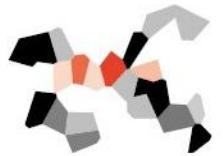


# Wandsworth Local Plan – Proposed Main Modifications Consultation

Representations by DPDS Consulting Group

On behalf of Mr Stuart Gulliver



March 2023

C12388

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**Client:** Mr Stuart Gulliver

**Reference:** C12388

**Version:** 1

**Status:** Final

**Author:** JT

**Checked:** VR

**Approved:** LMD

**March 2023**

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## Contents

|     |                                       |   |
|-----|---------------------------------------|---|
| 1.0 | Introduction                          | 1 |
| 2.0 | Representations to Main Modifications | 2 |
| 3.0 | Summary and Conclusions               | 4 |

## 1.0 Introduction

- 1.1 DPDS Consulting Group [DPDS] has been instructed by Mr Stuart Gulliver [‘the client’] to prepare and submit written representations to the consultation on Proposed Main Modifications (published for consultation on the 3<sup>rd</sup> February 2023) to the Wandsworth Local Plan on his behalf.
- 1.2 DPDS has also submitted representations to the Regulation 19 consultation on the Publication Version of the Local Plan and attended relevant Local Plan Examination hearing sessions on behalf of the client.
- 1.3 This representation should be read in conjunction with these previous representations made to the Wandsworth Local Plan.
- 1.4 The client owns a property at Albion Riverside and has a particular interest in any potential development allocations or policy designations relating to tall buildings in the riverside location around Battersea Bridge, as any development here is likely to have an impact on the future amenity of his property.

### Summary of Regulation 19 Representations

- 1.5 Overall, the client supported the restrictive approach to new tall buildings in Wandsworth Borough as set out in the Publication Version of the Local Plan.
- 1.6 In particular, the client supported Wandsworth Borough Council’s decision not to allocate The Glassmill at 1 Battersea Bridge Road for redevelopment as a tall building.
- 1.7 In response to the freeholder suggestion to allocate the site in representations made to the Regulation 18 consultation, the Council concluded that *“Due to the recency with which the existing building was developed it is considered to be unsustainable to allocate the site for redevelopment”*. The client fully agrees with this assessment and believes that, in the interests of sustainability, refurbishment of existing buildings should be prioritised over demolition and rebuild projects as is the case in other inner London boroughs.
- 1.8 In addition, a tall building in this location would appear alien and result in a lopsided townscape on the riverside location around Battersea Bridge, where prevailing building heights are low to medium-rise (3-8 storeys) for approx. 400m either side of the bridge.
- 1.9 In summary, an allocation to redevelop the Glassmill site is inappropriate as it would be premature (given the recency of construction of the existing building) and result in piecemeal development rather than a comprehensive and sustainable scheme.

## 2.0 Representations on Main Modifications

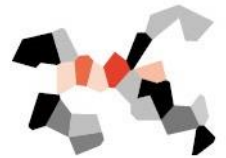
- 2.1 The client wishes to comment specifically on main modification ref. **MM146**, which relaxes the wording of Policy LP4 (Tall and Mid-rise Buildings) from saying that *“proposals for tall buildings will not be permitted”* to *“the Council will seek to restrict proposals for tall buildings”* outside the identified tall building zones.
- 2.2 The client has very serious concerns regarding this proposed modification, as it adds an element of interpretation to Policy LP4 and dilutes the status of the tall building zones which have been identified through a detailed urban design study. The modified wording allows developers to build a case for tall buildings in areas which have been deemed inappropriate for accommodating such scale of development. The proposed modification therefore undermines the detailed Urban Design Study which forms part of the evidence base for the Local Plan. Diluting the policy and enabling high rise development to potentially occur in highly sensitive areas makes the policy **less effective** at delivering its objective of ensuring that tall and mid-rise building development occurs in appropriate areas. Furthermore, by undermining its own evidence base, the Local Plan’s **justification** is weakened significantly. Therefore, accepting this modification would make the plan **unsound**.
- 2.3 The proposed modification encourages piecemeal development by allowing speculative sites to come forward for tall building development outside of established tall building zones. Such speculative sites, due to their scale, might not allow for a comprehensive scheme and delivery of important policy obligations such as affordable housing, car parking spaces or amenity space. The specific location of speculative sites could also result in further constraints, resulting in a scheme which might not being able to demonstrate a suitable access or construction management strategy, or a scheme which cannot demonstrate that impact on neighbouring amenity would be acceptable. The modification would also attract development proposals which seek to demolish existing modern buildings and rebuild, as opposed to the more sustainable alternative of refurbishing existing buildings.
- 2.4 By encouraging proposals which are not policy compliant and are speculative in nature, the Local Planning Authority would also undergo unnecessary additional strain in having to resource the determination of such applications which would ultimately not be approved due to their inability to demonstrate that material considerations point towards granting planning permission.
- 2.5 The client also wishes to comment on main modification **MM180**, which relates to Policy LP23 (Affordable Housing). The modification changes the wording of the policy from saying *“Site-specific viability information will only be accepted in exceptional cases, as set out in Policy H5 of the London Plan”* to *“In line with the threshold approach of London Plan Policy H5, applications not delivering the relevant minimum threshold must undergo the Viability Tested Route”*.
- 2.6 The client supports the extra clarity which this modification provides in terms of detailing the situations in which viability information is required to support a major development proposal (i.e. where it will not deliver the minimum affordable housing requirement).
- 2.7 The client does, however, have concerns that the removal of the term ‘exceptional cases’ could be interpreted by developers as justification for not attempting to provide the threshold level of affordable housing in major schemes and instead proceeding straight to a viability argument.
- 2.8 Our client would like to stress the need to provide at least the threshold level of affordable housing

in all major development schemes across the Borough, including within any future mixed-use or residential-led tall building developments. Without being able to deliver this very important public benefit, such proposals would not be fulfilling the objectives of sustainable development and should therefore not be granted planning permission.

- 2.9 By allowing developers room to potentially avoid delivering the threshold amount of affordable housing, the policy is effectively made less capable of meeting the Borough's affordable housing need. This need is identified in the December 2020 Wandsworth Local Housing Needs Assessment (LHNA) which forms part of the Local Plan Review Evidence Base. The LHNA states that 3,575 affordable homes are required per annum in the Borough, split between affordable rented dwellings and Affordable Home Ownership (AHO) units. As a result, should this modification be accepted, then the Local Plan could be considered ***not positively prepared*** (as it is not seeking to meet the Borough's objectively assessed affordable housing need as a minimum), and therefore ***unsound***.

## 3.0 Summary and Conclusions

- 3.1 This statement of representation has been prepared by DPDS Consulting Group on behalf of Mr Stuart Gulliver. It sets out our response to the Proposed Main Modifications to the Wandsworth Local Plan (published for consultation on 3<sup>rd</sup> February 2023).
- 3.2 The client has significant concerns regarding main modification ref. MM146, which rewords Policy LP4 to read *“the Council will seek to restrict proposals for tall buildings”* rather than *“proposals for tall buildings will not be permitted”*. This modification would undermine the evidence base of the Local Plan, specifically the Urban Design Study, and therefore the **justification** for Policy LP4 (Tall and Mid-rise Buildings). Not only this, it would also make the policy **less effective**, restricting its ability to deliver its stated objective of ensuring that tall building development is limited to appropriate areas. The proposed modification would therefore render the proposed Local Plan **unsound** and should not be carried forward into the final version of the Local Plan.
- 3.3 The client also has concerns regarding main modification ref. MM180 which applies to Policy LP23 (Affordable Housing) and proposes a change in wording from *“Site-specific viability information will only be accepted in exceptional cases, as set out in Policy H5 of the London Plan”* to *“In line with the threshold approach of London Plan Policy H5, applications not delivering the relevant minimum threshold must undergo the Viability Tested Route”*. Whilst the clarification provided by the modification is welcomed, there are concerns that the removal of the term ‘exceptional cases’ will be interpreted by developers as a justification for not seeking to deliver the required threshold of affordable housing as a default position. There is a significant need for affordable housing within the Borough and its delivery in a policy-compliant manner would be a significant benefit of any development proposal of which it forms part. Allowing room for developers to potentially avoid the requirements for affordable housing provision in effect reduces the policy’s capability to meet the Borough’s assessed affordable housing need. This would make the plan **not positively prepared** and therefore **unsound** as a result. Because of this, the proposed modification should not be carried forward into the final version of the Local Plan.
- 3.4 We trust that these representations will be given due consideration but would be happy to assist further if there are any queries based on the concerns raised.



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