet the draft local plan's wider strategic ambitions of growth.

#### *Policy PM9 – Wandsworth's Riverside (Lombard Road)*

With regards to inclusive growth, we support the promotion of residential-led development in the Focal Points of Activity. We consider that the housing delivery targets for the borough should be increased (as discussed against draft policy SDS1 above) which would likely result in an increase for delivery in the Wandsworth Riverside area.

The 'People First' element of the policy is also supported. Safestore recognise the importance of delivering a high-quality streetscape and increasing public access to the riverside. Lombard Road is capable of contributing to a number of these objectives of the draft plan where the right policy conditions allow for the site to be delivered and optimised for its re-development potential.

However, when married with the taller building policy part PM9 (4), in which it is outlined that development proposals for tall or mid-rise buildings in Wandsworth's Riverside will only be supported in zones identified in Appendix 2, we raise concerns that the overall deliver of benefits will be undeliverable considering the prescriptive height policy.

The townscape context of Lombard Road is considered on later in this note and within the accompanying report compiled by Montagu Evans.

### **Regulation 19 Policy Comments**

#### *Policy LP1 – The Design Led Approach (Ingate Place and Lombard Road)*

Draft policy LP1 requires development proposals to, among other things, use a design-led approach to optimise the potential of sites, in conformity with the approach set out in Policy D3 of the London Plan (2021).

Whilst Safestore is fully supportive of the LBW's intention to optimise site's utilising the design-led approach as set out, we consider this approach to be at odds with draft Policy LP4 (Tall and Mid-rise Buildings). The detail of draft Policy LP4 is discussed in detail below. However, a design led approach as set out in these draft 12 criteria of Policy LP1 allows for flexibility and for an Applicant and the Borough to engage in discussion through the relevant Development Management procedures. This approach ensures that any development proposals submitted to the Borough would need to respond to this policy whilst demonstrating that the site has been optimised to deliver best outcomes for the borough. A rigid approach which caps heights removes this design

approach from the process and is unlikely to therefore deliver the jobs and homes the borough needs as well as resulting in inferior design proposals.

#### *Policy LP3 – Historic Environment (Ingate Place and Lombard Road)*

Part 3 of this draft policy requires development proposals to positively contribute to and, whenever possible, enhance the setting and integrity of strategic and local views (as set out in the London Plan and in table 14.1) and valued. The starting point for this draft policy is to positively contribute, which appears to go over and above the position in the London Plan and the NPPF.<sup>3</sup> The extract from London Plan policies HC1 and HC4 demonstrate that the baseline is to conserve and to not harm, as opposed to requiring a positive contribution. Whilst we are generally supportive of protecting Wandsworth's historic and strategic environments, draft policy LP3 (Part 3) appears more onerous than the London Plan and the NPPF. This policy as drafted is therefore **not in general conformity with the London Plan** and **not consistent with national policy**.

#### *Policy LP4 – Tall and Mid-rise Buildings (Ingate Place and Lombard Road)*

This draft policy establishes tall and mid-rise building zones across the borough; with 'mid-rise' defined as 6-storeys or 18m (whichever is the lower) at Ingate Place and taller buildings defined as 7-storeys or 21m (whichever is the lower) at Lombard Road. We consider this rigid approach to tall buildings to be inflexible and an inappropriate strategy for the borough to be able to encourage and deliver appropriately optimised sites. Optimising sustainable brownfield sites is a strategy that is reiterated in both Policy D3 (Optimising site capacity through the design-led approach) of the London Plan and the National Planning Policy Framework.<sup>4</sup> By restricting the appropriate optimisation it is our view that the policy as drafted is too rigid and discourages development, thereby making the policy not deliverable and **not effective**.

#### *Ingate Place*

Ingate Place was included within an area with opportunity for tall buildings within a local context within the Regulation.18 Draft Local Plan, which was underpinned by the Arup Urban Design Study (2021). Ingate Place was also classed as area with low sensitivity to taller buildings (see image below).

There is no justification for the borough's change in approach to this site, by removing the site from the tall building zone and placing it into the mid-rise building zone. Appendix A of the Urban Design Study (2021) provides high level townscape, visual and heritage assessment for various tall building zones. This includes detailed massing models for many of the tall building areas, to assist in justifying an area's respective designation. However, it is noted that the mid-rise building zone the Site is located within (i.e., MB-B3a-02) has no such assessment and it is therefore unclear what evidence the Urban Design Study (2021) has utilised to justify the current mid-rise designation of the site.

Also, Ingate Place has notably been excluded from the Taller Building zone adjacent to the Site. Montague Evans found that there is no evidence to suggest that the tall building zone could not be extended to include the full extent of Ingate Place and indeed this would enable greater flexibility to introduce a varied composition of massing and heights as suggested by We Made That in their BDTQ Framework document.

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<sup>3</sup> Paragraph 199 of the National Planning Policy Framework

<sup>4</sup> Paragraph 130 (e) of the National Planning Policy Framework

The accompanying note from Montagu Evans also raises issue with the lack of analysis given to the local context. The designation of only the western portion of Ingate Place as a tall building zone is unduly restrictive and does not align with the scenario's baseline assessment and conclusions. Considering this, in the absence of any townscape assessment of a tall building at the site it is our view that Policy LP4 is **not justified**.

#### *Lombard Road*

With regards to Lombard Road, the tall building allocation of 7-20 storeys is subjective. The site presents an opportunity to deliver significant benefits through the delivery of homes, jobs and public realm improvements which can only be facilitated through the delivery of a taller building on site.

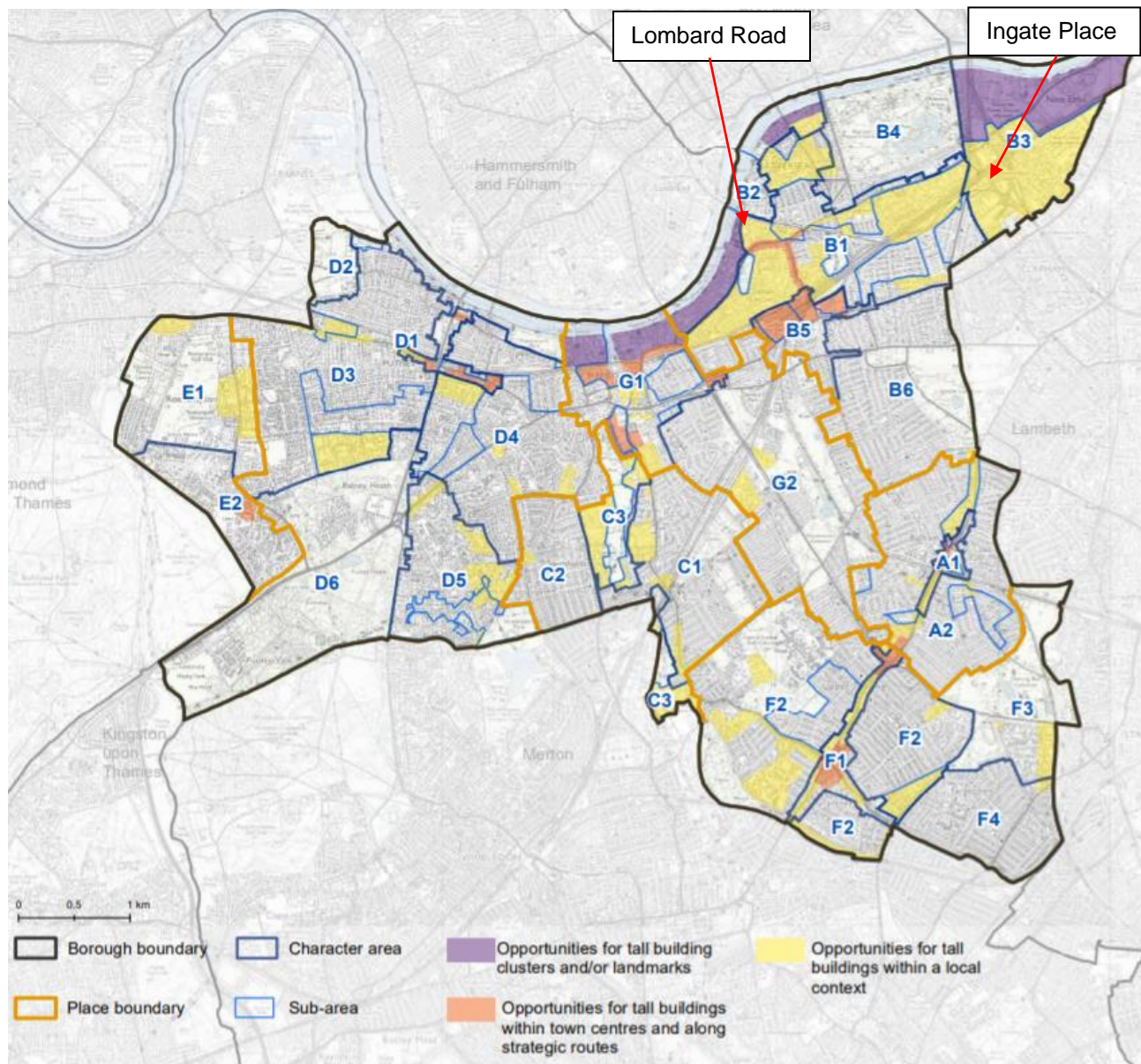
The accompanying Urban Design Study (2021) outlines that heights in this area are to be capped to ensure there is no detrimental impact on the adjacent York Gardens and Battersea Square Conservation Area.

However, the extent of visibility of new and existing development on the setting of a conservation area does not necessarily constitute harm and the degree of any harm for each individual case is rightly assessed on its own merits. Indeed, there are many instances of where tall or large-scale development appear as prominent features in the wider context of conservation area settings and this does not necessarily result in a negative impact, there may be resulting positive aspects of townscape such as juxtaposition of new and old, legibility and wayfinding and composition of tall building clusters.

It also fails to consider that Lombard Wharf is visible, most notably from the western edge of the Battersea Square conservation area as a standalone building with a modern architecture that contrasts with the low-rise historic character. The 14-storey Gwynne Road development is also visible as an isolated feature. Each building therefore forms part of the conservation area's setting and the introduction of additional building forms of a similar or comparable scale to respond to these standalone buildings may be beneficial in creating an improved composition of taller elements forming the backdrop in views looking southwards towards an emerging riverside cluster.

The accompanying letter compiled by Montagu Even outlines that the Study fails to account for how new development can contribute positively to defining a future character of place. To demonstrate this point, Collado Collins have drawn up a policy compliant scheme at the same scale described in the Study's scenario for Lombard Road. The indicative townscape views show how placing a height restriction on the site would create an awkward and unsuccessful townscape composition that would fail to meet the policy requirements of London Plan (2021) policies D1 (responding to established and emerging context) and D3 (design-led site optimisation).

Notably, this scheme would also fail to deliver substantial planning benefits that a taller building could. In the absence of any townscape assessment of a tall building at the site it is our view that Policy LP4 is **not justified** in its parameters of acceptable heights at Lombard Road



LP4 - Tall and Mid-rise Buildings - (Ingate Place and Lombard Road)

Draft Policy LP4 (Part C) states proposals for tall buildings will not be permitted outside the identified tall building zones. The apparent blanket-ban on tall buildings outside of tall buildings zones does not align with the recent *Master Brewer (2021)* judgment of the High Court. In summary, the court held that a tall building proposal should be assessed against the potential impacts outlined in Policy D9 (Part C) of the London Plan (2021) rather than assessing the impacts in a vacuum.<sup>5</sup> Whilst London Plan Policy D9 allows local planning authorities to be more prescriptive with tall building locations it is clear from the *Master Brewer* judgment that an assessment of a scheme holistically should be considered. As currently drafted, Policy LP4 (Part C) strictly prohibits tall buildings outside of tall building zones and removes an applicant’s ability to appropriately provide

<sup>5</sup> Paragraph 85 of Hillingdon judgment (<https://www.bailii.org/ew/cases/EWHC/Admin/2021/3387.html>)

a planning justification for a scheme. It is therefore our view that Policy LP4 (Part C) is **not in general conformity with the London Plan, nor is it effective**.

LP4 (Part 3) states proposals should be designed to reflect and respond to relevant key view corridors toward the Site to ensure location, form, detailing and prominence of tall buildings are appropriate within the wider context. We are generally supportive of this insofar as it seems to support the iterative design process and encourages applicants to engage in the design-led process.

LP4 (Part 4) states the design of the lower, middle and upper parts of tall buildings should result in the creation of a visually coherent scheme both in terms of the building itself and how it relates to the surrounding area, and its appearance in any mid or long-range views. Both Ingate Place and Lombard Road present a clear opportunity to deliver a legible and visually coherent scheme which acts as a distinct markers of entry into the BDTQ and edge of the tall build zone respectively. In this context, we consider the Site capable of accommodating buildings taller than 6 and 7 storeys respectfully in these locations.

LP4 (Part 16) states tall building proposals should incorporate active frontages at ground floor. We are supportive of LBW's approach to active ground floor uses.

Much of the tall building "impacts" to be assessed under Policy LP4 concern design. In this design context, development proposals should be tested through the development management process following submission of a detailed planning application. Further, subject to the appropriate townscape and design testing, we contend that both Ingate Place and Lombard Road are capable of accommodating a building taller than the heights identified as "tall" in the neighbouring tall building zone

In light of the above, it is our view that Ingate Place and Lombard Road have been wrongly capped at heights of 6 and 7 storeys respectively. The Urban Design Study (2020) presents no clear, townscape or design evidence of the Site in which to justify either designation; this is particularly pertinent considering both Sites were included within an opportunity area for tall buildings within a local context.

For the reasons set out above, we consider this policy as drafted is **not justified**. The strict interpretation of the London Plan's tall building policy D9 is likely to discourage development and unduly restrict LBW's ability to deliver the wider objectives of Policy LP4. The policy as drafted is also therefore **not effective**.

#### *LP6 – Basements and Subterranean Developments - (Ingate Place and Lombard Road)*

Part A.1 of this draft policy states that new basements will only be permitted where it would result in no more than one storey of basement accommodation below ground level. However, there does not appear to be any evidence base to justify this position in the Reg.19 Plan. The acceptability of basement development should be determined on a case-by-case basis and LBW should be supportive of such development where an applicant has demonstrated a basement has been appropriately designed with appropriate mitigation measures, where necessary. This draft policy therefore appears unduly restrictive, particularly in the context that there is no evidence to underpin this position. As such, we consider the policy is **not justified**.

#### *LP10 – Responding to the Climate Crisis – (Ingate Place and Lombard Road)*



The principle of sustainable design being reinforced within the policy to mitigate the impacts of climate change is noted. We are also pleased to see that LBW have recognised that some buildings may be challenged by the target requirement to meet BREEAM 'outstanding' accreditation. This is something that a B8 Storage and Distribution centres may find challenging to hit due to the nature of their relatively stripped back building form and function.

LP 10 part (C) outlines that non-residential development should achieve a 15% reduction through energy efficiency measures alone, but this may be practically difficult for a B8 storage and distribution centres, which are the lowest intensity emissions in the real estate sub sector<sup>6</sup>, to achieve as the existing units may not be a large energy consumer.

Moreover, the requirement to provide a payment in lieu via a carbon offset fund when on-site carbon reductions are not achieved able has the potential to impact the viability and subsequent deliverability of a development proposal. We would therefore advise LBW to alter LP 10 (C) so carbon offset payments are required subject to viability.

#### *LP23 – Affordable Housing – (Lombard Road)*

This draft policy seeks to maximise the delivery of affordable housing in line with the threshold approach set out in Policy H5 of the London Plan (2021).

As drafted, Policy LP23 (Part E), states that viability information will only be accepted in exceptional circumstances. Clarity is sought from the Council in this regard as the use of 'exceptional circumstances' results in confusion within the drafting. Where a site or development is not capable of coming forward in line with the threshold approach set out in Policy H5 of the London Plan, or where the policy compliant tenure split is not deliverable, a viability case should be capable of being advanced with the Council.

#### *LP33 – Promoting and Protecting Offices – (Ingate Place)*

This draft policy establishes the borough's approach to office development by focussing employment development to key strategic areas such as the Central Activities Zone ('CAZ'), town centres and the Vauxhall, Nine Elms and Battersea Opportunity Area ('VNEB'). The LBW Employment Land and Premises Study ('ELPS', 2020) indicates there is a net additional requirement for 22,500 sqm of office floorspace over the emerging plan period. We support the strategic need to deliver new office floorspace within the wider VNEB, and suggest the BDTQ can make a significant contribution to this figure.

As drafted, we consider that the planning policy LP33 has not considered the potential for Ingate Place to attract larger business with an appetite for larger office floorplates. The current land use designations that support only SME office floorspace has the potential to increase vacancy rates, decrease employment density and curtail the potential of the Site to provide a significant amount of jobs and growth that contribute to the strategic aims of the plan.

#### *LP34 – Managing Land for Industry and Distribution – (Ingate Place)*

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<sup>6</sup> Overview of real estate companies' environmental performance, October 2021 (<https://assets.kpmg/content/dam/kpmg/ie/pdf/2021/10/ie-overview-of-real-estate-companies-environmental-performance.pdf>)

This draft policy suggests that within the BDTQ, SME office accommodation will be appropriate on upper floors if intensification of industrial uses on the site are also delivered within a proposal. The introduction of SME office accommodation is broadly supported by Safestore. A more flexible policy approach will enable development proposals to bend to changing market conditions, thereby submitting viable planning applications that are able to contribute to the wider targets of growth within the LBW Local Plan.

Notwithstanding the flexibility of introducing SME space above industrial land, we feel that this policy should align with the London Plan Policy E5, which states that in their development plans Boroughs should explore opportunities to intensify, consolidate and make more efficient use of land in SIL, particularly through the principles set out in London Plan Policy E5(B) which promotes intensification and co-location.

The London Plan supports the opportunity to intensify existing employment and industrial uses, as part of a plan-led process. In order for the local plan to be considered sound, it must be consistent with regional and national policy. Wandsworth's draft policy LP34 should reflect the attitudes towards intensification, co-location and substitution within the London Plan.

We suggest that through Wandsworth's Local Plan review these opportunities for intensification and co-location should be encouraged to facilitate existing sites to make the maximum contribution to the Borough. Providing the flexibility could provide optimal conditions for start-ups, SME's and a strong economic base for local jobs as the market and demands shift, allows the local economy to flourish, in line with the aims of the Nine-Elms Opportunity Area and the BDTQM.

As is evident across London, a blend of different uses in the same location can create successful hubs of activity, which deliver resilient places. We consider that a degree of flexibility to these designations would greatly benefit the site, enabling landowners to take a proactive approach towards the needs of Ingate Place. There are therefore many potential land uses that could be successfully co-located with a B8 storage and distribution centre which would complement the strategic objectives of the Nine Elms/Battersea Opportunity area and the more localised BDTQM.

Restricting the potential land uses on-site has decreased the development opportunities for Ingate Place and its ability to contribute to the BDTQM and wider Battersea/Nine-Elms Opportunity Area. The designated land-uses are overly specific and have a disregard for any flexibility that the area may need to adapt to meet the rapidly changing future markets and needs.

For reasons that have been discussed, the site has significant unrealised potential for intensification and a clear strategic policy promoting commercial and other uses would help to unlock this. Enabling a mix of employment and non-employment uses within Ingate Place would provide place-making benefits such as increased vitality through integrating culture, community and workspace to create a thriving place. It can also provide economic benefits through opportunities for cross-collaboration between businesses, cross-subsidy to enhance the viability of development proposals to facilitate delivery, and the potential for employment land intensification.

Establishing a more flexible approach to the planning policy framework would benefit the wider LBW economy as well as this specific site. As currently drafted, the local plan is therefore not in **general conformity** with the national policy, specifically paragraph 11 of the NPPF, which seeks to ensure plan policy is sufficiently flexible to adapt to rapid change

*LP35 - Mixed-Use Development on Economic Land and LP37 - Requirements for New Economic Development - Ingate Place and Lombard Road*

Part A(3) of policy LP35 outlines that the redevelopment of industrial floorspace within Focal Points of Activity should seek to maximise the re-provision of existing industrial uses.

Policy LP37 outlines that that mixed-use developments that include a mix of residential and other commercial uses can come forward providing there are no detrimental impacts on the amenities of proposed residents.

Safestore support policies LP35 and LP37, as there are many examples of Safestore co-habiting with other land used within the capital, such as stores in Marble Arch, Camden, Hackney, Notting Hill and Chelsea.

*LP38 – Affordable Workspace - (Ingate Place and Lombard Road)*

Safestore encourage the provision of facilities and resources that support the success of a diverse range of businesses to grow without being unfairly constrained by the size and cost of their premises. It is our view that affordability is achieved through a range of measures including the specific product, and flexible terms of occupation, which is currently offered by the existing Safestore self-storage unit and business centre at Ingate Place.

LP38 is currently ineffective when applied to B8 storage and distribution units. Proposing a prescriptive 10% affordable workspace target is counter-productive to the operation of a self-storage site. For example, a self-storage centre requires the ground floor area to be available for easy to access storage and because of this, the ground floor space is often the most commercially valuable element of that form of development, meaning that some self-storage business models may be reliant upon the ground floor space being dedicated solely to their operation. It may therefore be unviable for many self-storage operators to relinquish the ground floor space to external affordable workspace operators.

It would not be practical to provide affordable workspace on upper floors due to the requirement of installing lifts and separate stair cores and lobbies to make them accessible and separate units and new structural floors. This would reduce the total ground floor area for the B8 storage units, rendering them unviable.

This should also be considered in the context of Safestore's business model of providing flexible storage space. Approximately 50% of storage space across Safestore's network are occupied by businesses of which a high proportion are SMEs. In terms of B8 storage units, affordability is not just about rental price. It is about the flexibility of terms, being able to exit an agreement at short notice, the ability take less or more space to respond to a businesses' fortunes. Self-storage units provide an affordable product through a package of flexible measures which are overlooked.

This draft policy requires proposals delivering over 1,000sqm of economic floorspace (such as offices) to provide at least 10% of the gross economic floorspace as affordable workspace. Whilst we acknowledge the affordable workspace policy in principle, due to its current inflexibility it is **not effective** and cannot be considered to be "sound". The policy as currently drafted requires applicants to deliver 10% of gross proposed economic floorspace even in an area which may see little SME demand, thereby making the space unlettable. This inflexibility can be corrected through applying the 10% threshold to the proposed net additional economic floorspace.

A similar issue was raised by Inspector Mike Fox in his Inspector's Report to the Lambeth Main Modifications, whereby he noted '*...the requirement of the policy to deliver 10 per cent of total floorspace, as drafted, for affordable workspace, provides very little flexibility in areas where SMEs have been declining due in part to high land costs.*'<sup>7</sup> Inspector Fox continued that by applying the threshold to the gross floor area, Lambeth's policy as drafted overlooks the back of house/circulation areas, which are not linked to specific users. As such, an affordable workspace applied to the net additional floorspace would result in a more 'efficient and equitable way of calculating such provision.'

#### *LP51 – Parking, Servicing and Car Free Development - (Ingate Place and Lombard Road)*

Draft policy LP51 (Part D) requires car-free development where a given site has a PTAL 4 rating. We are generally supportive of LBW's ambition to reduce car parking across the borough but would advise LBW to consider the car parking strategies on a case-by-case basis through the development management process, informed by a Transport Assessment and/or other appropriate documents. There does not appear to be any evidence base documents to underpin the position that PTAL 4 is the default car-free position. The policy as currently drafted appears unnecessarily rigid and may contradict applicant efforts to encourage the use of more sustainable transport modes. This draft policy is therefore **not justified**.

#### **Overall effects of the draft Plan**

As outlined above, Safestore have significant concerns with regards to the 'soundness' of the draft plan. In particular we consider that the details of the plan with regards to building heights results in such an overdue constraint as to render the site undeliverable during the plan period. The effect of which would be to sterilise the Sites and ensure that it does not deliver the homes, jobs and public realm sought by other elements of the plan.

Savills Viability have considered the subject sites within a 'viability in planning context', comparing a Site Value Benchmark (SVB) - (otherwise known as 'Benchmark Land Value (BLV)', to the Residual Land Value of a hypothetical scheme. Where the Residual Land Value is lower and/or not sufficiently higher than the Site Value Benchmark the project is not considered technically viable in planning and would unlikely be brought forward as a result.

In order to assess the impact of the Council's draft tall buildings policy on the subject sites we have considered the viability of a policy compliant and optimized scheme on each of the subject sites, reflecting informed by design work carried out by Collado Collins. Each scenario is considered with the assumption of the draft tall building policy having been adopted therefore setting a height restricted parameter for the developable envelope. We would note that the scenarios included within this assessment are intended for illustrative use only and do not necessarily represent a formal view on height, massing or density.

Given the intended purpose of this exercise which seeks to respond to the emerging Local Plan, Savills Viability have sought to rely upon the assumptions made within the Three Dragons Local Plan Viability Study dated 2022. Savills Viability have however diverged from the Viability Study assumption base where respective

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<sup>7</sup> Paragraphs 134-135 of Lambeth's Local Plan (2021) Inspector's Report ([https://beta.lambeth.gov.uk/sites/default/files/2021-07/Lambeth%20Local%20Plan%20Report%20-%20final\\_3.pdf](https://beta.lambeth.gov.uk/sites/default/files/2021-07/Lambeth%20Local%20Plan%20Report%20-%20final_3.pdf))

assumptions are considered unrealistic for the nature of hypothetical development included within our assessments.

### Ingate Place

In order to maximise the site through a mix of commercial uses, Savills Viability have assumed the redevelopment to comprise:

- The refurbishment of the factory building and conversion to higher value use as offices
- Retention of the modern storage annex,
- Holistic redevelopment of the Business Centre to provide enhanced modern specification industrial use, and
- Erection of two new storage buildings within the developable envelope permitted under the draft tall buildings policy.

The Storage Centre provides a total of 126,695 sq ft of accommodation over five storeys plus basement, alongside a modern extension providing an additional 21,829 sq ft over four storeys. The hypothetical scheme at Ingate Place is set out below:

Description	Use	Area GIA Sq m (Sq ft)	Area NSA/NIA Sq m (Sq ft)
Building A	Offices	2,200 (23,681)	1,650 (17,761)
Building B	Offices	2,200 (23,681)	1,650 (17,761)
Building C	Offices	2,200 (23,681)	1,650 (17,761)
Building D	Industrial/workspace	7,968 (85,768)	-
Building E	Storage	2,700 (56,705)	-
Building F	Storage	2,156 (23,207)	-
Building G	Offices	13,798 (148,521)	9,659 (103,965)
Total		33,222 (357,601)	-

The plans for each option are provided within the attached feasibility studies. Importantly, each option has been developed to accord with the provisions of the draft Local Plan in regards to land use and height.

Savills Viability has undertaken a valuation at the Site to assist in forming the baseline of the viability assessment and have concluded that the RLV is £14,900,000 million (m).

RLV	SVB		Status
	Local Plan	Site Specific	
<b>£15,800,000</b>	£22,700,000	£35,100,000	<b>Unviable</b>

Our assessment of Ingate Place concludes that the Residual Land Value based upon an optimised commercial-led development falls significantly below both the site specific and borough wide Site Value Benchmark and would therefore be considered unviable in planning.

The Site being subject to the 6-storey height cap therefore renders the draft plan, when read as a whole, undeliverable and **not effective**.

## Lombard road

For the site at Lombard Road, it is assumed that the site is brought forward jointly with 80-100 Gwynne Road (collectively '19 Lombard Road & 80-100 Gwynne Road'), in accordance with the relevant site specific allocation (ref RIV8) which proposed residential led mixed use development with re-provision of the light industrial use currently enjoyed. For the residential element, Savills Viability have assumed an affordable housing provision equivalent to 35% on a mixed tenure basis which is consistent with the Local Plan Viability Study. The hypothetical scheme at Lombard Road is set out below:

Use	Area GIA Sq m (Sq ft)	Area NSA/NIA Sq m (Sq ft)
Residential	6,503 (69,996)	4,624 (49,777)
Industrial / Storage	5,702 (61,376)	-
Plant	192 (2,069)	-
Basement	2,412 (25,963)	-
<b>Total</b>	<b>14,809 (159,404)</b>	-

The plans for each option are provided within attached feasibility studies. Importantly, each option has been developed to accord with the provisions of the draft Local Plan in regards to land use and height.

Savills Viability has undertaken a valuation at the Site to assist in forming the baseline of the viability assessment and have concluded that the RLV is £3,400,000 million (m).

RLV	SVB		Status
	Local Plan	Site Specific	
<b>£3,400,000</b>	£4,800,000	£12,880,000	<b>Unviable</b>

Our assessment of Lombard Road concludes that the Residual Land Value based upon an optimised residential-led mixed use development falls significantly below the site specific Site Value Benchmark and would therefore be considered unviable in planning. Even where the borough wide Site Value Benchmark is technically unviable in planning albeit to a reduced margin.

The Site being subject to the 6-storey height cap therefore renders the draft plan, when read as a whole, undeliverable and **not effective**.

## Conclusion

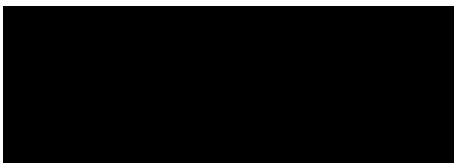
Safestore is committed to working with the Council to optimise the development potential of both Ingate Place and Lombard Road. Safestore is willing and capable of delivering against the strategic objectives of this Draft Local Plan. However, there are elements of the Regulation 19 Plan which would effectively curtail the ability of Safestore to deliver growth and an enhanced environment to the borough.

As currently drafted, **we do not consider the plan to be sound as it is not effective, justified or consistent with national policy.**

We look forward to continuing to work with the borough to deliver growth in Wandsworth and thank you for the opportunity to engage in this consultation. We would be grateful for confirmation of receipt of these representations and trust that these comments will be taken into consideration as officers finalise a submission version of the Local Plan.

Please do not hesitate to contact us on the details at the head of this letter should you require any further information.

Yours faithfully,

A large black rectangular redaction box covering the signature area.

**For and on behalf of Safestore PLC**

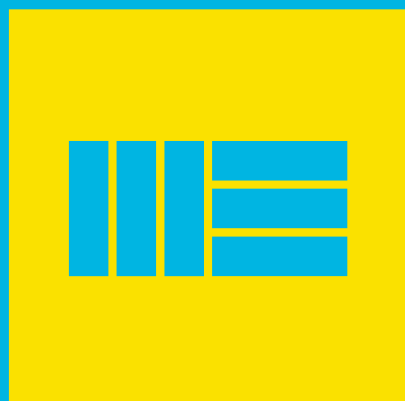
## **Appendix 1: Townscape Report**



# LONDON BOROUGH OF WANDSWORTH LOCAL PLAN: REPRESENTATIONS

REGULATION 19 DRAFT LOCAL PLAN  
AND URBAN DESIGN STUDY

28 FEBRUARY 2022



# CONTENTS

<b>EXECUTIVE SUMMARY .....</b>	<b>3</b>
1.0 INTRODUCTION	5
2.0 URBAN DESIGN STUDY (2021)	7
3.0 ANALYSIS OF TALL BUILDING SCENARIOS	17
4.0 REVIEW OF EMERGING PLANNING POLICY	24
5.0 RECOMMENDATIONS	29

# EXECUTIVE SUMMARY

Montagu Evans LLP has been instructed by Safestore to review and submit representations to Wandsworth Borough Council (“WBC”) in respect of their ‘Publication’ Draft Local Plan (Regulation 19), published for consultation in January 2022. The purpose of this report is to assess the evidence base which supports the Plan and informs its emerging planning policies with specific regard to the future redevelopment of Safestore’s sites at Ingate Place and 19 Lombard Road. On the basis of that assessment, we have formulated suggestions for revisions to the allocation in respect of scale/quantum.

Paragraph 31 of the NPPF (2021) states that planning policies are required to be underpinned by relevant and an up-to-date evidence base. It states that such evidence ‘should be adequate and proportionate, focussed tightly on supporting and justifying the policies concerned, and take into account relevant market signals’.

Paragraph 35 of the NPPF (2021) states that ‘Local Plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound.’

The evidence supporting the strategic policies concerning Ingate Place and Lombard Road includes the following documents:

- Wandsworth ‘Publication’ Local Plan Regulation 19 Consultation (10th December 2021);
- Wandsworth Borough Council: Urban Design Study (Arup, 9th December 2021)

Based on the representations set out within this report, we conclude that the evidence base and overarching strategic policies within WBC’s emerging Local Plan are not adequately evidenced, and so do not meet the requirements of paragraph 31 cited above. The allocations could, however, be amended to ensure they are robust and we make the following recommendations accordingly.

## ***Wandsworth Borough Council: Urban Design Study (December 2021)***

1. Further assessments of townscape character areas should be undertaken to ensure sufficient evidence is put forward to support the drafting of the Local Plan. The London Plan supports context-based, design-led optimisation to ensure best use is made of all land. That process requires a fine grain analysis to identify particular opportunities. The current evidence base does not comprise such a study. And in the same vein, the LPA should take into account emerging context within townscape character areas as a means to assess ‘Probability of Change’. Intensification policies based on current characteristics which are acknowledged may change will lead to under optimisation, contrary to the development plan and the objectives of sustainable development;
2. The specific height ranges for Tall Building Zones should be redefined as recommended ranges to allow for flexibility and the balancing out of the sort of complex planning and design considerations which are assessed through detailed design. Hence, more flexibility should be introduced in order to ensure allocations are deliverable and attuned to market forces and signals;
3. And linked to the above, criteria for assessing the acceptability of a tall building should be undertaken on a site-by-site basis and not solely constrained to within Tall Building Zones;

And so overall we conclude that policies currently drafted on a restrictive basis should be amended to indicative height parameters, with site specific reference points that are fixed and not subject to forces of change.

As part of our assessment of the evidence base, we draw your attention to the following recommendations:

1. (Para 2.21 and 2.22) a realignment of the B1 and B2 Sub-area boundaries to better reflect the characteristics of Lombard Road and its surroundings.
2. (Para 2.28) revise the 'Probability of Change' categorisation of the Stuarts Road Strategic Industrial Land (SIL) to acknowledge the London Plan's (2021) policies on industrial intensification and design-led site optimisation (with reference to Policies E7 and D3 respectively).
3. (Para 3.16) reconsider the extent of Tall Building Zone TB-B3A-02.

# 1.0 INTRODUCTION

- 1.1 Montagu Evans LLP has been instructed by Safestore to review and submit representations to the London Borough of Wandsworth Thames (“LBW”) in respect of their Publication Draft Local Plan (Regulation 19), published for consultation in January 2022. Our client is the freeholder of two sites at Ingate Place and 19 Lombard Road subject to draft allocations.

## **Purpose of Report**

- 1.2 The purpose of this report is to assess the evidence base that will inform the relevant draft Local Plan’s policies, with specific focus on the Urban Design Study (2021) drafted by Arup, and so to make practical suggestions for the formulation of robust policies which meet the requirements of national guidance.

## **The Policy Basis**

- 1.3 Paragraph 31 of the NPPF (2021) states: “The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals”.
- 1.4 Paragraph 35 of the NPPF (2021) concerns the examination of plans, stating: “Local Plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are:
- a. 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 areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.
  - b. Justified – an appropriate strategy, taking into account the reasonable alternative, and based on proportionate evidence.
  - c. 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
  - d. Consistent with National Policy – enabling the delivery of sustainable development in accordance with policies in the Framework and other statements of national planning policy, where relevant.”

- 1.5 The evidence supporting the draft planning policies set out in Paragraph 1.2 include the following documents:

- Wandsworth Local Plan Publication Regulation 19 Consultation (January 2022)
- London Borough of Wandsworth: Urban Design Study (Arup, 9th December 2021)

## **Report Structure**

- 1.6 We have structured this report in response to the way that the Council have arrived at the drafting of the emerging planning policies set out within their Publication Draft (Reg 19) Local Plan.
- 1.7 First, we analyse the Urban Design Study (2021) its purpose and methodology.
- 1.8 Then we consider the character sub-areas and associated tall building zones associated with Lombard Road and Ingate Place.
- 1.9 Before assessing the relevant draft planning policies set out in the emerging Local Plan, mindful of the supporting evidence base and wider place-based strategy for the Battersea Riverside and Nine Elms Mixed Use areas that the Lombard Road and Ingate Place sites lie within respectively.

### *Personnel*

- 1.10 This report has been prepared by James Keogh, Associate at Montagu Evans. It has been peer reviewed by Dr Chris Miele, Senior Partner, also of Montagu Evans. Both Mr Keogh and Dr Miele have extensive knowledge of tall and large-scale developments in urban environments and are both suitably qualified to provide representations on this policy matter. Montagu Evans, and the staff involved, have extensive experience advising on major developments in Wandsworth and are familiar with its characteristics and the direction of change.

# 2.0 URBAN DESIGN STUDY (2021)

- 2.1 The Urban Design Study (the 'Study') has been prepared by Arup on behalf of LBW. It was published in December 2021.
- 2.2 In this section of the submission we:
1. describe the structure of the Urban Design Study (2021);
  2. provide a commentary on the Study's content, focussing on the soundness of the supporting evidence data; and
  3. analyse the spatial and planning context of Ingate Place and Lombard Road.
- 2.3 We provide a summary of the methodology and logic flow of the Study because it sets out the basis for drawing conclusions about where tall buildings are likely to be acceptable in the future. That methodology is crucial in understanding the soundness of the evidence base.

## **Structure of the Technical and Baseline Study**

- 2.4 Sections 1 to 3 of the Urban Design Study (2021) provide an overview of the methodology which underpins the evidence base and a summary of the borough's built and ecological environment, as well as townscape character assessments for identified areas, separated into 25 sub-character areas within seven wider areas known as "Places".
- 2.5 Character assessments for each "area" include a brief overview of prevailing local characteristics, the identification of valued and negative features, building typologies, concluding with a sensitivity value that informs a strategy for managing change and future development. The strategy (either to 'Conserve, Restore, Improve or Transform') is then guided by a series of character area design principles.
- 2.6 Section 4 identifies capacity for growth within each identified sub-character area, providing a high-level evaluation of the potential for growth across the borough. The capacity for growth of an area is specifically concerned with the potential for tall buildings within the borough, utilising the assessment set out within the character assessments in Section 3.0 of the Study as a supporting evidence base. To inform an area's capacity for change, Sensitivity to Change and Probability of Change are calibrated using a matrix in order to determine the 'Development Capacity' for an area. In addition to the use of the matrix, mapping of existing and consented tall buildings informs an overall development strategy for accommodating growth in the Borough. The conclusions and quantitative figures are then used for the identification of tall and mid-rise building zones, also identified and set out in Section 4 of the Study.
- 2.7 Appendix A provides the supporting evidence and justification for the locations and appropriate heights of each identified tall building zone in the Borough. The overarching analysis to inform where tall buildings (buildings over seven storeys high) are appropriate includes townscape character, views and visual amenity and heritage impacts. The characteristics of individual tall building zones are then analysed further using scenarios testing and consideration of existing and consented tall buildings and/or masterplans. There are nine scenarios which collectively form a representation of the varied contexts across the Borough. It is noted that the two Safestore sites forming the focus of this report are included as part of 'Scenario 7: Riverside Cluster' (19 Lombard Road) and 'Scenario 9: Battersea Design and Tech Quarter' (Ingate Place).

2.8 The methodology underpinning the Study is set out in Appendix C and Appendix D includes a review of relevant national and strategic policy relating to tall buildings and a brief comparison of approaches to tall buildings policy taken in other boroughs sharing similar characteristics to Wandsworth. Appendix D concludes with a design quality review of ten recent tall building developments in Wandsworth. Appendix E contains an overview of predominant building typologies within the borough. Proformas used during site surveys and character assessments are included in Appendix F, whilst a summary of public consultation undertaken is laid out in Appendix G. This completes the Study.

### **Detailed Commentary**

2.9 We find the general underlying principles of the Study sound and well justified. We support the need to identify specific locations for tall building development within the Borough, in line with Policy D9 (Part B) of the London Plan 2021, and we agree with the general findings that Wandsworth and its environs requires a positive framework for development in consideration of the significant housing pressures facing the Borough. Carefully planning for growth and ensuring development responds to local context underpins good plan-making. The general philosophy of the Study supports this approach and is welcomed.

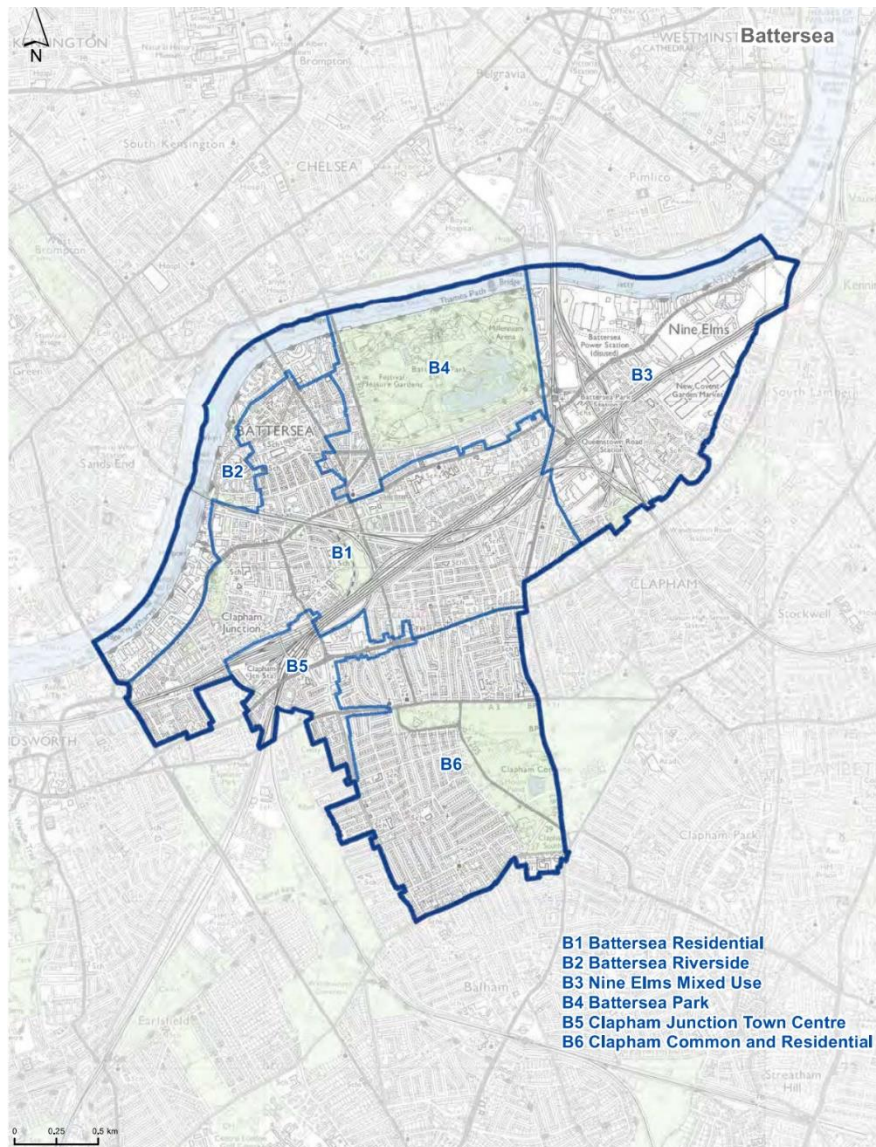
2.10 We also agree with the approach and adopted methodology set out in detail in Section 4, supported by a relatively comprehensive evidence base in Appendix A. This approach is the same methodology set out in the Urban Design Study prepared by Arup to support the Royal Borough of Richmond on Thames' Draft Local Plan and is based on the accepted and well adopted framework for assessment of townscape and visual effects, set out in the Guidelines for Landscape and Visual Impact Assessment (Third Addition) 2013. The methodology underpinning the Study is therefore considered to be sound.

2.11 Whilst the general approach to the methodology is supported, we are concerned with the lack of detail set out in the supporting evidence base, particularly that used to underpin policies defining where tall and mid-rise buildings are considered appropriate. We have further concerns with the identification of 'Tall Building Zones' which identify specific scales of development, which, when coupled with a general analysis of the surrounding townscape character of the area, is not justified and considered wholly unsound. We cover each point in detail below, with specific reference to each of the two sub-area character areas in question.

#### *Evidence Data – Battersea Character Area*

2.12 Page 54 of the Study provides an overview of the Battersea area (Fig. 1) of which both subject sites are located.





**FIG. 1 BATTERSEA CHARACTER AREA**

2.13 It is large and varied in character and includes the Vauxhall Nine Elms Opportunity Area to the east, Clapham Common to the south, Clapham Junction to the west and Battersea Park to the north. Battersea Power Station is a prominent landmark within the western portion of the opportunity area and the Thames frontage, another key characteristic of the area, forms the area's northern boundary. Particular changes and trends identified within the area include: the Battersea Power Station regeneration within the Central Activities Zone and the influence this has had on the emergence of a new Battersea Design and Tech Quarter immediately to the south and close to Battersea Park and Queenstown Road Stations. The two sub-areas associated with the subject sites are 'B1 Battersea Residential' and 'B3 Nine Elms Mixed Use'.

*Sub-area B1 Battersea Residential*

2.14 The key characteristics for area B1 are summarised as being typified by mid-20<sup>th</sup> Century public housing estates, interspersed with Victorian terraced housing and modern housing blocks. Battersea Park Road is identified as the area's primary local centre and the area's historic links with the river are acknowledged.

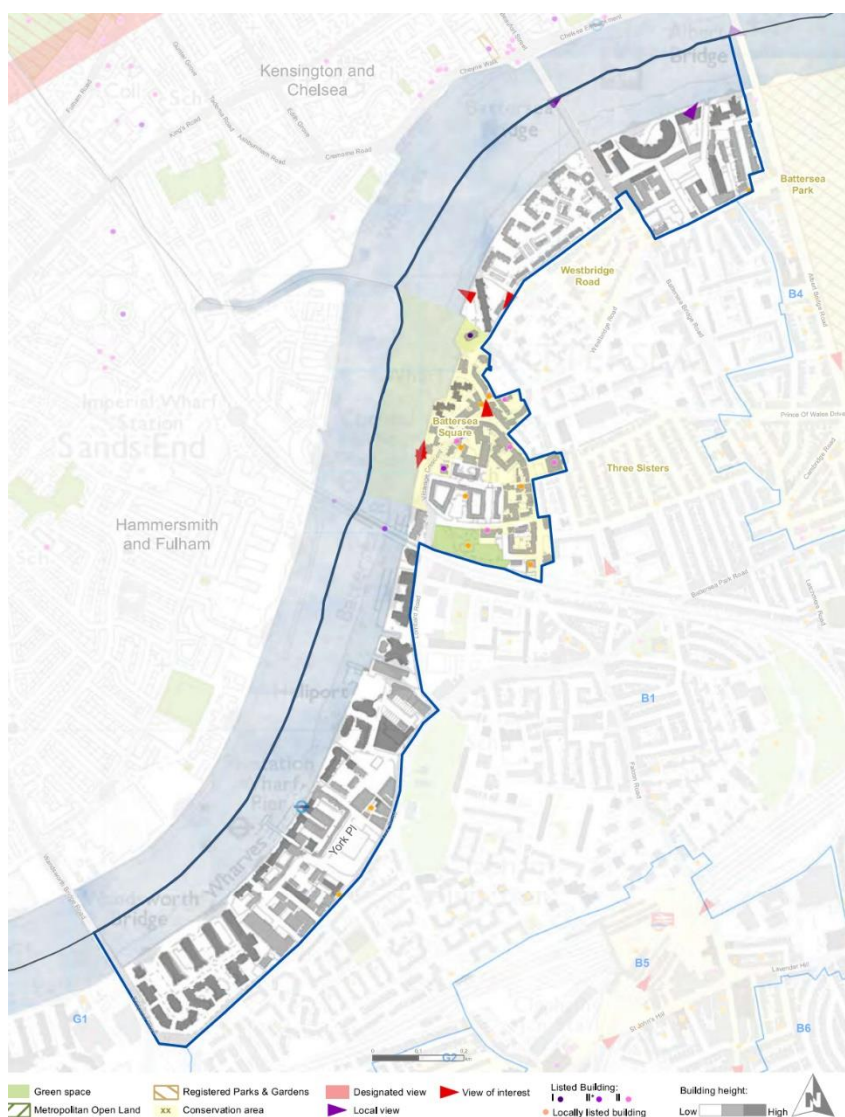
- 2.15 Based on a fair and accurate appraisal of the area's positive and negative features, a low sensitivity to change is identified with the overall future management strategy being to 'improve' the area's 'fragmented character'. The guiding design principles for the character area, most notably, 'incorporate focal points and a movement strategy across the area' and 'create new distinctive landmarks with a design integrity which improve legibility, focused along main roads and key junctions' are appropriate. A notable absence would be to achieve improved physical and visual connections with the river and identifying opportunities to create linkages with neighbouring character areas defined by the Study.
- 2.16 The Lombard Road site and neighbouring Travis Perkins site to the south are very much on the fringes of the B1 character area and in our judgement, much more akin with the river frontage and pattern of development along Lombard Road, including Barratts' Lombard Wharf and the Hotel Rafayel building.
- 2.17 As can be seen in Fig. 2 the emerging development further to the south encompassing York Road Business Centre at the junction of York Road/Lombard Road and the sequence of tall buildings including the western extent of the Winstanley Estate redevelopment and 100 and 100 York Road have, evidently altered and intensified the character of this portion of the Borough in recent times.
- 2.18 The Study's character analysis of area 'B2 Battersea Riverside' is more aligned with Lombard Road's more disjointed townscape than the predominant post-war and Victorian housing of area B1. Further, B2's area design guidance highlights the need to improve connectivity with the wider area – particularly eastwards between Lombard, York Road and towards Clapham Junction. It also calls for new development to have distinctive character and to create remarkable landmarks, as well as inviting public realm that forms part of a wider, coherent strategy to support increased activity and vibrancy along the riverside.



**FIG. 2 – EMERGING DEVELOPMENT IN CHARACTER AREA B1**

- 2.19 As seen in Fig.3 the central portion of Character Area B2 (between the railway viaduct to the north and junction of York/Lombard Road to the south, is pinched inwards to a single urban block depth.

- 2.20 There does not appear to be any obvious logic for this with regards to the Study's 'sensitivity to change' based methodology. For example, no particular sensitivities are identified across either area B1 or B2 to the south of the railway viaduct, aside from a portion of the Battersea Park Road and Battersea High Street sub-area. This lies approximately 200 metres to the east and at the opposite end of Gwynne Road.
- 2.21 We would therefore recommend that the boundaries of areas B1 and B2 are reconsidered in order to better reflect the contrasting townscape character between the riverside and Lombard Road corridor and the established residential estates to the east.
- 2.22 A revised character area boundary line is suggested to follow the line of Yelverton Road, which itself is bookended by the recent 14-storey development on Gwynne Road and the York Road Business Centre development. It is further considered that the open space of Harroway Gardens creates a distinct buffer between the two character areas and offers opportunities for much needed public realm enhancements as rightly identified in the Study's character area analysis.

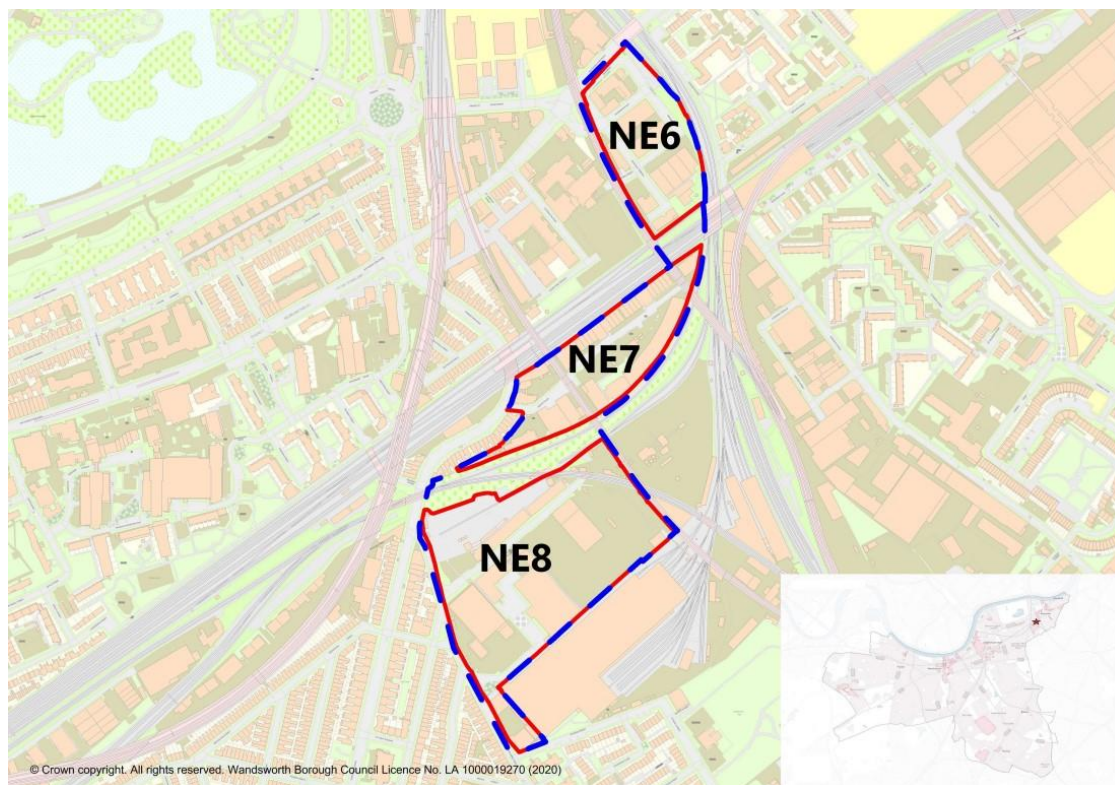


**FIG. 3 – CHARACTER AREA B2 (AS PROPOSED)**

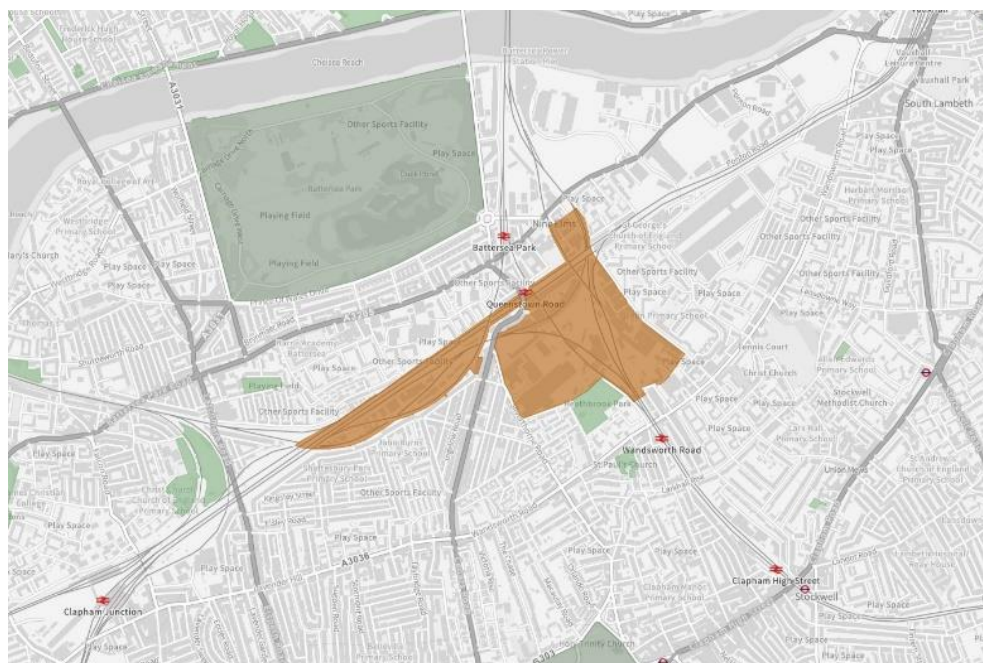
*Sub-area B3 Nine Elms Mixed Use*

- 2.23 As with Sub-area B1, we agree with the general assessment of the Nine Elms Mixed Use Character Area's townscape and key features.
- 2.24 The high-density development within the Vauxhall Nine Elms Opportunity Area and emerging development of Battersea Power Station are clearly dominant elements of the immediate landscape and there is much potential to improve connections across the remainder of the character area to lessen the impact of railway severance and optimise development potential. The emerging Battersea Design and Tech Quarter is recognised by the Study as being an integral feature of the area's regeneration potential. Based on the character assessment, the area is given a low sensitivity rating and is categorised as suitable for a 'Transform' strategy for forward planning.
- 2.25 Whilst we are in broad agreement with the Study's list of B3's negative and positive qualities **the very limited reference afforded to the varied land uses within the area is notable and we believe this to be a defining characteristic of the area.**
- 2.26 As set out in the Battersea Design & Tech Quarter Economic Appraisal & Design Framework, 2020 ('BDTQ') and Map 5.1' of the draft Local Plan, WBC intends to utilise the draw of Battersea Power Station and VNEB as a catalyst for further creative and tech investment within the BDTQ (see Fig. 4).

**FIG. 4 – MAP 5.1 OF WANDSWORTH'S DRAFT LOCAL PLAN**



2.27 A large proportion of the BDTQ area identified in Wandsworth's draft Local Plan lies within Strategic Industrial Land (SIL) which also accounts for a significant proportion of the B3 character area (see Fig 5). Furthermore, the tangle of railway lines running through the SIL create clear spatial separation from the identified low-rise neighbourhood to the east.



**FIG. 5 - MAP OF STUARTS ROAD STRATEGIC INDUSTRIAL LAND**

2.28 Alongside the London Plan's promotion of a design-led approach to the optimisation of development sites across London (Policy D3), the policy expectation to protect and intensify industrial and related uses within the SIL (Policy E7) is equally relevant here and the ability to intensify densities requires a degree of flexibility in relation to building heights and mass. While this report's focus is on the townscape and urban design implications of the Study, **we believe that Character Area B3's design guidance should include reference to ensuring that new development, particularly within the SIL, should explore opportunities for intensification in order to meet the requirements of both Policies D3 and E7. In direct contrast to meeting the objectives of these policies and encouraging design-led optimisation of industrial land, page 164 of the Study identifies land within the SIL as having a 'lower probability of change' in the same category as protected parks and open space. We believe this categorisation should be amended to acknowledge the potential of Wandsworth's SIL to accommodate design-led optimisation and further justification to support this in townscape terms is set out below.**

2.29 Policy E5.B (SIL) states: 'Boroughs, in their development plans, should: 3) explore opportunities to intensify and make more efficient use of land in SILs in Development Plan reviews and through Opportunity Area Planning Frameworks in collaboration with the GLA and other planning authorities within and outside London (Policy E7 Industrial intensification, co-location and substitution).'

2.30 Policy E7 'Industrial Intensification, co-location and substitution' states:

*A. Development Plans and development proposals should be proactive and encourage the intensification of business uses in Use Classes B1c, B2 and B8 occupying all categories of industrial land through:*

1) introduction of small units

2) development of multi-storey schemes

3) addition of basements

4) more efficient use of land through higher plot ratios having regard to operational yard space requirements (including servicing) and mitigating impacts on the transport network where necessary.

*B. Development Plans and planning frameworks should be proactive and consider, in collaboration with the Mayor, whether certain logistics, industrial and related functions in selected parts of SIL or LSIS could be intensified to provide additional industrial capacity. Intensification can also be used to facilitate the consolidation of an identified SIL or LSIS to support the delivery of residential and other uses, such as social infrastructure, or to contribute to town centre renewal. This process must meet the criteria set out in Part D below. This approach should only be considered as part of a plan-led process of SIL or LSIS intensification and consolidation (and the areas affected clearly defined in Development Plan policies maps) or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough, and not through ad hoc planning applications. In LSIS (but not in SIL) the scope for co-locating industrial uses with residential and other uses may be considered. This should also be part of a plan-led or masterplanning process.*

#### *Tall Buildings*

- 2.31 Section 4.5 of the Study sets out the policy background for tall buildings and highlights the locational requirements of London Plan Policy D9 Part B. While the broad principles of the methodology used to identify tall building zones is accepted, **the overarching nature of the methodology based on identifying zones of existing and consented tall buildings and PTAL ratings, places limitations on the ability to consider the more granular qualities of the Borough's characteristics.** This is fundamental in providing a full understanding of specific townscape characteristics which is needed to inform the most appropriate forms of development and optimisation of development sites.
- 2.32 Specific parameters for tall building development, identified as 'Tall Building Zones' are detailed in Appendix A. These 'Zones' are specific and constrained and are not considered to be supported by sufficient supporting evidence to justify the identification of exact/precise parameters and resulting quantum of development.
- 2.33 Section 4.1 (Page 160) provides a definition of tall buildings in Wandsworth, based on the analysis of existing tall buildings, consented schemes and masterplans, as well as scenarios prepared specifically for the study (Appendix A).
- 2.34 Firstly, there is a general presumption here that tall buildings are only acceptable within three areas within the Borough: the River Thames frontage (including VNEB Opportunity Area); within town centres and within or adjacent to existing estates and emerging masterplans.
- 2.35 Whilst this is understandable to some degree, the approach discounts other areas of the Borough identified as having low sensitivity and potential for change such as the large portion of character area B3 Nine Elms Mixed Use to the south of the east/west mainline railway.**
- 2.36 This includes Nine Elms Sunday Market, the housing estates surrounding it and the Stewarts Road SIL to the west. In our considerable experience of working on tall building projects, tall building development is capable of being acceptable in areas of lower height. **What matters is the quality of their design and the way in which they respond and relate to the existing and emerging context, and the way the transition**

**between scales is manifested.** There are many examples of where this approach is acceptable in townscape terms, including sensitive heritage locations.

- 2.37 In this respect, we draw attention to our experience advising on many sites of this type over the years and including but not limited to:
- Whitgift Centre in Croydon where the Hammerson and Westfield's scheme included tall development (c40m) within a conservation area and adjacent to a number of highly graded and lower scale buildings.
  - Quinn Estate's 2019 planning permission for the mixed-use redevelopment of Bardell Wharf in Rochester, which lay in the setting of the Grade I listed Rochester Castle and Rochester Cathedral.
  - L&G's 2019 planning permission for a residential-led mixed-use development including an 18 storey building at Longley Industrial Estate in Brighton.
- 2.38 Indeed, London Plan (2021) Tall Building Policy D9 allows for such an approach to be taken.
- 2.39 **We highlight the recent Hillingdon judgement [Case Ref: CO/1683/2021] which makes clear that tall buildings can be found to be acceptable in areas that are not identified as being acceptable by local planning authorities, where they meet the requirements of D9 Part C.** The analysis of acceptability should consequently allow for a degree of flexibility when forming a broad definition of where tall buildings are permissible and should not place generic height restrictions of development outside of defined tall buildings zones. This highlights the correct approach which should be taken. In short, **sites capable of supporting significant intensification should be identified with reference to their capacity to accommodate change, mindful of the sensitivity criteria in London Plan D9 C.**
- 2.40 Page 169 of the Study states that the evidence base does not show, nor considers where newly consented tall buildings are expected to be built across the borough in the coming years. **Emerging context is a weighty material consideration when understanding how a place/area is to evolve over time, and where intensification of development has been established and is likely to be accepted in the future. London Plan (2021) Policy D1 provides the policy basis for such an approach to be taken.**

#### *Definition of Tall Buildings*

- 2.41 Section 4.1 (Page 160) of the Study provides a definition of what is considered a tall building within LBW: *Buildings which are 7 storeys or over, or 21m or more from street level to the top of the building, whichever is lower.*

#### *Tall Building Zones*

- 2.42 Page 172 of the Study uses the constraints and opportunities identified in the preceding sections to identify 'Tall and Mid-rise Building Zones'.
- 2.43 Tall buildings are defined in the Study as: *Buildings which are 7 storeys or over, or 21m or more from street level to the top of the building, whichever is lower.*
- 2.44 Page 175 of the Study states: *The following pages provide the appropriate heights and a description of the tall building zones within each Place.*
- 2.45 Appendix A provides the supporting evidence and justification for the extents and appropriate heights of each of the identified tall building zones and states that *broad areas identified in the tall buildings strategy have*

*been analysed to understand whether there are individual zones within them that have the potential to accommodate tall buildings.*

2.46 The analysis identifying if an area is appropriate for tall buildings includes a high-level assessment of the potential impacts a tall building may have on:

- Townscape character, including relationship to existing landmarks and the River Thames;
- Views and visual amenity, including long range views (particularly local or strategic views);
- Heritage assets, including the setting of the Palace of Westminster and Westminster Abbey, Registered Parks and Gardens, Scheduled Ancient Monuments, conservation areas and listed buildings.

2.47 Zones are then tested using analysis of:

- Scenarios developed specifically for the Urban Design Study;
- Consented tall buildings and/or masterplans; and
- Existing tall buildings and how they contribute (positively, negatively or neutrally) to the existing character of an area.

2.48 The Study states that *the scenarios [are] developed in order to test the appropriateness of Tall Building Zones have been prepared solely for the purpose of testing additional height and density at a site and are not intended to be viable site-specific masterplan proposals* (Page 212). **This is approach is a significant oversight and ignores the importance of viability in determining whether a development is ultimately deliverable or not.**



# 3.0 ANALYSIS OF SCENARIO TESTING

## TALL BUILDING ZONE TB-B1-03 (APPROPRIATE HEIGHTS: 7-20 STOREYS)

3.1 A scenario of clustered development plots within this zone is set out on page 223 of the Study. This includes the 19 Lombard Road site, adjoining plumbers' merchants' site and the Travis Perkins site (37 Lombard Road) immediately to the south.

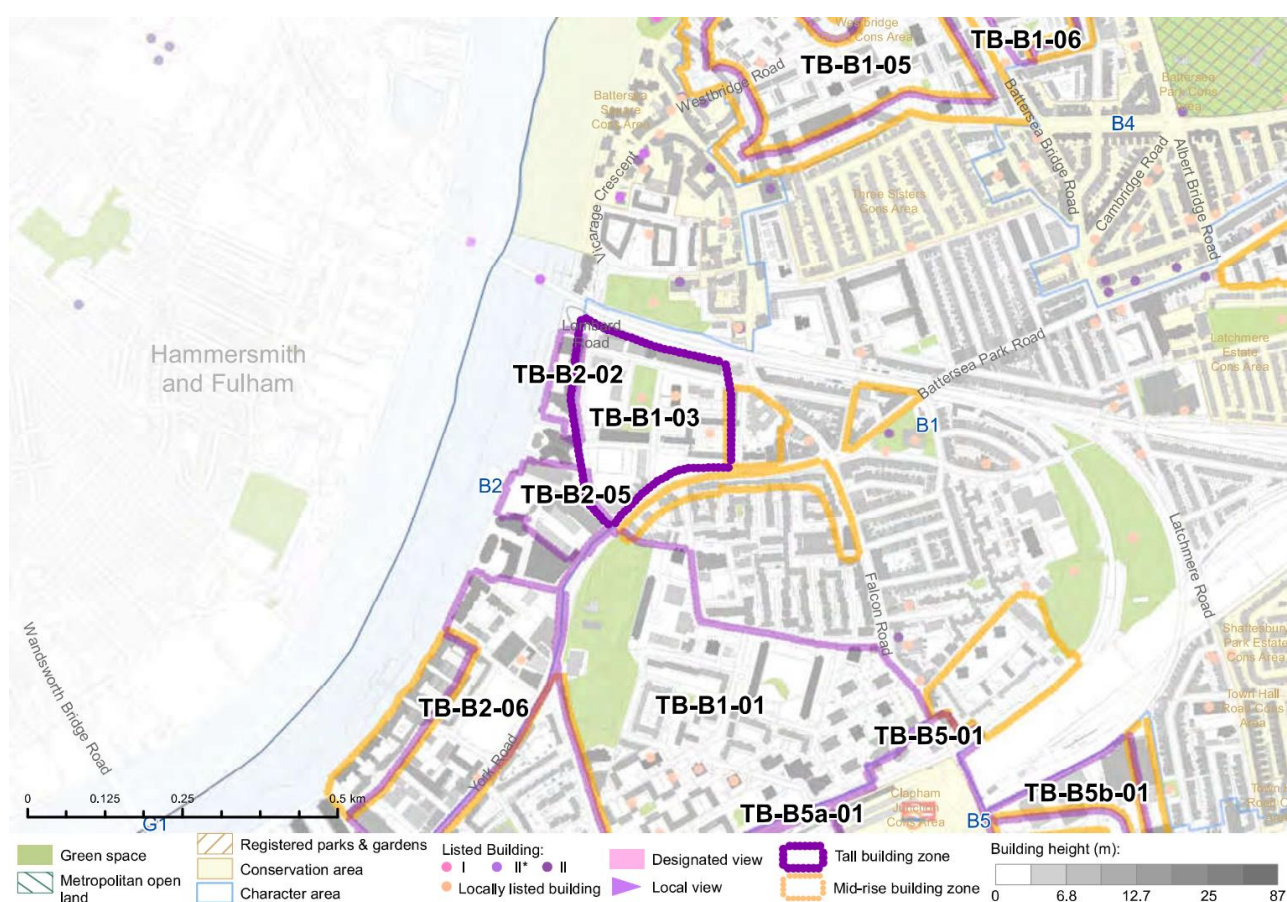


FIG. 6 – MAP OF TALL BUILDING ZONE 'TB-B1-03'

3.2 The development scenarios for each site put forward a site layout and massing response (see Fig. 7) that respond to the design principles set out in the Study's character assessment of the B1 Battersea Residential Area. This includes the incorporation of focal points, a movement strategy and new distinctive landmarks to be focussed on main roads and key junctions. We support the comprehensive approach to considering both sites together as this will enable the most efficient use of developable land and create potential to introduce a collective townscape response to this section of Lombard Road. The issue here is the suggestion that the 19 Lombard Road site would only be capable of supporting a predominantly mid-rise massing of 6 storeys with a 10 storey element at the Gwynne Road/Lombard Road junction and partly within the adjoining plumber's merchants' site.

- 3.3 We note that the extent of visibility (ZTV) modelling demonstrates no adverse impacts on townscape and heritage in the immediate and wider surroundings, with the site's location close to the river and railway embankment providing further distance and separation from any sensitive receptors. Any degree of visibility from the Battersea Square Conservation Area would be seen in the context of other prominent buildings including Lombard Wharf (28 storeys) and would need to be assessed in relation to all other relevant planning policy relating to a development proposal for this site.



**FIG. 7 – URBAN DESIGN STUDY (2021) SITE LAYOUT AND HEIGHTS PLAN**

- 3.4 The development scenario concludes with the following assessment, and we have highlighted the parts we disagree with. We then set out our own analysis of the site and its context to support our concerns with the findings of the Study.

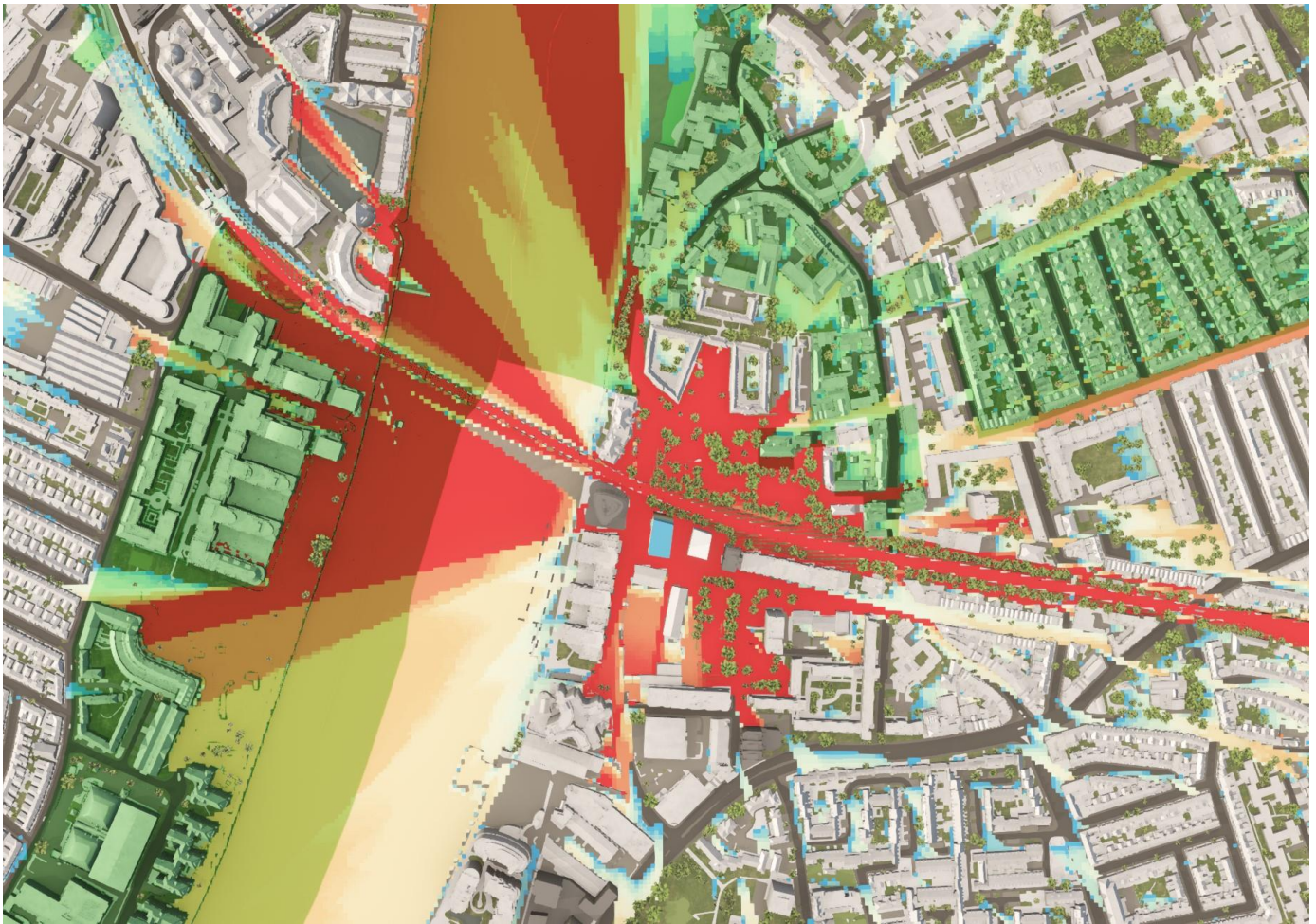
*Any potential impacts on this area on the adjacent York Gardens will be mitigated by its transformation as part of the consented masterplan for the adjacent area, which re-provides the open space within the plot set behind other tall building development. Similarly, any new development in this plot should protect the locally listed Harroway Road open space, including its mature trees which will enhance the integration of future tall building proposals.*

***The heights illustrated in the scenario are considered to be broadly appropriate in principle, if well-designed and in accordance with design principles in Appendix A. Around Harroway open space, taller buildings should respect the relatively small scale of the streets and the setting of the valued open green space. Site specific designs may therefore look to consider setting taller buildings back from the open space and Gwynne Road, so as not to dominate these spaces with tall elements.***

*Individual buildings will need to carefully consider the appropriate height for individual plots within the zone, and generally the greatest height should be located internally to the plot (stepping down to surrounding streets) and along York Road where it is closest to the River Thames frontage. Development in the north of the area may have additional height due to the presence of the elevated railway line, **although it should not exceed 10 storeys to ensure the small-scale historic character of Battersea Square Conservation Area is protected.** Development should also step down towards the mid-rise zone in the east to protect the character of and views from within the small-scale residential period terraces along Battersea High Street and Simpson Street.*

***The existing 24 storey post-war tower is overly dominant in the area, including on surrounding sensitive receptors such as Battersea Square Conservation Area. Therefore, this height should not be replicated in the zone, and re-development proposals should seek an overall improvement to the character and a reduction in impacts. The consented 20 storey building in the south of the zone (55-59 Lombard Road) is considered appropriate only for this area, responding to the width of the York Road and the adjacent taller development to the south and east. None of the valued features, views or key features would be adversely affected by developments of up to 7-20 storeys in areas noted above if well designed and planned.***

- 3.5 The main issue with the scenario's assessment and conclusion is the implication that any development within the Tall Building Zone should be capped at 10 storeys so as not be visible from the Battersea Square Conservation Area. It fails to mention that the 28 storey Lombard Wharf tower is already a prominent feature and is visible from several points within the conservation area, including from within the setting of nearby listed buildings, most notably St Mary's Church of England Primary School. It is also important to note that recent tall building development at Chelsea Harbour and Imperial Wharf to the west is also clearly visible, forming part of the conservation area's setting.
- 3.6 **The extent of visibility of new and existing development on the setting of a conservation area does not necessarily constitute harm and the degree of any harm for each individual case is rightly assessed on its own merits.** Indeed, there are many instances of where tall or large-scale development appear as prominent features in the wider context of conservation area settings and this does not necessarily result in a negative impact, there may be resulting positive aspects of townscape such as juxtaposition of new and old, legibility and wayfinding and composition of tall building clusters.
- 3.7 The Study includes a ZTV on page 224 which shows that the majority of long to mid-range visual impact is contained over the river to the west with the historic street pattern of the Battersea Square Conservation Area resulting in a very limited number of points where a 10-storey development at 19 Lombard Road would be visible. It should be stressed that these views would predominantly be glimpsed over rooftops and the full extent of any development would not be discernible. To demonstrate the effect the conservation area's street pattern would have on visibility of taller development, we undertook a ZTV (Fig. 8) that models a scenario where the 19 Lombard Road site includes a building that breaches the height of Lombard Wharf. There is an increase in visibility as to be expected, however the number of points of visibility remains relatively low and contained towards the river frontage. It can also be seen that the red zones (where the majority of development would be visible resulting in the greatest visual impact) would be contained to Fred Wells Gardens (outside of the conservation area), east/west along the railway line and to the south of the site along York Road.



**FIG. 8 – ZTV (SCENARIO FOR 19 LOMBARD ROAD)**

- 3.8 With regards to townscape composition, Lombard Wharf is visible, most notably from the western edge of the Battersea Square conservation area as a standalone building with a modern architecture that contrasts with the low-rise historic character. The 14-storey Gwynne Road development is also visible as an isolated feature, albeit to a lesser extent. Each building therefore forms part of the conservation area's setting and the introduction of additional building forms of a similar or comparable scale to respond to these standalone buildings may be beneficial in creating an improved composition of taller elements forming the backdrop in views looking southwards towards an emerging riverside cluster.
- 3.9 A fundamental issue with the approach taken to establishing building heights in the Study is that it fails to account for how new development can contribute positively to defining a future character of place. To demonstrate this point, Collado Collins have drawn up a policy compliant scheme (see Appendix) at the same scale described in the Study's scenario for Lombard Road. The indicative townscape views show how placing a height restriction on the site would create an awkward and unsuccessful townscape composition that would fail to meet the policy requirements of London Plan (2021) policies D1 (responding to established and emerging context) and D3 (design-led site optimisation).
- 3.10 Further, it would limit the ability to establish an appropriate form of development that takes account of physical constraints such as proximity to railway line, neighbouring residential units and massing relationship with public realm/open space.
- 3.11 The actual height, form and location of any tall buildings should be assessed through a design-led process that takes account of cumulative impacts, materials and composition of townscape as well as any impact on heritage assets. This approach is supported by London Plan Policy D3 and D9 Part C and would enable the

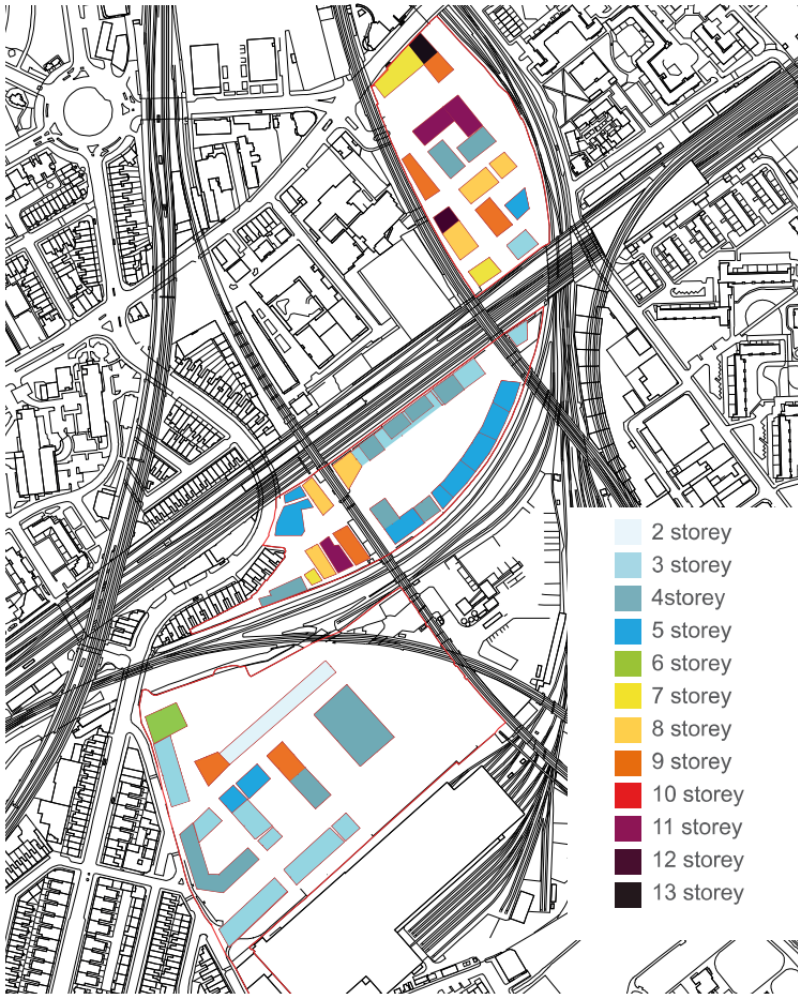
optimisation of development sites within the tall building zone whereas placing a height cap to restrict scale risks severely limiting the deliverability of site allocations.

**TALL BUILDING ZONE TB-B3A-02 (APPROPRIATE HEIGHTS: 7-11 STOREYS)**

3.12 The Study describes a scenario for a cluster of development based on the ‘Battersea Design & Tech Quarter (BDTQ) Economic Appraisal & Design Framework’ (We Made That, 2020). Ingate Place forms the central portion of the cluster.

3.13 The Study states that a detailed heights plan is not currently available, and the heights shown above have been assumed for the purpose of the townscape and characterisation analysis. The BDTQ Framework document provides a broad proposition of potential buildings heights (Fig. 9) and states that:

*‘In the context of the Battersea Design & Tech Quarter, height is not a pre-requisite of visual impact. The predominant shoulder height could be within 4-10 storeys...The overall approach is to ensure variety in building heights to avoid monotony and the creation of ‘canyon-like’ streetscape...’*



**FIG. 9 – BATTERSEA DESIGN & TECH QUARTER FRAMEWORK PLAN**

3.14 The BDTQ Framework highlights a number of schemes within the Quarter that are either under construction or approved. This includes 6-10 Ingate Place, a 15-storey building now under construction and lying immediately to the west of the Ingate Place site and within Wandsworth's draft Tall Building zone which places a height cap at 11 storeys. Page 80 of the BDTQ Framework provides an indicative height and massing strategy for Ingate Place based on assumptions made relating to industrial floorspace and the 65% plot ratio requirement of London Plan Policy E7. **The Framework does not provide any detail or analysis on how the form of future development can positively respond to the immediate and wider townscape character**, aside from some very basic high-level principles linked to public realm and movement patterns in the area.

3.15 The Study's scenario analysis, sets out the following assessment of the area:

*Potential impacts on views will depend on the eventual form of buildings in these areas, and their approach to materials and detailing. However, the massing and spread may have widespread visibility particularly along the railway tracks.*

*Considering the setting of, and views from the nearby conservation area to the south west, the building heights shown are considered to be broadly appropriate in principle, if well-designed and in accordance with design principles in Appendix A. Heights should respect the setting of existing landmark buildings including the former Hamptons Depository to the south of the zone and Queenstown Road Station to the west.*

*The heights of the scenario within the tall building zone are considered to be appropriate for the area. The tallest elements should be located along the railway lines and particularly to mark the national rail station at Queenstown Road. However, development requires careful placement within the zone to preserve views towards Battersea Power Station while also respecting the smaller scale character of the area, particularly to the south and west.*

*In particular, development should step down towards the small scale and consistent Parktown Estate Conservation Area to the west and the Hamptons Depository to the north and east. It is noted that a development (6-10 Ingate Place) is under construction and will rise to 15 storeys (45m). However, due to the proximity of Battersea Park Registered Park & Garden and Conservation Area, the heights shown in the scenario are considered appropriate and further new development should not exceed these.*

*None of the valued features, views or key features would be adversely affected by developments of up to 7-11 storeys in areas noted above if well designed and planned.*

3.16 We agree with the strategy for positioning height towards the railway and close to Queenstown Road and the need to respond to the setting of more sensitive receptors, most notably the nearby Parktown Estate Conservation Area. **However, we raise issue with the lack of analysis given to the local context and believe the intention to identify only the western portion of Ingate Place as a tall building zone is unduly restrictive and does not align with the scenario's baseline assessment and conclusions.**

3.17 There is no evidence to suggest that the tall building zone could not be extended to include the full extent of Ingate Place and indeed this would enable greater flexibility to introduce a varied composition of massing and heights as suggested by We Made That in their BDTQ Framework document.

3.18 To demonstrate the constraints placed on the ability to intensify or further optimise Ingate Place, Collado Collins Architects undertook an options exercise (see Appendix), taking account of the site's existing use as a storage facility and the challenges involved in reconfiguring the site's capacity to enable commercially viable optimisation.

- 3.19 The Hamptons Factory (1901) is a characterful, former factory building within the site and a valuable heritage and townscape asset for the Stuarts Road area. Its distinctive appearance, industrial sized floor to floor heights and robust condition would naturally lend itself to being repurposed as a hub for workspaces and light industrial related uses. This would necessitate a decant and relocation strategy for the storage facility within the site area. The existing 2-storey business centre on the northern edge of the site offers potential to be intensified to enable a reconfiguration of the site to accommodate growth and industrial intensification within the SIL and the Opportunity Area.
- 3.20 Placing a 6-storey height cap on the site severely limits the ability to optimise development capacity and safeguard the continued, viable operation of industrial activities. In townscape terms, a maximised envelope of development scenario based on the mid-rise characterisation would result in a continuous 6-storey slab block along the northern edge of the site. This would fail to respond to the more cellular, plot-based vision of the BDTQ framework as well as detracting from the character of the Hamptons Factory and its visibility from the railway and wider context.
- 3.21 We therefore suggest that a less restrictive policy approach to defining heights on Ingate Place and the wider Stuarts Road area, would support a design-led optimisation of industrial uses with full regard to establishing a successful townscape character that would be more consistent with the Council's rightly ambitious vision for the future of the area.**

# 4.0 REVIEW OF EMERGING PLANNING POLICY

- 4.1 The Urban Design Study (2021) prepared by Arup has informed the drafting of several draft planning policies set out within the LBW's Regulation 19 Draft Local Plan. This includes the Place-based Strategies for Battersea Residential and Nine Elms Mixed Use character areas, as well as emerging planning policies concerning visual and townscape considerations.
- 4.2 We set out below the draft policy wording, as currently draft in the Draft Local Plan, with our recommended changes set out throughout the text in Underlined Bold Italics (with proposed omissions struck through). We then provide our critical analysis and justification for the proposed changes.
- 4.3 The below focusses on the following draft planning policies:
- Policy LP1: The Design-Led Approach
  - Policy LP4: Tall and Mid-rise Buildings

## 4.4 Policy LP1 The Design-led Approach

- A. Development proposals must reflect and demonstrate that the following principles have been applied having had regard to their relevance within the context of the scale and nature of the development proposed:
1. Use a design-led approach **satisfying the criteria set out in London Plan Policy D3 and D9 Part C** to optimise the potential of sites so that the layout and arrangement of buildings ensure a high level of physical integration with their surroundings and consideration of broader placemaking.
  2. Ensure that the scale, massing and appearance of the development provide a high-quality, sustainable design and layout that enhance and relate positively to the prevailing local character and the emerging character (where the context is changing), **in line with London Plan Policy D1**.
  3. Demonstrate meaningful and consistent engagement with local communities that gives them the opportunity to shape development from the early stages and throughout the planning process.
  4. Avoid creating a canyon effect through appropriate set back; and by stepping down heights to avoid adverse impacts on local character and the street scene.
  5. Ensure the urban grain and site layout take account of and improve existing patterns of development and movement, permeability and street widths in order to contribute positively to well-being and enhance active travel.
  6. Provide recognisable, legible and tree-lined street networks and other spaces with their edges defined by buildings, making it easy for anyone to find their way around, and to promote accessibility, social interaction, health and well-being.



7. Include well-located public spaces that support a wide variety of activities, and provide a high-quality public realm, satisfying the criteria set out in London Plan Policy D8.
8. Ensure that the proposed finishing materials and façade design (such as the degree of symmetry, variety, the pattern and proportions of windows and doors and their details) demonstrate an appreciation and understanding of vernacular, local character and architectural precedents in the local area, while not preventing or discouraging appropriate innovation.
9. Maximise active frontages / ground floor uses facing main pedestrian routes, having regard to the location of the site; and ensure that ground floor design provides high-quality and safe access for pedestrians and cyclists.
10. Demonstrate an integrated approach to hard and soft landscape design which maximises urban greening, integrates existing and incorporates new, natural features into a multifunctional network that supports quality of place, biodiversity and water management.
11. Minimise opportunities for crime and antisocial behaviour including terrorist activities in a site-specific manner, based on an understanding of the locality and the potential for crime and public safety issues.
12. Achieve the highest standards of accessible and inclusive design, in accordance with the London Plan Policy D5.

B. The Council will secure the creation of beautiful, well-designed and high-quality places by:

1. encouraging the use of its pre-application service;
2. encouraging meaningful developer-led public engagement in advance of the submission of a planning application;
3. undertaking a review of the design of appropriate major schemes using the Council's Design Review Panel; and
4. expecting the development of masterplans or concept frameworks where sites are clustered.

4.5 We find Policy LP1 unsound and too prescribed. Elements of the draft policy do not conform with the London Plan (2021), which encourages a context and design-led approach to the optimisation of development sites. We recommend the policy is redrafted in order to be brought in line with strategic planning policies of the London Plan (2021).

#### **4.6 Policy LP4 Tall and Mid-rise Buildings**

- A. Buildings which are 7 storeys or over, or 21 metres or more from the ground level to the top of the building (whichever is lower) will be considered to be tall buildings.
- B. 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. Planning applications for tall buildings will be assessed against the criteria set out in Parts C and D of the London Plan Policy D9 and those set out below as follows:

## Visual Impacts

1. That the proposal respects and responds to key views and their associated corridors towards and from strategic landmarks and heritage assets across both the borough and neighbouring boroughs.
2. 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.
3. 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.
4. The design of the lower, middle and upper parts of any tall building should result in the creation of a visually coherent scheme both in terms of the building itself, how it relates to the surrounding area and how it would appear in any mid-range and long-range views.
5. Planning applications should be supported by **visual impact analysis** ~~graphic 3D modelling~~. ~~The 3D modelling~~ **This analysis** must take account of the existing and emerging skyline ~~incorporate any existing tall buildings or those where an extant planning permission is in place~~ to ensure that the individual and cumulative impact of the proposal is fully assessed. ~~including in relation to its impact on the existing skyline.~~
6. Development proposals affecting the setting and approaches of the Westminster World Heritage Site, will be required to address all criteria set out in Part B of Policy LP3.

## Spatial Hierarchy

7. 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.
8. Where tall buildings are proposed to be located in close proximity to publicly accessible areas measures should be incorporated to soften their edges and create high-quality public spaces including through the use of generously sized, safe and attractive walkways and the introduction of soft landscaping, including trees of an appropriate scale for the space to which it relates.

## Tall Buildings Near the River Thames Frontage

9. Tall buildings should not result in the creation of development which would impede the outlook and/or amenity of occupiers of existing buildings or users of public spaces having regard to their relationship with the river frontage.
10. Where appropriate, the massing of proposed tall buildings should take into account their landward facing orientation and provide sufficient articulation, including through devices such as a 'step down,' in order to provide an appropriate transition between the proposed building(s) and those of a lower height.
11. Where relevant any proposed tall building(s) should be set back from the Thames Path to ensure that it continues to provide a welcoming public route or where it would provide an opportunity to enhance its attractiveness and usability.

## Microclimate and Lighting

12. 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), as well as on night-time vistas and panoramas and fauna.
13. 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.
14. Building materials should be capable of ensuring that the proposals would not contribute to the urban heat island effect as a result of thermal radiation or the release of anthropogenic (waste) heat. Regard should be had to Policy LP10 (Responding to the Climate Crisis).
15. Planning applications should be supported by a shade analysis that clearly demonstrates that any shadow created by a proposed tall building(s) would not give rise to solar gain such as to cause thermal discomfort for users of publicly accessible and private spaces.

## Ground Floor Uses and Public Realm

16. Proposals for tall buildings should incorporate active frontages at ground floor. The main access to any proposed tall building should be located within a frontage facing a main street or publicly accessible area and should provide a safe, welcoming and clearly defined entrance.
17. The lower sections of any tall building should provide for pedestrian weather protection (such as colonnades) along the main frontages of the building and should incorporate the use of high-quality materials and human-scale detailing that encourages social interaction and animates the ground floor external environment.
18. Where ground floor non-residential uses are proposed, the public realm should be enhanced through the incorporation of public spaces such as plazas at their entrance unless it can be clearly demonstrated that such an approach would not be appropriate.
19. Sites which have existing through routes or are capable of accommodating through routes must ensure that such routes are maintained or provided to support ease of movement and connectivity.

C. Proposals for tall buildings will not be permitted outside the identified tall building zones.

~~D. 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.~~

E. Buildings which do not fall within the definition of a tall building as set out in Part A, but are 5 storeys or over, or 15 metres or more from the ground level to the top of the building (whichever is lower) will be considered to be mid-rise buildings.

F. Proposals for mid-rise buildings will be supported in tall and mid-rise building zones identified at Appendix 2, where the development would:

1. be located **and designed to respond sensitively to the scale and character of the surrounding area** ~~in order to create a step down between the proposed development and buildings within the surrounding area;~~
2. respond appropriately in height, scale and massing to existing buildings in the surrounding area, and protect or enhance heritage assets, including their settings;
3. respect the scale, width and proportion of adjacent buildings, streets and watercourses, and local character, and avoid adverse effects on key characteristics, valued features and sensitivities as identified in the relevant character area profile set out in the Council's Urban Design Study (2021); and
4. provide a varied and interesting roofline, respond to surrounding architectural styles, avoid the creation of long homogeneous blocks of development and create active frontages at ground floor level.

G. Proposals for mid-rise buildings will not be permitted outside the identified tall and mid-rise building zones.

~~H. Proposals for mid-rise buildings should not exceed the appropriate height identified within the relevant mid-rise building zones as identified at Appendix 2 of this Plan~~

- 4.7 We find Policy LP4 unsound and not aligned with the objectives of London Plan Policy D3 and D9 Part C. Elements of the draft policy do not conform with the London Plan (2021), which encourages design-led and qualitative approach to establishing appropriate scales of development, taking account of other relevant policies in the development plan. We recommend the policy is redrafted in order to be brought in line with strategic planning policies of the London Plan (2021).

# 5.0 RECOMMENDATIONS

5.1 Based on the representations set out within this document, we make the following recommendations to the London Borough of Wandsworth in relation to the emerging Local Plan and its supporting evidence base:

5.2 Urban Design Study (2021)

- Further assessments of townscape character areas should be undertaken so to ensure sufficient evidence is put forward to support the drafting of the Local Plan;
- Consideration be taken to emerging context within townscape character areas as a means to assess 'Probability of Change';
- The specific height ranges for Tall Building Zones should be amended to be recommended ranges with an emphasis placed on a design-led approach to site optimisation;
- Criteria for assessing the acceptability of a tall building(s) should be undertaken on a site-by-site basis and not solely constrained to within Tall Building Zones;

(Para 2.21 and 2.22) a realignment of the B1 and B2 Sub-area boundaries to better reflect the characteristics of Lombard Road and its surroundings.

(Para 2.29) revise the 'Probability of Change' categorisation of the Stuarts Road Strategic Industrial Land (SIL) to acknowledge the London Plan's (2021) policies on industrial intensification and design-led site optimisation (with reference to Policies E7 and D3 respectively).

(Para 3.17) reconsider the extent of Tall Building Zone TB-B3A-02.

5.3 Draft Local Plan Policies (2022)

- Amend restrictive policies relating to specific height ranges;
- Amend draft policies so to comply with national planning policy as well as strategic policies set out in the London Plan (2021);

5.4 We trust these representations are clear and helpful. We would welcome the opportunity to assist you further in the preparation and drafting of your emerging Local Plan, should there be a requirement.

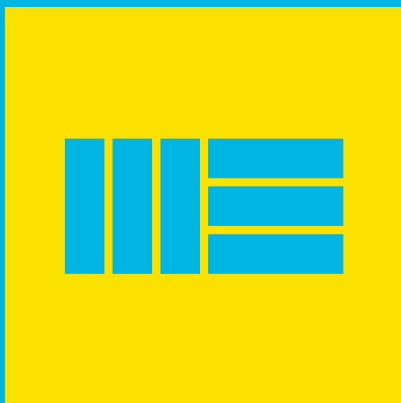


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WE CONSIDER OUR CREDENTIALS, HOW WE HAVE STRUCTURED OUR BID AND OUR PROPOSED CHARGING RATES TO BE COMMERCIALY SENSITIVE INFORMATION.  
WE REQUEST THAT THESE BE TREATED AS CONFIDENTIAL.

## **Appendix 2: Viability Analysis**



28<sup>th</sup> February 2022



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Dear Sirs,

**Re: London Borough of Wandsworth - Local Plan Publication (Regulation 19) Consultation**

We write in connection with the London Borough of Wandsworth Local Plan (Regulation 19) Consultation draft dated January 2022 concerning the two opportunity sites known as 'Lombard Road' and 'Ingate Place' currently under the ownership of Safestore UK Ltd ('Safestore'). Savills has been instructed by Safestore to respond as part of the consultation process focusing on the impact of the draft policies on viability and deliverability.

This response is intended to assist the London Borough of Wandsworth ('the Council') in the preparation of its emerging tall buildings policy and we would welcome the opportunity to work with the Council and its advisors throughout the consultation process in order that such policy may be further developed.

In support of this exercise we have considered the key assumptions included by the Council's appointed viability consultants Three Dragons, and provide comment herein where appropriate. It should be noted that any reliance upon the Council's supporting viability study does not confirm our agreement to the same, and we reserve the right to make further representations at a later stage where appropriate to do so. Moreover, our professional view may differ from time-to-time in accordance with market movements and changes in professional and planning guidance and our position is therefore reserved.

Please note that our assessment does not constitute a formal valuation and should not be relied upon as such. No liability is given to any third party and the figures suggested are not in accordance with the RICS Valuation – Global Standards 2022 (incorporating the IVSC International Valuation Standards), together the 'Red Book', and neither Savills nor the author can accept any responsibility to any third party who may seek to rely upon it, as a whole or any part as such. Moreover, our assessment does not constitute a formal Financial Viability Assessment (FVA) and should not be represented as such, rather our assessment is a point in time review of the impact of restrictive draft policy.

The overriding response is that the Local Plan should not put in place policies that fetter development opportunities from being brought forward or that mean those tasked with major development investment decisions must operate at the margins of viability. Following recent experience, rapid economic changes such as the current pandemic can have a significant and long-lasting market impact. It is important that the viability of the development plan is therefore resilient to such impacts and promotes flexibility

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS.  
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**Site context**

The subject sites referred to above and considered within this response are known as (1) 19 Lombard Road, London SW11' and (2) Ingate Place, London SW8. We consider each site below in greater detail.

The first property, 19 Lombard Road is wholly occupied by Safestore and configured for light industrial use. It is of concrete frame construction effectively arranged over three storeys to provide 46,984 sq ft including first and second floor mezzanine levels of which 15,910 sq ft represents ground floor space. Access is provided to the west via Lombard Road where customer and staff parking is provided. The eastern rear of the site fronts to Gwynne Road to the south.

In accordance with the wider site allocation and for assessment purposes we have assumed that 19 Lombard Road will be brought forward on the basis of holistic redevelopment alongside the land under third party ownership to the immediate south west known as 80-100 Gwynne Road - a former plumbing merchants previously known as 'Fraser & Ellis', providing a total collective site area equivalent to approximately 0.3 hectares (0.74 acres).

The adjacent property known as 80-100 Gwynne Road is also configured for light industrial use within a steel portal frame construction effectively arranged over two storeys providing 10,210 sq ft Including 2,445 sq ft of ancillary offices. Access is provided via Lombard Road to the west and Gwynne Road to the south whilst external yard area is located to the eastern part of the site. Land uses in the immediate vicinity comprise a mix of industrial and residential.

The site plan for 19 Lombard Road and 80-100 Gwynne Road which together make up the site allocation is illustrated at Figure 1 below:

**Figure 1 – Lombard Road Site Plan**



The second property under consideration is known as 'Ingate Place, London SW18 and is currently configured over two primary buildings known as the 'Storage Centre' and 'Business Centre'. The Storage Centre comprises a factory built during the early 1900s known as the former Hamptons Factory. It is currently occupied by Safestore and comprises an historic brick curved structure providing 126,695 sq ft of accommodation over five storeys plus basement, alongside a modern extension providing an additional 21,829 sq ft over four storeys. The Business Centre is configured over two storeys and provides a total of 69,731 sq ft. The property is largely let to a number of commercial enterprises across a range of sub-tenancies. The site is of an irregular shape and measures approximately 1.42 hectares (3.5 acres) and is shown within Figure 2 below.

**Figure 2 – Ingate Place Site Plan**



### **Policy context**

The Council's emerging Local Plan is anticipated for adoption during summer 2023 and will set out the future spatial strategy for the borough. In accordance with the London Plan (Policy D9) each borough's Local Plan should define the nature of tall buildings in addition to those locations deemed appropriate for such development within each borough. Draft Policy LP4 of the emerging Local Plan seeks to define tall and mid-rise buildings) within the Policies Map Changes Document.

The Lombard Road site is allocated together with the adjacent third party land to the south west under RIV8, which stipulates high capacity residential-led mixed use development with workspace retention. In terms of height, the site is located within sub-area B2, which is designated as appropriate for 7-10 storeys, or 21-30 metres in height. Given the site falls to the periphery of the zone it is reasonable to assume a lower threshold of eight storeys (21m) may be applicable and have assumed the same for viability assessment purposes.

Ingate Place, despite an earlier favourable designation by the Council at Regulation 18 stage falling within a Tall Buildings Opportunity Area, within the updated Regulation 19 publication the site now lies adjacent to a tall building zone (TB-B3a-02 within sub area B3), and has been designated as appropriate for heights below six storeys with draft policy stipulating that taller buildings will not be supported.

Our response focuses on the significant concerns of Safestore surrounding the Council's Regulation 19 stage amendment of its emerging tall buildings policy. Through representation during the consultation period this response seeks to demonstrate the impact of the draft policy from a viability perspective to help ensure that the subject sites under Safestore's ownership are not unduly fettered whilst maintaining viability.

In preparing our response to the Consultation we acknowledge the work undertaken by the Council's viability consultants Three Dragons.

### **Approach & Methodology**

We have considered the subject sites within a viability in planning context comparing a Site Value Benchmark - otherwise known as 'Benchmark Land Value', to the Residual Land Value of a hypothetical scheme with vacant possession. Where the Residual Land Value is lower and/or not sufficiently higher than the Site Value Benchmark the project is not considered technically viable in planning and would unlikely be brought forward as a result.

In order to assess the impact of the Council's draft tall buildings policy on the subject sites we have considered the Residual Land Value for a hypothetical optimized policy compliant scheme on each of the subject sites reflecting informed by design work carried out by Collado Collins.

Our assessment has been carried out in accordance with the draft tall building policy which effectively sets a height restricted parameter for the developable envelope. We would note that the scenarios included within this assessment are intended for illustrative use only and do not necessarily represent a formal view on height, massing or density.

As above, for the site at Lombard Road it is assumed that a policy compliant scheme site is brought forward jointly with 80-100 Gwynne Road (collectively '19 Lombard Road & 80-100 Gwynne Road'), in accordance with the relevant site specific allocation (ref RIV8) which proposed residential led mixed use development.

For the residential element, we have assumed an affordable housing provision equivalent to 35% on a mixed tenure basis which is consistent with the Local Plan Viability Study. The hypothetical scheme at Lombard Road is set out within Figure 3 below:

**Figure 3 – Schedule of Accommodation (Lombard Road)**

Use	Area GIA Sq m (Sq ft)	Area NSA/NIA Sq m (Sq ft)
Residential	6,503 (69,996)	4,624 (49,777)
Industrial / Storage	5,702 (61,376)	-
Plant	192 (2,069)	-
Basement	2,412 (25,963)	-
<b>Total</b>	<b>14,809 (159,404)</b>	-

For Ingate Place our approach focuses on a policy compliant commercial led mixed use development to take account of the relevant draft policies covering the site. We have consulted with Collado Collins architects who have considered indicative massing for hypothetical redevelopment of the site.

In order to maximise the site through a mix of commercial uses, we have considered the refurbishment of the existing Storage Building ('Building G') with conversion to higher value use as offices alongside the retention of the modern storage annex ('Building F'). We have further considered the holistic redevelopment of the Business Centre to provide enhanced modern specification dual height industrial use at ground level ('Building D') with offices above set out across four storeys ('Buildings A – C') and the erection of a new storage building, 'Building E'.

For the new office accommodation within Buildings A – C we have assumed a gross:net efficiency of 75% with a reduced 70% efficiency within the refurbished Storage Building – 'Building G' taking account of existing configuration.

The hypothetical scheme schedule of accommodation for Ingate Place is set out within Figure 4 below:

**Figure 4 – Schedule of Accommodation (Ingate Place)**

Building	Use	Area GIA Sq m (Sq ft)	Area NSA/NIA Sq m (Sq ft)
Building A	Offices	2,200 (23,681)	1,650 (17,761)
Building B	Offices	2,200 (23,681)	1,650 (17,761)
Building C	Offices	2,200 (23,681)	1,650 (17,761)
Building D	Industrial / workspace	7,968 (85,768)	-
Building E	Storage	2,700 (56,705)	-
Building F	Storage	2,156 (23,207)	-
Building G	Offices	13,798 (148,521)	9,659 (103,965)
<b>Total</b>		<b>33,222 (357,601)</b>	-

Under each of the above assessments we have made the general assumption of full and implementable planning permission following discharge of all conditions with effective vacant possession.

Given the intended purpose of this exercise which seeks to respond to the emerging Local Plan, we have sought where appropriate to rely upon the assumptions made within the Three Dragons Local Plan Viability Study dated 2022. We have however diverged from the Viability Study assumption base where respective assumptions are considered unrealistic for the nature of hypothetical development included within our assessment.

We would note that our use of these assumptions does not necessarily reflect Savills' endorsement or agreement to the same. However, our approach seeks to align with the Council's decision making to the extent reasonably possible at the Plan making stage. We discuss some of the key assumptions include within our assessment below at Figure 5:

**Figure 5 – Overview Schedule of Key Assessment Inputs**

Description	Assumptions	Comments
<b>Site Value Benchmark</b>	£16m/hectare (£6.5m/acre)	Represents a borough wide land value 'VA2 (Mic, N, E)' average across all EUVs exc offices / warehouse and retail inclusive of 20% landowner's premium (Para 6.72).  Site Value Benchmark is fundamentally a site specific consideration and we would consequently note the limitations in the

		application of an area wide Site Value Benchmark. Hence we consider a site specific Site Value Benchmark below.
<b>Market Sales Values</b>	£9,700 psm (£901 psf) – Value Zone 2	<p>Reflects the sales value applied to ‘Value Zone 2 (Mid, N, E)’ stipulated under Para 5.14 of the Three Dragons assessment. An equivalent sum is included within our assessment.</p> <p>We have not considered other ‘residential’ uses including Senior Living, Build-to-Rent and/or Co-Living for the purposes of this exercise.</p> <p>No allowance is made for ground rent income which is appropriate for planning viability purposes.</p>
<b>Affordable Sales Values</b>	<p>£1,940 psm (£180 psf) - Low cost rent</p> <p>£5,820 (£541 psf) - Intermediate</p>	<p>Sales Values included at Para 6.38 – Social Rent (20% MV), LAR (30% of MV), LLR (55% MV), Shared ownership (67% MV), First Homes (70% MV - capped).</p> <p>Under Policy LP23 Affordable housing of the Reg 19 Local Plan residential development will target 50% of all new homes to be affordable. However, London Plan Policy H5 targets a minimum of 35% which has been tested for the purposes of our assessment on a blended tenure basis.</p>
<b>Commercial Values</b>	<p><u>Offices</u></p> <p>360 psm £33.50 psf outside of VNEB Zone</p> <p>6% Yield</p> <p><u>Industrial</u></p> <p>£19.50 psf</p> <p>5% Yield</p>	<p>The stated values reflect modern good quality specification accommodation. The possible configuration of commercial accommodation is inherently varied and requires a high level approach at this stage. In reality a wide range in potential rental values and investment yields is possible depending on factors such as size and configuration, location and specification etc.</p> <p>Within our assessment of Site Value Benchmark we have considered comparable evidence, VOA rating and the Viability Study in determine an appropriate ‘step down’ in values to take account of quality of accommodation including specification and condition.</p>
<b>Developer’s Return (Profit)</b>	<p>Market Residential (20%)</p> <p>Affordable Residential (6%)</p> <p>Commercial (15%)</p>	<p>We have adopted a higher profit target of 20% on GDV for the market residential element included within our assessment (versus the 17.5% applied by Three Dragons) which is reflective of the inherent risk in the construction and sales process taking account of macro and micro economic risk factors.</p>

		Three Dragons' profit allowance for affordable and commercial elements is considered reasonable and adopted within our assessment.
<b>Sales &amp; Marketing</b>	3% - Residential / Commercial  6.8% purchaser's costs for commercial element.	Equivalent to generic allowance included within the Local Plan Viability Assessment (Para 6.2 – 6.3).
<b>Build Costs</b>	Reliance on BCIS data  Plus 10% for external works	<p>Three Dragons adopt BCIS median costs dated Q4 2020 to inform their assessment. Given the passage of time and current levels of inflation we have adopted an equivalent approach using updated BCIS data.</p> <p>Savills are not appointed as cost consultants and we are therefore unable to make professional judgment on the adopted cost assumptions by Three Dragons. We would also draw attention to likely movements in build costs which should be acknowledged within this assessment between this consultation stage and forthcoming consultation which may impact on scheme viability.</p> <p>Nb. Figure shown is exclusive of externals and demolitions costs which are accounted for separately. Allowance for costs associated with external works equivalent to Local Plan Viability Assessment Para 6.16.</p>
<b>Extra Policy Costs</b>	Residential - +2.5%  Commercial - +1.5%	Extra Policy costs included at Para 6.33 with allowance for residential element to help achieved net zero and to meet BREEAM 'Excellent' for office use.
<b>Contingency</b>	5%	Equivalent to generic allowance included within the Local Plan Viability Assessment (Para 6.20).
<b>Professional Fees</b>	10%	Equivalent to generic allowance included within the Local Plan Viability Assessment (Para 6.18).
<b>Finance</b>	100% debt funding at 6.75%	An allowance of 6% is included by Three Dragons to inform their Viability Study. This allowance is unrealistic for large scale development in London and a 6.75% allowance has been included within our assessment.
<b>CIL / S106</b>	<u>BCIL</u>  Residential - £373.32 psm  Commercial – Nil	We have adopted the CIL figures included within the Local Plan Viability Study which allow for indexation.

	<u>MCIL2</u> Residential / commercial - £80.73 psm  S106 - Nil	We have excluded S106 contributions within our assessment. Where additional S106 contributions are included we would note this having an adverse impact on scheme viability.
<b>Timescales</b>	Pre-commencement (3 months)  Build out (18 months)  Residential Sales (12 months)  Commercial Sales (on PC)	Timescales for assumed quantum of development set out within Local Plan Viability Assessment (Para 6.22).  Development timescales are highly sensitive to site-specific factors. In the absence of a detailed masterplan we are unable to provide further specific comment within this response.

### Site Viability Assessment

In accordance with the methodology set out above, as a starting point we have considered Site Value Benchmark having regard to both the borough wide approach adopted within the Local Plan Viability Study – which appears to significantly under value the subject sites, and a further assessment which takes account of site specific considerations on a desktop basis.

Whilst the purpose of this exercise is not to conduct a full assessment of viability in planning, Site Value Benchmark is a material consideration for any reasonable landowner acting prudently and should be properly accounted in assessing viability.

On the basis of a borough wide approach, for the Lombard Road site would predicate on employment land values when taking account of the respective existing site uses enjoyed. On this basis the Site Value Benchmark of £16,000,000/hectare when applied to the site would equate to say £4,800,000 based upon the allocation site area

On a site specific basis of assessment, the existing accommodation at Lombard Road provides a total of 46,984 sq ft of light industrial accommodation across ground and two additional mezzanine floors whilst 80-100 Gywnne Road provides a total floor area of 7,765 sq ft of ground floor and 2,445 sq ft of first floor ancillary office accommodation plus yard area.

On a desktop basis where a notional industrial rental range in value of £12.50 per sq ft is applied to the ground level accommodation, representing a step-down to new build specification set out under the Local Plan Viability Study i.e. £19.50 per sq ft for modern new build accommodation, and with an adjusted rent equivalent to 50% across the mezzanine storeys, £20 per sq ft applied to the ancillary offices, a total combined passing rent of say £540,000 per annum is derived.

When the estimated rent is capitalised at 5.5%, reflecting a reasonable adjustment to the Local Plan Viability Study an Existing Use Value of say £10,730,000 is concluded, allowing for incentive and net of purchaser's costs.



Applying a 20% landowner's premium to this figure suggests a Site Value Benchmark in the order of say £12,880,000. The following table at Figure 6 compares the Site Value Benchmark determined in accordance with the Local Plan Viability Study versus a site specific assessment:

**Figure 6 – Comparison of SVB (Lombard Road)**

SVB (Local Plan Viability)	SVB (Site Specific)
£4,800,000	£12,880,000

On the basis of a borough wide approach, the Site Value Benchmark for Ingate Place would also predicate on employment land values when taking account of the respective existing uses enjoyed across the site. On this basis the adopted Site Value Benchmark of £16,000,000/hectare when applied to the site would equate to £22,700,000 based upon the current site area.

On a desktop basis in order to assess Ingate Place on a site specific basis we note the site is currently configured across two primary buildings known as the 'Storage Centre' and 'Business Centre' whilst other possible developable sections of the site are disregarded.

The Storage Centre provides a total of 126,695 sq ft of accommodation over five storeys plus basement, alongside a modern extension providing an additional 21,829 sq ft over four storeys. Having regard to the general tone of evidence, VOA rating and the Council's Viability Study, we have applied a notional blended storage rental value of £6.25 per sq ft across all floors.

The Business Centre is configured over two storeys and provides a total of 69,731 sq ft set out across both industrial and office use. The property is largely let to a number of commercial enterprises across a range of sub-tenancies but could reasonably yield up vacant possession at short notice. Having regard to the general tone of evidence and VOA rating list we have adopted a notional rent in the order of £12.50 per sq ft for the industrial premises and £20 per sq ft for the offices.

On the basis of the above a total combined passing rent of say £1,840,000 per annum is derived. We have capitalised the combined rental income at 5.5% which concludes an Existing Use Value of say £29,250,000, allowing for incentive and net of purchaser's costs. Applying a 20% landowner's premium to this figure generates a Site Value Benchmark of say £35,100,000. The following table compares the Site Value Benchmark determined in accordance with the Local Plan Viability Study versus a site specific assessment.

**Figure 6 – Comparison of SVB (Ingate Place)**

SVB (Local Plan Viability)	SVB (Site Specific)
£22,700,000	£35,100,000

We would note that our above assessment is provided illustratively at this stage and does not constitute a formal Financial Viability Assessment (FVA) where a range of considerations may be considered. We are further aware that confidential third party asset valuations carried out for each site conclude values in excess

of those adopted on a desktop basis above and our position is therefore reserved. The inclusion of a higher valuation would have the impact of further suppressing viability.

Having reviewed indicative supporting Site Value Benchmarks for each site above, in accordance with the methodology set out above we have appraised each site in accordance with the drawings and accommodation schedules provided by Collado Collins in order to assess viability. To inform build costs we have adopted BCIS figures for new build / refurbishment as appropriate whilst making allowance for external works, fees and contingency. The results of our assessment are as follows:

**Figure 7 - Appraisal results for Lombard Road**

RLV	SVB		Status
	Local Plan	Site Specific	
£170,000	£4,800,000	£12,880,000	Unviable

Our assessment of Lombard Road concludes that the Residual Land Value based upon an optimised residential-led mixed use development falls significantly below the site specific Site Value Benchmark and would therefore be considered unviable in planning. Even where the borough wide Site Value Benchmark is technically unviable in planning albeit to a reduced margin. Our appraisal for Lombard Road is attached at **Appendix 1** to the rear of this note.

**Figure 8 - Appraisal results for Ingate Place**

RLV	SVB		Status
	Local Plan	Site Specific	
£15,800,000	£22,700,000	£35,100,000	Unviable

Our assessment of Ingate Place concludes that the Residual Land Value based upon an optimised commercial-led development falls significantly below both the site specific and borough wide Site Value Benchmark and would therefore be considered unviable in planning. We would note the inclusion of affordable workspace within the hypothetical scheme would have a further detrimental impact on scheme viability. Our appraisal for Ingate Place is attached at **Appendix 2** to the rear of this note.

## Conclusion

Based upon the analysis presented above our assessment demonstrates that the Council's draft tall building policies covering the subject sites are fundamentally detrimental to scheme viability. The consequence of adopting such policies would likely preclude such sites coming forward for development during the Local Plan period fettering critical housing delivery, employment opportunities and the delivery of planning obligations within the borough.

The scale of redevelopment should not be constrained by overly restrictive policy requirements that will adversely impact on viability and most likely deter or prevent any development proposals from coming forward. Instead, development should be encouraged and optimised, given the respective site locations, with the focus being on design quality and placemaking.



In line with the above, we would seek modification to those draft policies covering the subject sites restricting height. Greater flexibility in policy would better reflect the positive contribution future redevelopment could have for the borough through the delivery of viable and well-designed schemes.

We would expect the draft policy to be amended through consultation and welcome further engagement to assist the Council with any further technical work being undertaken through due process.

The importance of flexibility is reinforced when taking account of the many changes regularly taking place in the development industry, not only related to the ongoing pandemic, but also in respect of the building regulatory system and substantial cost inflation etc. For a plan that operates over several years and whose next review may not take place for some time, it is important to consider the likely impacts now to avoid unnecessary viability issues in future years through flexibility.

Should you have any queries in relation to the above please do not hesitate to contact Savills directly. We would be happy to provide additional comment and support discussions with the Council and its advisors in due course.

**Enclosed**

Appendix 1: Site Appraisal – Lombard Road

Appendix 2: Site Appraisal – Ingate Place

19 Lombard Road & 80-100 Gwynne Road  
Indicative Scheme (Draft)

Development Appraisal  
Savills  
28 February 2022

**19 Lombard Road & 80-100 Gwynne Road  
Indicative Scheme (Draft)**

**Appraisal Summary for Phase 1**

Currency in £

**REVENUE**

Sales Valuation	Units	ft <sup>2</sup>	Sales Rate ft <sup>2</sup>	Unit Price	Gross Sales
Market Residential	50	32,355	900.00	582,390	29,119,500
Affordable Residential	<u>26</u>	<u>17,422</u>	377.00	252,619	<u>6,568,094</u>
<b>Totals</b>	<b>76</b>	<b>49,777</b>			<b>35,687,594</b>

**Rental Area Summary**

	Units	ft <sup>2</sup>	Rent Rate ft <sup>2</sup>	Initial MRV/Unit	Net Rent at Sale	Initial MRV
Commercial	1	61,376	10.75	659,792	659,792	659,792

**Investment Valuation**

Commercial					
Market Rent	659,792	YP @	5.0000%	20.0000	
(1yr Rent Free)		PV 1yr @	5.0000%	0.9524	12,567,467

**GROSS DEVELOPMENT VALUE**

**48,255,061**

Purchaser's Costs	(854,588)
Effective Purchaser's Costs Rate	6.80%
	(854,588)

**NET DEVELOPMENT VALUE**

**47,400,473**

**NET REALISATION**

**47,400,473**

**OUTLAY**

**ACQUISITION COSTS**

Residualised Price		177,635	
			177,635
Stamp Duty		553	
Effective Stamp Duty Rate	0.31%		
Agent Fee	1.00%	1,776	
Legal Fee	0.75%	1,332	
			3,661

**CONSTRUCTION COSTS**

Construction	ft <sup>2</sup>	Build Rate ft <sup>2</sup>	Cost
Build Costs	159,404	179.04	28,540,000
Contingency		5.00%	1,491,175
Demolition			570,000
BCIL	43,140 ft <sup>2</sup>	34.60	1,492,644
MCIL2	43,140 ft <sup>2</sup>	7.50	323,550
S106			1
			32,417,370
<b>Other Construction</b>			
Extra Policy Costs		2.50%	713,500
			713,500

**PROFESSIONAL FEES**

Professional	10.00%	2,982,350	
			2,982,350

**MARKETING & LETTING**

**19 Lombard Road & 80-100 Gwynne Road**

**Indicative Scheme (Draft)**

Marketing (residential)	1.00%	291,195	
Marketing (commercial)		50,000	
Letting Agent Fee	10.00%	65,979	
Letting Legal Fee	5.00%	32,990	
			440,164

**DISPOSAL FEES**

Sales Agent (residential)	1.50%	436,793	
Sales Agent (commercial)	1.00%	125,675	
Affordable Agent		50,000	
Sales Legal	0.50%	208,435	
Affordable Legal		50,000	
			870,902

**FINANCE**

Debit Rate 6.750%, Credit Rate 0.000% (Nominal)			
Land		21,403	
Construction		1,417,235	
Other		201,148	
Total Finance Cost			1,639,786

**TOTAL COSTS**

**39,245,368**

**PROFIT**

**8,155,105**

**Performance Measures**

Profit on Cost%	20.78%
Profit on GDV%	16.90%
Profit on NDV%	17.20%
Development Yield% (on Rent)	1.68%
Equivalent Yield% (Nominal)	5.00%
Equivalent Yield% (True)	5.16%
IRR% (without Interest)	31.22%
Rent Cover	12 yrs 4 mths
Profit Erosion (finance rate 6.750)	2 yrs 10 mths

Ingate Place  
Redevelopment Option

Development Appraisal  
Savills  
28 February 2022

**Ingate Place  
Redevelopment Option**

**Appraisal Summary for Phase 1**

Currency in £

**REVENUE**

**Rental Area Summary**

	<b>Units</b>	<b>ft<sup>2</sup></b>	<b>Rent Rate ft<sup>2</sup></b>	<b>Initial MRV/Unit</b>	<b>Net Rent at Sale</b>
Building G (Offices)	1	103,965	33.50	3,482,817	3,482,817
Building F (Storage)	1	23,207	6.25	145,044	145,044
Building A (Offices)	1	17,761	33.50	594,985	594,985
Building B (Offices)	1	17,761	33.50	594,985	594,985
Building C (Offices)	1	17,761	33.50	594,985	594,985
Building D (Industrial)	1	85,758	19.50	1,672,281	1,672,281
Building E (Storage)	1	29,063	6.25	181,644	181,644
<b>Totals</b>	<b>7</b>	<b>295,275</b>			<b>7,266,741</b>

**Investment Valuation**

<b>Building G (Offices)</b>					
Market Rent	3,482,817	YP @	6.0000%	16.6667	
(1yr 6mths Rent Free)		PV 1yr 6mths @	6.0000%	0.9163	53,188,858
<b>Building F (Storage)</b>					
Market Rent	145,044	YP @	5.5000%	18.1818	
(1yr Rent Free)		PV 1yr @	5.5000%	0.9479	2,499,677
<b>Building A (Offices)</b>					
Market Rent	594,985	YP @	6.0000%	16.6667	
(1yr 6mths Rent Free)		PV 1yr 6mths @	6.0000%	0.9163	9,086,488
<b>Building B (Offices)</b>					
Market Rent	594,985	YP @	6.0000%	16.6667	
(1yr 6mths Rent Free)		PV 1yr 6mths @	6.0000%	0.9163	9,086,488
<b>Building C (Offices)</b>					
Market Rent	594,985	YP @	6.0000%	16.6667	
(1yr 6mths Rent Free)		PV 1yr 6mths @	6.0000%	0.9163	9,086,488
<b>Building D (Industrial)</b>					
Market Rent	1,672,281	YP @	5.0000%	20.0000	
(1yr Rent Free)		PV 1yr @	5.0000%	0.9524	31,852,971
<b>Building E (Storage)</b>					
Market Rent	181,644	YP @	5.5000%	18.1818	
(1yr Rent Free)		PV 1yr @	5.5000%	0.9479	3,130,439
<b>Total Investment Valuation</b>					<b>117,931,410</b>

**GROSS DEVELOPMENT VALUE**

**117,931,410**

Purchaser's Costs	(8,019,336)
Effective Purchaser's Costs Rate	6.80%
	(8,019,336)

**NET DEVELOPMENT VALUE**

**109,912,074**

**NET REALISATION**

**109,912,074**



**Ingate Place  
Redevelopment Option**

**OUTLAY**

**ACQUISITION COSTS**

Residualised Price		15,822,245		
				15,822,245
Stamp Duty		632,890		
Effective Stamp Duty Rate	4.00%			
Agent Fee	1.00%	158,222		
Legal Fee	0.75%	118,667		
				909,779

**CONSTRUCTION COSTS**

<b>Construction</b>	<b>ft<sup>2</sup></b>	<b>Build Rate ft<sup>2</sup></b>	<b>Cost</b>	
Building G (Offices)	148,521	139.00	20,644,419	
Building E (Storage)	29,063	99.00	2,877,237	
Build costs (Buildings A - D)	<u>156,810</u>	200.00	<u>31,362,000</u>	
<b>Totals</b>	<b>357,601 ft<sup>2</sup></b>		<b>54,883,656</b>	
Contingency		5.00%	2,820,346	
Demolition & Enabling			700,000	
MCIL2			1,600,000	
				60,004,002
<b>Other Construction</b>				
Extra Policy Costs		1.50%	823,255	
				823,255

**PROFESSIONAL FEES**

Professional		10.00%	5,640,691	
				5,640,691

**MARKETING & LETTING**

Marketing		1.00%	1,179,314	
Letting Agent Fee		10.00%	726,674	
Letting Legal Fee		5.00%	363,337	
				2,269,325

**DISPOSAL FEES**

Sales Agent Fee		1.00%	1,179,314	
Sales Legal Fee		0.50%	589,657	
				1,768,971

**FINANCE**

Debit Rate 6.750%, Credit Rate 0.000% (Nominal)				
Land			1,918,317	
Construction			3,065,778	
Total Finance Cost				4,984,095

**TOTAL COSTS**

**92,222,362**

**PROFIT**

**17,689,711**

**Performance Measures**

Profit on Cost%	19.18%
Profit on GDV%	15.00%
Profit on NDV%	16.09%
Development Yield% (on Rent)	7.88%
Equivalent Yield% (Nominal)	5.71%
Equivalent Yield% (True)	5.92%
IRR% (without Interest)	28.06%

**Ingate Place****Redevelopment Option**

Rent Cover	2 yrs 5 mths
Profit Erosion (finance rate 6.750)	2 yrs 7 mths

**Ingate Place  
Redevelopment Option**

<b>Initial</b>	<b>MRV</b>
3,482,817	
145,044	
594,985	
594,985	
594,985	
1,672,281	
181,644	
<b>7,266,741</b>	

Ingate Place  
Redevelopment Option

Ingate Place  
Redevelopment Option

## **Appendix 3: Feasibility Studies**

# Ingate Place

Feasibility Study

# 1. Assessment

## 1.1 Site Analysis

### 1.1.1 Urban scale context

The site is surrounded by railway tracks which sit 4 - 10m high above ground level and have an area of 1.3 ha. The site has a PTAL rating of 5.

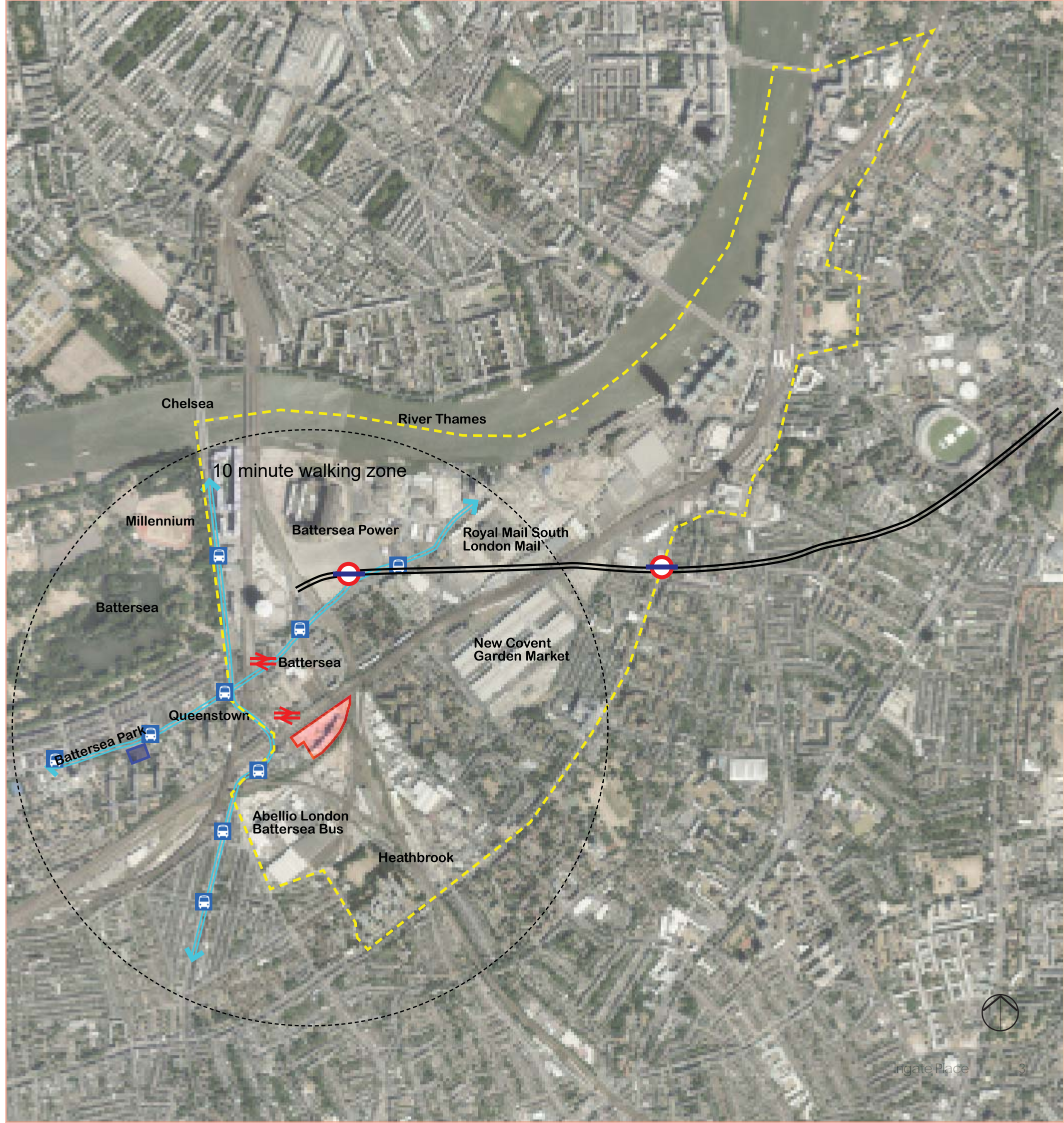
It sits in the 'Strategic Industrial Area' and is currently used by Abbey business centre, along with workshops and Safestore. It is located immediately in between Conservation Area (Battersea Park & Parktown Estate) and Nine Elms development site. 10 to 11 storey high residential blocks locate in 300 meters distance to West and East, and most other adjacent buildings are 2 to 4 storey low rise residential buildings.

The site is within 5 minutes walking distance to Battersea Park and provides direct link to Hyde Park through Georgian Garden Squares, which gives merit to potential residence who enjoy jogging and cycling.

Due to the site being surrounded by rail tracks there is only one access point from Queenstown Road. There is limited visibility of the site from the local context.

Despite increased traffic along Queenstown Road during peak time hours this has no detrimental impact for accessing the site.

-  New Northern line Station
-  Adjacent Main Road
-  VNEB Opportunity
-  Ingate Place
-  Train
-  Bus Stop





### 1.1.2 Aerial Views

The aerial views on this page show the site (outlined in red) facing north, east and south.



Bird's eye view looking north



Bird's eye view looking east



Bird's eye view looking south

### 1.1.3 Historical Context

The site is an 'Island' surrounded by train tracks. Couple of factory buildings were constructed in 1890's along the north & south of the railway. In 1901 the radial building was built as a large Depository.

Whilst the factory building has been redeveloped since, it has not been changed but usage ; Depository over a half century, factory of Decca Record for couple of decades, then depository again in 1982. It has been used by Safestore since 2004.



1850



1882 Pre-WWII



1920



1952



1975



1995

## 1.1.4 Local Context

Battersea is in London Borough of Wandsworth and situated in a couple of miles south of Marble Arch. The area draws the public attention due to active development; Nine Elms and a couple of large projects are on progress or under planning.

### Nine Elms

Nine elms is a district of London, situated in the far north-eastern corner of the London Borough of Wandsworth between Battersea and Vauxhall.

It is primarily an industrial area, dominated by Battersea Power Station railway lines a major Royal Mail sorting office and New Covent Garden Market. Also in the area is the Battersea Dogs and Cats Home.

The history of the area dates as AD47, with evidence of Roman occupation and grew significantly during the pose medieval period.

‘Nine Elms railway station opened on 21 May 1838 as the first London terminus of the London and South Western Railway; the station was connected to points between Vauxhall and London Bridge by Thames steam boats. The arrival of this major transport infrastructure, alongside the construction of the bridges at Westminster (1750) and Vauxhall (1816), stimulated rapid development in the area, but the dissecting of existing neighbourhoods by the construction of the railway viaduct also cut through the unity of many Lambeth districts and proved to be an obstacle to development in the long-term.

The new railway viaduct to Waterloo opened in the late 1840s. The railway terminus at Nine Elms was closed in 1948 and after being damaged during the blitz of World

War II was eventually demolished, before being replaced by New Covent Garden’s flower market, which built in 1974, has become one of the icons of Nine Elms on the South Bank. Another focal point of the area is Battersea Power Station. Designed by Sir Giles Gilbert Scott, it was constructed in two parts from 1929-33 (Station A) and 1944-55 (Station B). Once fully completed it had a capacity of 509 MW, providing a fifth of London’s electricity needs. Although its presence has become a major part of London’s cultural landscape and continues to attract worldwide attention.’<sup>1</sup>

Work commenced in 2013 on regeneration of the area around Battersea Power Station, including shops, cafes, restaurants, art and leisure facilities, office space and residential buildings. An essential part of the work is an extension of the London Underground to service the area. The proposed extension would branch from the Northern line at Kennington and travel west to Nine Elms and Battersea. The station structure itself is expected to be repaired and secure by 2016, with completion of the whole project by 2020.

1 - nineelmslondon



Battersea Dogs & Cats Home



Nine Elms new residential towers



Battersea Power Station and railway

### Battersea Park

Battersea Park is a 200 acre (83-hectare) green space at Battersea in the London Borough of Wandsworth in London. It is situated on the south bank of the River Thames opposite Chelsea, and was opened in 1858. Prior to 1846 the area was known as Battersea fields, a popular spot for dwelling.

‘It is the most interesting of all the London Parks; An inner city park with so much variety, hidden secrets, and activities.

The most obvious wildlife in the Park are the birds living on or around the lake.’<sup>2</sup>

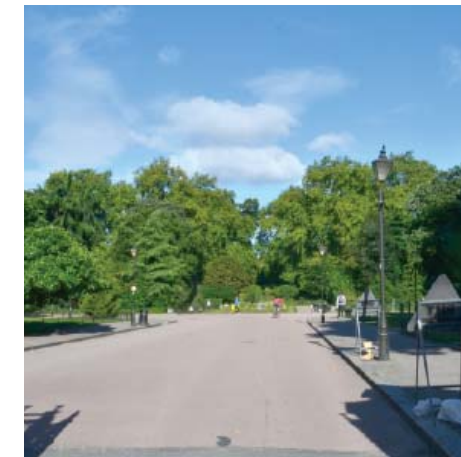
It is a conservation area itself.

### Park Town Estate

Another conservation area in the context is Park Town Estate. It ‘is not typical Battersea. Here alone a large conventional freehold estate, some 68 acres in all, was acquired and built up over forty years from the 1860s in a sustained effort at town-planning.’<sup>3</sup>

‘It had been hoped would be occupied by middle class families attracted both by low prices and by open spaces such as Battersea Park or Clapham Common. In the event, the construction of railway viaducts, embankments and railway repair works later in the decade made this part of Battersea much less desirable for middle class residence. By 1871 a majority of houses had been subdivided into two or three dwelling units, and the population had come to resemble that on more humbly conceived neighbouring estates, with 70% of household heads being in skilled manual or non-manual occupations.’<sup>4</sup>

- 2 - Friends of Battersea Park
- 3 - English Heritage
- 4 - Transactions 33 (1982), pp 329 - 8; abstract by Francis Grew, 12-Dec-1997



Battersea Park Rosery Gate



Battersea Park



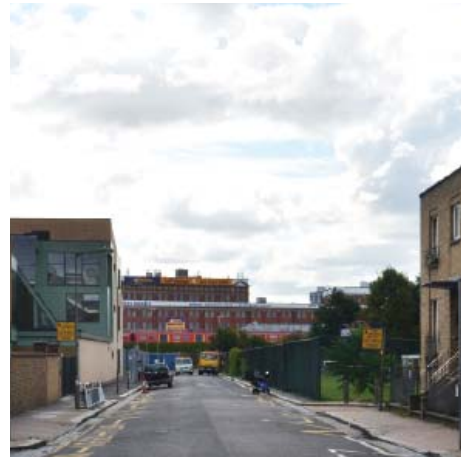
Park Town Estate along Queenstown Road



Park Town Estate along Ingate Place

### 1.1.5 Site Context Views

The site is mainly seen in Lockington Road, Queenstown Road Station platform, all the railways passes around it and above 3 storeys building height.



1 - Lockington Road



2 - Queenstown Road



3 - Battersea Park Road



4 - Battersea Park Station



5 - Flat in Strasbug Road



6 - Queenstown Road Station



7 - The Viaduct and Gas Station



8 - Viaduct and the Site Entrance



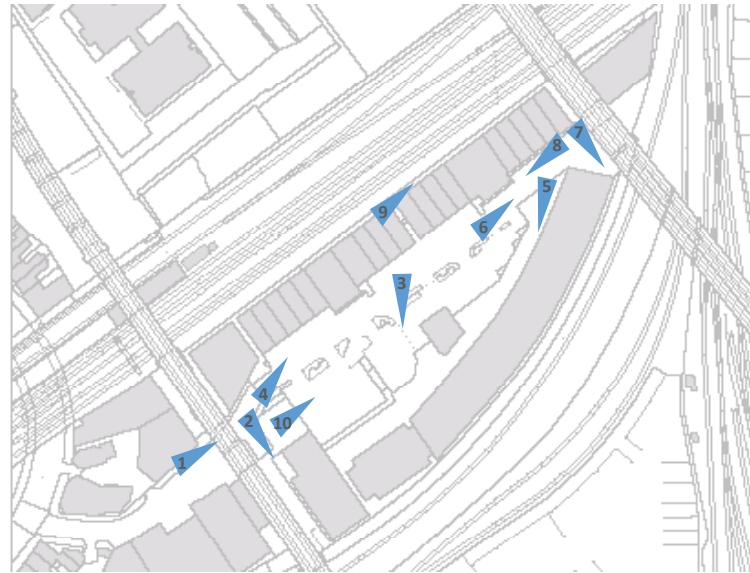
9 - 220 Queenstown Road



10 - Queenstown Road Station to the Site

### 1.1.6 Existing Site Buildings

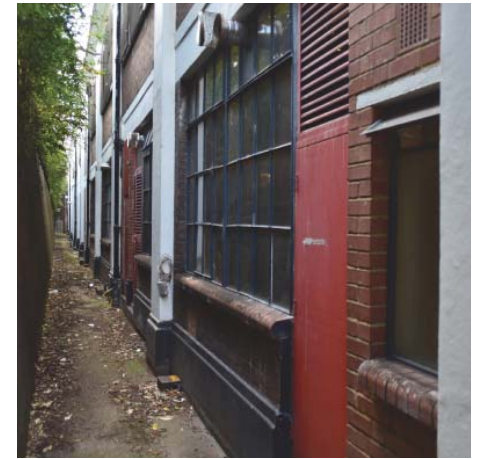
The workshop and Business Centre buildings which were built in the 60's/70's are located along the north west railway. The safestore building which forms a barrier along the south east railway was built in 1901.



7 - Safestore and railway



8 - Workshop and access



9 - Back of workshop and railway



1 - Safestore building



2 - Neighbour building at the entrance



3 - New storage building along entrance



4 - Workshops to the north



5 - Safestore



6 - Access to Prada



10 - Car parking between workshops and Safestore

### 2.1.7 Site Existing Building

The site is in the strategic industrial area and surrounded by 4 to 10m viaducts. The neighbouring site Battersea Park East is in the Nine Elm development scheme. It will be mixed use and tallest building height is in 60m.

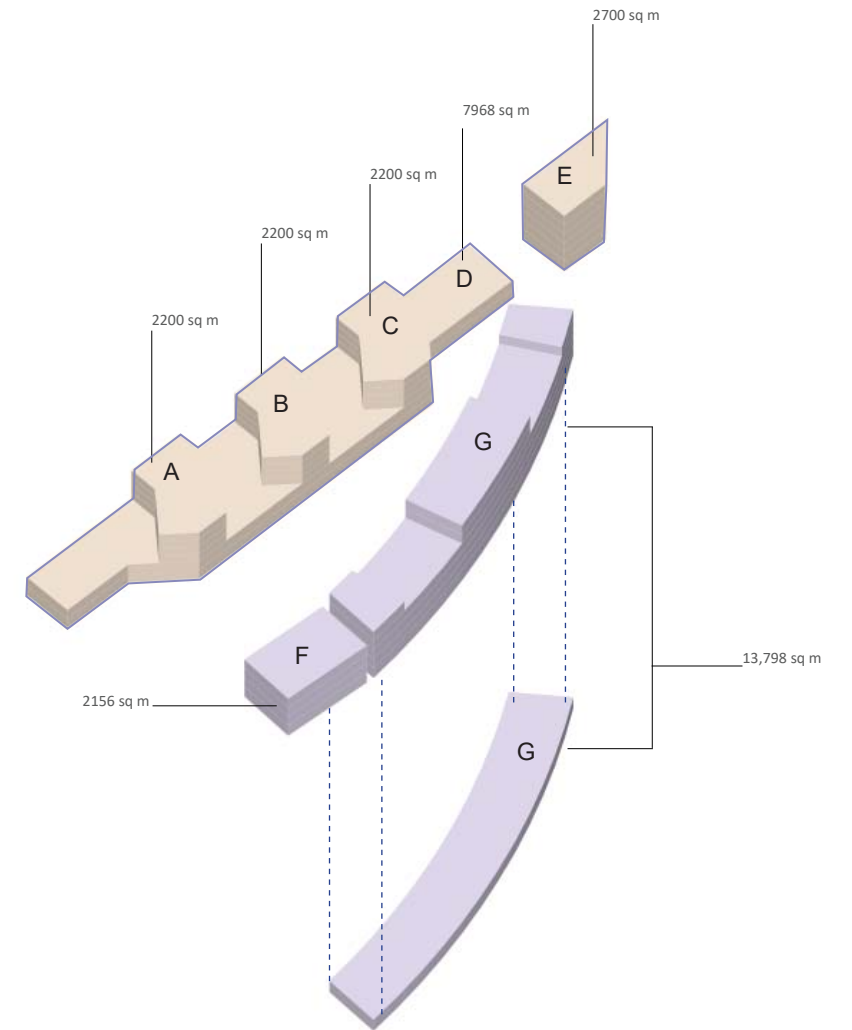
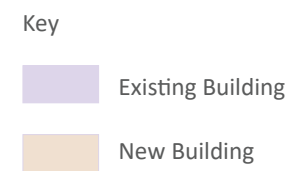


Existing Site Bird Eye View

### 2.1.8 Massing Proposal

The proposal looks to retain the buildings towards South of site with new buildings bordering the Northern edge.

Employment / Commercial	
Block A	2,200 sqm
Block B	2,200 sqm
Block C	2,200sqm
Block D	7,968 sqm
Block E	2,700 sqm
Block F (existing)	2,156 sqm
Block G (existing)	13,798 sqm
<b>Grand Total</b>	<b>33,222 sqm</b>



2.1.9 New Build Areas

**Block A**

00	0 sqm
01	0 sqm
02	550 sqm
03	550 sqm
04	550 sqm
05	550 sqm
Total	2,200 sqm

**Block B**

00	0 sqm
01	0 sqm
02	550 sqm
03	550 sqm
04	550 sqm
05	550 sqm
Total	2,200 sqm

**Block C**

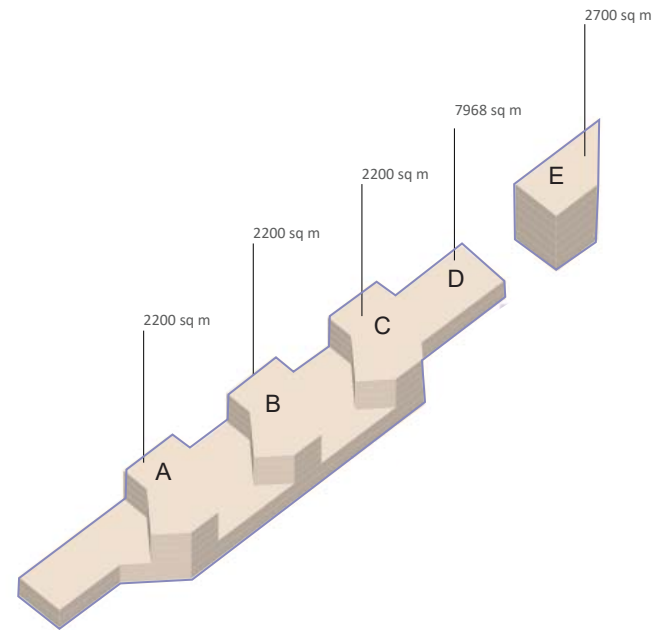
00	0 sqm
01	0 sqm
02	550 sqm
03	550 sqm
04	550 sqm
05	550 sqm
Total	2,200 sqm

**Block D**

00	3984 sqm
01	3984 sqm
Total	7,968 sqm

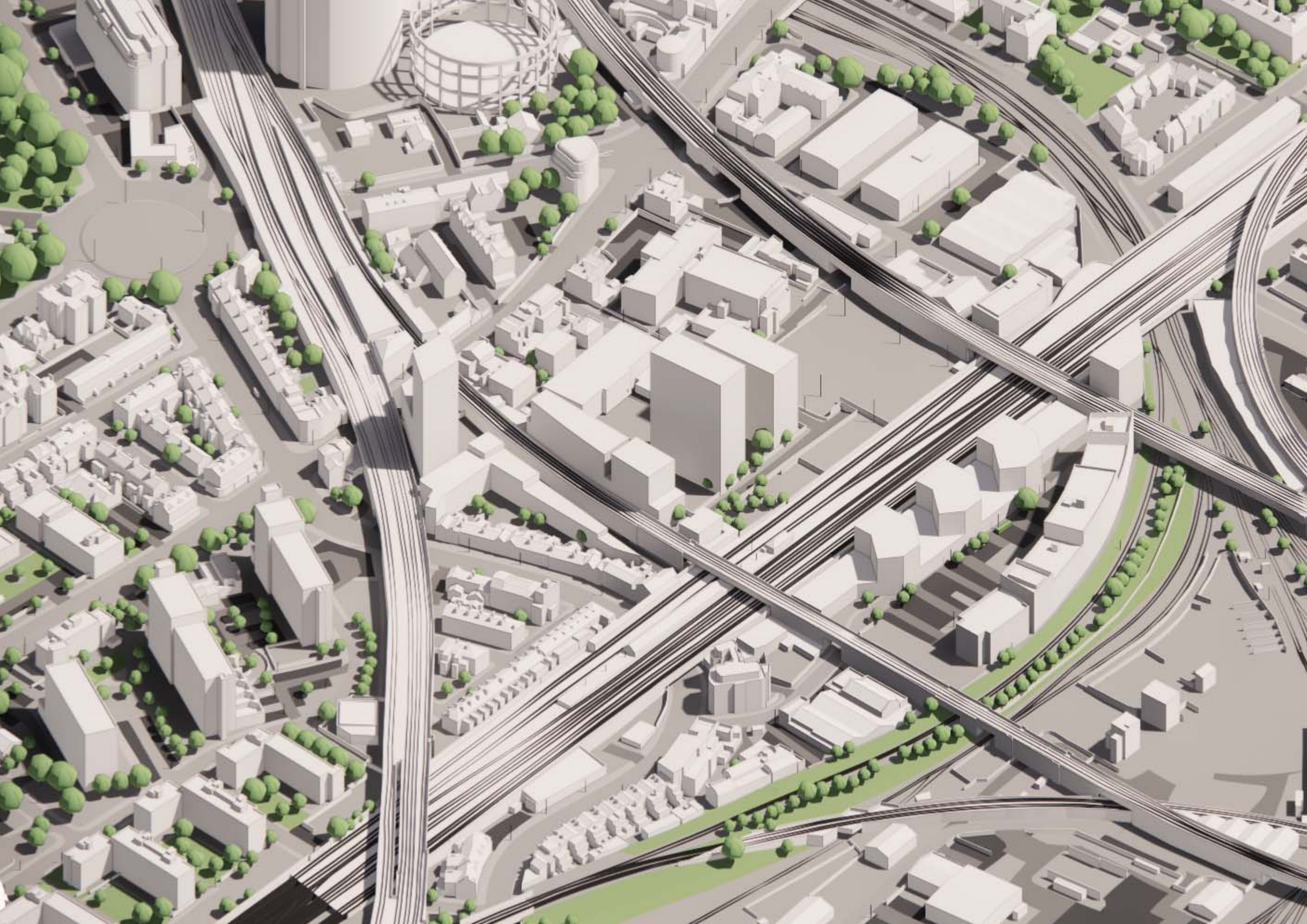
**Block E**

00	450 sqm
01	450 sqm
02	450 sqm
03	450 sqm
04	450 sqm
05	450 sqm
Total	2,700 sqm



Key

- Existing Building
- New Building







ColladoCollinsArchitects

# Lombard Road, Wandsworth

Feasibility Document

February 2022



## 2. Assessment

### 2.1 Physical Context

#### 2.1.1 Aerial View

The site is located on the southern bank of the River Thames along the Grade II \* Cremorne Bridge linking Imperial Wharf and Clapham Junction, within the London Borough of Wandsworth.

The area is characterised by a mix of large scale industrial (shed type) buildings and a wide variety of residential buildings that reach up to 28 storeys.

The current site comprises a Safestore facility and Fraser & Ellis (plumber's merchant) along with parking facilities along Lombard Road. The surrounding areas of Gwynne Road provide for on street parking.



## 2. Assessment



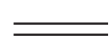

### 2.1 Physical Context

#### 2.1.2 Site Context

The site has good transport links and is within a ten to fifteen minute walk to Clapham Junction Station and a fifteen minute walk to Wandsworth Town Station. There is a bus stop on Lombard Road with services to Victoria, Clapham Junction and Roehampton.

There are two green spaces in close proximity to the site - Fred Well Gardens to the north of the railway and Harroway Gardens to the south east.

There are two Conservation Areas in the proximity, The Sands End Conservation Area and the Battersea Conservation Area.

-  Site Boundary
-  Main Roads Surrounding Site
-  Rail & Underground lines
-  Sun path



## 2. Assessment

### 2.1 Physical Context

#### 2.1.3 Existing Site Buildings

The existing Safestore building was completed in 2002 and is highly visible along Lombard Road (London Borough of Wandsworth) with further frontages facing Gwynne Road. The main entrance to Safestore is slightly pulled back from Lombard Road allowing for a number of car parking spaces. The Safestore building along Lombard Road is two storeys high whilst it increases in height along Gwynne Road (equivalent of 4 storeys). The second occupier of the site is Fraser & Ellis (plumber's merchant). Their building is two storeys high with their main access off Gwynne Road.



To the rear of the site adjacent to the Harroway Gardens there is a large open service yard, which together with the building presents a largely blank frontage to Gwynne Road. Similarly, the Lombard Road frontage presents little activity to the street. The context along the main road is mainly residential entrances or industrial shed/service yards.



Land uses in the immediate vicinity comprise a mix of industrial and residential.



## 2. Assessment

### 2.1 Physical Context

#### 2.1.4 Local Context

Battersea is a largely residential inner-city district of south London in the London Borough of Wandsworth. It is on the south side of the River Thames, 2.9 miles (4.8 km) south-west of Charing Cross.

##### Fred Wells Gardens

Fred Wells Gardens is a medium-sized public park close to the River Thames. The park has a good selection of facilities that include an open access tennis court that is free to the public and a large children's playground.

##### Harroway Gardens

Situated in a corner of Battersea fast changing with new residential developments, this relatively small park is an important focal point of greenery for a growing population. The Gardens are in a green well surrounded by medium and high rise blocks overlooking the mature tree cover. A short distance from the heliport and the riverside walk.

##### London Heliport

Battersea Heliport originally started life back in 1959. Following closure of the City of London floating helipad at Trigg Lane in 1985, Battersea Heliport, located in Lombard Road on the Battersea riverside, became the only CAA licensed heliport serving the city of London. It provides an essential service to the business community and local emergency services, such as the London Air Ambulance (HEMS).

##### Royal Academy of Dance

The prestigious and historic Royal Academy of Dance will be moving to a new purpose built headquarters in Battersea after council planners approved plans for the redevelopment of the Homebase warehouse store in York Road. The new academy will offer bigger, brighter and better dance studios and performance space, with modernised

changing rooms and office space, a library for RAD's archives and two cafés.

##### St Mary's Church

There has been a centre of Christian worship on this site from at least the 13th century. The parts of the medieval church which survive today are the tower, some of the nave arcading (mid-15th century) and the Bishop West Chapel, built in the early 16th century. The church is Grade II\* listed.



London Heliport



Fred Wells Gardens



Royal Academy of Dance



Harroway Gardens



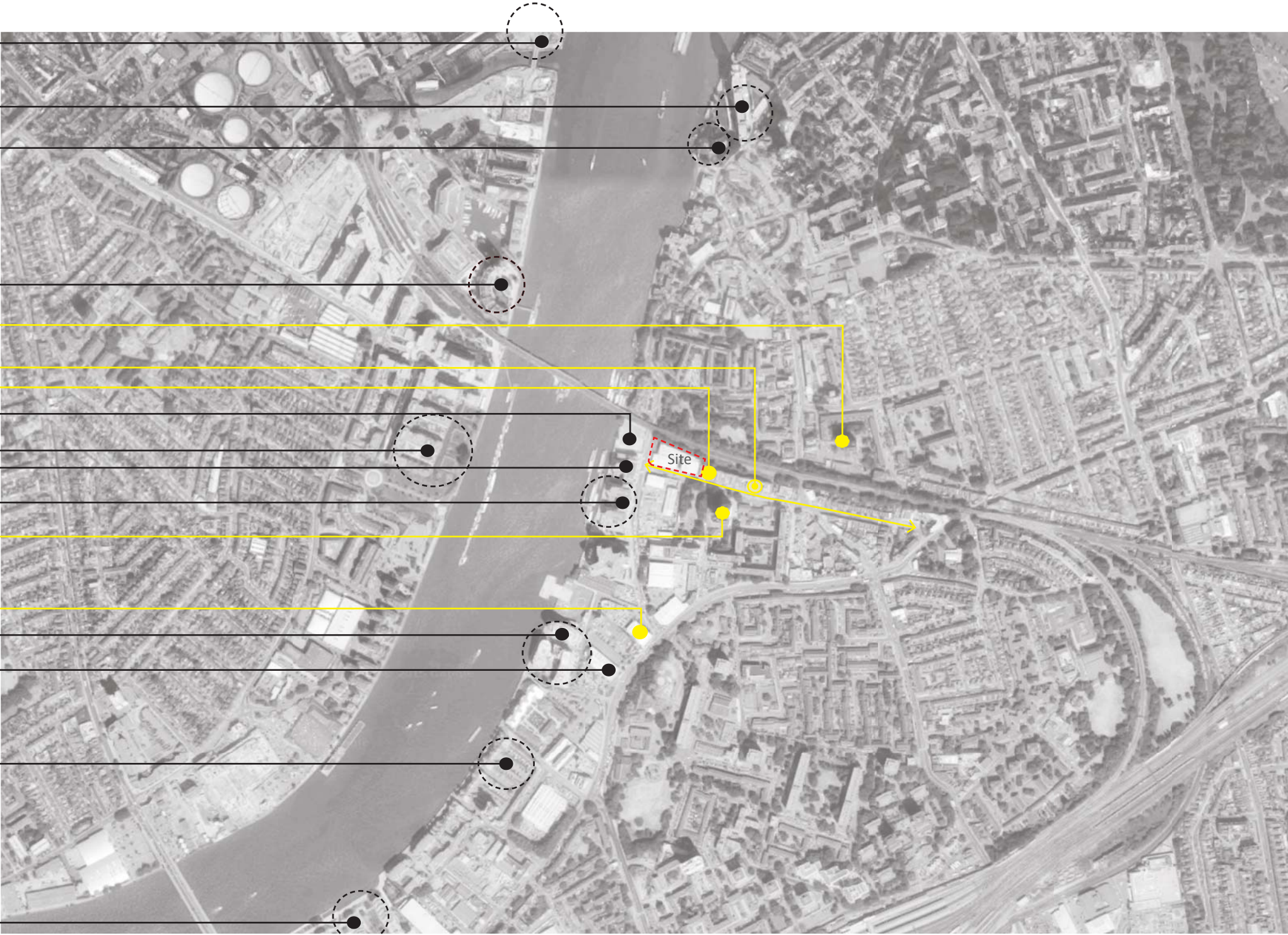
St. Mary's Church

2. Assessment

2.2 Emerging Context

2.2.1 Thames River - Tall Buildings

- Lots Road, Power Station 26-37 storeys
- Montevetro, 20 storeys
- St. Mary's Church
- Chelsea Harbour, 17 storeys
- Gaitskell Court, 15 storeys
- Gwynne Road, 8 storeys
- Wandsworth Tower, 14 storeys
- 12-14 Lombard Road, 28 storeys
- Imperial Wharf, 13 storeys
- Oyster Wharf, 9 storeys
- Falcon Wharf, 16 storeys
- Totteridge House, 24 storeys
- Hotel Verta, 16 storeys
- 38 Lombard Road, 20 storeys
- Hotel Verta, 16 storeys
- 98 York Road (Fockers VW), 17 storeys
- Plantation Wharf, 13 storeys
- Battersea Reach, 13 storeys



## 2. Assessment

### 2.2 Emerging Context

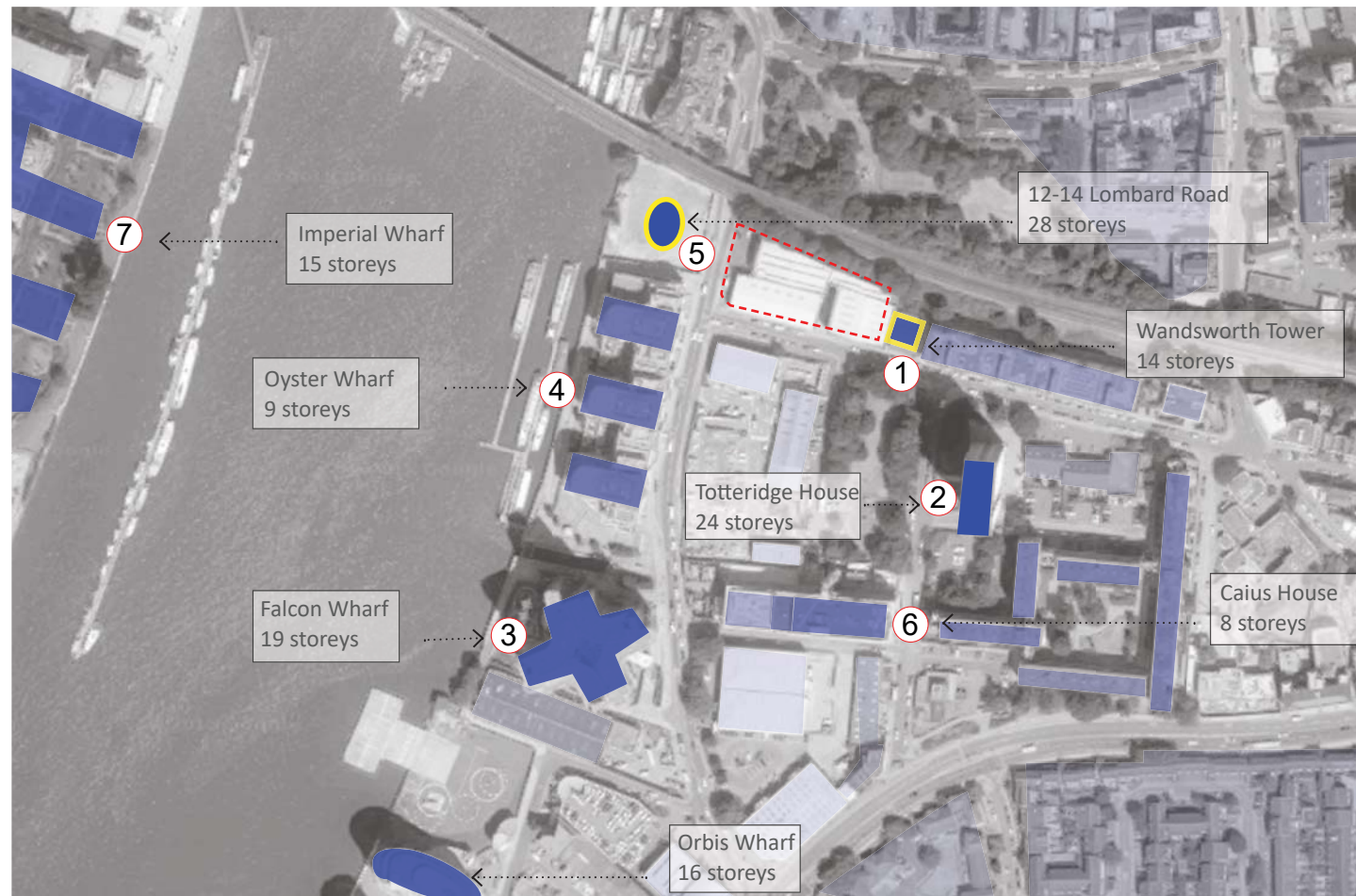
#### 2.2.2 Local Context

The urban grain in the immediate vicinity is mainly large grain /large scale buildings, particularly to the south of the site and across the river. The varying mix of building heights surrounding the site ranges between one and three storeys (retail warehouse buildings) and three to 28 for residential developments.

This character is very different to that south of York Way and north of Cremorne Bridge viaduct

The site lies between two character zones defined by the following:

- The immediate context to the west and south of the site is defined by higher level buildings - between 8 and 24 storeys.
- The exception to this are the new residential building facing east (6 floors) and the Travis Perkins site which contains two single storey shed structures (equivalent of two to three storeys)
- To the west and east the site will be bound by relatively recent residential led development of a larger/higher scale.



01- Wandsworth Tower



02- Totteridge House



05- 12-14 Lombard Road



03- Falcon Wharf



04- Oyster Wharf



06- Caius House



07- Imperial Wharf

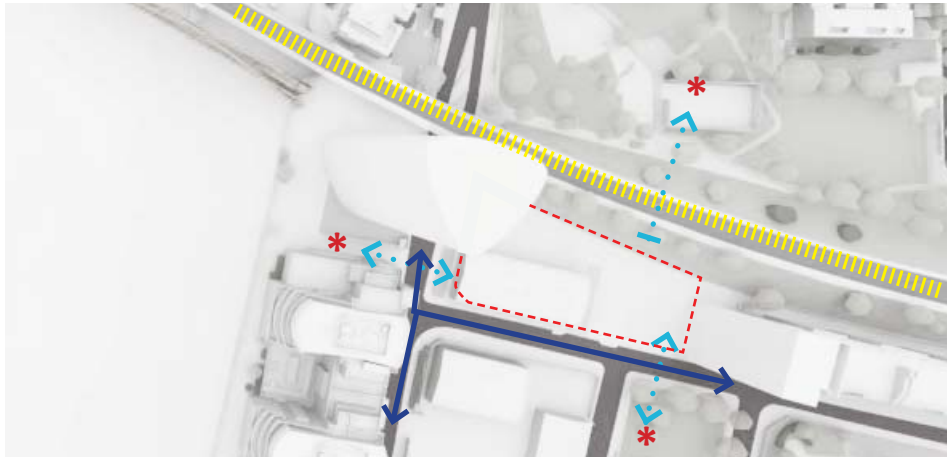
08- The Belvedere

### 3. Design Development

#### 3.1 Constraints

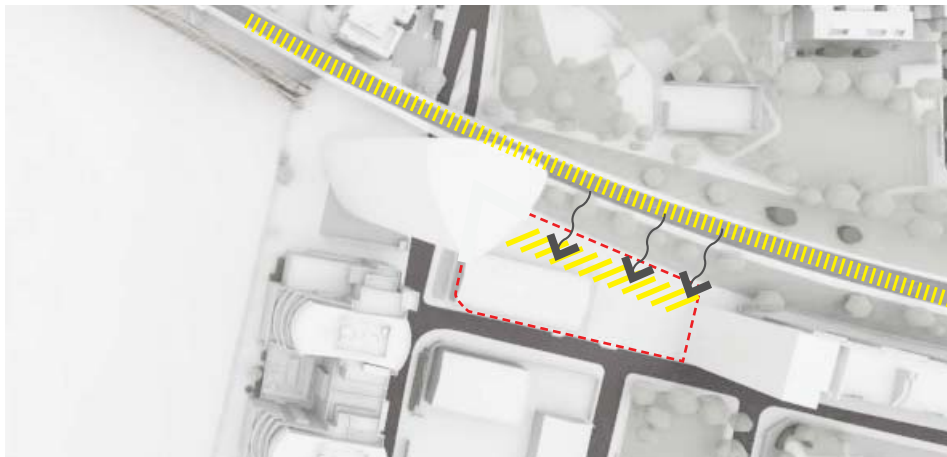
##### Accessibility

The site's main access is from Lombard Road facing west. Safestore wish to retain their main access from Lombard Road which will need to be tested due to its proximity to the viaduct. To avoid interfering with the Safestore frontage the residential car park entrance will most likely need to shift to the eastern edge of Gwynne Road.



##### Railway

The site is located to the south of the trainlines which connect into Clapham Junction. Any proposed accommodation will need to be raised above the trainlines (on a podium level) and pulled away from the edge to avoid poor outlook and to minimize the impact of passing trains.



##### Public Realm

Currently the site offers no public realm. In order to provide attractive and animated frontage the building edges will need to set back and reduce its footprint along Lombard Road. This would allow the site to serve as a pedestrian link between the riverbank and Harroway Gardens.



##### Sunlight/Daylight

Any proposed development will need to orientate itself to allow for maximum levels of sunlight.



##### Transport

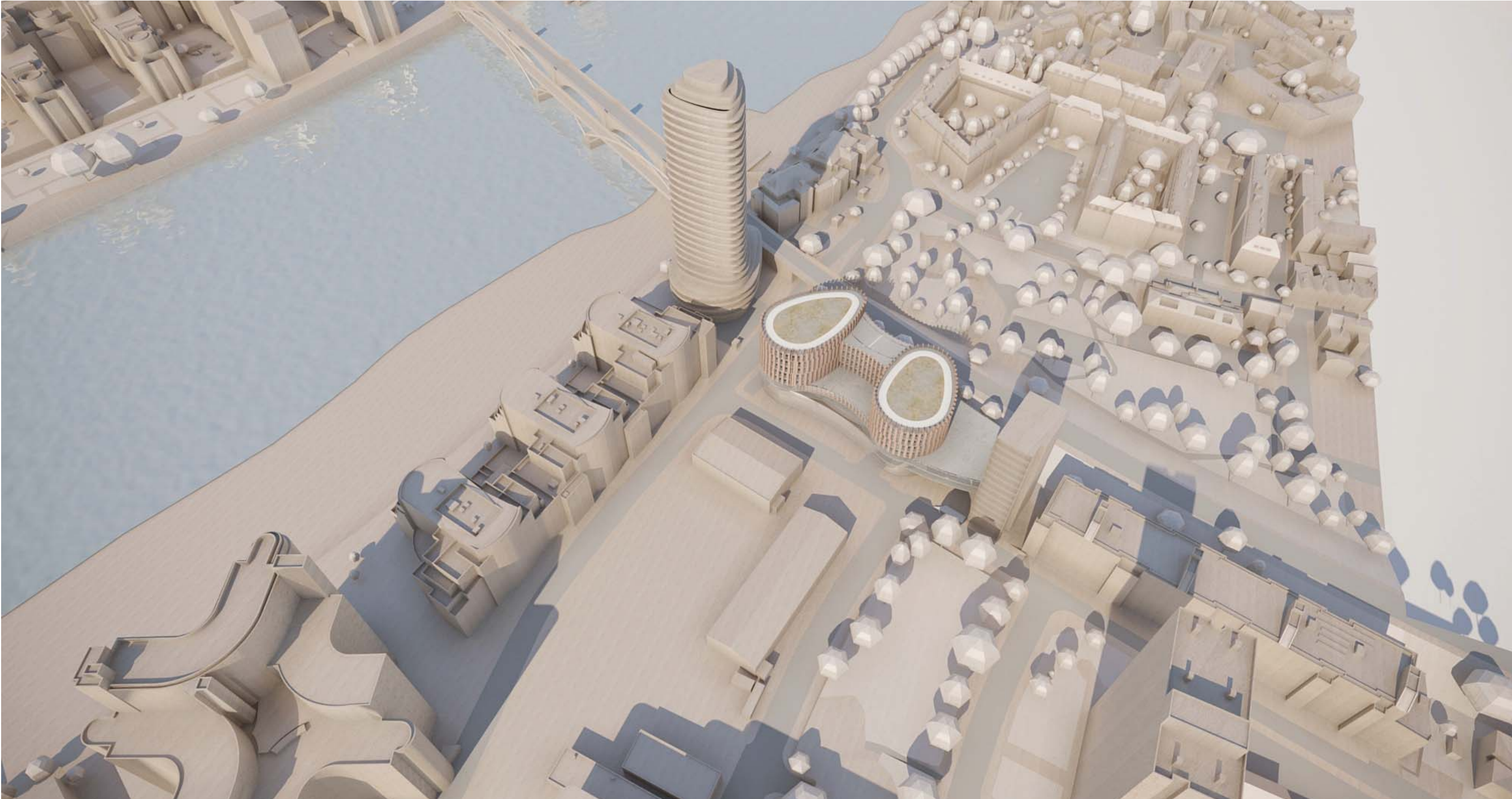
Bus, national rail and Overground transportation routes are available. The site has a PTAL rating of 2-3 which is classified as poor however the rating does not take into account transport connections such as Clapham Junction. The site will need to provide sufficient parking spaces either below or above ground.





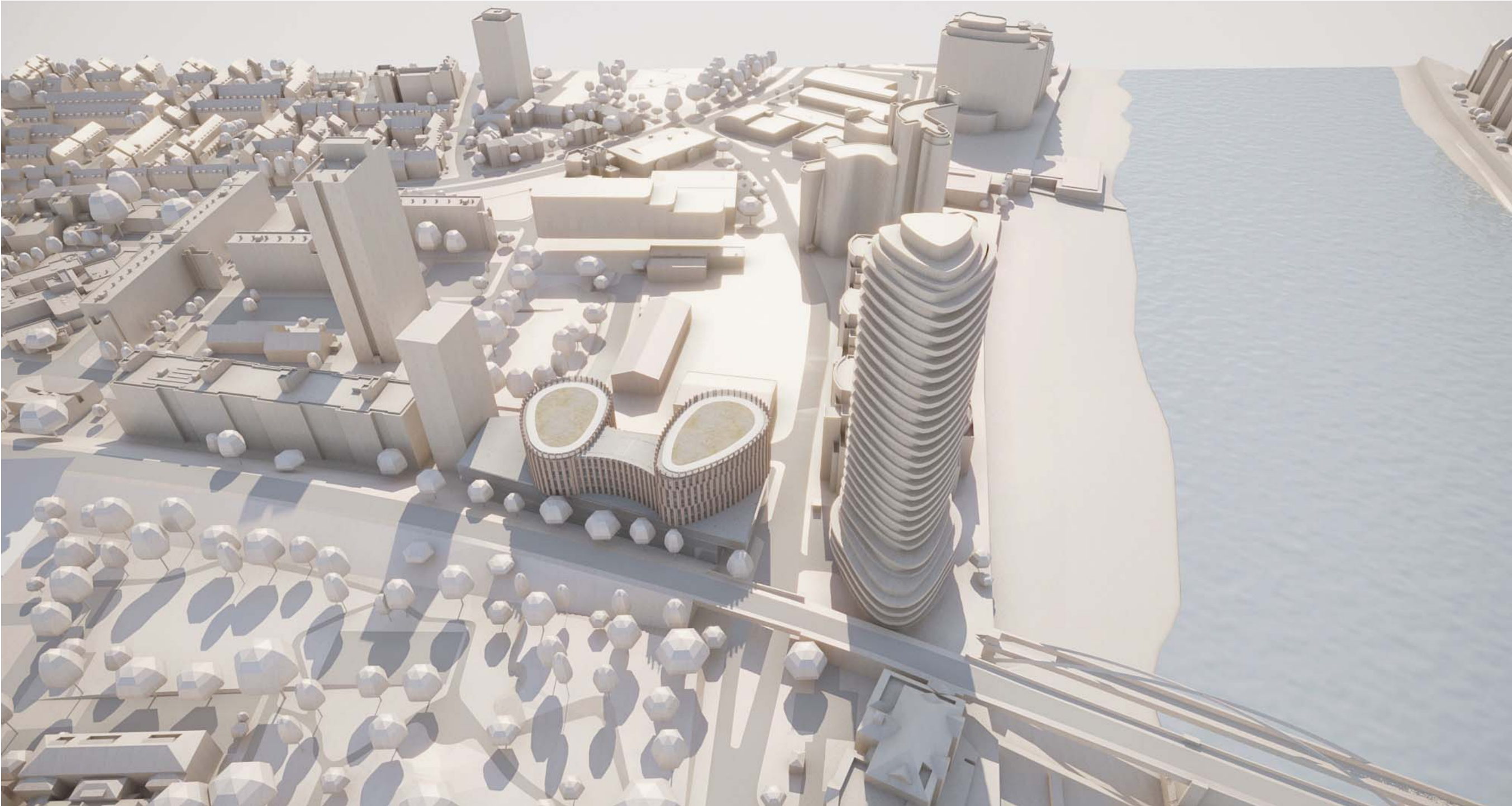
3. Design Development

3.2 Proposed Design



3. Design Development

3.2 Proposed Design



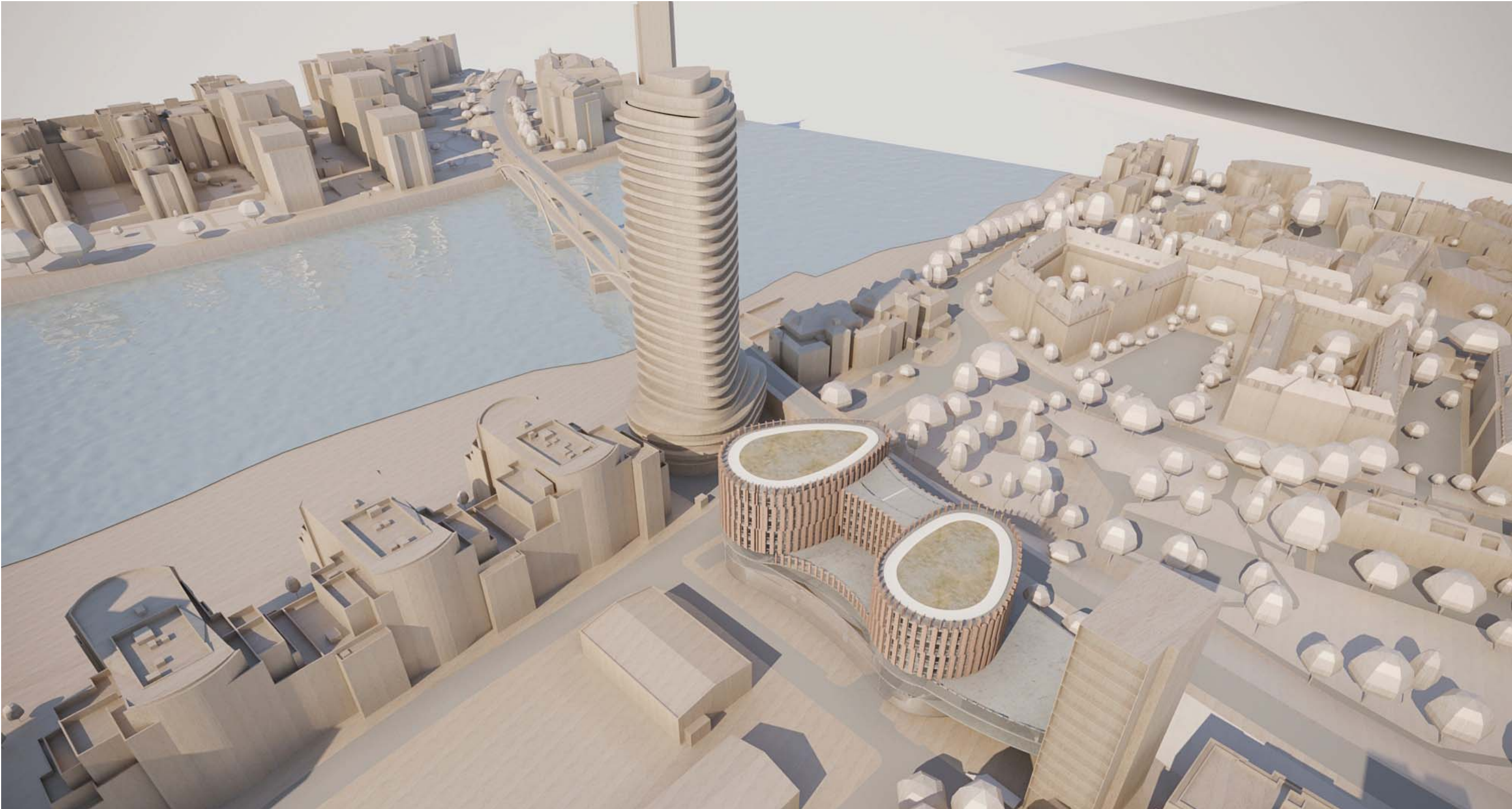
3. Design Development

3.2 Proposed Design



3. Design Development

3.2 Proposed Design



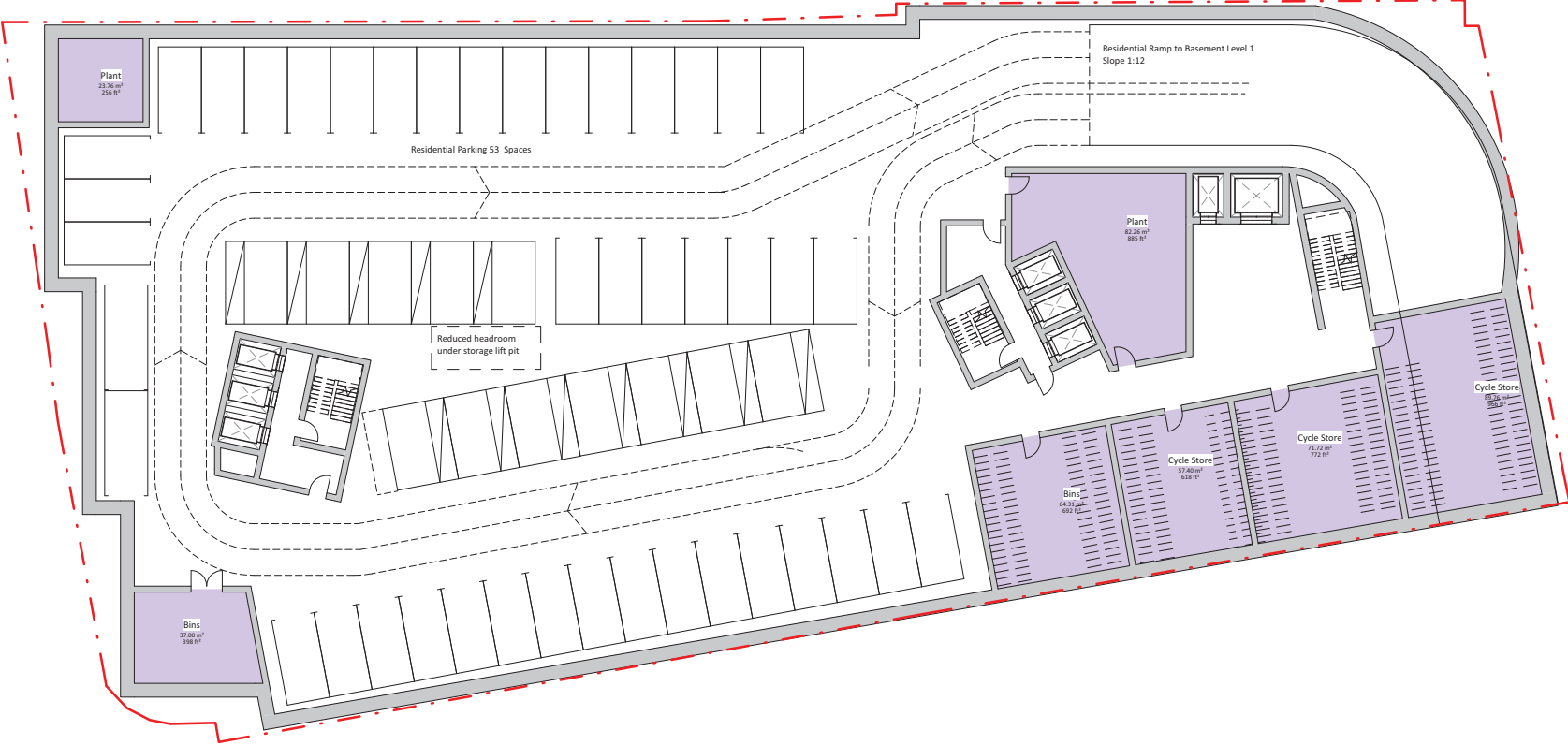
### 3. Design Development

#### 3.2 Proposed Design



4. Floor Plans

4.1 Basement Plan



4. Floor Plans

4.2 Ground Floor Plan



4.2 Ground Floor Plan

4. Floor Plans

4.3 Storage Floor Plan



4.2 Ground Floor Plan



## 4. Floor Plans

### 4.4 Residential Floor Plan



4.2 Ground Floor Plan

TOTAL	GIA / NSA PROPOSED					
	GEA		GIA		NSA	
	sq m	sq ft	sq m	sq ft	sq m	sq ft
Residential	-	-	6503	69,996	4624	49,777
<b>TOTAL</b>	<b>0.0</b>	<b>0</b>	<b>6503</b>	<b>69996</b>	<b>4624</b>	<b>49777</b>

percentage of units by type

APARTMENT NUMBERS					
Studio	1 Bed 2P		2 Bed 4P		TOTAL
No.	No.		No.		No.
14	23		39		76
<b>14</b>	<b>23</b>		<b>39</b>		<b>76</b>
18.4%	30.3%	0.0%	1	0.0%	100.0%

<b>14</b>	<b>23</b>	<b>39</b>	<b>76</b>
18.4%	30.3%	51.3%	100.0%

Residential Parking Spaces 55  
 Parking Ratio 1 spaces per unit

**NON\_RESIDENTIAL USES**

Selfstorage	GIA / NSA PROPOSED			
	GEA		GIA	
	sq m	sq ft	sq m	sq ft
B -1	0.0	0	0	0
Ground	0.0	0	588	6,329
First	0.0	0	2557	27,524
Second	0.0	0	2557	27,524
<b>TOTAL</b>	<b>0.0</b>	<b>0</b>	<b>5702</b>	<b>61376</b>

NB This excludes the cover loading bay area

Plant	GIA / NSA PROPOSED				Rooms
	GEA		GIA		No.
	sq m	sq ft	sq m	sq ft	No.
B 1	0.0	0	154	1,654	21
Ground	0.0	0	39	414	22
	0.0	0		0	23
	0.0	0	0	0	24
<b>TOTAL</b>	<b>0.0</b>	<b>0</b>	<b>192</b>	<b>2069</b>	<b>90</b>

TOTALS	GIA / NSA PROPOSED			
	GEA		GIA	
	sq m	sq ft	sq m	sq ft
Plant	0.0	0	192	2069
Selfstorage	0.0	0	5702	61376
Resi basement	0.0	0	2412	25963
RESIDENTIAL	0.0	0	6503	69996
<b>TOTAL</b>	<b>0.0</b>	<b>0</b>	<b>14809</b>	<b>159404</b>

The NSA is the sum of the all of the GIAs of the individual apartments  
 The areas have been measured as shown on the following drawings: 14095-SK-000  
 The areas are approximate and relate to the likely areas of the building at the current state of the desi  
 The standard RICS Code of Practice for measuring areas has been used with the exception that interna  
 Any decisions to be made on the basis of these predictions, whether as to project viability,  
 pre-letting, lease agreements and the like, should make allowance for the following:

1. Design development.
2. Accurate site survey, site levels and dimensions.
3. Construction methods and building tolerances.
4. Local Authority consents.

ColladoCollinsArchitects

## **Appendix 4: Legal Opinion**

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

2 Colmore Square  
38 Colmore Circus  
Queensway  
Birmingham  
B4 6SH  
DX 701863 Birmingham 6

T 03700 864000  
F 03700 864001

By e-mail:  
planningpolicy@wandsworth.gov.uk

Date 24 February 2022  
Our Ref TW/ M-00861617

Dear Sir/Madam,

**CONSULTATION RESPONSE  
DRAFT PUBLICATION WANDSWORTH LOCAL PLAN 2023-2038  
PROPOSED POLICY PM3- NINE ELMS**

We are instructed by Safestore Properties Ltd.

The Council would already have received a formal consultation response to the draft publication Local Plan from Savills, made on behalf of our client. As part of that consultation response Savills have made reference to proposed Local Plan policy PM3 stating:

*“The 2020 Battersea Design and Technology Quarter (BDTQM), document, compiled by 'We Made That', has had a significant role in draft policy PM3. However, to date there has been no formal public consultation process inviting landowners to provide comments on this document. Any SPD would need a statutory 4-6 weeks of public consultation and due alterations before adoption. Therefore, significant weight cannot be placed upon the BDTQM in the draft Local Plan before this process has been undertaken. The draft Local Plan should not go through public consultation while incorporating the spatial-based policy of the BDTQM, that is yet to go through the necessary adoption processes. The weight given to the BDTQM within the draft local plan without the necessary due consultation is therefore **unsound.**”*

The purpose of this letter is to confirm that we fully endorse the concerns raised by Savills in respect of draft policy PM3.

Draft Policy PM3 requires development proposals within the BDTQ to have reference to the strategy set out within the BDTQ Economic Appraisal and Design Framework (EADF).

The current status of the BDTQ and EADF in planning terms appears to be that of a Supplementary Planning Document (“SPD”), which is intended to expand upon policy or provide further detail to policies. However, the evidence base upon which the Council rely, its conclusions and methodology, has not been subject to formal public engagement, consultation and scrutiny.

Critically, there has been no direct engagement with landowners (of which our client is one), on the proposed guidance or framework for future development relied upon and which now forms the backbone of development permitted under policy PM3.

This raises a clear procedural fairness issue here.

This is not a point of insignificance or of a minor nature. The concerns raised in this letter and Savills consultation response raise a substantial issue which goes to the heart of the Local Plan process and ultimately whether this Plan is sound. In this respect, we note that there are at least 35 references to the *BDTQ* in the draft Plan which underlines the significant weight and importance given by the Council to the *BDTQ* and related framework, supporting information and documents; all of which remain untroubled and untested by a formal consultation process.

We need not remind you of course that if material prejudice is caused by procedural unfairness (which it has in this case), the court may quash any decisions that contribute to that unfairness (see for example [\*Hopkins Developments Ltd v Secretary of State for Communities and Local Government \[2014\] EWCA Civ 470\*](#)).

In addition, NPPG guidance states, (emphasis added):

#### **How can strategic policy-making authorities gather evidence needed to justify policies?**

***Policies need to be justified.*** Evidence to underpin policies can be taken from a wide variety of sources, including the Authority Monitoring Report and planning application and appeal decisions. Strategic policy-making authorities will need to consider carefully the need to commission evidence that will add delay and cost to plan production. Wherever possible, authorities may wish to prepare evidence in-house or jointly to speed up the process, and obtain best value for the taxpayer. Strategic policy-making authorities may wish to seek advice on this, for example, from the Planning Advisory Service as part of their ongoing plan-making support.

The evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively. Strategic policy-making authorities may wish to consider ensuring that their assessment of and strategies for housing, employment and other uses are integrated, and that they take account of relevant market signals.

Wherever possible, assessments can share the same evidence base and be conducted over similar timescales, but strategic policy-making authorities need to take care to ensure that the purposes and statutory requirements of different assessment processes are respected.

Assessments should be proportionate, and should not repeat policy assessment that has already been undertaken. ***Wherever possible, strategic policy-making authorities should consider how the preparation of any assessment will contribute to the plan's evidence base. The process should be started early in the plan-making process and key stakeholders should be consulted in identifying the issues and any relevant data that the assessment must cover.***

#### **Paragraph: 038 Reference ID: 61-038-20190315**

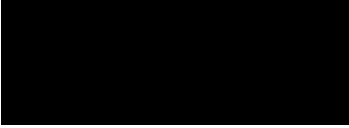
In the light of all the above, we would formally invite the Council to confirm that it will delay the submission of the draft Plan until such time as there has been full and fair engagement with our client, other landowners and stakeholders on the *BDTQ* and related framework, supporting information and documents relied upon by the Council.

It is inherent in the Local Plan process that credible and legally robust evidence is available as part of a transparent, fair and lawful decision-making process. That is clearly at risk here if the Plan proceeds absent of that consultation.

In the absence of the assurance requested the subsequent Local Plan process will potentially fall into legal error leaving the Council open to potential legal challenge.

That is an outcome that our client is keen for the Council to avoid in all the circumstances.

Yours sincerely



**SHOOSMITHS LLP**

Enc.

cc: Head of Legal Services – Wandsworth Council