

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

104 St. John Street
London, EC1M 4EH

info@centroplan.co.uk
07855 490 252

centroplan.co.uk

15.03.23

Dear Madam/Sir,

DRAFT LB WANDSWORTH LOCAL PLAN REVIEW – MAIN MODIFICATIONS CONSULTATION

On behalf of our client – Heliport London Ltd – we hereby submit representations with respect to the above. Our client has a contractual position on the land currently accommodating Heliport House and made representations on Policy LP4 (Tall and Mid-rise Buildings), RIV2 (Dovercourt site, York Road, SW11) and Appendix 2 (Tall and Mid-rise Building Map) at the Regulation 19 stage of the Local Plan Review. In November 2022, we attended the examination hearings relevant to these policies, where Main Matters 10 and 13 were discussed.

As set out in our previous representations, we consider it necessary for the purposes of soundness, to amend the wording of the Policy LP4, Allocation RIV2 and amend the Tall and Mid-rise Building Map in Appendix 2 to facilitate greater flexibility to provide increased height on the Dovercourt site (henceforth: “the site”). Our position and justification on these matters was set out in full in the Hearing Statements provided for Main Matter 10 and Main Matter 13 ahead of the examination hearings. As such, these arguments will not be set out again in this letter in the interests of brevity, but reference should be made to those Statements when reading this letter.

Policy LP4 (Tall and Mid-rise Buildings)

The proposed main modifications to the plan include the following revisions (MM146) to Policy LP4:

“C. The Council will seek to restrict ~~Proposals for tall buildings will not be permitted~~ outside the identified tall building zones.

“G. The Council will seek to restrict ~~Proposals for mid-rise buildings will not be permitted~~ outside the identified tall and mid-rise building zones.”

The modifications to Policy LP4 are not relevant to the site, as it is already designated within a tall building zone and is hence unaffected by the proposed modifications. Therefore, our objection to this policy remains unresolved.

Allocation RIV2 (Dovercourt site, York Road, SW11)

The following revisions (MM123) are also proposed to Allocation RIV2:

“Amend the wording of paragraph 11.31 as follows:

‘In accordance with the tall building maps in Appendix 2, part of the site is located in tall building zone TB-B2-05. The maximum appropriate height range for the zone is 7 to 10 storeys, and the maximum appropriate height range for the site ~~must~~ should be in accordance with the tall building maps in Appendix 2. The height of developments within that zone should not exceed the heights of, and should be in accordance with, the tall building maps in Appendix 2, which set out the identified maximum appropriate heights in line with Policy LP4. Development proposals for tall buildings or mid-rise buildings will only be appropriate within the identified zone where they address the requirements of Policy LP4 (Tall and Mid-rise Buildings).’”

On the surface, the modifications to Allocation RIV2 appear to be intended to afford more flexibility to the building heights recommended in the Tall Buildings Maps in Appendix 2. However, the modifications would be unlikely to substantively change the intention of the policy. Even with the modification, the first guidance that a decision-maker reading Paragraph 11.31 would see is that “[t]he maximum appropriate height range for the zone is 7 to 10 storeys”. This statement reads unconditionally and is not substantively altered by the subsequent guidance “that the maximum appropriate height range for the site should be in accordance with the tall building maps in Appendix 2.” It is therefore likely that a decision-maker reading this policy could assess a planning application on the basis that the height of the proposal must be within the 7 to 10 storey range.

Suggested Modifications

As previously set out, we proposed that the following modification to Policy LP4 would bring it into soundness:

Proposals for tall buildings should generally not exceed the appropriate height range identified for each of the tall building zones as set out at Appendix 2 to this Plan, unless sufficient justification is provided to demonstrate that this threshold can be exceeded. 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.

Likewise, we propose the following modifications to Paragraph 11.31 of Allocation RIV2 to bring it into soundness:

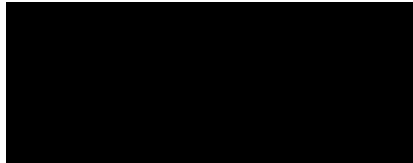
11.31 Building heights - In accordance with the tall building maps in Appendix 2, part of the site is located in tall building zone TB-B2-05. The general maximum appropriate height range for the zone is 7 to ~~20~~ 10 storeys, and the general maximum appropriate height range for the site must be in accordance with the tall building maps in Appendix 2, unless sufficient justification is provided to demonstrate that this threshold can be exceeded. Unless such justification is provided, the height of developments within that zone should not exceed the heights of, and be in accordance with, the tall building maps in Appendix 2, which set out the identified maximum appropriate heights in line with Policy LP4. Development proposals for tall buildings or mid-rise buildings will only be appropriate within the identified zone where they address the requirements of Policy LP4 (Tall and Mid-rise Buildings).

Conclusion

We consider that the proposed modifications are not justified. Instead, we consider that our proposed revisions are justified and would bring LB Wandsworth's draft Local Plan into soundness, in accordance with Paragraph 35 of the NPPF.

We look forward to hearing from you in due course.

Yours faithfully,



Tarun Cheema
Planner
Centro Planning Consultancy