41-49 AND 49-59 BATTERSEA PARK ROAD LONDON, SW8 5AL

STATEMENT OF CASE

ON BEHALF OF WATKIN JONES GROUP

FOLLOWING THE NON-DETERMINATION OF PLANNING APPLICATION REFERENCE 2022/1835 BY THE LONDON BOROUGH OF WANDSWORTH

DECEMBER 2024

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APPENDICES

1.0 INTRODUCTION

1.1 On behalf of Watkin Jones Group ('WJG" / "Applicant" / "Appellant") this Statement of Case ("the Statement") has been prepared following the non-determination of an application for Full Planning Permission ("the Application" / "the Appeal") for the mixed use redevelopment of the site known as 41-49 Battersea Park Road (Booker Cash & Carry) and 49-59 Battersea Park Road (the former BMW Car Service Garage) SW8 5AL ("the Site").

1.2 The Site is located within the administrative authority of the London Borough of Wandsworth ("the Council" / "LBW").

1.3 The proposed development ("the Development" / "the Proposed Development" / "the Scheme" / "the Proposals") seeks the demolition of the existing building on the Site and redevelopment of the Site to deliver the following:

- Purpose Built Student Accommodation and ancillary space (Sui Generis) - 762 student bedrooms of which 198 are affordable;
- Residential Dwellinghouses (Class C3) - 55 affordable dwellings, of which 27 are Low-Cost Rent (Social Rent) and 28 are Intermediate (London Living Rent);
- 495 sqm (GIA) of flexible commercial and community floor space: Unit 1 comprising 91 sqm of Class E use; Unit 2 comprising 187 sqm of flexible Class E/Class F use; Unit 3 comprising 91sqm of Class E use; and Unit 4 comprising 97 sqm of flexible Class E/Class F use;
- 3 buildings ranging in height from 12 to 22 storeys;
- Car free development, except for 5 wheelchair accessible car parking spaces;
- 680 long-stay cycle parking spaces and 50 short stay cycle spaces;
- 4,442 sqm of public realm, including 356 sqm of play space;
- 379 sqm private amenity space associated with the Class C3 residential use in the form of balconies;
- 1,434 sqm internal and 665 sqm external communal amenity space associated with the PBSA;
- New landscaping and planting of 73 new trees; and
- New vehicular servicing route between Sleaford Street and New Covent Garden Access Road.

1.4 The Application submitted to the Council was validated on 26 May 2022 under Reference 2022/1835.

1.5 The formal description of the Development is as follows:

"Application for Phased Full Planning Permission for: Demolition of the existing building and construction of three new buildings, together comprising Residential (Use Class C3) and Student Accommodation (Sui Generis) along with Commercial, Business and Service (Use Class E) and/or Local Community and Learning (Class F) floorspace. Associated works include hard and soft landscaping, car parking and new vehicular access / servicing, and other ancillary works."

1.6 This appeal is against the non-determination of the Application. It is submitted within six months of the determination date of 13 September 2024 as agreed between the Appellant and LBW as set out in the PPA dated 25 July 2024. A further revised determination date of 18 November 2024 was agreed via exchange of email correspondence between Montagu Evans and LBW on 6 September 2024 (**Appendix 1.0**).

1.7 In the absences of any reasons for refusal, this Statement summarises the planning merits of the Application as a whole and sets out the case why planning permission should be granted in the context of Section 38(6) of the Planning and Compulsory Purchase Act 2004. It also briefly responds to third-party comments made by interested parties although the Appellant reserves the right to respond further in evidence should it be necessary. Unfortunately, the lack of response from LBW means that this Statement of Case has to be longer than would usually be the case.

STATEMENT OF COMMON GROUND

1.8 A draft Statement of Common Ground ("SOCG") has been prepared for agreement with the Council. It has not been agreed at this stage. The draft SOCG sets out the following:

- Overview of the site context and surroundings;
- Overview of the planning history of the Site including the fact that the Appeal Site benefits from a grant of planning permission ("the Extant Permission") on 28 March 2019 for a development described as:

"Demolition of all existing buildings and construction of new buildings of between 5 storeys and 18 storeys, containing 307 residential units, business (Class B1) floorspace and flexible retail/restaurant and cafe/business floorspace (Class A1-A5 and B1), CHP basement, vehicle and cycle parking, plant and associated works, landscaping and a new access onto Sleaford street."

- This planning permission has been implemented as established by a CLEUD granted on 22 August 2023;
- Overview of pre-application and post-engagement between the Appellant and all stakeholders including Scheme amendments;
- Overview of legislative framework and relevant development plan policies;
- Those matters related to the Application that are common ground between the Appellant and the Council; and
- Agreed planning conditions, Section 106 Heads of Terms between the Appellant and the Council and a draft Section 106.

1.9 This Statement just be read in conjunction with the draft SOCG.

APPEAL ROUTE

1.10 As set out in the enclosed Appeal Form, the Appellant considers that a Public Inquiry is the most appropriate procedure given the need to call expert evidence across a range of disciplines.

1.11 There are likely to be complexities in regard to some of these matters with large amounts of highly technical evidence required to be presented by experts from both the Appellant and the Council. This is particularly so in relation to sunlight/daylight and highways impact issues.

1.12 Moreover, the Appeal has generated public interest to date with high levels of public consultation responses and the active involvement of Battersea Society alongside other interested parties. An Inquiry can best allow for the participation of these third parties.

2.0 PLANNING ASSESSMENT

2.1 This section provides a summary appraisal of the Scheme against the relevant development plan policy and relevant national planning policy as identified in Section 3 of the SOCG.

LAND USE ASSESSMENT

THE PRINCIPLE OF THE REDEVELOPMENT OF THE SITE

2.2 The principle of the redevelopment of the Site is established by its site allocation in the Local Plan (Allocation Ref: NE2) for *"mixed use development including residential and commercial uses"*. The principle of regeneration is also supported by the Site's location in the Vauxhall Nine Elms Battersea Opportunity Area Framework (VNEBOAF) (2012).

2.3 Moreover, the existing building on the Site is of no particular architectural or historic interest and the principle of the Site's redevelopment has been accepted under the Extant Permission (see SOCG) granted in March 2019 which has been lawfully implemented.

2.4 The NPPF notes that Plans and Decisions should apply a "*presumption in favour of sustainable development*" (Paragraph 11). Furthermore, Paragraph 125 in the Chapter titled "Making Effective Use of Land states that planning decisions should:

- *"C) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;*
- *D) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively…"*

2.5 London Plan Policy GG2 (Making the best use of land) states that to create successful sustainable mixed-use places that make the best use of land, development must enable the development of brownfield land. The Policy further requires developments to proactively explore the potential to intensify the use of land to support additional homes and workspaces.

2.6 The principle of the redevelopment of the Site therefore accords with relevant development plan policies.

LOSS OF EXISTING USES

2.7 The Bookers Cash and Carry building is a retail warehouse unit and considered to be *sui generis*. There is no adopted policy that protects such uses, so we consider that its loss continues to be acceptable as it was under the Extant Permission.

2.8 Whilst the BMW service centre building has now been demolished, its last lawful use was Class B2. The Site is not identified within a designated employment area and therefore London Plan Policy E7 is applicable (Industrial intensification, co-location and substitution) on the basis that this is a "non-designated industrial site". The policy states that mixed-use or residential development proposals on Non-Designated Industrial Sites should only be supported where:

> *"it has been allocated in an adopted local Development Plan Document for residential or mixed-use development".*

2.9 By consequence of the Site's allocation in the LBW Local Plan, the Proposals accord with London Plan Policy E7 (part ii) and its redevelopment for mixed use or residential development is acceptable in principle.

2.10 Furthermore, the Extant Permission establishes the principle of developing the Site for a mixed use development and the acceptability of the loss of the existing uses in policy terms.

PRINCIPLE OF STUDENT ACCOMMODATION

2.11 The Proposals incorporate a mix of uses, including privately managed purpose-built student accommodation ("PBSA"). The 762 student bedrooms are split between two buildings (Plot 2 and Plot 3) and benefit from ancillary amenity spaces and facilities in both parts.

PBSA AS A CONTRIBUTOR TOWARDS HOUSING LAND SUPPLY

2.12 Paragraph 63 of the NPPF states that …"*Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, … students*".

2.13 The NPPG outlines that strategic policy-making authorities need to plan for sufficient student accommodation. It notes that encouraging more dedicated student accommodation may provide low-cost housing that takes pressure off the private rented sector and increases the overall housing stock (Paragraph: 004 Reference ID: 67-004-20190722).

2.14 The NPPG also outlines that all student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can in principle count towards contributing to an authority's housing land supply based on:

- the amount of accommodation that new student housing releases in the wider housing market (by allowing existing properties to return to general residential use); and / or
- the extent to which it allows general market housing to remain in such use, rather than being converted for use as student accommodation.

2.15 The NPPG goes on to say that authorities will need to base their calculations on the average number of students living in student only accommodation, using the published census data, and take steps to avoid double-counting. The exception to this approach is studio flats designed for students, graduates or young professionals, which can be counted on a one for one basis. A studio flat is a one-room apartment with kitchen facilities and a separate bathroom that fully functions as an independent dwelling (Paragraph: 034 Reference ID: 68-034-20190722).

2.16 The NPPG also outlines that communal accommodation, including student accommodation and other communal accommodation, can count towards the Housing Delivery Test. Self-contained dwellings are included in the National Statistic for net additional dwellings. Communal accommodation is accounted for in the Housing Delivery Test by applying adjustments in the form of two nationally set ratios. These are based on England Census data. The ratios for both net student and net other communal accommodation are found in the Housing Delivery Test measurement rule book 1 (Paragraph: 041 Reference ID: 68-041-20190722) and identify that 2.5 students equate to 1 household. As such, 2.5 student cluster flats are equal to 1 household, whereas 1 studio flat is equal to 1 household. Based on the mix of studios and clusters flats (237 studios and 525 clusters flats), the PBSA as whole would deliver the equivalent of 447 homes as a contributor to LBWs and London's housing supply.

2.17 London Plan supporting Paragraph 4.15.1 of Policy H15 states that London's higher education providers make a significant contribution to its economy and labour market. Furthermore, it is important that their attractiveness and potential growth are not compromised by inadequate provision for new student accommodation. The housing need of students in London, whether in PBSA or shared conventional housing, is an element of the overall housing need for London determined in the 2017 London Strategic Housing Market Assessment (SHMA). London's overall housing need in the SHMA is expressed in terms of the number of conventional self-contained housing units. However, new flats, houses or bedrooms in PBSA all contribute to meeting London's housing need. The completion of new PBSA therefore contributes to meeting London's overall housing need and is not in addition to this need. As such, it is important to consider the addition of PBSA in the context of overall housing need.

2.18 As outlined above, it is clear that PBSA contributes towards the delivery of housing. Moreover, in the absence of sufficient PBSA, students are left with the only alternative of occupying Houses in Multiple Occupation (HMOs) which

[1] The national average number of students in student only households is 2.5. This has been calculated by dividing the total number of students living in student only households by the total number of student only households in England. Source data is from the Census 2011 and is published by the Office for National Statistics.

has the potential to reduce the stock (and affordability) available for single family households. This also applies to future housing stock being built, which will have less demand for student residents if there is an available supply of PBSA. As evidenced by the Cushman and Wakefield PBSA Demand Report submitted as part of the Application (**Appendix 2.0**), there are not enough PBSA beds in London to meet the needs of the demand pool and so at present HMO properties within the Borough continue to be a vital source of accommodation for students.

2.19 Since the delivery of PBSA will make a substantial contribution to meeting housing needs and will free up larger homes in the borough and elsewhere in London (making them available for single family households), the scheme will deliver substantial benefit.

POLICY REVIEW – LONDON PLAN

2.20 Paragraph 4.15.2 of the London Plan states that there is an estimated requirement for 87,500 (3,500 annualised over 25 years) PBSA bed spaces within London. Whilst it does not provide specific Borough targets or represent a cap, it is implicit that those Boroughs within suitable commutable distances via sustainable forms of transport to Higher Education Providers (HEPs) will contribute to meeting the majority of this demand.

2.21 In respect of evidencing need, and in addition to letters of support from three HEPs (**Appendix 3.0**), the Cushman and Wakefield PBSA Demand Report undertakes a student demand analysis and identifies current and future demand for student accommodation in London. The analysis emphasises that the Site's accessible location renders it particularly suitable for use as student accommodation as it falls within the catchment for a number of HEPs in London including:

1. Imperial College London;
2. Royal Academy of Music;
3. London School of Economics and Political Science;
4. University of Roehampton;
5. King's College London;
6. The Courtauld Institute;
7. University College of Osteopathy;
8. Conservatoire for Dance and Drama;
9. The Guildhall School of Music and Drama;
10. The London School of Hygiene and St George's University;
11. University of Westminster;
12. University College London;
13. SOAS;
14. University of the Arts Colleges;
15. Royal Veterinary College Camden Campus;
16. City University of London;
17. Queen Mary University;
18. London Metropolitan University; and
19. Birkbeck University.

2.22 The analysis estimates that there are circa 135,000 students requiring a bed space within a commutable distance of the Site (considered to be 45-minute travel time) against a supply of 37,060 beds, resulting in a student to bed ratio of 3.64 students to 1 bed within commutable distance of the Site. There is, then, a compelling evidenced-based demand for additional student accommodation in this location.

2.23 Whilst student housing need can be satisfied through a range of accommodation types including HMOs and BTR, the delivery of PBSA accords with Policy H15 of the London Plan and delivers bespoke accommodation to meet the specific needs of students. This not only includes a design, layout and amenity provision that is specifically tailored for students but also a managed environment providing academic and pastoral support for students. Further, the delivery of PBSA provides a genuine alternative for students to HMO and BTR, reducing pressure on these housing tenures and creating greater availability (and by consequence affordability) for other household-types including families.

2.24 Policy H15 also states that Boroughs should seek to ensure that local and strategic need for PBSA is addressed, provided that a number of criteria are met. The criteria are each addressed below:

1) at the neighbourhood level, the development contributes to a mixed and inclusive neighbourhood.

2.25 Policy H15 does not define what the "neighbourhood level" is, nor does it establish what is considered to be a "mixed and inclusive neighbourhood". However, the object of the policy is to promote a mix of uses and avoid over-concentrations of student accommodation. An analysis of PBSA schemes that have been delivered or granted planning permission in the Wandsworth part of the VNEB OA since 2011 has been undertaken. The time-framed examined broadly ties in with the publication of the VNEB OA Planning Framework which was published in 2012. The analysis provides a robust analysis over at least a ten year period. The analysis then compares the proportion of PBSA schemes relative to the Class C3 residential schemes delivered or permitted over the same period. In doing this, the London Plan assumption (Paragraph 4.1.9) of 2.5 student beds equating to 1 single conventional residential household has been applied. Since this ration is applied in the London Plan and the NPPG, this approach is considered to be robust. Details of the schemes included in this analysis are set out in **Appendix 4.0**.

2.26 In summary and based on the data gathered, should planning permission be granted for the Development, the percentage of residential homes as student homes would become 4.3% of all residential homes in the Wandsworth part of the VNEB OA that have been delivered or granted planning permission since 2012. This relatively small percentage is considered to be compelling evidence to demonstrate that the delivery of PBSA on the Site would contribute positively to a mixed and inclusive neighbourhood and that it would not lead to an overconcentration of PBSA at a neighbourhood level.

2.27 This analysis is supported by the GLA who stated in its pre-application response that *"it is therefore considered the scheme contributes to a mixed and inclusive neighbourhood"*. In its Stage 1 report, the GLA again remarked that *"the scheme is considered to contribute to mixed and inclusive communities."*

2) the use of the accommodation is secured for students.

2.28 The PBSA will be secured for use by students (excluding the summer vacation period) via a Section 106 agreement. This is set out in the proposed Section 106 agreement.. The London Plan at Paragraph 4.15.13 accepts the temporary use of student accommodation during vacation periods for other uses.

3) the majority of the bedrooms in the development including all of the affordable student accommodation bedrooms are secured through a nomination agreement for occupation by students of one or more higher education provider.

2.29 The Applicant is in discussions with various HEPs, two of which have expressed support for the Proposals. A further HEP has committed to preparing Heads of Terms. The Applicant is committed to using reasonable endeavours to secure a nominations agreement for the majority of the accommodation prior to occupation which is set out in the proposed Section 106 agreement. This aligns with the PBSA LPG and is set out in the proposed Section 106 agreement.

4) the maximum level of accommodation is secured as affordable student accommodation as defined through the London Plan and associated guidance:

- *a. to follow the Fast Track Route, at least 35 per cent of the accommodation must be secured as affordable student accommodation or 50 per cent where the development is on public land or industrial land appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location and substitution;*
- *b. where the requirements of 4a above are not met, applications must follow the Viability Tested Route set out in Policy H5 Threshold approach to applications, Part E; and*
- *c. the affordable student accommodation bedrooms should be allocated by the higher education provider(s) that operates the accommodation, or has the nomination right to it, to students it considers most in need of the accommodation.*

2.30 The Proposed Development delivers 198 student bedrooms as affordable student accommodation. As a percentage, this equates to 25.98% of the student accommodation as a whole. Whilst this level is not justified by a Viability

Assessment as required by the policy, the PBSA LPG acknowledges that the "the inclusion of separate [affordable] conventional housing may nonetheless be acceptable and even desirable as part of pursuing mixed and inclusive neighbourhood objectives". It further notes that this may be particularly relevant where C3 delivery is relatively poor including on sites where previous C3 consents have not been built out. In this regard, whilst there is an implemented Extant Permission which secured affordable housing, it has not been built out and therefore there is a strong case to deliver conventional affordable housing on the Site alongside PBSA. Finally, Paragraph 71 of the NPPF acknowledges the benefits of mixed tenure sites in respect of creating diverse communities and supporting timely build out rates. Such mixed tenure sites can include a mixture of ownership and rental tenures, including Social Rent as well as housing designed for specific groups such as student accommodation.

2.31 Therefore, the approach in this instance is for the Scheme to provide both affordable PBSA and affordable conventional housing – the sum of which will equate to 39.55% affordable housing based on habitable room across the Site to meet the fast-track policy target set out in the London Plan.

5) the accommodation provides adequate functional living space and layout.

2.32 The Development has been designed by a highly experienced developer using the principles of developing and managing other successful student accommodation schemes in London. This is explained in greater detail within the Design and Access Statement which demonstrates that the accommodation provides functional living space and layout which meets the "adequate" policy test. The private amenity space proposed amounts to 1,434 sqm internal and 665 sqm external and includes an excellent range of spaces for studying in groups, recreation, break-out space and fitness.

2.33 Since the Proposals are for Student Accommodation, there are no specific minimum size standards of relevance, however, the Design and Access Statement outlines the design standards adopted for the proposed accommodation. The Scheme proposed accommodation of high quality, and reflecting the vast experience the applicant has in this area given the many thousands of student rooms it has developed and manages.

B) Boroughs, student accommodation providers and higher education providers are encouraged to develop student accommodation in locations well-connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes.

2.34 In this regard, the Site can be considered to represent a suitable location for student accommodation on the basis of its close proximity to local services, all of which are easily accessible by walking, cycling and public transport. This is demonstrated by its PTAL Rating of 5.

<u>POLICY REVIEW – LOCAL PLAN</u>

2.35 Local Plan **Policy LP28** (Purpose-Built Student Accommodation) Proposals for Purpose-Built Student Accommodation will be supported where the development:

1. meets all requirements for student accommodation, including affordable provision through the threshold approach, as set out in London Plan Policy H15;

2.36 This assessment has been undertaken above.

2. is accompanied by a site management and maintenance plan which demonstrates that the accommodation will be managed and maintained over its lifetime so as to ensure an acceptable level of amenity and access to facilities for its occupiers, and would not give rise to unacceptable impacts on the amenities of existing residents in the neighbourhood;

2.37 The draft **Student Management Plan** prepared by Fresh (the Appellants accommodation management business) details how the accommodation will be managed and maintained over its lifetime so as to ensure an acceptable level of amenity and access to facilities for its occupiers. This will ensure that the Appeal Scheme will not give rise any unacceptable impacts upon nearby residents.

2. has access to good levels of public transport, and to shops, services and leisure facilities appropriate to the student population;

2.38 As explained in the SOCG and the Transport Assessment, the Site has good access to public transport including Battersea Power Station Underground Station, along with a range of shops, services and facilities in the Battersea and Nine Elms area. Moreover, the Proposals include Use Class E and Class F uses at the ground floor which will further contribute to the existing local offer.

3. would not result in an over-concentration of single-person accommodation at the neighbourhood level which may be detrimental to the balance and mix of uses in the area or place undue pressure on local infrastructure;

2.39 Unlike Policy H15, Policy LP28 (Purpose Built Student Accommodation) of the adopted Local Plan seeks to define "neighbourhood". The Local Plan defines the "neighbourhood level" as within an 800-metre radius. Policy LP28 seeks to avoid an overconcentration of "single-person accommodation" at the "neighbourhood level" (800-metre radius) of a given site. We have also therefore undertaken an assessment of PBSA schemes and other single-person accommodation schemes within an 800 metre radius of the Site. In doing this exercise and as shown on the map in **Appendix 4.0**, whilst this radius would include the student schemes granted planning permission at Palmerstone Court and Belmore Street (Lambeth College), the radius also includes a number of other uses including:

- The Class C3 residential developments identified in the Wandsworth part of VNEB OA as delivered or granted planning permission since 2011 and identified in **Appendix 4.0** – 14,628 households;
- The large existing housing estates of Patmore and Savona;
- The Queenstown Road Strategic Industrial Location;
- Linford Street Business Estate;
- New Covent Garden Market Site; and
- Newton Preparatory School.

2.40 Based on the above, within an 800-metre radius of the Site, there is a variety of land uses that contribute to creating a mixed use and inclusive neighbourhood. In addition to this, as a scheme providing both PBSA and affordable housing, the Development would further reinforce the diversity of uses within the existing neighbourhood. Accordingly, the Development would contribute positively to the local area at neighbourhood level and would not result in an over-concentration of a single-person accommodation.

4. provides a high-quality living environment, including the provision of appropriate functional living spaces and layouts , well-integrated internal and external communal areas, and a high level of amenity (providing good levels of daylight and sunlight, and natural ventilation); and

2.41 The Design and Access Statement demonstrates compliance with this criterion. The Proposals include the provision of accommodation which meets all appropriate standards and facilities, and delivers well-integrated internal and external communal areas producing a high quality living environment. Indeed, the Proposals have been developed with input from the Applicant who has extensive experience delivering high quality student schemes. Accordingly, the units have been designed to ensure that quality is maximised for the future student residents, including through corridors designed to provide natural cross ventilation and daylight, and windows with openable vent panels and integral louvres to improve ventilation.

2.42 With regards to amenity space, 1,434 sqm internal and 665 sqm external communal amenity space is proposed, split across Plots 2 and 3. Students would also have access to the proposed public realm.

2.43 For Plot 2, the student amenity space includes shared indoor amenity at Level 7 and Level 16, along with a communal terrace at Level 7. Indoor facilities would accommodate study spaces, a gym, a cinema screening room, a laundry room, a communal dining space, and a games room. The total internal amenity space between these 2 floors is 505 sqm. In addition, a 187 sqm roof terrace is provided which will boast a combination of raised beds and built-in seating.

2.44 For Plot 3, there is shared indoor and outdoor amenity at Level 7, accommodating study spaces, a gym, a cinema screening room, a laundry room, a communal dining space, lounges and a games room. Level 7 offers a communal terrace that provides views across Battersea and Nine Elms, with another communal terrace at Level 1, contributing to additional external space with raised beds, seating and tables which cater for informal study or dining space. In

addition to this, the ground floor also offers shared lounge spaces. The total internal amenity space is 929 sqm, with 478 sqm of external amenity space.

2.45 Finally, as set out elsewhere in this Statement, the Development receives good levels of daylight and sunlight, as well as natural ventilation.

5. *provides at least 10% of student rooms which are readily adaptable for occupation by wheelchair users.*

2.46 For the PBSA, Plot 2 will provide 5% of rooms as wheelchair accessible in line with BS8300 2018 (including 1% as hoisted units), and 5% as wheelchair adaptable from the outset, equating to 10% of student rooms as wheelchair user rooms overall in this Plot.. For Plot 3, 5% wheelchair accessible studio bedrooms are provided, and it is proposed that the required 5% adaptable units can be provided based on need through the conversion of two cluster units into a single accessible unit through the installation of a new accessible bathroom. The units equate to 5% accessible (including 1% hoisted units) and 5% potential adaptable units. As such, compliance with this policy is achieved.

PRINCIPLE OF RESIDENTIAL DEVELOPMENT

2.47 The Development would deliver 55 Class C3 residential dwellings in Building A which fronts onto Battersea Park Road to contribute positively to the mix of uses proposed, and to reflect the nature and needs of the wider Nine Elms area.

2.48 The NPPF notes the Government's objective of "*significantly boosting*" the supply of housing (Paragraph 61). Paragraphs 7 and 8 of the NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development, which comprises three dimensions; economic, social, and environmental. The three dimensions should not be considered in isolation, instead they should be sought simultaneously through the planning system. Paragraph 8 identifies that to meet the "*social objective*" a sufficient number and range of homes will need to be provided to meet the needs of present and future generations.

2.49 London Plan Policy H1 (Increasing Housing Supply) states boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially on small sites and low-density sites in commercial, leisure and infrastructure use. Likewise, the Policy promotes the development of windfall sites to meet housing need.

2.50 The London Plan sets a ten-year housing target of 19,500 for the London Borough of Wandsworth (1,950 annually). Table 2.1 of the London Plan identifies that for the Vauxhall/Nine Elms/Battersea Opportunity Area there is an indicative need for 18,500 homes.

2.51 Local Plan Policy SDSI (Spatial Development Strategy 2023 – 2038) states that in the period 2023 – 2038 the Local Plan will provide for a minimum of 20,311 new homes. This includes the provision of a minimum of 1,950 new homes per year up until 2028/2029, including on small sites.

2.52 Local Plan Policy PM3 (Nine Elms) supports development within the Nine Elms area in order to contribute to realising the overall housing capacity of the VNEB of 18,500 homes.

2.53 As previously identified, the adopted site allocation supports the provision of residential uses on this Site. Likewise, residential development was approved as part of the Extant Permission and the principle of residential development on the Site is therefore acceptable.

AFFORDABLE HOUSING (CLASS C3)

2.54 Paragraph 64 of the NPPF requires Planning Policies to specify the type of affordable housing required and set policies for meeting this need on site, unless off-site provision or an appropriate financial contribution in lieu can be robustly justified and it can be agreed that this approach contributes to the objective of creative, mixed, and balanced communities.

2.55 London Plan Policy H4 (Delivering Affordable Housing) states that the strategic target is for 50% of all new homes delivered across London to be genuinely affordable.

2.56 London Plan Policy H5 (Threshold Approach to Applications) sets out the threshold for residential applications to be "fast tracked", meaning that they are not required to provide a viability assessment at application stage. The threshold is set at 35% for standard residential development but 50% for public sector or industrial sites where there would be a net loss in industrial floorspace.

2.57 London Plan Policy H6 (Affordable Housing Tenure) states that the following split of affordable products should be applied to residential development:

1. a minimum of 30 per cent low-cost rented homes, as either London Affordable Rent or Social Rent, allocated according to need and for Londoners on low incomes;
2. a minimum of 30 per cent intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared ownership; and
3. the remaining 40 per cent to be determined by the borough as low-cost rented homes or intermediate products (defined in Part A1 and Part A2) based on identified need.

2.58 Policy H6 also states where affordable homes are provided above 35 per cent, their tenure is flexible, provided the homes are genuinely affordable (defined in Part A1 and Part A2) and should take into account the need to maximise affordable housing provision, along with any preference of applicants to propose a particular tenure.

2.59 Local Plan Policy LP23 (Affordable Housing) states that the Council will seek to contribute to securing the Mayor's strategic target of 50% of all new homes to be affordable. Development that creates 10 or more dwellings must provide affordable housing on-site in accordance with the threshold approach set out in London Plan Policy H5 (outlined above). An affordable housing tenure split of at least 50% low-cost rent products, with a balance of other intermediate products, will be required.

2.60 All of the proposed 55 Class C3 residential dwellings will be affordable, based on a tenure split of 49% Low-Cost Rent (Social Rent) and 51% Intermediate (London Living Rent) on both a habitable room basis and unit basis. This is compliant with Policy LP23 of the Local Plan and Policy H6 of the London Plan.

AFFORDABLE HOUSING NEED

2.61 On the basis that Local Plan Policy LP23 (Affordable Housing) states that the Council will seek to contribute to securing the Mayor's strategic target of 50% of all new homes to be affordable, the Council will need to deliver 677 affordable homes per year (half of the annual target of 1,354 homes).

2.62 According to the Council's 2022/2023 Housing Trajectory and Summary Tables (2022/2023) which is the most recently published, net affordable housing completion over the last five years (2018/19 to 2022/23 have averaged at 389 per year – just 57% of the annual requirement. Furthermore of this, 389 per year, only 155 (40%) have been Social Rent or Affordable Rent, despite the Council's policy of 50:50.

2.63 The situation appears to be getting worse, with the Housing Trajectory suggesting that housing land capacity at 31 March 2023 demonstrates that only 21% of capacity is expected to be affordable housing, well short of the target of 50%.

2.64 The delivering of 55 affordable dwellings would represent over 14% of the Council's annual average delivery rate of affordable housing and the 27 Social Rent dwellings would deliver 17% the Council's annual average delivery rate of Social Rent Housing

2.65 In summary, LBW has significantly underperformed against its affordable housing target over the last five years and based on projected land capacity at 31 March 2023, is continuing to underperform. There are no obvious means by which this position is likely to be remedied in the short to medium term. It is contended that, as a result, substantial weight must be given to the affordable housing the Appeal Scheme would deliver.

AFFORDABLE HOUSING THRESHOLD AND FAST-TRACK

2.66 As noted previously, the Site currently comprises two land parcels; one part occupied by Bookers as a retail warehouse club (Sui Generis) and one part which contains land that was formally occupied by BMW service centre

(Class B2). As only part of the Site is considered industrial, it is considered reasonable to adopt a blended approach to calculating what the affordable housing threshold target is. The approach has been agreed with the GLA and LBW during pre-application discussions. This is similar to the approach taken when part of a Site is public land and when part of it is in private ownership as set out in the "Threshold Approach to Affordable Housing on Public Land" Practice Note (July 2018).

2.67 5,681 sqm of the Site area is on land occupied by Bookers and 2,414 sqm of the Site area is land associated with the former BMW service centre. This creates a total site area of 8,095 sqm.

2.68 As a retail warehouse, the policy target set by Policy H5 of the London Plan to qualify for the affordable fast-track for the Bookers land parcel would be 35%. For the BMW service centre land parcel, the policy target would be 50% as it is non-designated industrial land for which there is a net loss proposed.

2.69 Applying the respective site areas against the respective policy targets, we have identified that the blended affordable policy target across the Site would amount to 39.55% in order to qualify for the fast-track approach. This is set out in **Appendix 5.0.**

2.70 As both the proposed Class C3 residential and PBSA land use policies require the delivery of affordable housing, it has been agreed with LBW and the GLA that the affordable composition of the Scheme to reach the fast-track target of 39.47% can be achieved by a combination of C3 affordable housing and affordable student homes.

2.71 Combined, the C3 residential housing and the PBSA as a whole would deliver 369 habitable rooms. 171 of these habitable rooms are attributed to the 55 Class C3 affordable homes and represents 18.33% of the habitable rooms across the Site. Therefore, in order to achieve the fast-track threshold of 39.47%, 198 student rooms will be delivered as affordable too.

2.72 As such, it is proposed that alongside the 55 x Class C3 affordable homes (171 habitable rooms), 198 student rooms will be affordable, and which would be nominated to a HEP. This leads to a total percentage of 39.55% of affordable homes across the Scheme as a whole based on a habitable room calculation.

2.73 This approach ensures that the Proposed Development is compliant with the 'fast-track route' set by Policy H5 and means that no viability assessment is required to support the application. This has been agreed by both the GLA and LBW during pre-application engagement.

CLASS C3 HOUSING MIX

2.74 National planning policy contained within the NPPF requires a range of size, type and tenure of housing to address the need of different groups in the community, including affordable housing, families with children, older people and students. Paragraph 63 of the NPPF notes the importance of delivering a range in the size, type and tenure of housing to reflect the needs of different groups within the community.

2.75 London Plan Policy H10 (Housing Size Mix) states that schemes should consist of a range of unit sizes. The Policy states that to determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision makers should have regard to:

1. Robust local evidence of need where available, or where this is not available, the range of housing need and demand identified by the 2017 London Strategic Housing Market Assessment;
2. The requirement to deliver mixed and inclusive neighbourhoods;
3. The need to deliver a range of unit types at different price points across London;
4. The mix of uses in the scheme;
5. The range of tenures in the scheme;
6. The nature and location of the site, with higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity;
7. The aim to optimise housing potential on sites;
8. The ability of new development to reduce pressure on conversion, sub-division and amalgamation of existing stock; and

9. The need for additional family housing and the role of one and two bed units in freeing up existing family housing.

2.76 Overall, the policy states that the dwelling mix will be applied flexibly in light of individual site circumstances, including location, site constraints, sustainable design, the need to provide mixed and balanced communities, viability and the availability of public subsidy.

2.77 Local Plan Policy LP24 (Housing Mix) states that development Proposals creating additional residential units will be supported where the market housing dwelling mix:

1. includes a range of house sizes to address local need for including family-sized housing and down-sizing; and
2. takes into account the existing housing stock in the neighbourhood in order to avoid any over-concentration of a single size of homes where this would undermine the achievement of creating mixed and balanced communities; and
3. contributes to the borough-level indicative proportions detailed in **Figure 6.2**.

Figure 6.2 Policy LP24 Housing Mix.

DWELLING SIZE / TENURE	1 BEDROOM	2 BEDROOM	3 BEDROOM	4+ BEDROOM
Low-cost rent affordable housing	40–45%	30-35%	20-25%	5-10%
Intermediate affordable housing / First Homes	35-40%	40-45%	15-20%	5-10%

2.78 Notwithstanding the above, Policy LP24 also states that the mix will be considered on a site by site basis and in applying the preferred housing mix regard will be given to:

1. current evidence in relation to housing need;
2. the surrounding context and character;
3. the overall level of affordable housing proposed; and
4. the financial viability of the scheme.

2.79 The mix of housing proposed for the affordable units, is outlined in **Figure 6.3** below.

Figure 6.3 Proposed Mix of Affordable Units.

DWELLING SIZE / TENURE	1 BEDROOM		2 BEDROOM		3 BEDROOM		4+ BEDROOM		TOTAL	
Social Rent	**5**	19%	**10**	37%	**9**	33%	**3**	11%	**27**	49%
London Living Rent	**8**	29%	**16**	57%	**4**	14%	**0**	0%	**28**	51%
Total	**13**	**24%**	**26**	**47%**	**13**	**24%**	**3**	**5%**	**55**	100%

2.80 Whilst the proposed mix doesn't provide the exact mix outlined in **Figure 6.2**, this is an indicative mix as referenced in Policy LP24 which also acknowledge that the mix will be considered on a site by site basis. In this regard, the mix has been tested through a full marketing exercise with a number of local registered housing providers which has resulted in a strong level of interest and formal offers. It has also been discussed and accepted by LBW housing and planning officers during pre-application engagement. Finally, the mix complies with London Plan Policy H10 by providing a range of unit sizes.

2.81 Overall, we consider that the proposed mix of the conventional affordable housing aligns with Policy H10 of the London Plan and Policy LP24 of the Local Plan.

PRINCIPLE OF COMMERCIAL FLOORSPACE (USE CLASS E)

2.82 Paragraph 85 of the NPPF states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

2.83 London Plan Policy E1 (Offices) states that improvements to the quality, flexibility and adaptability of office space of different sizes (for micro, small, medium-sized and larger enterprises) should be supported by new office provision, refurbishment and mixed-use development.

2.84 London Plan Policy E9 (Retail, Markets and Hot Food Takeaway) states that a successful, competitive and diverse retail sector, which promotes sustainable access to goods and services for all Londoners, should be supported.

2.85 **Table 2.1** of the London Plan identifies that for the Vauxhall/Nine Elms/Battersea Opportunity Area there is an indicative need for 18,500 jobs.

2.86 As previously explained, the Local Plan site allocation specifies that "commercial uses" are appropriate on this Site.

2.87 Local Plan Policy PM3 (Nine Elms) supports development within the Nine Elms area in order to contribute to the economic development and regeneration of the VNEB OA within the CAZ to ensure that it develops as a strategic employment hub, which provides a mix of economic and commercial floorspace typologies and sizes suitable for a range of occupiers.

2.88 The proposal seeks to provide four ground floor commercial units, with two of these under Class E (Units 1 and 3), and two of these being flexible Class E and Class F uses (Units 2 and 4). It is anticipated that the commercial units could yield somewhere in the region of between 7 and 23 jobs on an FTE basis.

2.89 Overall, it is clear that the principle of delivering commercial uses (Use Class E) is acceptable in this location and algins with Policy E1 and E9 of the London Plan and Policy PM3 of the Local Plan. The uses are also supported by LBW and the GLA throughout pre-application discussions. The "Socio-Economic" section below also provides an overview of the economic benefits from the proposed use, which is material consideration, alongside the obvious design and placemaking benefits of mixing uses and providing activity at the edge of urban routes and spaces.

PRINCIPLE OF COMMUNITY USE (USE CLASS F)

2.90 London Plan Policy S1 (Developing London's Social Infrastructure) states development Proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported.

2.91 Local Plan Policy LP17 (Social and Community Infrastructure) states that the Council will work with its key partner organisations and developers to ensure that high-quality, inclusive social and community facilities and services are provided and/or modernised to meet the changing needs of the whole community and reflect the approaches that the Council or its partners take to the delivery of services.

2.92 The Proposal seeks to secure two of the ground floor units, as flexible Class E and Class F uses (Units 2 and 4). Unit 2 would also be fitted out and leased at a peppercorn rent to provide affordable space for community groups.

2.93 A Cultural Strategy has been prepared by Future City and was submitted as part of the Application. The strategy outlines the following:

- BPR's aim to be a unique and valuable community for residents, employees and the surrounding neighbourhoods that champions local culture and creative enterprise;
- The placemaking context, understanding the specific local area characteristics and cultural assets that inform the applicant's approach (Section 2.1-2.2);
- BPR's alignment to city and local planning authority policy relevant to culture and placemaking (Section 2.3);
- A strategic approach led by a vision and principles to inform the development and delivery of cultural projects (Section 3); and
- The specific potential for ground floor uses and public realm (Section 4.2).

2.94 Overall, the proposed community use accords with Policy S1 of the London Plan and Policy LP17 of the Local Plan. It would provide clear community benefit as outlined in the Cultural Strategy, through enhancing the Scheme provisions for both future residents and existing nearby residents.

2.95 Therefore, the proposed community uses are considered acceptable.

LAND USE SUMMARY

2.96 In summary, the principle of the redevelopment of the Site is acceptable and this is reinforced by both the Site's site allocation and the Extant Permission. Furthermore, the mix of uses proposed complies with the adopted site allocation which promotes "mixed use development including residential" as well those policies relating to the delivery

of PBSA; conventional housing including policies relating to affordable housing and unit mix; commercial uses; and community uses.

TECHNICAL CONSIDERATIONS

TALL BUILDINGS

2.97 London Plan Policy D9 relates to tall buildings and adopts a criteria-based approach to the consideration of a site's suitability for accommodating a tall building.

2.98 Part A deals with the definition of what comprises a tall building and notes that Development Plans should define what is considered a tall building for specific localities. Criteria (B) considers locations for tall buildings. The London Plan states that Development Plans should define what is considered a tall building, but it should not be less than 6 storeys or 18 metres. The Proposals meet this criterion since they exceed 6 storeys/18 metres.

2.99 Part B of Policy D9 outlines that boroughs should determine if there are locations where tall buildings may be an appropriate form of development and identify these areas in Development Plans.

2.100 Appendix 2 of the Local Plan identifies the Site in a tall building zone (TB-B3-01), which outlines that an appropriate height of 8 to 25 storeys (24 to 75 metres) is acceptable in this location. Policy LP4 (Tall and Mid-rise Buildings) states that tall buildings will be appropriate in this location where they would not result in any adverse visual, functional, environmental and cumulative impacts. Tall buildings are considered as buildings 7 storeys or over, or 21 metres or over. The Policy requires Proposals for tall buildings to be assessed against the London Plan Policy D9 criteria set out above. The above is also reflected in the Allocation which states that "the maximum appropriate height range for the zone is 8 to 25 storeys".

2.101 It should also be noted that the Extant Permission has consent for the development of up to 18 storeys which according to Policy LP4, is considered a "tall building" in this location. Following robust assessment throughout the application process, this height was accepted by LBW and GLA officers, in line with Policy LP4 which considers that tall buildings are appropriate on the Site. The principle of tall buildings on this site, thus, continues to be acceptable in principle.

2.102 On that basis, Part C of Policy D9 outlines that proposals should address various potential impacts. Figure 7.1 explains how the Proposals have considered these.

Figure 7.1: Review of London Plan Policy D9 Part C

POLICY D9 CRITERIA	RESPONSE
1. VISUAL IMPACTS	
a) the views of buildings from different distances: *i. long-range views – these require attention to be paid to the design of the top of the building. It should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views* *ii. mid-range views from the surrounding neighbourhood – particular attention should be paid to the form and proportions of the building. It should make a positive contribution to the local townscape in terms of legibility, proportions and materiality* *iii. immediate views from the surrounding streets – attention should be paid to the base of the building. It should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.*	The Heritage, Townscape and Visual Impact Assessment (HTVIA) submitted as part of this application provides an assessment of immediate, mid-range and long-range views. The HTVIA confirms the Proposed Development would enhance the appearance, character, and function of the townscape as well as reinforce the spatial hierarchy of the local and wider context, aiding legibility and wayfinding.
b) whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding	
c) architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan	The DAS explains that the Scheme has been conceived from a design-led approach, whereby materials and quality have formed a strong focus.
d) proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been	The HTVIA identifies that there is no harm to the significance of heritage assets as a result of the Proposals.

	explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area	
e)	*buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it*	The site is not located in the setting of a World Heritage Site
f)	*buildings near the River Thames, particularly in the Thames Policy Area, should protect and enhance the open quality of the river and the riverside public realm, including views, and not contribute to a canyon effect along the river*	The Site is approximately 330m from the River Thames, with a significant amount of recent development intervening. The Site falls outside of the Thames Policy Area and therefore there is no material impact on the River Thames.
g)	*buildings should not cause adverse reflected glare*	The proposal does not include excessive amounts of glazing and where it is included will not cause adverse reflected glare.
h)	*buildings should be designed to minimise light pollution from internal and external lighting*	As outlined in the DAS and Landscaping Strategy lighting has been designed to minimise any light pollution impact on neighbouring properties.
2.	**FUNCTIONAL IMPACT**	
a)	*the internal and external design, including construction detailing, the building's materials and its emergency exit routes must ensure the safety of all occupants*	Safety has been considered as part of both the DAS and the Fire Statement to ensure that the design meets all of the required safety standards and provides the required standard of emergency exit routes.
b)	*buildings should be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm. Servicing, maintenance and building management arrangements should be considered at the start of the design process*	The following reports explain how the Scheme will be managed to ensure that there is limited impact on the surrounding area: • Student Management Plan; • Refuse and Waste Management Plan; • Servicing and Delivery Plan; and • Travel Plan.
c)	*entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding areas*	
d)	*it must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building*	The proposal is car-free and will therefore have very little impact on the transport network. Cycle parking is proposed in accordance with London Plan Policy and a Travel Plan has been prepared to encourage sustainable modes of transport. The Transport Assessment explains that the transport network is capable of accommodating the proposal.
e)	*jobs, services, facilities and economic activity that will be provided by the development and the regeneration potential this might provide should inform the design so it maximises the benefits these could bring to the area, and maximises the role of the development as a catalyst for further change in the area*	As outlined in **Section 6.0** and the Socio-Economic Report, the Proposals will provide a range of jobs, services, facilities, and economic activity.
f)	*buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental effect on solar energy generation on adjoining buildings*	The Proposals will not give rise to any adverse impacts on these technical matters. This has been explored throughout design development.
3.	**ENVIRONMENTAL IMPACT**	
a)	*wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building*	As outlined in the Daylight, Sunlight and Overshadowing Report and the Wind and Microclimate Assessment, the Proposals are not considered to have any unacceptable impact on the surrounding areas.
b)	*air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect street-level conditions*	The Air Quality Assessment submitted as part of this application outlines that the proposal does not adversely impact air quality. In fact, the report concludes the Scheme is air quality neutral.
c)	*noise created by air movements around the building(s), servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the building*	The Noise and Vibration Assessment submitted as part of this application explains that any noise created by the development would be at an acceptable level.
4.	**CUMULATIVE IMPACTS**	
a)	*the cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals and when developing plans for an area. Mitigation measures should be identified and designed into the building as integral features from the outset to avoid retro-fitting.*	The DAS and HTVIA outline how cumulative impacts of development has been considered. Overall, the conclusion is reached that the Proposals are acceptable when assessed cumulatively.

2.103 The Architect has designed the Scheme through close engagement with the Applicant as an experienced contracting business that has delivered well over 60,000 homes in the last 25 years and is focussed on buildability and deliverability. The Applicant has a depth of experience delivering student housing and residential schemes of a similar scale and has undertaken a robust review of the Proposals ahead of submission. The Scheme has evolved through the pre and post application period to ensure that the design is technically and financially viable and has matured through regular discussions with LBW's design officer, alongside the Design Review Panel.

2.104 Post submission, following various matters raised by LBW Officers, statutory consultees, councillors and other stakeholders, the design has been updated to overcome original concerns raised. This has been accompanied by

various design workshops with LBW Officers, as well as a further two formal Design Review Panel to ensure that the height and massing of the Scheme is appropriate within its local setting and in relation to neighbouring buildings. The response from the final Design Review Panel is provided in **Appendix 6.0**. In the Moving Forward section of the Letter, the Panel remarked:

"We are very pleased how the scheme has evolved and applaud the applicant and client through their team of consultants for responding positively to the officer's and Panel's feedback.

The revised vision and strategies presented for the landscape have transformed the scheme and promise a high-quality development. Continuity through the delivery stage is important and for that reason we would encourage the client to engage the team as the scheme proceeds."

2.105 In summary, the Scheme massing has evolved through extensive pre and post application discussions whereby officers have expressed support for the proposed heights/massing. It should be noted that the Extant Permission established the principle of tall buildings on the Site, which is further supported by the Local Plan which supports tall buildings in the area.

2.106 In addition to the principle of tall buildings being acceptable in this location, it is evident from the above review that technically, tall buildings are also acceptable on the Site, which was also found to be the case for the Extant Permission. This is further demonstrated in the suite of technical reports submitted in support of this Application.

2.107 When the Proposals are assessed against the technical requirements of policy, the Scheme is considered to comply at both a regional and local level and is therefore considered acceptable in this respect.

DENSITY

2.108 Paragraph 129 of the NPPF states that planning policies and decisions should support development that makes efficient use of land. Plans should contain policies to optimise the use of land and meet as much of the identified need for housing as possible.

2.109 Part d of Paragraph 125 of the NPPF states that planning *decisions "should promote and support the* development *of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively…"*

2.110 Paragraph 130 of the NPPF sets out that *"where there is an existing or anticipated shortage of land for meeting identified* housing *needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site*".

2.111 London Plan Policy GG2 (Making the Best Use of Land) states that in order to create successful sustainable mixed-use places, development proposals must proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development in locations that are well-connected by public transport, walking and cycling. The Policy further states that this will be achieved through enabling development of brownfield land. The optimum development capacity of a Site should be determined through applying a design-led approach.

2.112 London Plan Policy D3 (Optimising site capacity through the design-led approach) seeks to optimise the capacity of sites based upon a design-led approach and states "*that high density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling*". Policy D6 of the Plan seeks for development proposals to make the most efficient use of land and optimise density, in line with National Guidance. Supporting text to Policy D6 states at paragraph 3.3.1:

"For London to accommodate growth in an inclusive and responsible way every new development needs to make the most efficient use of land. This will mean developing at densities above those of the surrounding area on most sites."

2.113 Local Plan Policy SDS1 (Spatial Development Strategy 2023-2038) states that new homes will be delivered in the borough by making the best use of land whilst ensuring that development densities are appropriate to the location and size of the site in accordance with the "design led approach" set out in Policy LP1.

2.114 Combining the residential units (55) and the student bedrooms (762) results in a figure of 1,021 units per hectare based on a site area of 0.8ha (or 1,149 habitable rooms per hectare).

2.115 The Site is located in an extremely sustainable/accessible location and currently comprise a vacant underutilised building. Moreover, surrounding area has been subject to a significant amount of development, which reflects the policy context outlined above which seeks to optimise density in locations such as this.

2.116 The density has also been discussed in detail with the GLA, LBW and during DRPs, within which it was agreed that the proposed density is appropriate. In addition, the density is of a similar level by habitable room to that already approved under the Extant Permission.

2.117 Overall, it is clear that the proposed density is acceptable in this location and in particular will make effective use of land, which is strongly supported by national, regional and local planning policy including Policy D3 and Policy GG3 of the London Plan, and Policy SDS1 and Policy LP1 of the Local Plan, as well as Section 11 of the NPPF.

DESIGN

2.118 High quality and inclusive design is encouraged at all policy levels. The NPPF notes that good design is a key aspect of sustainable development and plays a crucial role in promoting better places for people. **Paragraph 135** of the NPPF states that planning policies and decision makers should ensure that developments:

A. "*will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
B. *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
C. *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
D. *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
E. *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
F. *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.*"

2.119 Paragraph 137 of the NPPF states that "Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot".

2.120 London Plan Policy D3 states that developments proposals should:

"FORM AND LAYOUT

1. *enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions;*
2. *encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area;*
3. *be street-based with clearly defined public and private environments; and*
4. *facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users.*

EXPERIENCE

5. *achieve safe, secure and inclusive environments;*
6. *provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest;*
7. *deliver appropriate outlook, privacy and amenity;*
8. *provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity;*

9. *help prevent or mitigate the impacts of noise and poor air quality; and*
10. *achieve indoor and outdoor environments that are comfortable and inviting for people to use.*

QUALITY AND CHARACTER

11. *respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character*
12. *be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well*
13. *aim for high sustainability standards (with reference to the policies within London Plan Chapters 8 and 9) and take into account the principles of the circular economy*
14. *provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water."*

2.121 Local Plan Policy LP1 (The Design-Led Approach) outlines that developments should use a design-led approach 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. Developments should ensure that the scale, massing and appearance provide a high-quality, sustainable design and layout that enhance and relate positively to the prevailing local character and the emerging character

2.122 The Proposals have been prepared through extensive discussions with local residents/stakeholders, the GLA and the LBW pre and post submission. Various design workshops with LBW post submission have helped evolve the Scheme on a plot by plot basis to ensure that the Scheme design is of the highest quality and supported by LBW Urban Design Officers. Further to this, the Scheme has been presented at three formal Design Review Panels pre and post submission to further strengthen the design quality, alongside various post submission workshops with LBW. Accordingly, the Scheme has been subject to significant evolution in order to arrive at the current design. The amendments made throughout the pre-application and post application period are explained in greater detail in the Design and Access Statement

2.123 The proposed building facades have taken inspiration from the surrounding and historic context, including taking notes from the Thames and the Colour Fields painting movement of the 1950s, and take the form of pre-cast concrete which have been coloured to create separate identities and to create contrast and break up the façade.

2.124 Landscaping also forms an integral part of the Proposals in order to enhance the function/design of the Scheme. This has been re-designed and improved since submission and this is explained in greater detail in the Design and Access Statement and the Landscape Strategy.

2.125 In addition to many other design considerations, sustainability has formed an important part of the Proposals and the Scheme has been developed to incorporate sustainability methods of design and construction. For example, the facades have been designed with sustainability in mind to maximise light whilst minimising overheating as part of the dynamic façade modelling.

2.126 Overall, it is considered that the Proposals represent high-quality design and therefore accord with regional and local policy, as well as, with Paragraph 137 of the NPPF.

HERITAGE AND TOWNSCAPE

2.127 **Paragraph 200** of the NPPF states:

"In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance… Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk based assessment…"

2.128 The requirements of paragraph 200 are fulfilled by the provision of this Planning Statement and the Heritage, Townscape and Visual Impact Assessment submitted in support of the Application.

2.129 Once the significance of a heritage asset affected by proposals has been established, Paragraph 212 of the NPPF states:

"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss of less than substantial harm to its significance".

2.130 The Annexe of the NPPF defines 'conservation' in relation to heritage as:

"The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance".

2.131 Harm to the significance of a heritage asset is discussed at paragraphs 212-215 of the NPPF in which the extent of harm can either be 'substantial' or 'less than substantial' respectively.

2.132 In the event that harm was found, we would consider this to be less than substantial. In cases of less than substantial harm, Paragraph 215 states that:

"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use".

2.133 London Plan Policy HC1 (Heritage, Conservation and Growth) states that *"proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process."*

2.134 Local Plan Policy LP3 (Historic Environment) sets out that development proposals will be supported where they sustain, preserve and, wherever possible, enhance the significance, appearance, character, function and setting of any heritage asset (both designated and non-designated), and the historic environment.

2.135 The Proposed Development has evolved through a constructive pre-application process with the GLA and LBW, along with input from three independent Design Review Panels pre and post submission, a further meeting with the GLA, and various LBW design workshops post submission. See Section 3 for more detail on this.

2.136 The HTVIA confirms that it represents a demonstrable improvement to the existing appearance and function of the townscape and betterment relative to the extant consent for the Site. Likewise, the Proposals would have no impact upon the setting or significance of heritage assets nearby.

2.137 Overall, the Proposals would improve the local townscape, reinforce local identity and contribute positively towards the regeneration aspirations envisaged by the Vauxhall Nine Elms Battersea (VNEB) Opportunity Area. As such, the Development is compliant with the aforementioned policies.

HOUSING QUALITY

2.138 With regards to the Class C3 housing, London Plan Policy D6 (High quality and standards) requires housing developments to be of the highest design quality and provide adequately-size rooms with comfortable and function layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures. The Policy requires development to meet the minimum standards set out below, which will be applied to all tenures and residential accommodation that is self-contained.

Table 7.2 London Plan – Minimum Space Standards for New Dwellings.

NUMBER OF BEDROOMS	NUMBER OF BED SPACES	1 STOREY DWELLINGS	2 STOREY DWELLINGS	BUILT-IN STORAGE
1b	1p	39 (37)		1
	2p	50	58	1.5
2b	3p	61	70	2
	4p	70	79	
3b	4p	74	84	2.5
	5p	86	93	
	6p	95	102	
4b	5p	90	97	3
	6p	99	106	
	7p	108	115	
	8p	117	124	

2.139 Furthermore, the Policy requires housing developments to maximise the provision of dual aspect dwellings and normally avoid single aspect dwellings.

2.140 Local Plan Policy LP27 (Housing Standards) requires all new residential development to comply with the Nationally Described Space Standards and policies of the London Plan. All residential development is expected to provide dual-aspect accommodation, unless it can be suitably demonstrated that a single aspect dwelling would provide for a more appropriate design solution than a dual aspect dwelling. Where such circumstances are demonstrated, all single aspect units should:

1) *"provide for an acceptable level of daylight for each habitable room, and optimise the opportunity for enabling direct sunlight;*
2) *ensure that the aspect is not predominantly north facing;*
3) *not face onto significant sources of air pollution and/or noise and vibration, and/or odours which would preclude opening windows;*
4) *provide a good level of natural ventilation throughout the dwelling via passive/non-mechanical design measures; and*
5) *ensure that future occupiers have a good level of privacy and do not experience adverse impacts from overlooking."*

2.141 Local Plan Policy LP28 (Purpose Built Student Accommodation) outlines that proposals should provide a high-quality living environment, including the provision of adequate functional living spaces and layouts, well-integrated internal and external communal areas, and a high level of amenity (providing good levels of daylight and sunlight, and natural ventilation).

2.142 All of the proposed C3 residential dwellings meet the minimum floorspace policy standards identified by the policy above. Furthermore, there are no single aspect north facing units with those few units that are single aspect having been located to maximise westerly views. In addition, 80% of apartments are dual aspect.

2.143 As outlined in the Daylight, Sunlight and Overshadowing Report, the proposed units have been designed so to maximise natural daylight amenity for its future occupants with over 85% of habitable rooms tested meeting or exceeding the relevant ADF recommendations, representing an excellent rate of compliance, particularly for a development within an opportunity area.

2.144 Equally, the internal sunlight levels are good for an urban regeneration scheme with 80% of the residential units exceeding the BRE guideline recommendations.

2.145 For the PBSA, 78% of Plot 2 rooms would meet the BRE guidance and 51% of Plot 3 room would meet the BRE guidance. It is important to note that the assessments have been undertaken for all rooms, irrespective of orientation and therefore the lower provision of pass rates in Plot 3 is because of its orientation.

2.146 In terms of sunlight to amenity areas and open spaces, all of the amenity spaces on the Site including the public realm will receive at least two hours of direct sunlight for 50% of the area on 21 March complying with the BRE Two Hour Sun on Ground Indicator Test. The analysis confirms that on 21 June, practically all of the amenity space including public realm will receive at least two hours of direct sunlight.

2.147 In terms of ventilation, the Proposals make use of Mechanical Ventilation and Heat Recovery (MVHR), alongside comfort cooling and natural ventilation to ensure that the proposed units are sufficiently ventilated.

2.148 The Council commissioned an independent review of the Daylight, Sunlight Assessment and Overshadowing Assessment prepared by the Applicant (**Appendix 7.0**). The review which was undertaken by Delva Patman Redler confirmed that *"overall daylight and sunlight provision would be reasonable for a dense housing and student accommodation development and amenity spaces would be well sunlit"*.

2.149 In summary, the Proposed Development would provide high quality living accommodation and is considered acceptable in the context of Policy D6 of the London Plan and Policy LP27 of the Local Plan.

ACCESSIBILITY

2.150 London Plan Policy D7 (Accessible Housing) states that at least 10 per cent of dwellings should meet Building Regulation required M4 (3) 'wheelchair user dwellings' and all other dwellings should meet M4 (2) 'accessible and adaptable dwellings'.

2.151 Local Plan Policy LP27 (Housing Standards) states that all new residential development should meet the requirements of London Plan Policy D7.

2.152 Plot 1 which comprises the affordable residential homes, will provide 11% (no. 6) M4(3) wheelchair user homes, exceeding London Plan and LBW policy requirements.

2.153 The requirement to deliver 10% adaptable PBSA bedrooms under Policy LP28 of the Local Plan and confirmation that the Development complies with this is set out in the preceding section.

SOCIO-ECONOMIC BENEFITS OF PROPOSED DEVELOPMENT

2.154 Policy SDSI (Spatial Development Strategy 2023-2038) of the Local Plan states that the Council will support town centre regeneration, seeks to provide suitable training and skills developments for local residents, and seek to increase workforce participation.

2.155 As outlined in the Socio-Economic Report prepared by Montagu Evans (**Appendix 8.0**), the Proposed Development is expected to create permanent jobs on completion, both within the proposed flexible ground floor Class E/F space, and in the operation and management of the PBSA. It is estimated that a PBSA operator would employ 8 FTE staff to manage the accommodation and provide cleaning and maintenance services, whilst as a central estimate c.7-23 jobs could be created within the commercial space if let for retail use (assuming a range of 15-20 sqm per FTE, from the HCA Employment Density Guide 3rd Edition). If used for co-working space, the number of jobs could exceed this, whilst a community use would likely generate fewer jobs.

2.156 It is estimated that the Site in its last use sustained c.30 jobs, based on applying a retail warehouse employment density (90 sqm NIA per FTE, from the HCA Employment Density Guide 3rd Edition). On this basis, the Proposed Development is expected to be broadly neutral in terms of number of permanent jobs sustained, owing to the potential to sustain higher density employment from a smaller space.

2.157 The Socio-Economic Report provides greater detail on the key benefits/impacts of the Scheme, which includes:

CONSTRUCTION PHASE (CIRCA 3 YEARS) ECONOMIC BENEFITS

- Provision of 280 full time constructions jobs;
- Generation of £68m GVA benefitting the London economy;
- Creation of an estimated 7-10 apprenticeships; and
- Jobs for LBW residents and support for local businesses (secured through the proposed Section 106 agreement).

POPULATION AND HOUSING IMPACTS

- The Proposals would be unlikely to lead to the over-subscription of GP practices; and

- The low child yield resulting from the Scheme would likely be absorbed by existing space capacity in local schools.

WIDER BENEFITS

- New residents will control an estimated £4.9m per annum of retail, leisure and food & beverage expenditure, a portion of which will be spent with local businesses;
- Construction workers and permanent workers will also spend money locally during and before/after their shifts, further boosting the local economy;
- Up to 31 FTE jobs once the Scheme is operational
- Students in particular will also have an opportunity to contribute to local community groups through volunteering; and
- Students could also provide a valuable source of flexible low-cost labour for local businesses.

2.158 Overall, the Development would deliver economic benefits to the local area and the Proposals would comply with Policy SDSI of the Local Plan.

DAYLIGHT AND SUNLIGHT IMPACT

2.159 Paragraph 135(f) of the NPPF states that development should create places with a high standard of amenity for existing and future users.

2.160 Paragraph 130(c) of the NPPF states that:

"when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards)."

2.161 London Plan Policy D6 states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside space.

2.162 Local Plan Policy LP2 (General Development Principles) states that development proposals must not adversely impact the amenity of existing and future occupiers or that of neighbouring properties, or prevent the proper operation of the uses proposed or of neighbouring uses. Proposals will be supported where the development (amongst other things):

1) "avoids unacceptable impacts on levels of daylight and sunlight for the host building or adjoining properties (including their gardens or outdoor spaces); and
2) avoids unacceptable levels of overlooking (or perceived overlooking) and undue sense of enclosure onto the private amenity space of neighbouring properties."

2.163 The Site is located within the Vauxhall, Nine Elms and Battersea Opportunity Area within the London Borough of Wandsworth; an area undergoing significant growth and regeneration. The Site is subject to an Extant Permission which has been implemented and therefore any daylight and sunlight effects arising from the Proposed Development have been assessed by comparison to this, as well as viewed in the context of the urban environment within which the Site is located.

<u>IMPACTS ON VIRIDIAN APARTMENTS</u>

2.164 The Viridian Apartments lies immediately to the west of the Site. The current condition of the Site (a circa two storey retail warehouse) means that the north-easterly facing windows of the Viridian Apartments that look onto the Site have a relatively unrestricted outlook which presents a high baseline that is almost uncharacteristic of an Opportunity Area in London.

2.165 It is also important to note that a number of the windows facing the Site and fronting onto Sleaford Street are heavily self-obstructed by a combination of balconies and solid privacy screens. This therefore makes these windows and

rooms more sensitive to alterations in natural light and more reliant on light from a lower trajectory directly across the Site.

2.166 The outcome of the Vertical Sky Component (VSC) Assessment is that 74 of the 221 habitable windows tested would meet the BRE Guidelines recommendations (33%) following the redevelopment of the Site. The vast majority of windows that do not meet the default numerical targets are those located beneath overhanging balconies and blinkered by privacy screens on either side.

2.167 In contrast to the Extant Permission, the Proposed Scheme has re-orientated Plot 1 and angled it away from the adjacent Viridian Apartments, providing an improved outlook across Sleaford Street towards Battersea Park Road. This helps to limit the extent of any additional daylight and sunlight effects upon neighbouring residents (both existing and future) by comparison to the effects already deemed acceptable with the Extant Permission.

2.168 By consequence, the VSC compliance rate of 33% exceeds the compliance rate of 23% under the Extant Permission and therefore results in a betterment over the Extant Permission which is a significant material consideration.

2.169 In respect of the Extant Permission, the Officer Report noted that:

"Considering the characteristics of the site context, the level of compliance noted in the baseline condition is not surprising that any meaningful form of massing on the site will inevitably give rise to reductions to the existing daylight levels. This is further exacerbated by the presence of the balconies and privacy screens which materially reduce the availability of light.

It is therefore considered as the proposed development matches the height and massing of the existing surrounding buildings, as well as the consented developments, then the daylight effects of the proposal should be considered in the context of the urban location in which the site is positioned."

2.170 When compared to the Extant Permission in greater detail, a total of 116 windows will experience improvements in VSC (52%), 10 windows will experience no difference (5%), and 95 windows (43%) would experience some degree of change in VSC. It must be noted, however, that the degree of change in the vast majority of instances is arguably imperceptible, with the greatest alteration being just 6.3% VSC in absolute terms. 73% of those windows experience no greater than a 3% alteration in absolute VSC from the Extant Permission

2.171 The overall compliance rates against the default BRE criteria are, therefore, improved with the Proposed Development in place by comparison to the Extant Permission. The degree of alteration in VSC between the Proposed and Extant Permission levels is also limited, with the vast majority of windows that record a relative alteration experiencing less than a 3% reduction in VSC, which is arguably imperceptible, and furthermore 52% of windows will experience improved retained VSC levels and reduced levels of impact by comparison to the Extant Permission.

2.172 With regards to sunlight, there would be no difference between the sunlight availability with the Proposed Development in place compared to the Extant Permission, with all 15 southerly orientated habitable rooms continuing to meet BRE guideline recommendations.

2.173 The Council commissioned independent review of the Daylight and Sunlight Assessment undertaken by Delva Patman Redler confirmed that *"the impacts of the Proposed Development on Viridian Apartments would be less than the impacts of the consented scheme."*

NEW MANSION SQUARE

2.174 Since the Application was submitted, New Mansion Square, which is located immediately to the south and west of the Site, has been completed and is now fully occupied.

2.175 The outcome of the Vertical Sky Component (VSC) Assessment is that 747 of the 1,101 habitable windows tested would meet the BRE Guidelines recommendations (68%). This is marginally less than the 74% compliance under the Extant Permission. In both instances, however, the compliance rate is largely exacerbated by the presence of private amenity balconies which equally overhang floors below.

2.176 As such, in accordance with the BRE guidelines, an alternative assessment has been undertaken without the balconies in place to determine if the Proposed Development is the critical factor in any loss of light. In this regard, the VSC outcome would mean that 821 of the 1101 windows would meet the BRE Guidelines recommendations (75%). A further 115 windows (10%) would retain a VSC of at least 15% which is considered reasonable for an Opportunity Area. Of the remaining 159 rooms (14%) experiencing some alterations beyond the BRE Guidance, 78 (7%) are bedrooms for which the BRE acknowledge are less important.

2.177 In terms of sunlight provision, the APSH results confirm that 192 of the 248 southerly orientated rooms (77%) will meet the BRE guideline recommendations. This is the same number of rooms as with the Extant Permission therefore should continue to be considered acceptable. It should also be noted that the compliance rate increases to 94% when the effect of balconies is excluded from the assessment.

2.178 The Council commissioned independent review of the Daylight and Sunlight Assessment undertaken by Delva Patman Redler stated that *"It is evident that the retained levels of VSC with the proposed Scheme would be lower (poorer) than with the consented scheme and that the percentage loss would be higher (worse) for the proposed Scheme than the consented scheme. However, on facades 2, 3 and 4, the differences would less than 1% VSC worse on average across all windows on each floor level and therefore imperceptible. On façade 1, the differences would be greater, reaching around 4% VSC worse on average across all windows on each of the 13th and 14th floor levels. However, at that level the main living rooms and kitchens would mostly retain VSC values of around 20% VSC or more."*

2.179 On the whole, whilst the impact of the Proposed Development on New Mansion Square is slightly worse than the Extant Permission and there is some consequential harm arising from this, it is not significantly different. Given the degree of flexibility which is to be applied in accordance with Paragraph 130(c) of the NPPF, it cannot be concluded that the impact of the scheme is unacceptable in policy terms.

142-192 THESSALY ROAD

2.180 This residential block is located to the south-west of the Site and is situated behind Viridian Apartments, with its closest elevation some 100m from the Site boundary.

2.181 The VSC form of assessment demonstrates that 37 of the 52 windows will meet the BRE guideline recommendations (71%). All of the remaining 15 windows (29%) are located beneath the deck access walkways and are recessed into the building making them more sensitive to alterations in the skyline opposite. This is illustrated by the existing VSC values being very low despite the relatively cleared site conditions (ranging from 1.16% to 6.84%) whereas the majority of unencumbered windows are currently recording VSC levels in excess of 20%. As such, even fractional reductions in absolute VSC (0.37%-2.13%) give rise to disproportionately larger relative percentage alterations.

2.182 When assessed without the effect of the deck access/overhanging profile in place, each of the windows would comfortably meet the BRE guidelines, clearly demonstrating that it is the effect of the receiving buildings' inherent architectural design rather than the scale of the Proposed Development that is the influencing factor in the relative loss of light.

DAYLIGHT AND SUNLIGHT CONCLUSION

2.183 In conclusion, it is considered that the daylight and sunlight impact of the Development on surrounding built development is acceptable in policy terms given the flexibility which is to be applied. Indeed, the existing low built form on the Site means that at present the Viridian Apartments and New Mansion Square having a relatively unrestricted outlook which is almost uncharacteristic of conditions within an Opportunity Area in London. In addition, these developments incorporate balconies and in some cases privacy screens. These factors together means that care must be taken to ensure that the policy approach is applied sensibly. In this urban environment context, and taking into account the Site Allocation and its location within the VNEB OA, the Extant Permission, the undisputed need for PBSA and housing and the need to make best use of previously developed land which commands substantial weight, it is considered that the daylight impacts of the proposed development are overall, not markedly different from those of the Extant Permission scheme and are acceptable. The Scheme therefore accords with Policy D6 of the London Plan and Policy LP2 of the Local Plan as well as Policy 130 of the NPPF.

PUBLIC REALM / LANDSCAPING

2.184 London Plan Policy GG1 (Building strong and inclusive communities) states that to build on the city's tradition of openness, diversity, and equality, and help deliver strong and inclusive communities, those involved in planning and development must provide access to good quality community spaces, services, amenities, and infrastructure that accommodate, encourage, and strengthen communities, increasing active participation and social integration, and addressing social isolation.

2.185 Part E of Policy GG1 goes on to state that development must ensure that streets and public spaces are consistently planned for people to move around and spend time in comfort and safety, creating places where everyone is welcome, which foster a sense of belonging, which encourage community buy-in, and where communities can develop and thrive.

2.186 Part G of Policy GG1 sets out ensure new buildings and the spaces they create are designed to reinforce or enhance the identity, legibility, permeability, and inclusivity of neighbourhoods, and are resilient and adaptable to changing community requirements.

2.187 Part H of Policy GG1 outlines that new development should support and promote the creation of a London where all Londoners can move around with ease and enjoy the opportunities the city provides, creating a welcoming environment that everyone can use confidently, independently, avoiding separation or segregation. Similarly, Part I of Policy GG1 supports the promotion and creation of an inclusive London where barriers are minimised.

2.188 Policy D5 (Inclusive design) of the London Plan sets out that development proposals should achieve the highest standards of accessible and inclusive design by providing high quality people focused spaces that are designed to facilitate social interaction and inclusion and to be convenient and welcoming with no disabling barriers. Development should also be able to be entered, used, and exited safely, easily and with dignity for all.

2.189 Policy D8 (Public realm) of the London Plan builds on this, stating that development proposals should be based on an understanding of how the public realm in an area functions and creates a sense of place, during different times of the day and night, days of the week and times of the year. Development proposals should encourage and explore opportunities to create new public realm where appropriate and ensure the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, relates to the local and historic context, and easy to understand, service and maintain. The proposal also seeks to ensure that development proposals maximise the contribution that the public realm makes to encourage active travel.

2.190 The Local Plan Policy LP20 (New Open Space) sets out that major developments will be required to provide new public open space on site and make improvements to the public realm. These spaces should have convenient public access points are provided which are open at all times; accessible to all ages and abilities; have a design that reflects best practice in terms of environmental sustainability; adopt placemaking principles; forms an integral part of the wider scheme; and would maximise biodiversity benefits.

2.191 The Local Plan Site Allocation states that proposals should improve frontages, public realm and signage along Battersea Park Road/Nine Elms Lane. Active building frontages on to Nine Elms Lane, Sleaford Street and the entrance road into the market site should be provided.

2.192 As outlined in the Landscape Strategy, the three plots are integrated into a vibrant landscape and new public realm of the highest design quality. The Site is located within an existing community and aims to create a connective landscape by providing new routes throughout the Site connecting the Battersea Power Station Phase 4a and Thessaly Road to both Battersea Park Road and the Linear Park.. In addition, the new routes provided by the Development will provide improved connectivity between the wider housing estates to the south-east of the Site to the new health centre in Battersea Power Station Phase 4a (New Mansion Gardens), and the new school to the north-east of the Site. A Wider Connections Plan demonstrating this is set out at **Appendix 9.0**.

2.193 The Glade, a green gateway between the proposed buildings will act as a meeting point, sheltered by the building positions and the landscape treatment, and is activated by the ground floor internal and external uses. The integrated congregation spaces within the landscaping are positioned adjacent to student entrances and community facilities and places to pause, rest and socialise throughout the layout.

2.194 A range of spaces are proposed within the landscape which include, hard and soft landscaping, play space, and planting with the aim to create opportunities for the community that will inhabit them through the provision of open spaces to play, relax, study & exercise.

2.195 The Proposed Development seeks to deliver 4,442 sqm of public realm which we consider is a significant benefit of the Scheme.

2.196 The Cultural Strategy, prepared by Future City, outlines that the proposed public realm will be both a distinct asset to its residents (students and affordable housing tenants) and to its neighbouring communities passing through to access educational, recreational and employment opportunities in the local neighbourhood. It is both a space where these communities can converge but also a space that protects and nurtures residents' health and wellbeing. The public realm will be supported by a series of artwork that will be commissioned to provide an identity and character to the space and also provide socio-economic value in terms of driving footfall and increasing dwell times, promoting community cohesion and providing opportunities for lifelong learning. The artwork suggested in the Cultural Strategy could include, for example, commissions relating to seating and tables, lighting, soft landscaping and wayfinding and signage. This is secured by the landscaping related planning conditions, and the Cultural Strategy obligation within the proposed Section 106 Agreement.

2.197 In summary, it is concluded that the Proposal comply with Policy GG1 and Policy D8 of the London Plan and Policy LP20 of the Local Plan.

PRIVATE AND COMMUNAL RESIDENTIAL AMENITY SPACE

2.198 The Mayor's Housing SPG (November 2012) sets out a requirement for a minimum of 5 sqm of private outdoor space that should be provided for 1-2 person dwellings and an additional 1sqm for each additional occupant (Standard 4.10.1). This guidance is retained under **Policy D6** (Housing quality and Standards) of the London Plan.

2.199 Local Plan Policy LP27 (Housing Standards) states that residential developments and mixed-use schemes incorporating a residential element will be expected to provide an appropriate amount of communal amenity space in accordance with the London Plan standards.

2.200 In addition to this, the policy requires all new residential developments to meet all requirements for housing standards and private internal space set out in the Policy D6 of the London Plan, and provide private outside space to a minimum of 10 sqm for 1 and 2 bedroom dwellings and 15 sqm for dwellings with 3 or more bedrooms (excluding footpaths, parking areas, access ways, side, or front gardens).

2.201 For the 55 affordable residential units, 379 sqm private amenity space is provided which meets the requirements of Policy D6.

2.202 In terms of the private amenity space requirements outlined in LP27, this would equate to a total requirement of 630 sqm based in the proposed residential provision and mix; and therefore, the Proposed Development would result in a shortfall of 251 sqm. The Applicant has explored the potential to increase this, but it is not possible to provide the shortfall at roof level because of the required renewable energy provision including air source heat pumps and solar photovoltaics. Furthermore, discussions with design officers at the Council during pre-application advice outlined the desire to prioritise the public realm at ground floor level to provide a more meaningful place for both the residents of the Site and the surrounding areas. As such, the design team have developed a scheme that maximises a high-quality public realm, rather than provided an exclusive private amenity space for Plot 1 at ground floor. It is considered that this approach provides a more appropriate solution to place-making at ground floor since the future residents of Plot 1 have still access to it. Moreover, generous private balconies are provided for residents, exceeding the minimum requirements of London Plan Policy D6 by approximately 154 sqm overall – an additional 2.8 sqm per unit on average.

2.203 Therefore, although the requirements of Policy LP27 have not been met, the Scheme will offer plentiful communal amenity space within the proposed public realm which could be used by residents in addition to the balconies that are oversized against the London Plan standards. There are also other public open spaces in the area including the Power Station Park, the River Thames, the Linear Park and Battersea Park – all of which are within a maximum of 800 metres of the Site providing further opportunity for external amenity. On balance, we consider the minor conflict

with Policy LP27 is justified and outweighed in particular by Policy LP1 (The Design-led Approach) and Policy LP20 (New Open Space) of the Local Plan and Policy D8 (Public realm) of the London Plan.

2.204 Overall, it is considered that the Proposals provide an acceptable amount of private and communal amenity space, which in-turn contributes to the delivery of a high-quality scheme.

PLAY SPACE

2.205 Policy S4 (Play and Informal Recreation) of the London Plan states that development proposals for schemes that are likely to be used by children and young adults should increase opportunities for play and informal recreation and enable children and young people to be independently mobile.

2.206 The Policy further states that for residential development proposals should incorporate good-quality accessible play provision for all ages. At least 10 square metres of play space should be provided per child that provides a stimulating environment, is accessible to all safely from the street and forms an integral part of the surrounding neighbourhood. These spaces should also incorporate trees, be overlooked to enable passive surveillance, and not be segregated by tenure.

2.207 Local Plan Policy LP19 (Play Space) states that development proposals for schemes that are likely to be used by children and young people should satisfy all requirements set out in London Plan Policy S4. Where it has been clearly demonstrated that the provision of on-site play space would not be feasible or appropriate, the Council will require a financial contribution towards the provision of new facilities or the enhancement of existing facilities in the locality which have, or are capable of having, sufficient capacity to accommodate the needs of the Proposed Development.

2.208 The Landscape Strategy prepared by Planit outlines that using the GLA Play Space Calculator, there is a total requirement of 470 sqm of play space. For ages 0-4 and 5-11, 327 sqm is required to comply with GLA standards. The Proposals include the provision of 356 sqm of play space for a variety of ages from 0 to 11 years old, therefore exceeding GLA standards for these age groups. 12+ provision is to be provided off site, and is to be secured via a Section 106 Agreement contribution of £56,250 to account for the 125 sqm shortfall. This contribution has been agreed with officer to support a calisthenics station and “make space for girls” provision at Heathbrook Park.

2.209 The play space will be un-fenced and integrated sensitively into the proposed landscape, with play elements formed from natural materials such as rope, timber and rock. Play elements for both age ranges will be located close to each other, as this encourages bravery in younger children. Play elements that are accessible for all abilities will also be included.

2.210 Sensory play will also be explored through meandering discovery paths through planting. Play equipment incudes jumping discs, a climbing pyramid, a climbing frame, alongside various other structures. Benches and seating are also proposed adjacent to the playable spaces to provide surveillance resting spaces for parents and guardians.

2.211 The Landscape Strategy provides greater detail on the play space provision, which fully accords with adopted London and LBW planning policy.

TRANSPORT

2.212 Section 9 of the NPPF sets out the Government’s policies with regard to transport. Paragraph 115 sets out that development should be ensured that:

a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;
b) safe and suitable access to the site can be achieved for all users; and
c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.”

2.213 Within this context, Paragraph 117 states that applications for development should:

a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards; and
d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations."

2.214 Chapter 10 of the London Plan provides the regional guidance for transport. London Plan Policy T1 (Strategic approach to transport) states that all developments should make the most effective use of land, reflecting its connectivity by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

2.215 London Plan Policy T2 (Healthy Streets) states that proposals should reduce the dominance of vehicles on London's streets, whilst being permeable by foot and cycle and connectable to local walking a cycling network as well as public transport.

2.216 Local Plan Policy LP49 (Sustainable Transport) states that the Council will support proposals that reduce the need to travel and will work to promote safe, sustainable and accessible transport solutions for all users, which minimise the impacts of development including congestion, air pollution and carbon dioxide emissions, and maximise opportunities for health benefits and providing access for all to services, facilities and employment.

2.217 Local Plan Policy LP49 also state that Development proposals, including for a change of use, will be expected to be people focused and meet the Healthy Streets objectives which put human health and well-being at the centre of transport planning, especially by providing for active travel and multi-destination trips.

2.218 Local Plan Policy LP50 (Transport and Development) states that development that will generate a large volume of trips must:

1) have good public transport access levels (PTALs) i.e. 4 or higher; and/or
2) be in an area with sufficient public transport capacity, or be capable of supporting improvements to provide good public transport accessibility and capacity, taking account of local character and context; and
3) be safe, avoid harm to highway safety, and provide suitable access to the site which can be achieved for all people; and
4) ensure improvements can be undertaken within the transport network that cost-effectively limit the significant impacts of the development, when required. Development will normally only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

2.219 A Transport Assessment (TA) prepared by SLR outlines that the development is well placed in respect of local amenities and public transport which can be accessed via public transport modes. Accordingly, a Manual PTAL calculation which demonstrates that the site benefits from a PTAL rating of 5, which highlights the excellent accessibility credentials of the Site.

2.220 A Travel Plan (TP) has been prepared which takes into account the residential, student accommodation and commercial aspects of the Scheme. The TP outlines that a range of opportunities has been pursued in order to encourage sustainable transport modes.

2.221 Overall, the TA concludes that the development proposals have been shown to not have an adverse impact on the highways or public transport network surrounding the development. A minimal impact is forecast on pedestrian movements.

CAR PARKING

2.222 The NPPF requires Local Authorities to consider parking provision within new developments based upon the accessibility of the development and the opportunities for public transport and facilitate the provision of ultra-low emission vehicles.

2.223 London Plan Policy T6.1 (Residential Parking) states that developments should not exceed the maximum parking standards set out in Table 10.3. In line with the requirements of Table 10.3, based on the Site's location within Inner London with a PTAL of 5, developments should be car free, with the exception of disabled parking spaces. All residential car parking spaces must provide infrastructure for electric or ultra-low emission vehicles. At least 20% of spaces should have active charging facilities with passive provision for all remaining spaces.

2.224 Part G of Policy T6.1 states that disabled parking should be provided for new residential developments. Residential development proposals delivering ten or more units must as a minimum ensure that 3% of dwellings, at least one designated disabled parking bay per dwelling is available from the outset. Development proposals are further required to demonstrate how an additional 7% of dwelling could be provided with on designated disabled person's parking spaces per dwelling.

2.225 Local Plan Policy LP51 (Parking, Servicing and Car Free Development) outlines that off street residential car parking should not exceed the maximum requirements set out in the London Plan. Minimum numbers of disability-friendly car parking spaces and electric vehicle charging capacity should be provided in accordance with the London Plan. Car-free residential development will be required where the PTAL is 4 or higher and the Site is located within an Opportunity Area.

2.226 In accordance with Regional and Local Policy, the proposal is for car-free development, with the exception of 5 blue badge spaces (meeting the 3% requirement). This includes 1x space for the PBSA bedrooms, 1x space for the commercial units and 3x spaces for the affordable residential units. All spaces provide capacity for electric charging.

2.227 As such, when combined with the TP and the cycle parking provision outlined below, the Proposals promote a policy compliant move away from car travel, towards more sustainable modes of transport.

CYCLE PARKING

2.228 Paragraph 111 of the NPPF requires developments to provide for attractive and well-designed walking and cycling networks and supporting facilities such as cycle parking.

2.229 Policy T5 (Cycling) of the London Plan set out the following requirements for residential cycle parking:

LONG STAY

- 1 space per studio or 1 person 1-bedroom dwelling;
- 1.5 spaces per 2 person 1-bedroom dwelling; and
- 2 spaces per all other dwellings.

SHORT STAY

- 5 to 40 dwellings: 2 spaces; thereafter: 1 space per 40 dwellings.

2.230 For student accommodation Policy T5 states that 0.75 long-stay spaces should be provided per bedroom and 1 short-stay space provided per 40 bedrooms.

2.231 Local Plan Policy LP51 (Parking, Servicing and Car Free Development) states that cycle parking should be provided in accordance with the minimum levels set out in the London Plan with reference to Table 10.2 and any subsequent amendments. The parking must be easily accessible, secure, and well-located to the unit it is associated with.

2.232 Cycle Parking is proposed on-site for the residential, student accommodation and commercial uses in line with Policy T5, as set out in **Figure 7.3**.

Figure 7.3 Proposed Cycle Parking.

USE CLASS	LONG-STAY	SHORT-STAY
Student Accommodation	572	19
Residential (Class C3 – C4) `	104	3
Commercial (Class A1 – A5)	4	28
Total	680	50

2.233 The long-stay spaces will be provided at ground floor level as dedicated cycle stores within each of the buildings. The short-stay spaces will be located at various points within the public realm and will be placed at suitable locations in relation to entrance points and existing cycle infrastructure.

2.234 Overall, the proposed cycle parking provision is compliant with regional and local policy and should therefore be supported.

DELIVERY, SERVICING AND WASTE MANAGEMENT

2.235 Local Plan Policy LP51 (Parking, Servicing and Car Free Development) states adequate off-street servicing arrangements are made for commercial vehicles and general servicing.

2.236 A Delivery and Servicing Management Plan (DSMP) prepared by SLR sets out the strategy to manage/control deliveries and servicing movements, as well as the general operation of the Site. The Plan ensures the successful and efficient operation of servicing/delivery activity and site operation on a day-to-day basis. The majority of the Scheme (Plot 2 and Plot 3) will be managed accommodation with on-site management.

2.237 An Operational Waste Management Strategy prepared by Equilibria sets out the approach that has been taken to estimate the quantities and characteristics of the wastes that are anticipated for the operational building based on the planning application scheme design and the design principles that have been applied to identify indicative space allowances for the temporary storage and transfer of these materials pending collection. It also describes the operational principles that will be applied to encourage a more sustainable approach to the management of waste materials in line with the Government's waste hierarchy of Prevention; Re-use; Recycling and Recovery with disposal via landfill as a last resort.

2.238 Overall, the proposed development will incorporate an acceptable and appropriate strategy for managing deliveries, servicing and waste management across the Site, and accords with Policy LP51.

ENERGY AND SUSTAINABILITY

2.239 Section 14 of the NPPF relates to 'Meeting the challenges of climate change, flooding and coastal change' and states that the planning system should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience, encourage the reuse of existing resources including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

2.240 Paragraph 164 of the NPPF states that new development should be planned for in ways that can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Paragraph 162 requires new development to take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

2.241 Policy SI2 (Minimising greenhouse gas emissions) of the London Plan outlines that major developments should be net zero-carbon, which means reducing carbon dioxide emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:

1. Be lean: use less energy and manage demand during operation;
2. Be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly;
3. Be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on- site; and
4. Be seen: monitor, verify and report on energy performance.

2.242 Policy SI2 also sets out that a minimum on-site reduction of at least 35% beyond Building Regulations is required for major development. Residential development should achieve 10% though energy efficient measures whilst non-

residential should achieve 15%. Since the London Plan adoption in 2021, Part L Building Regulations have been updated, and now Part L 2021 standards, which took effect from June 2022, are to be adhered to. An on-site carbon reduction of at least 50% for domestic elements, and 35 % beyond Part L 2021 of building regulations should be achieved for non-domestic elements. Residential developments are expected to achieve on site savings beyond the minimum 35% improvements, so residential developments should aim to achieve a 50% improvement of on-site carbon reduction. That being said, the GLA within their Energy Assessment Guidance Cover Note (June 2022) outline that non-residential developments may find it more challenging to achieve significant on-site carbon reductions beyond Part L 2021 to meet both the energy efficiency target and the minimum 35% improvement.

2.243 Local Plan Policy LP10 (Responding to the Climate Crisis) outlines that all new major development should achieve zero carbon standards, as set out in the London Plan, with a minimum on-site reduction of 35%. If this cannot be fully achieved on site, as a last resort in exceptional circumstances, any shortfall must be offset through a contribution into the Council's Carbon Offset Fund. The policy also notes that changes to the Building Regulations will be kept under review and carbon reduction policy requirements may be subject to change, and that new carbon emission reduction requirements may be implemented in accordance with new evidence.

2.244 This policy also outlines that new residential development will be expected to meet the BRE Home Quality Mark or Passivhaus standards wherever practicable. New non-residential buildings over 100 sqm will be required to meet BREEAM ‘Outstanding’ standard, unless it can be demonstrated that this would not be technically feasible.

2.245 The Energy Statement prepared by Atelier Ten outlines the measures that have been incorporated in order to achieve the London Plan’s zero carbon requirements. As outlined in Policy SI 2 of the London Plan, this policy requires major development to meet a minimum of at least 35% on-site reduction in order to achieve the London Plan’s zero carbon requirements.

2.246 Since the adoption of the London Plan, the GLA published their Energy Assessment Guidance (June 2022). This guidance seeks schemes to be assessed against the 2021 Building Regulations Part L guidance, which requires domestic elements of schemes to exceed the 50% betterment, and non-domestic elements to exceed 35% betterment.

2.247 Notwithstanding compliance with Policy SI2, in awareness of this guidance, the Scheme has been assessed against the 2021 Part L baseline, where the Scheme exceeds the domestic target of 50%, achieving 73%. Against the non-domestic target, the Scheme exceeds the 35% target, achieving 36%

2.248 In summary, the Scheme complies with Policy SI2 of the London Plan, and the Scheme exceeds requirements for domestic elements and non-domestic elements against the Guidance.

2.249 To achieve this level of carbon reduction the buildings energy demands have been reduced through the implementation of energy efficiency measures such as high standards of fabric thermal performance, airtight construction, heat recovery systems and low energy lighting and controls.

2.250 To achieve the London Plan zero carbon target, a carbon off set of 1,896 Tonnes of CO2 is required, which equates to a carbon off set payment of £159,127 (based on the GLA standard carbon off-set payment of £95/ Tonne CO2).

2.251 In addition to the above, a Sustainability Statement and BREEAM & HQM Pre-assessment report sets out the sustainability strategies which relate to the following areas:

- Health & Wellbeing;
- Energy;
- Transport;
- Water;
- Materials;
- Waste;
- Land Use & Ecology; and
- Pollution.

2.252 The BREEAM pre-assessments confirm that the Proposals achieve a BREEAM outstanding rating, as required by Policy, for the student accommodation, retail units, office and community spaces against the BREEAM New Construction 2018 scheme.

2.253 For the residential units, Home Quality Mark (HQM) One Pre-Assessment has been completed voluntarily by the Applicant, which demonstrates that a HQM ONE 4- star rating is achievable with an overall targeted score of 50% (48% required for 4 stars).

2.254 In addition to this, through the application of the cooling hierarchy, all residential spaces on all plots comply with the TM59 overheating assessment under the mandatory DSY1 2020 London Heathrow weather file without the use of mechanical cooling.

2.255 Overall, the Proposals will provide a Scheme that is both energy efficient and highly sustainable, with the proposed Scheme complying with the above national, regional and local policies/objectives.

CIRCULAR ECONOMY

2.256 Policy SI7 (Reducing waste and supporting the circular economy) of the London Plan states that schemes that are preferable to the GLA should promote circular economy outcomes and aim to be net zero-waste. The Policy states that a Circular Economy Statement should be submitted which demonstrates how:

1. How all materials arising from demolition and remediation works will be re-used and/or recycled;
2. How the proposals design and construction will reduce material demands and enable building materials, components and products to be dissembled and re-used at the end of their usual life;
3. Opportunities for managing as much waste as possible on site;
4. Adequate and easily accessible storage space and collection systems to support recycling and re-use;
5. How much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy; and
6. How performance will be monitored and reported.

2.257 Local Plan Policy LP13 (Circular Economy, Recycling and Waste Management) outlines that Circular Economy Statements will be required for all referable applications which set out how the Proposed Development promotes circular economy outcomes and the aim for net zero waste. Likewise, developers will be expected to reuse, recycle, or recover 95% of construction and demolition waste and find beneficial uses for 95% of excavation waste.

2.258 A Circular Economy Statement has been prepared by ADW Developments based on the requirements of Policy SI7. The statement covers the following aims:

- Identifies potential strategies and approaches that enable the Scheme to be 'circular';
- Presents quantitative targets for material use, waste management, reuse and recycling to facilitate evidence-based performance; and
- Identifies opportunities for the application of circular economy principles through the whole life cycle promoting whole-life efficiencies in the Scheme.

2.259 The key circular economy commitments, targets and opportunities for this Scheme are policy compliant, as outlined below:

- To divert 95% of non-hazardous demolition waste from landfill, with retention onsite where possible and reuse;
- To divert 95% of non-hazardous excavation waste from landfill, with retention onsite where possible;
- To divert 95% of construction (new build) waste from landfill with an emphasis on reuse and high value recycling where possible;
- Proportion of materials with a reused or recycled content to be at least 20%;
- Other materials to be responsibly sourced as per the Sustainable Procurement Policy; and
- To maximise the recycling of operational waste from the student accommodation and commercial spaces.

2.260 Overall, it is considered that the Scheme complies with Policy SI7 of the London Plan and Policy LP13 of the Local Plan.

WHOLE LIFE CARBON

2.261 London Plan Policy SI2 (Minimising Greenhouse Gas Emissions) outlines that development proposals referable to the Mayor should calculate whole lifecycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.

2.262 Local Plan Policy LP10 (Responding to the Climate Crisis) states that all major developments should submit a Whole Life Carbon Assessment.

2.263 In accordance with the above Policy, ADW Developments have prepared a Whole Life Carbon Assessment for both the residential and student parts of the Scheme. The assessments consider the following building elements:

- Substructure;
- Superstructure: Frame, Upper Floors, Roofs, Stairs and Ramps, External Walls, External Doors & Windows;
- Finishes;
- Fittings, furnishings & equipment;
- Services (MEP); and
- External Works.

2.264 Overall, the reports outline that in accordance with policy, appropriate action has been taken to reduce life-cycle carbon emissions.

HEALTH IMPACT ASSESSMENT

2.265 London Plan Policy GG3 (Creating a Healthy City) states that development must:

A. ensure that the wider determinants of health are addressed in an integrated and co-ordinated way, taking a systematic approach to improving the mental and physical health of all Londoners and reducing health inequalities;
B. promote more active and healthy lives for all Londoners and enable them to make healthy choices;
C. use the Healthy Streets Approach to prioritise health in all planning decisions;
D. assess the potential impacts of development proposals and Development Plans on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help reduce health inequalities, for example through the use of Health Impact Assessments;
E. plan for appropriate health and care infrastructure to address the needs of London's changing and growing population;
F. seek to improve London's air quality, reduce public exposure to poor air quality and minimise inequalities in levels of exposure to air pollution;
G. plan for improved access to and quality of green spaces, the provision of new green infrastructure, and spaces for play, recreation and sports;
H. ensure that new buildings are well-insulated and sufficiently ventilated to avoid the health problems associated with damp, heat and cold; and
I. seek to create a healthy food environment, increasing the availability of healthy food and restricting unhealthy options.

2.266 Local Plan Policy LP15 (Health and Wellbeing) states that planning applications will be required to demonstrate that any potential negative health and well-being impacts have been addressed and health benefits have been maximised through the submission of a Health Impact Assessment for all development proposals which include 50 or more residential units.

2.267 A Health Impact Assessment has been prepared by Montagu Evans and is submitted as part of this Application. The Assessment concludes that the health impacts identified through this Rapid HIA are overwhelmingly positive. The Proposed Development is expected to make a positive impact on public health within the local area. A such it accords with the aforementioned planning policy.

AIR QUALITY

2.268 Paragraph 199 of the NPPF supports opportunities to improve air quality or mitigate impacts where necessary.

2.269 London Plan Policy SI 1 (Improving air quality) states that development proposals should not lead to further deterioration of existing poor air quality, create any new areas that exceed air quality limits or delay the date at which compliance will be achieved or create unacceptable high levels of exposure to poor air quality. In order to achieve this, the Mayor will require development proposals to be at least Air Quality Neutral and be designed to prevent and minimise increasing exposure. Major development proposals will be required to be submitted with an Air Quality Assessment to show how the proposal accords with the requirements set out above.

2.270 Local Plan Policy LP14 (Air Quality, Pollution and Managing Impacts of Development) states that the Council will support developments which incorporate 'air quality positive' design and the use of new technologies. Development proposals must be at least 'Air Quality Neutral', and should not contribute to worsening of air quality during the construction or operation stage, in accordance with Policy SI1 of the London Plan. In order to assess the appropriateness of introducing new developments in areas already subject to poor air quality, the following will be required:

1) An air quality impact assessment, supported by modelled data, where necessary;
2) Mitigation measures which are demonstrated to be effective in reducing the development's impact on air quality, including the type of equipment to be installed, the provision of thermal insulation and ducting abatement technology;
3) Measures and appropriate design solutions which would protect the occupiers and users of new developments, and in particular vulnerable people, including children and the elderly, from existing sources; and
4) The provision of demonstrably effective mitigation measures for developments intended to accommodate sensitive receptors or close to sites used by sensitive receptors such as schools, hospitals, and care homes where these are located in areas of existing poor air quality.

2.271 An Air Quality Assessment has been undertaken by Redmore Environmental Ltd. The Assessment concludes that during the construction phase of the development there is the potential for air quality impacts as a result of fugitive dust emissions from the Site. However, assuming good practice dust control measures are implemented, the residual significance of potential air quality impacts from dust generated by demolition, earthworks, construction and track out activities are predicted to be not significant. It is anticipated that this will be controlled by an appropriately worded planning condition.

2.272 The assessment also concludes that during the operational phase of the Proposed Development, the air quality impacts from elevated pollution levels on future occupations are predicted to be not significant and suitable for the proposed end-use.

2.273 In addition to the above, potential emissions from the Proposals were assessed in order to determine compliance with the air quality neutral requirements of the London Plan. The building energy strategy does not produce emissions to atmosphere. Additionally, the Scheme is classified as 'car- free'. As such, the development is considered to be air quality neutral.

2.274 Overall, the Assessment confirms that the proposal accords with planning policy in relation to air quality.

NOISE AND VIBRATION

2.275 Paragraph 198 of the NPPF requires developments to mitigate and reduce to a minimum the potential adverse impacts resulting from noise from new development and avoid noise giving rise to significant adverse impacts on healthy and the quality of life.

2.276 London Plan Policy D14 (Noise) of the London Plan states that in order to reduce, manage and mitigate noise to improve health and quality of life, residential and non-aviation development proposals should manage noise by avoiding significant adverse impacts on healthy and quality of life, reflect the Agent of Change principle, mitigation and minimise the existing and potential adverse impacts of noise and improve and enhance acoustic environments.

2.277 Local Plan Policy LP14 (Air Quality, Pollution and Managing Impacts of Development) states the Council will require the reduction, management, and / or mitigation of noise and vibration that would arise as a result of development to ensure that the health and quality of life of existing and future residents, especially within noise sensitive buildings, is protected. Development proposals should have regard to the Policy D14 of the London Plan, and the following will be required to be demonstrated as part of a noise assessment:

1) *"The impact of any new plant and equipment upon both receptors and general background noise levels;*
2) *The provision of effective mitigation measures where noise resulting from a development needs to be controlled and managed, including through the promotion of good acoustic and site design and use of new technologies;*
3) *Time limits and restrictions for activities where noise cannot be sufficiently mitigated, including through the use of planning conditions; and*
4) *Measures to protect the occupiers of new developments from existing sources, without harming the successful continued operation of existing uses in line with the Agent of Change principle set out in the London Plan Policy D13."*

2.278 An Environmental Noise & Vibration Assessment has been prepared by PDA. This explains that, calculations have been undertaken for the Bedrooms and Living Spaces to evaluate the internal noise levels. Recommendations are given for glazing, ventilation and building façade elements to meet the internal noise level requirements of the relevant technical guidance. The calculations establish that the relevant noise level criteria can be achieved within the proposed accommodation. It is anticipated that noise mitigation could be secured by the relevant draft planning condition.

2.279 In addition, a vibration survey has been undertaken running concurrently with the noise measurements. The measured and predicted vibration levels are well below the 'Low probability of adverse comment' criterion of BS 6472 for both day and night-time periods and, as such, adverse impact is not expected. This demonstrates that the vibration levels are compliant with the aforementioned policy.

ARBORICULTURE

2.280 London Plan Policy G7 (Trees and Woodlands) outlines that development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

2.281 Local Plan Policy LP56 (Tree Management and Landscaping) states that the Council will require the retention and protection of existing trees and landscape features, including veteran trees. Where appropriate, planning applications must be supported by sufficient evidence to demonstrate that provision has been made for the incorporation of new trees, shrubs and other vegetation of landscape significance that complement existing, or create new, high-quality green areas, which deliver amenity, environmental, and biodiversity benefits.

2.282 Policy LP56 resists development that would result in the damage or loss of trees, including veteran trees and trees considered to be of townscape or amenity value, unless the tree is dead, dying or dangerous; or the tree is causing significant damage to adjacent structures; or the tree has little or no amenity value and it is not possible to retain the tree as part of the development; or felling is for reasons of good arboricultural practice.

2.283 Likewise, consent for works to protected trees (Tree Preservation Orders and trees in Conservation Areas) will only be granted where;

a) proposed works of pruning are in accordance with good arboricultural practice, or
b) proposals for felling are properly justified through a detailed arboricultural and/or structural engineer's report; and c. adequate replacement planting is proposed.

2.284 A **Tree Survey** (TS) and **Arboricultural Method Statement** (AMS) identifies that there are currently six trees located on Site. The AMS describes the extent and effect of the proposed developed on individual trees and groups of trees within and adjacent to the Site.

2.285 It should be noted that the Extant Permission obtained approval for the removal of five trees, and accepted that replacement planting would provide sufficient mitigation for this impact.

2.286 This proposal, on the other hand, retains the existing 6 trees on the Site, which run alongside Battersea Park Road, which improves upon the Extant Permission. In addition to this, the proposals include the planting of 73 new trees, with 13 of these on the upper terraces. As such, it is compliant with Policy G7 of the London Plan and Policy LP56 of the Local Plan

ECOLOGY AND BIODIVERSITY

2.287 The NPPF promotes biodiversity in recognition of its role in supporting the natural and local environment, under Paragraph 187, by requiring planning policies to protect sites of biodiversity value and provide net gain for biodiversity.

2.288 London Plan Policy G6 (Biodiversity and access to nature) states that development proposals should mitigate impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.

2.289 Local Plan Policy LP55 (Biodiversity) states that development proposals will be required to protect and enhance biodiversity, through:

1) *"ensuring that it would not have an adverse effect on the borough's designated sites of habitat and species of importance, as well as other existing species, wildlife, habitats and features of biodiversity value;*
2) *The incorporation and creation of new habitats or biodiversity features on development sites including through the design of buildings and use of Sustainable Drainage Systems where appropriate. Developments will be required to deliver a net gain in biodiversity, through the incorporation of ecological enhancements;*
3) *ensuring that new biodiversity features or habitats connect to the existing ecological and green and blue infrastructure networks and complement surrounding habitats;*
4) *enhancing wildlife corridors for the movement of species, including river, road and rail corridors, where opportunities arise; and*
5) *maximising the provision of ecologically functional habitats within soft landscaping"*

2.290 This policy also outlines that all development should utilise opportunities to attract new species to a site. This can include the incorporation of artificial nest boxes and bricks in buildings to provide nesting and roosting opportunities for birds, including species under threat such as swifts, house martins, swallows and house sparrows, and where appropriate, bats. Swift bricks integrated into new buildings are preferred, as these are suitable for multiple bird species. As outlined in the National Planning Practice Guidance, these relatively small features can achieve important benefits for wildlife. Applicants will be expected to provide details of such features as part of planning applications.

2.291 An Ecological Impact Assessment has been prepared by Greengage and is submitted as part of this Application. The Assessment confirms that the Site possesses low potential for nesting birds, and negligible potential for all other notable and / or protected species. Impacts on nesting birds are not anticipated due to the retention of the potentially suitable habitat (existing trees). Key enhancement recommendations include green roofs, ecological piles, new trees, wildlife friendly planting, vertical greening, insect hotels, and bird bat and bee boxes/bricks. These have all been incorporated into the landscaping strategy and can be secured through an Ecological Management Plan condition. In addition to this, potential impacts on nearby non-statutory designated sites could be mitigated through the protection of a Conservation Ecological Management Plan.

2.292 In addition, a Biodiversity Net Gain Assessment has been undertaken by Greengage which demonstrates that the Proposals result in a net gain of 147.56% as a result of the proposed mitigation measures. As such, it is evident that the Proposals accord with Policy G6 of the London Plan and Policy LP55 of the Local Plan.

URBAN GREENING

2.293 Policy G5 (Urban greening) of the London Plan sets out that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. A target Urban Greening Factor (UGF) of 0.4 for developments that are predominately residential.

2.294 Local Plan Policy LP57 (Urban Greening Factor) states that all development proposals should contribute to the greening of Wandsworth borough by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

2.295 Development proposals will be required to:

1) follow the guidance on the Urban Greening Factor (UGF) in the London Plan for calculating the minimum amount of urban greening required as well as for the thresholds different types of development will be required to meet;
2) incorporate as much soft landscaping and permeable surfaces as possible; and
3) take into consideration the vulnerability and importance of local ecological resources (such as water quality and biodiversity) when applying the principles of the UGF.

2.296 In exceptional circumstances, if it can be clearly demonstrated that meeting the thresholds would not be feasible, a financial contribution may be acceptable to provide for the improvement of biodiversity and green and blue infrastructure assets within the locality.

2.297 The Landscape Strategy outlines that the Proposals achieve an UGF of 0.4, meeting the London Plan policy target under Policy G5. The Scheme design has maximised urban greening across the Site and off-site contributions, such as the installation of the New Covent Market Access Road trees, would provide additional greening.

2.298 The Scheme makes significant landscaping improvements over the Extant Permission and has achieved this whilst meeting other planning objectives such as renewable energy on building roofs and making the public realm permeable with connections throughout the Site.

FLOOD RISK AND DRAINAGE

2.299 Paragraph 181 of the NPPF outlines that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Part c of Paragraph 167 requires development to demonstrate that they incorporate sustainable drainage systems, unless there is clear evidence that this would be inappropriate.

2.300 Policy I13 (Sustainable drainage) of the London Plan outlines that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features, in line with the following drainage hierarchy:

1. rainwater use as a resource (for example rainwater harvesting, blue roofs for irrigation);
2. rainwater infiltration to ground at or close to source;
3. rainwater attenuation in green infrastructure features for gradual release (for example green roofs, rain gardens);
4. rainwater discharge direct to a watercourse (unless not appropriate);
5. controlled rainwater discharge to a surface water sewer or drain; and
6. Controlled rainwater discharge to a combined sewer.

2.301 Policy SI13 goes on to state that drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation.

2.302 Local Plan Policy LP12 (Water and Flooding) states that all planning applications will need to clearly demonstrate that the proposals avoid, or reduce contributing to all sources of flooding, including fluvial, tidal, surface water, groundwater, flooding from sewers, take account of climate change (including predicted future changes), and would not increase flood risk elsewhere. Future development in Zone 3a will only be considered if the 'Sequential Test' has been applied and the Exceptions Test passed in accordance with national planning policy and guidance. The Sequential Test is considered to have been passed if the Site meets a range of criteria, including if the application site is a Local Plan Site Allocation, unless the proposed use is not in accordance with the allocations of the Local Plan.

2.303 This policy also outlines that the Council will require the use of Sustainable Drainage Systems (SuDS) in all development proposals. Applicants will have to demonstrate that surface water will be drained to ground water courses or a surface water sewer and not to the foul water sewer.

2.304 Since the Site has a Local Plan Site Allocation, it passes the sequential test and as demonstrated in the Flood Risk Assessment has been prepared by Apex Consulting Engineers, the Proposals also pass the exception test. As such, it considered that development is acceptable in-principle.

2.305 The FRA identifies that the site lies within Flood Zone 3. That being said, the FRA concludes that the Proposed Development would be expected to remain dry in all but the most extreme conditions. Providing the recommendations made in the FRA are instigated, flood risk from all sources would be minimised, the consequences of flooding are acceptable and the development would be in accordance with the requirements of the NPPF.

2.306 Likewise, the FRA demonstrates that the Proposed Development would be operated with minimal risk from flooding, would not increase flood risk elsewhere and is compliant with the requirements of the NPPF. The development should not therefore be precluded on the grounds of flood risk.

2.307 In addition, Apex Consulting Engineers have prepared a Drainage Strategy which determines the means of collection and discharge of the foul and surface water from the Proposed Development and to ensure the volume of surface water runoff from the development is reduced, therefore, reducing flood risk elsewhere.

2.308 The Drainage Strategy outlines that the development will use SuDS attenuation techniques where possible including permeable paving, green roofs and tree pits. In summary, subject to the implementation of the Drainage Strategy, the development may be occupied safely and adequately drained while reducing flood risk overall.

2.309 Therefore, the Proposals accord with planning policy in relation to flooding and drainage, namely Policy SI13 of the London Plan and Policy LP12 (Water and Flooding) of the Local Plan.

ARCHAEOLOGY

2.310 Chapter 16 of the NPPF relates to the conserving and enhancing the historic environment and identifies heritage assets as an irreplaceable resource and that they should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

2.311 Policy HC1 (Heritage Conservation and growth) of the London Plan, as set out above, requires development proposals affecting heritage assets and their settings to conserve their significance.

2.312 Local Plan Policy LP3 (Historic Environment) states that proposals for development involving ground disturbance in Archaeological Priority Areas (as identified on the Policies Map), or heritage assets of archaeological interest will need to be supported by a desk based archaeological assessment and may also require appropriately supervised field evaluation.

2.313 An Archaeological Desk Based Assessment has been prepared by RPS and confirms that the information presented could now be the limit of the LPA’s archaeological planning requirements for the Site and no further work would be required.

2.314 As such, it is considered that the Proposals accord with Polich HC1 of the London Plan and Policy LP3 of the Local Plan.

CONTAMINATION

2.315 Paragraph 198 of the NPPF requires planning policies and decisions to ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination.

2.316 London Plan Policy E7 (Industrial intensification, co-location and substitution) states that appropriate mitigation should be made where potential contamination is present.

2.317 Local Plan Policy LP14 (Air Quality, Pollution and Managing Impacts of Development) states that where development is proposed on contaminated or potentially contaminated land, a desk study and site investigation in line with the most up-to-date guidance will be required. Proposals for the remediation of any contamination identified will need to be agreed with the Council before development proceeds.

2.318 A Preliminary Ground Investigation Report makes a series of recommendations following the findings of the preliminary site investigation, which ensure that the Proposals would be compliant with the above policies and be acceptable from a contamination perspective. These recommendations are secured via a proposed planning condition.

FIRE SAFETY

2.319 Policy D12 (Fire Safety) of the London Plan requires developments to achieve the highest standards of fire safety. All major development proposals are required to be submitted with a Fire Statement, which is an independent fire strategy produce by a third party suitably qualified assessor. The statement should detail how the development proposal will function in terms of the building's construction methods, products and materials, means of escape for all building users, features which reduce the risk to life, access for fire service personnel, provision within the curtilage of the Site to enable fire appliance to gain access to the building and ensuring that any potential future modifications to the building will take into account.

2.320 Local Plan Policy LP27 (Housing Standards) states that all new residential development should achieve the highest standards of fire safety, having regard to the requirements of Policy D12 of the London Plan.

2.321 It should be noted that the Proposed Development incorporates two stair cores in response to the proposed Building Regulations changes, using guidance in the draft BS9991 to reflect anticipated changes to guidance in relation to stair cores, evacuation lifts and smoke control in tall buildings. These changes in regulations were announced in Government statements confirming that two stair cores are required for all buildings above 18 metres in height. This is to create more resilience to support evacuation and firefighting operations in the case of the fire.

2.322 A Fire Strategy has been prepared by Atelier Ten and sets out a strategy that has been prepared in accordance with Policy D12.

SUMMARY OF TECHNICAL CONSIDERATIONS

2.323 Overall, in addition to the land use principles being acceptable, it is considered that the Development will result in a high-quality living environment for both future occupiers and visitors of the Site. In particular, the Development would provide:

- Buildings of high-quality design and architecture that make a positive contribution to local townscape;
- Buildings that have no harmful impact on local heritage assets;
- A development that makes best use of accessible previously developed land;
- Play space provision that exceeds the anticipated age 0-11 child yield for the Site, and provides a financial contribution of £56,250 to off-site age 12+ play space directed towards a calisthenics station and "make space for girls" provision at Heathbrook Park;
- High quality accommodation with 80% dual aspect units and appropriate levels of daylight;
- 4,442 sqm of new public realm and new public access through the Site to enhance wider pedestrian permeability;
- A public realm underpinned by a cultural strategy that will provide opportunities for artists and community groups;

- A significant reduction in vehicle movements to and from the Site as a result of the development and a commitment to sustainable transport measure through car-free development (with exception of disabled spaces), cycle provision and commitment to a Travel Plan;
- An energy efficient development powered by renewable energy with carbon reduction in excess of minimum policy requirements.
- BREEAM “outstanding” targeted for the commercial units and the PBSA;
- Homes Quality Mark 4-star rating targeted for the Class C3 residential;
- An air quality neutral operational development;
- Provision of 73 trees – an uplift of 67;
- Biodiversity Net Gain of 147.56%; and
- An Urban Greening Factor of 0.4, meeting policy standards.

3.0 DEVELOPMENT PLAN COMPLIANCE AND MATERIAL CONSIDERATIONS

COMPLIANCE WITH THE DEVELOPMENT PLAN

3.1 In accordance with Section 38 (6) of the Planning and Compulsory Purchase Act, an assessment must be made to whether the Proposed Development is compliant with the development plan when read as a whole.

3.2 Based on the assessment undertaken within this Statement and the conclusions drawn from the other technical documents, when considered against the statutory development plan, the Statement finds much direct support. Indeed, the Development delivers a mix of uses consistent with the Site's adopted Site Allocation and complies with the key design principles within the allocation. It also makes best use of previously developed land, will address a significant need for PBSA and conventional affordable housing, deliver new employment opportunities, provide premises for local community groups, make a positive improvement to local townscape, and bring public realm and place-making benefits. From an environmental perspective, the Application will deliver a biodiversity net gain significantly in excess of policy, as well as compliance with policies relating to carbon reduction, urban greening, circular economy and drainage. Overall, compliance is therefore found with those policies most important for determining the Application, including:

- London Plan Policy D6 (High quality and standards);
- London Plan Policy D9 (Tall Buildings);
- London Plan Policy GG2 (Making the Best Use of Land);
- London Plan Policy G5 (Urban greening);
- London Plan Policy H1 (Increasing Housing Supply);
- London Plan Policy H4 (Delivering Affordable Housing);
- London Plan Policy H6 (Affordable Housing Tenure);
- London Plan Policy H15 (Purpose Built Student Accommodation);
- London Plan Policy I13 (Sustainable drainage);
- London Plan Policy SI2 (Minimising greenhouse gas emissions);
- Local Plan Site Allocation ref. NE2;
- Local Plan Policy PM3 (Nine Elms);
- Local Plan Policy LP4 (Tall and Mid-Rise Buildings);
- Local Plan Policy LP10 (Responding to the Climate Crisis);
- Local Plan Policy LP12 (Water and Flooding);
- Local Plan Policy LP23 (Affordable Housing);
- Local Plan Policy LP27 (Housing Standards);
- Local Plan Policy LP28 (Purpose Built Student Accommodation); and
- Local Plan Policy LP57 (Urban Greening Factor).

3.3 There are some aspects of the proposed development which are not in strict accordance with some aspects of development plan policy. Where this is the case, the Proposed Development's approach has been justified and the extent that any harm arising from the conflict is limited, particularly when weighed in the context of the support of other development plan policies. In particular:

- Part 4 of Policy H15 (PBSA) of the London Plan: the Application proposes 25% affordable student accommodation rather than 35% affordable student housing and the under provision has not been justified by a viability assessment. This shortfall in affordable student accommodation, however, is mitigated by the provision of conventional affordable housing and which provides the outstanding balance to ensure that the Development provides 39.55% affordable housing overall and is compliant with fast-track policy target set out in the London Plan; and
- Policy LP27 (Housing Standards) of the Local Plan): The quantum of private amenity space for Building 1 falls short of the policy by 251sqm. This is mitigated by the quantum of communal amenity space within the proposed public realm which could be used by residents in addition to the generously sized residential balconies that exceed the minimum requirements of the London Plan. Furthermore, there is access to other areas of open space within a maximum of 800 metres of the Site including the Power Station Park, the River

Thames, the Linear Park and Battersea Park that provide alternative external amenity for residents. The under-provision is also outweighed by Policy LP1 (The Design-led Approach) and Policy LP20 (New Open Space) of the Local Plan and Policy D8 (Public realm) of the London Plan which promote good design, place-making and an integrated approach to landscape design. It is also material to note that the quantum of private amenity space is still compliant with Policy D6 (Housing Quality and Standards) of the London Plan.

3.4 The weight attached to these two conflicts when accounting for the mitigating factors is limited. Therefore, when considered in the context of the other Development Plan polices, not least the Site Allocation, the need to deliver affordable housing, and the need to optimise accessible brownfield sites within the VNEB Opportunity Area, it is considered that the Proposed Development is compliant with the Development Plan when read as a whole.

THE PLANNING BALANCE

3.5 Irrespective of the assessment of the Proposed Development against the development plan, there is also a need to identify any material considerations that could weigh in favour or against the Development in case such material considerations indicate a different outcome to the assessment against the development plan.

3.6 Notwithstanding that it is considered that the daylight impacts of the Development on surrounding development are acceptable overall on the basis of the Site's location within a high density Opportunity Area and is therefore compliant with the development plan, there are some existing residential habitable rooms at Viridian Apartments and New Mansion Square in particular that will see a noticeable reduction in daylight levels as a result of the Proposed Development and there will be some harm arising. Whilst it is considered that this is acceptable in policy terms, it is considered appropriate to attribute **limited adverse weight** to this harm.

3.7 Harm also arises from the shortfall in affordable student housing against Policy H15 of the London Plan and whilst this is at the expense of providing conventional affordable housing which is of greater priority in the Borough, **limited adverse weight** is attributed to this harm.

3.8 No adverse weight is given to the shortfall in private amenity space against Policy LP27 of the Local Plan because it is still compliant with the London Plan policy and is mitigated by the quantum of communal amenity space within the proposed public realm and the generously sized residential balconies that exceed the minimum requirements of the London Plan. Further, there is access to other areas of public open space and external amenity in the area including the Power Station Park, the River Thames, the Linear Park and Battersea Park – all of which are within a maximum of 800 metres of the Site.

3.9 Ultimately in the context of Paragraph 125 of the NPPF which states that applications for the reuse of brownfield land for housing should be approved unless substantial harm would be caused, the negative impacts of the Development would certainly not arise to substantial harm.

3.10 In contrast, there are a number of material considerations that weight in favour of the Development as follows:

- The making best use of suitable allocated brownfield land for new homes in accordance with a site allocation - **substantial weight**;
- The delivery of 55 affordable homes in a borough that has a proven track record of under-delivery against its affordable housing policy target and is unable to demonstrate through its latest housing land capacity assessment that it can come close to achieving its affordable housing target of 677 homes per year (50% of the annual target of 1,354 homes) in the immediate future – **substantial weight**;
- The delivery of 502 homes (equivalent) contributing significantly to LBW's housing annual target of 1,354 homes per year and its local housing need of 4,383 dwellings per annum. – **substantial weight**;
- The delivery of 762 student bedrooms contributing urgent supply to the existing student to bed ratio shortfall of 3.64 students to 1 bed within commutable distance of the Site – **substantial weight**;
- A new public realm providing 4,442 sqm of high quality public realm for use by new residents and the existing community, including the provision of play space in excess of policy standards for ages 0-11 – **significant weight**;
- A BNG uplift of 147% and the replanting of 73 new trees (with no existing loss) – **significant weight**;

- Economic benefits including the creation of 280 full time construction jobs, including 7-10 apprenticeships and the creation of up to 31 jobs once the Development is operational, as well as local business spending by new residents on retail, leisure and F&B expenditure – **moderate weight**;
- The provision of ground floor commercial and community uses on the ground floor of the Development providing local amenities to future and neighbouring residents, creation of jobs and active frontage – **moderate weight**;
- The provision of an affordable commercial and community use on the ground floor of Plot 1 that will be available at a peppercorn rent to provide opportunities for start-ups and local community groups – **moderate weight**; and
- The Proposed Development will result in a demonstrable improvement to the existing appearance of the Site and function of the local townscape and have no impact upon the setting or significance of heritage assets nearby – **moderate weight**.

3.11 It is therefore our strong view that there are many tangible material considerations of ranging weights, that weigh heavily in favour of a positive determination.

3.12 In conclusion, the Development is compliant with the development plan when read as a whole. There are also material considerations that further weigh in favour of the Development such that planning permission should be granted when considered in the context of Section 38 (6) of the Planning and Compulsory Purchase Act.

4.0 THIRD PARTY COMMENTS

4.1 The Appellant is aware of a number of third-party comments that were made during the Application. This includes objections raised by the Battersea Society and the general public. These are summarised below:

BATTERSEA SOCIETY

4.2 In their letter dated 7 July 2022 in response to the Application as submitted in April 2022, the key themes of the Battersea Society's objection were as follows:

- Lack of clarity of how proposals would sit alongside surrounding context;
- Traffic concerns along New Covent Market access road;
- Concerns over play space positioning;
- Lack of detail on commercial units;
- Concerns that increase in students will result in loss of independent outlets around Battersea Park Station and replaced with fast food chains;
- Dispute principle of student accomodation and affordable housing blended calculation approach;
- Object to the removal of trees and request improvements to Urban Greening Factor and Biodiversity Net Gain scores;
- Seeks BREEAM Outstanding for entire scheme; and
- Seeks improvements to Daylight and Sunlight assessment method used.

4.3 The Battersea Society issued another letter on 6 June 2024 in response to the re-consultation of the Application following the April 2024 amendments. The key themes of the objection were as follows:

- Overdevelopment of site;
- Unfavourable to student accomodation;
- Concerns over daylight sunlight assessment approach;
- Concerns over existing student accomodation review;
- Seek BREEAM Outstanding for entire scheme;
- Concerns over delivery approach and vehicle turning space; and
- Concerns over design.

4.4 The Appellant offered meetings to discuss the Proposals and the comments received, however, the Society was unwilling to discuss. The Appellant issued a response to the Battersea Society on 15 July 2024 (**Appendix 10.0**) which we consider addresses all of their concerns.

SOCIAL JUSTICE BATTERSEA

4.5 An objection letter and associated appendices was uploaded onto the Council's website on 22 July 2024. The key themes of the objection were as follows:

- That the student community would disrupt community cohesion;
- Increased unemployment;
- A rise in crime;
- Strain on social care services;
- Environmental impact;
- Overprovision of students in the area; and
- Building heights to tall.

GENERAL PUBLIC

4.6 According to the LBW website, 274 letters of objection have been uploaded. However, this is across the three consultations that have been undertaken on the Application with some households objecting each time. Indeed, the 274 letters of objection can be disseminated into approximately 95 individual households. The key themes of objection arising from the public are as follows:

- Height and density;
- Noise and unsocial behaviour from students;
- Insufficient parking provision;
- Daylight, sunlight and overshadowing impacts to neighbouring properties;
- Lack of public open amenity space;
- Concerns over access and servicing arrangements and associated congestion;
- Pollution and environmental impacts;
- Flood risk;
- Lack of evidence of job creation;
- Impact on local infrastructure; and
- Quality of public consultation.

4.7 In addition to objections from approximately 95 households, there were 53 households writing in support of the Application. The key themes were as follows:

- Need for affordable housing;
- Creation of new employment opportunities;
- Redevelopment of a site that is currently unattractive;
- The delivery of PBSA will free up housing elsewhere in the locality;
- Delivery of high quality public realm; and
- Provision of community space.

4.8 The Appellant has considered the third-party comments to the Application and those that are material to the determination of the Application are addressed in this Statement and SOCG.

4.9 The Appellant reserves the right to produce additional evidence should matters be raised by third-party objectors post submission of the appeal.

5.0 CONCLUDING REMARKS

5.1 The Appeal submitted on behalf of the Appellant proposes the redevelopment of the Site within the London Borough of Wandsworth to provide:

- Purpose Built Student Accommodation and ancillary space (Sui Generis) - 762 student bedrooms of which 198 are affordable;
- Residential Dwellinghouses (Class C3) - 55 affordable dwellings, of which 27 are Low-Cost Rent (Social Rent) and 28 are Intermediate (London Living Rent);
- 495 sqm (GIA) of flexible commercial and community floor space: Unit 1 comprising 91 sqm of Class E use; Unit 2 comprising 187 sqm of flexible Class E/Class F use; Unit 3 comprising 91sqm of Class E use; and Unit 4 comprising 97 sqm of flexible Class E/Class F use;
- 3 buildings ranging in height from 12 to 22 storeys;
- Car free development, except for 5 wheelchair accessible car parking spaces;
- 680 long-stay cycle parking spaces and 50 short stay cycle spaces;
- 4,442 sqm of public realm, including 356 sqm of play space;
- 379 sqm private amenity space associated with the Class C3 residential use in the form of balconies;
- 1,434 sqm internal and 665 sqm external communal amenity space associated with the PBSA;
- New landscaping and planting of 73 new trees; and
- New vehicular servicing route between Sleaford Street and New Covent Garden Access Road.

5.2 The formal description of development is as follows:

"Application for Phased Full Planning Permission for: Demolition of the existing building and construction of three new buildings, together comprising Residential (Use Class C3) and Student Accommodation (Sui Generis) along with Commercial, Business and Service (Use Class E) and/or Local Community and Learning (Class F) floorspace. Associated works include hard and soft landscaping, car parking and new vehicular access / servicing, and other ancillary works."

5.3 The Statement has provided an assessment of the Proposals against the Statutory Development Plan, as required by Section 38(6) of the Planning and Compulsory Purchase Act 2004.

5.4 The Proposals have been formulated in accordance with the adopted London Plan (2021) and the Wandsworth Local Plan (2023). The Proposals have also considered any other material considerations identified in this Statement.

5.5 The assessment undertaken in this Statement confirms that when read against Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Paragraph 11 (c) of the NPPF, the Proposed Development accords with the Development Plan when read as a whole and should therefore be granted planning permission.

5.6 It is also strongly contended that the Proposals give rise to significant material planning benefits which weigh heavily in favour of the Scheme to the extent that the planning balance would clearly rest in favour of approval.

APPENDIX 1.0

CORRESPONDENCE REGARDING APPLICATION DETERMINATION DATE

Sam Stackhouse

Subject: FW: Battersea Park Road - 2022/1835

From: Mark Hunter <Mark.Hunter@richmondandwandsworth.gov.uk>
Sent: 06 September 2024 16:52
To: Sam Stackhouse <sam.stackhouse@montagu-evans.co.uk>
Cc: Janet Ferguson <Janet.Ferguson@richmondandwandsworth.gov.uk>; James Ainsworth <james.ainsworth@montagu-evans.co.uk>; Ben Wrighton <Ben.Wrighton@watkinjones.com>; Zelie Batchelor <zelie.batchelor@montagu-evans.co.uk>
Subject: RE: Battersea Park Road - 2022/1835

Official

Sam,
That looks reasonable, hopefully we won't get any more events, but will do what we can, and October PAC is our aim.
Mark

Mark Hunter
Head of Strategic Development
07866 031673

From: Sam Stackhouse <sam.stackhouse@montagu-evans.co.uk>
Sent: Thursday, September 5, 2024 4:55 PM
To: Mark Hunter <Mark.Hunter@richmondandwandsworth.gov.uk>
Cc: Janet Ferguson <Janet.Ferguson@richmondandwandsworth.gov.uk>; James Ainsworth <james.ainsworth@montagu-evans.co.uk>; Ben Wrighton <Ben.Wrighton@watkinjones.com>; Zelie Batchelor <zelie.batchelor@montagu-evans.co.uk>
Subject: RE: Battersea Park Road - 2022/1835

Official

Mark

I hope you are having some better luck on the recruitment front.

I've caught up with Ben and I am aware that we are now focussing on an October committee. With this in mind, we have put together a mini-programme to work to which we would be grateful for your buy-in. We have suggested re-consultation commencing next Wednesday which we hope is achievable. We are also endeavouring providing comments on conditions and a return of the draft S106 by close of play on 13 September.

The PPA has been updated to reflect this as attached with the key dates repeated below for ease.

- Re-consultation – 11th September for 2 weeks
- Draft Conditions Review - Applicant team to issue comments by 13th September 2024 and LBW issue response by 20th September 2024
- Draft S106 return- Applicant team to issue comments by 13th September 2024 and LBW issue response by 20th September 2024

- Finalisation of Officer Report – 4th October
- Publication of Officer Report – 18th October
- Planning Committee – 24th October
- GLA Stage 2 referral – 25th October
- Substantive S106 drafting – 31st October
- GLA Stage 2 response – 11th November
- S106 Completion / DN Issue – 18th November

I look forward to hearing from you.

Regards

Sam

SAM STACKHOUSE
PARTNER

Montagu Evans LLP, 70 St Mary Axe, London, EC3A 8BE
d: 020 7866 8620 m: 07826 947 254 e: sam.stackhouse@montagu-evans.co.uk

gislation.

APPENDIX 2.0
STUDENT DEMAND ASSESSMENT

CUSHMAN & WAKEFIELD

Purpose-built Student Accommodation Demand Report

41-49 (Bookers) and 49-59 (BMW) Battersea Park Road, London

January 2024

INTRODUCTION

This Purpose-built Student Accommodation Market Demand Report has been prepared by Cushman & Wakefield for Watkin Jones in relation to the proposed student accommodation development on the site 41-49 Nine Elms Lane & 49-59 Battersea Park Road in Battersea, London, SW8 5AL.

The proposed development will consist of 762 purpose-built student accommodation bed spaces, with a proposed accommodation mix of 69% cluster and 31% studio and will benefit from high-quality amenity spaces both internally (1,315m²) and externally (450m²), providing a good student experience to residents.

The purpose of this substituted report is to provide an overarching response to all matters which have been raised by LBW, statutory consultees, councillors and other stakeholders, and proposes the following principal amendments to the live application ref: 2022/1835:

- Reduction in height of Building 1 from 14 to 12 storeys, reduction in footprint, and reconfiguration to reduce privacy and overlooking concerns and improving daylight to neighbouring buildings
- Introduction of second stair core into Buildings 1 & 2
- Reduction in student bedrooms from 779 to 762
- Reduction in residential dwellings from 81 to 55
- Increase in community floorspace
- Increased student internal amenity space
- Changes to landscaping, play space and public realm
- Increase in bio-diversity net gain and Urban Greening Factor
- Amendments to Sleaford Street including a change from bay parking to parallel parking
- Retention of all trees along Battersea Park Road and new planting along Sleaford Street and New Covent Garden Market Access Road
- Redesign of façade to adapt to environmental conditions including improvements in fabric efficiency to increase carbon savings and reduce overheating
- Additional PV to further increase carbon savings

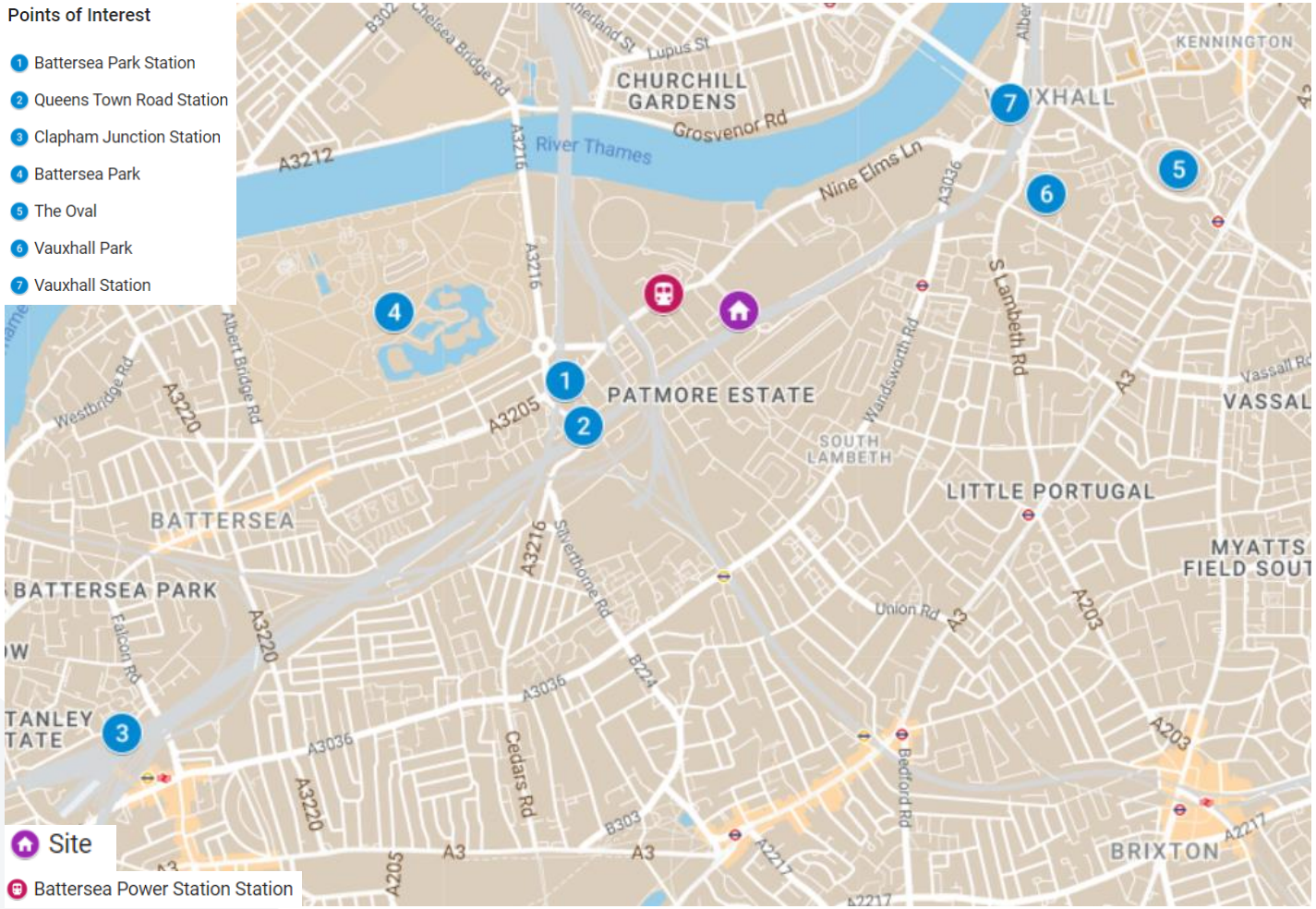
This report considers the following areas:

Benefits of the location – an assessment of the location as a site for student accommodation, highlighting key amenities and attractions (as well as public transport links), within a commutable distance.

Scale of demand for accommodation in this location – an assessment of the number of Higher Education institutions (including satellite campuses, partner colleges etc.) within a commutable distance of the site and calculation of a demand pool (i.e. students requiring a bed space) for accommodation based on this.

Analysis of historic, current and projected student to bed ratios in London – analysis of the London market highlighting structural levels of undersupply in relation to national averages and projections of future growth and the impact of the development pipeline on the health of the market

SITE LOCATION – LOCAL AMENITIES

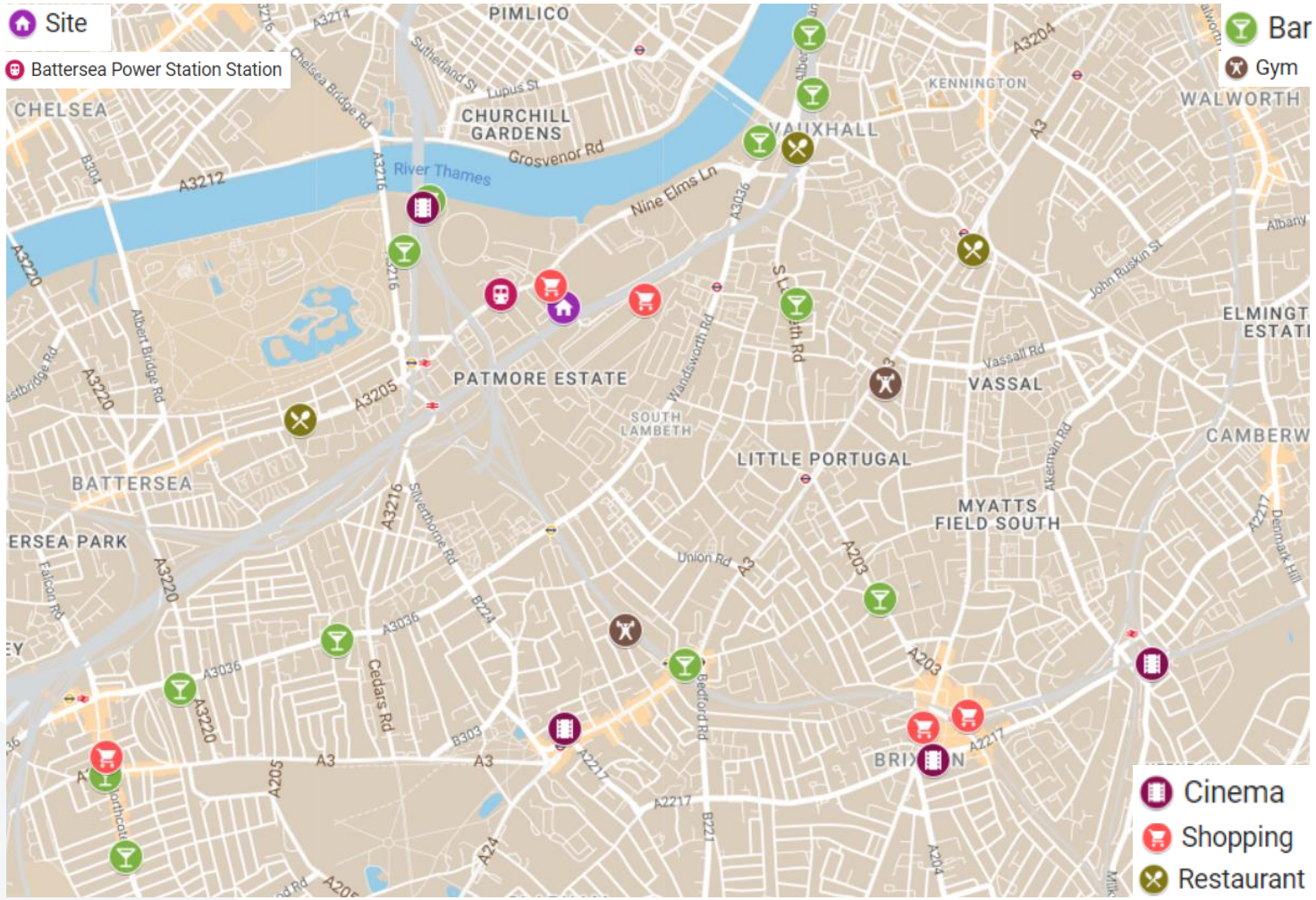


Source: Cushman & Wakefield

The proposed development is located on the site of 41-49 Nine Elms Lane and 49-59 Battersea Park Road SW8 5AL. The site benefits from being within an easily commutable distance to a number of the Capital's most prestigious Higher Education Institutions, which have the potential to create a strong demand pool for the new scheme (considered in detail later in this Briefing Note).

Battersea is very well connected in terms of public transport. The new Battersea underground station opened in 2021, connecting Battersea to the London Underground network, making the site accessible to the West End and the City within a 15 minute commute. Clapham Junction, Battersea's main transport hub connects to London Victoria in around four minutes, as well as connecting to Waterloo, London Bridge, Croydon, Hounslow and places in the South West such as Richmond, Putney and Wimbledon. The area is also well connected in terms of the London bus network. Further to this Clapham Junction is also a national railway station with connections to Gatwick Airport.

SITE LOCATION – LOCAL AMENITIES



*Provided for illustrative purposes only, not comprehensive.

Source: Cushman & Wakefield

A key attractor for students to study in London is the huge array of amenities across the Capital. Battersea is no exception, with a variety of bars , restaurants, cinemas and gyms available within easy reach of the site – as shown on the adjacent map.

The area is also home to a number of retail outlets, both chain stores and independents. The surrounding area boasts two gyms, four cinemas and Battersea Park – which hosts a number of live events and concerts throughout the year.

Battersea Power Station shopping centre will opened its doors to the public from September 2022 and bringing over 100 new retail stores to the area and a unique 18,500²ft food court concept.

BATTERSEA – NORTHERN LINE EXTENSION

The proposed development location benefits from the extension of the Northern Line between Kennington and Battersea which was completed in autumn 2021. The new Battersea Power Station is less than a five minute walk from the site.

The Northern Line Extension has been revolutionary for the Battersea area in opening up the West End and the City within around a 15 minute journey time.

Battersea Station Main Entrance Construction

Source: TFL 2021

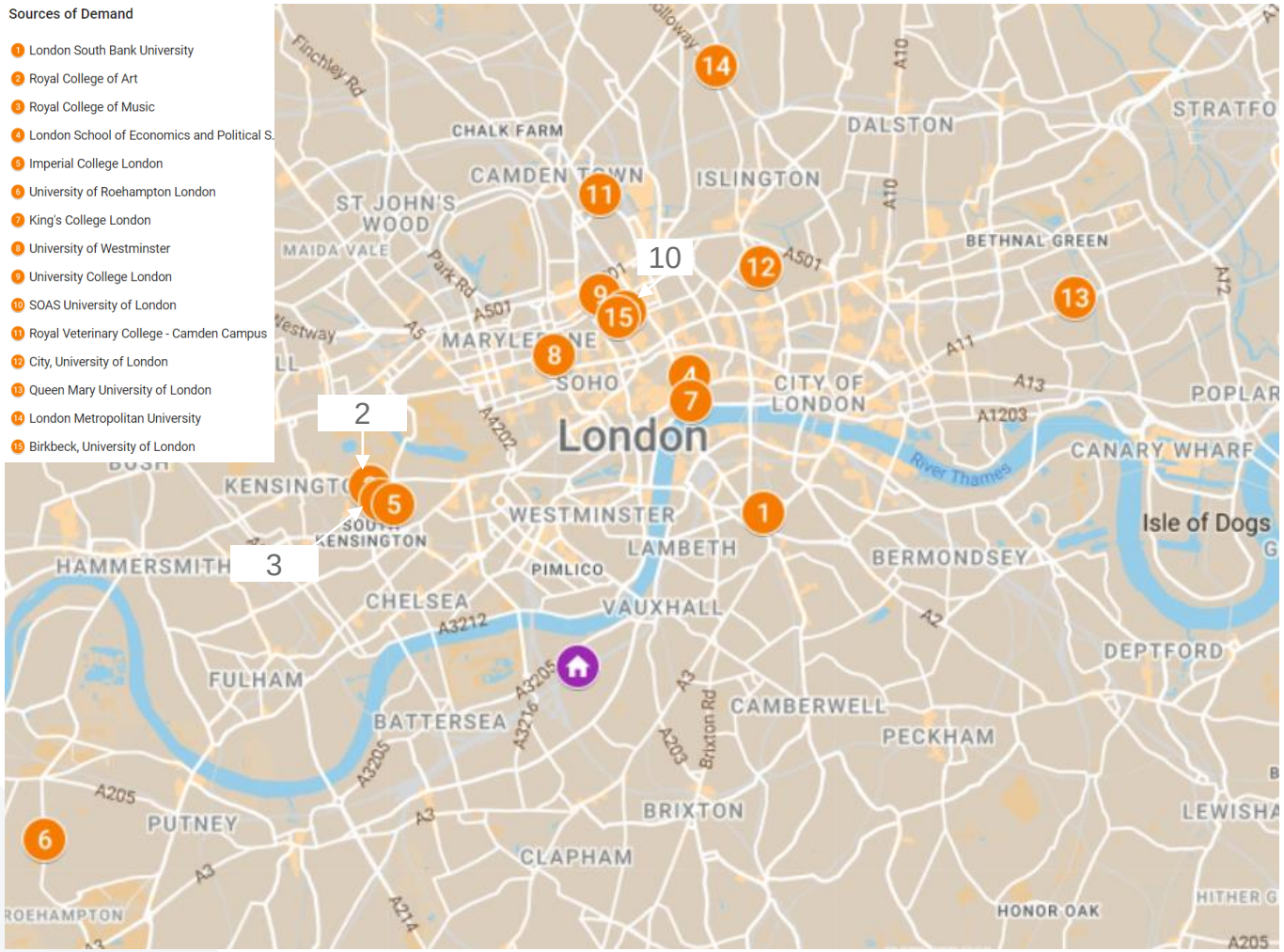
The Northern Line extension has opened up whole swathes of the London Higher Education market to the Battersea area. We have modelled that the following institutions are now within an acceptable 45 minute public transport commute time.

- University of Westminster
- University College London
- School of Oriental & African Studies
- University of the Arts Colleges
- Royal Veterinary College (RVC) Camden Campus
- City University London
- Queen Mary, University of London
- London Metropolitan University
- Birkbeck, University of London

It should be noted that University College London and City University London have expressed support for the proposed development.

Excluding campuses outside of commuting distance (e.g. RVC Hawkshead), the extension potentially opens the site up to an additional 109,890 students than those considered under the current public transport system.

SITE LOCATION – COMMUTABLE INSTITUTIONS



*Note white boxed numbers indicated obscured marker numbers.

Source: Cushman & Wakefield

The proposed site is already well located for students studying at a range of Higher Education institutions in the Capital. While many institutions are accessible within an hour's commute of the site (which is acceptable for some students), we have highlighted the following institutions as being within the typical acceptable 45 minute range of the site (the travel time generally deemed to be suitable for students studying in London). This commuting time has been derived from Cushman & Wakefield's extensive market experience and our conversations with leading London universities.

University College London, City University of London, Imperial College, The Royal Academy of Music and The Royal College of Art are located across the River to the North of the site, commutable in under 40 minutes using public transport (currently). Slightly further afield, but within an acceptable commuting time, are the London School of Economics (45 minutes), King's College London (41 minutes) and The University of Roehampton (42 minutes). The closest source of demand is London Southbank University (LSBU), just half an hour from the site on public transport. The small Courtauld Institute of Art is also within commuting distance.

Overleaf we explore demand trends for these institutions.

SOURCES OF DEMAND

	Travel Time via Public Transport (mins)	FT Student Population 2021/22	Growth 2016-2021	Students from Outside the Region
Imperial College London	32	20,015	3,665	16,010
Royal Academy of Music	37	790	-30	685
Royal College of Art	36	2,465	710	2,090
London School of Economics and Political Science	45	12,495	1,765	10,415
London South Bank University	31	12,830	2,315	5,235
University of Roehampton	42	11,615	1,995	5,780
King's College	41	34,040	9,945	24,130
University of Westminster	18	17,760	2,645	9,225
University College London	22	39,940	9,300	31,200
SOAS University of London	25	5,025	-180	2,835
Royal Veterinary College	30	2,315	260	1,980
City University London	38	17,385	1,465	9,040
Queen Mary University of London	39	24,030	6,440	13,360
London Metropolitan University	33	11,715	2,465	4,855
Birkbeck University of London	24	4,400	115	1,790
Total		**216,820**	**42,875**	**138,630**

Source: HESA 2021/22

The table opposite lists Higher Education institutions located within a commutable distance of the proposed development site. All institutions, with the exception of The Royal Academy of Music & SOAS have shown significant growth over the past five years, a trend which is expected to continue.

The number of students from outside of the region gives an indication of the potential demand pool (although this is refined later in this Note), as students domiciled outside of Greater London are more likely to demand a purpose-built student accommodation bed space. This rough estimation gives a pool of just under 134,000 students demanding a bed at these institutions alone.

Demand for student accommodation in London as a whole is explored overleaf.

LONDON MARKET OVERVIEW

London is the UK's largest student market and one of the most popular global education destinations with just under 329,545 full-time and sandwich students studying at a Higher Education institution (across all boroughs in the City). Growth over the last year is evident across a large number of institutions, with specialist Higher Education providers performing especially strongly in a market where students are looking for a return on a large investment in their education in terms of living costs.

Student to bed ratios in London between 2012 and 2023 have been consistently above Cushman & Wakefield's nationally observed average of 2.0:1, indicating a structural undersupply of purpose-built student accommodation in London. Growing student numbers coupled with limited development for the size of the city has led to unmet demand. Growth over the last year is evident across a large number of institutions, with specialist Higher Education providers performing especially strongly in a market where students are looking for a return on a large investment in their education in terms of living costs. International students have been a strong source of growth, with this cohort increasing by 11% in a single year.

There are a total of 88,634 purpose-built student accommodation bed spaces in London (excluding Kingston, which is treated as separate from the London market) for the 2023/24 academic year. 41%% of the beds are located in Zone 1 and 71% in Zones 1 & 2. Much of the "affordable" private sector stock is located in outer London locations; areas including Wembley, Stratford, Walthamstow and Tottenham Hale. There are a large number studio bed spaces in the market and these are priced well above the overall average, at £17,669 per annum and over 300 studios priced over £30,000 per annum.

The private sector is spread across 22 London boroughs, with over 1,000 beds in 13 boroughs. The largest of the boroughs for PBSA is Islington with over 10,300 beds in 2023. Seven boroughs contain two thirds of the total beds, largely in central London. For the 2023/24 academic year there has only been one new scheme – Novel Student's Wick Park (330 beds).

Source: Cushman & Wakefield Student Accommodation Tracker 2022, HESA 2020/21

COMMUTABLE UNIVERSITIES STUDENT TO BED RATIO

London Commutable Demand Pool	2021/22
Total Full-time & Sandwich Students	**233,045**
From which:	
Deductions from the pool of students	
Students from the region who do not require accommodation	67,250
Students from outside London over the age of 25	31,030
TOTAL POOL	134,765
Number of beds (university)	37,060
Student: Bed Ratio	3.64

Commutable Institutions: Imperial College London, The Royal Academy of Music, London School of Economics and Political Science, London South Bank University, University of Roehampton, King's College London, The Courtauld Institute, University College of Osteopathy, Conservatoire for Dance and Drama, The Guildhall School of Music and Drama, The London School of Hygiene and St George's University. University of Westminster, University College London, SOAS, University of the Arts Colleges, Royal Veterinary College Camden Campus, City University London, Queen Mary University of London, London Metropolitan University and Birkbeck University.

Source: HESA 2020/21 /Cushman & Wakefield Student Accommodation Tracker 2022

The pool calculation sets out our assumptions of demand for student accommodation at the proposed site taking into account current supply levels in London and the latest HESA student figures (2020/21) for commutable institutions. In arriving at our demand pool, C&W has excluded a number of students who are unlikely to demand accommodation in the city. This includes:

- Students already living in their parental or own residence in the Greater London area
- Students from outside of Greater London over the age of 25.

Supply includes all bed spaces currently available to commutable universities (owned, lease and nominated).

As can be seen he student to bed ratio for commutable institutions stands at 3.64:1 and is indicative of structural levels of undersupply.

COMBINED DEMAND SOURCES DEMAND POOL

The demand pool results in demand in excess of 134,000 students (over half the total London demand pool for accommodation). However, the universities currently only have 37,060 bed spaces available to them.

This results in a student to bed ratio of 3.64:1, far higher than the national average.

Source: HESA 2021/22/Cushman & Wakefield Student Accommodation Tracker 2023

CONCLUSIONS

- The London student to bed ratio is significantly higher than the national average and Cushman & Wakefield believes this is likely to remain at a similar level until 2027/28 even with additional development, highlighting ongoing structural levels of undersupply
- Even with a 10% fall in demand the ratio will still remain above the national average
- The commutable institutions of the Battersea Park Road site include some of London's most prestigious research intensive universities, including the London School of Economics, Imperial College London and King's College London
- Under current public transport conditions, there are 134,765 students requiring a bed space within a commutable distance of the site and a student to bed ratio of 3.64:1

CUSHMAN & WAKEFIELD

APPENDIX 3.0
HEP LETTERS OF SUPPORT

THE LONDON SCHOOL OF ECONOMICS AND POLITICAL SCIENCE

Residential Services
Houghton Street
London
WC2A 2AE

Telephone: 020 7955 7083
mailto:i.spencer@lse.ac.uk

Ian Spencer
Director of Residential Services

Wandsworth Council
Planning Service
Town Hall, Wandsworth High Street
London, SW18 2PU

Attn: Anastasia Bernard

4 July 2024

Dear Anastasia,

Application Reference: 2022/1835
Address: Booker Cash & Carry and BMW Car Service Garage 41-49 and 49-59 Battersea Park Road London SW8 5AL.

I write in **support** of the pending full planning application (ref. 2022/1835) at Booker Cash & Carry and BMW Car Service Garage 41-49 and 49-59 Battersea Park Road London SW8 5AL seeking permission for the following development:

"Demolition of the existing building and construction of three new buildings (between 15 and 22 storeys in height), together comprising 81 residential units (Use Class C3) and Student Accommodation comprising 779 student bedrooms (Sui Generis) along with 515sqm (GIA) flexible Commercial, Business and Service (Use Class E) and/or Local Community and Learning (Class F) floorspace with associated works including hard and soft landscaping, car parking, new vehicular access/servicing, and other ancillary works."

LSE is one of the UK and London's premier Higher Education institutions with a global reputation. The School is keen to ensure that we can attract the world's best students to London and having access to affordable accommodation within commuting distance from the School's main campus on Houghton St / Aldwych is essential for our students. The proposals at Battersea Park Road are suit the LSE as they will offer our students access to a blend of affordable bedrooms and studio accommodation if they prefer.

The proposals also meet our requirement for high quality student accommodation, and we are satisfied that the amenity space provided will enable the student experience we desire from our third-party accommodation providers. Watkin Jones has a reputation for delivering high quality schemes and some of our students have already lived in the accommodation they constructed in partnership with University of London and UPP at Eleanor Rosa House in Stratford.

If the planning application is successful, it will provide LSE with an opportunity to expand our student accommodation offer. Our aim is to guarantee all first-year students to the School an offer of accommodation. The location is ideal for us as it is situated in a welcoming and developing neighbourhood. The development will be well connected to the LSE campus buildings via bus and cycling routes and via the Northern Line extension.

I therefore provide support to the planning application.

Yours faithfully,

Ian Spencer
LSE Director of Residential Services

City, University of London
Northampton Square
London
EC1V 0HB
United Kingdom

T +44 (0)20 7040 5060

Stephen Hissett
Principal Planner | Strategic Development Team
London Borough of Wandsworth
Room 57, Town Hall
Wandsworth High Street
London
SW18 2PU

Sent via Email

11 April 2022

Dear Mr Hissett,

Proposed student accommodation at 41-49 Battersea Park Road

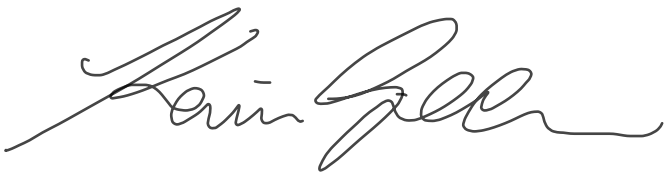
I am writing to express support for the proposals, given City's strategy of developing strategic partnerships with private providers of high quality, purpose-built student accommodation.

As you know we don't own halls ourselves, but have sought to establish long term arrangements for our students within responsibly managed and well-designed premises in advantageous locations. There is always high demand for high quality schemes with affordable rooms which this scheme offers alongside good amenity with transport links to our City and Islington campuses via the Northern line.

We are conscious of the role Higher Education Institutions can play within local communities to reduce pressure on general housing stock, and while acknowledging student choice, consider that the wider pastoral support coupled with recognised standards of care are usually a better solution than many private lettings.

Please do feel free to quote this letter of support in your consideration of this planning application.

Yours Faithfully



Kevin Gibbons

Director, Property & Facilities

Stephen Hissett
Principal Planner | Strategic Development Team
London Borough of Wandsworth
Room 57, Town Hall
Wandsworth High Street
London
SW18 2PU
Sent via Email

9 February 2022

Dear Mr Hissett,

Re: Support for the proposed student accommodation at 41-49 Battersea Park Road

I write to outline our support and interest for the student accommodation proposals at Battersea Park Road, for which a planning application has yet to be submitted by the Watkin Jones Group. The London Plan recognises the lack of purpose-built student accommodation as holding up existing housing stock, for other families and young professionals. Purpose built, student residences is a preferred option for the University, thereby relieving pressure on the general housing supply.

University College London has been in partnership with a number of private providers to deliver well designed student housing at an affordable price. We already have a number of agreements with private student accommodation providers to accommodate our students across London, meeting their specific needs and the University's standards for responsible management.

The development at Battersea Park Road will help students studying at these campuses and from the excellent new transport links, access to our campuses in Holborn and Fitzrovia. In light of the current pandemic, it is important now more than ever, for our students' wellbeing that there is an environment nearby to relax and enjoy. Coupled with the extensive landscaping proposals and strong amenity provision, the proximity of the Battersea Power Station numerous shops and services in the area will also be a welcome addition for students.

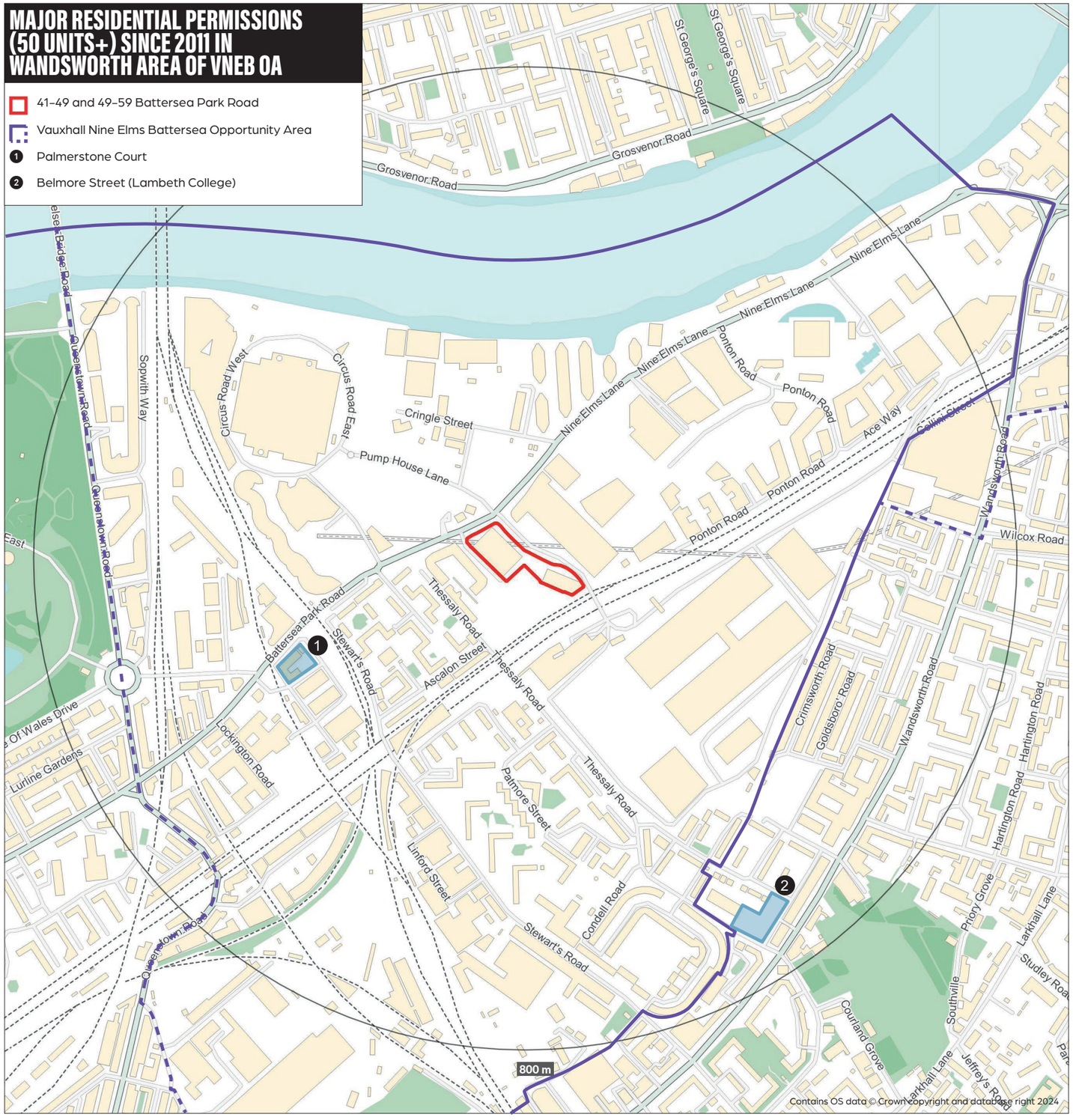
Our long-term relationship with PBSA providers like WJ has been established on recognising the need for affordable rent levels, the right types of accommodation, quality build and successful consultation with the University. This proposal meets the University's own standards for provision, location and management and on behalf of University College London, we are in support of this development.

Yours Faithfully

Duncan Palmer
Director of Campus Experience and Commercial Services
University College London

APPENDIX 4.0
RESIDENTIAL PERMISSIONS MAP

MAJOR RESIDENTIAL PERMISSIONS (50 UNITS+) SINCE 2011 IN WANDSWORTH AREA OF VNEB OA



STUDENT AND RESIDENTIAL DEVELOPMENT IN LBW PART OF VNEB OA

MAJOR RESIDENTIAL PERMISSIONS (50 UNITS +) IN THE LAST 10 YEARS IN VNEB OA				UNITS X AVERAGE HOUSEHOLD OF 1.7
Borough	**Site**	**Units**	**Source**	
LBW	334 Queenstown Road	95	VNEB Household Research, August 2017	162
LBW	Chelsea Bridge Wharf	1,115	VNEB Household Research, August 2018	1,896
LBW	Embassy Gardens Phase 1	643	Officer Report 2011/1815	1,093
LBW	Riverlight	555	VNEB Household Research, August 2020	944
LBW	Viridian	240	VNEB Household Research, August 2021	408
LBW	Battersea Exchange	290	Wandsworth Council Housing Trajectory	493
LBW	Battersea Power Station	3,853	Officer Report 2020/0579	6,550
LBW	Sleaford Industrial Estate	386	Wandsworth Council Housing Trajectory	656
LBW	Royal Mail Site	1,950	Offficer Report 2019/2250	3,315
LBW	New Covent Garden Entrance Site	430	Officer Report 2014/2810	731
LBW	New Covent Gardens Northern Development Phase 2	618	Officer Report 2019/2995	1,051
LBW	New Covent Gardens Northern Development Phase 1b	559	Officer Report 2018/5698	950
LBW	Tidbury Court	22	Officer Report 2020/2434	37
LBW	Prince of Wales Drive	926	Planning Statement 2020/3867	1,574
LBW	Lexington Gardens	357	Officer Report 2017/1890	607
LBW	40-42 Ponton Road	510	Officer Report 2016/4720	867
LBW	346 Queenstown Road	451	Officer Report 2015/6384	767
LBW	Embassy Gardens Phase 2	872	Officer Report 2013/5239	1,482
LBW	Embassy Gardens Phase 3	207	Officer Report 2015/5664	352
LBW	Market Towers	494	Officer Report 2015/5942	840
	Proposed BPR AH	55		94
	Total	**14,628**		**24,868**

MAJOR STUDENT PERMISSIONS IN THE LAST 10 YEARS IN VNEB OA			
Borough	**Site**	**Units**	**Source**
LBW	Palmerston Court	868	Officer Report 2020/2837
	Proposed BPR Student	762	
	Total	1,630	
	Student to households (2.5 units per household) Total	**652**	

Average Occupancy taken from Nine Elms and Vauxhall Opportunity Area Household Research (2017)

The proposed development would provide 762 student bedspaces and 55 residential dwellings, alongside ground floor retail, employment and community uses, thereby providing a mix of uses. 16% of new occupants would be those living in the residential dwellings.

Subject to planning permission being granted, the development would be only the second privately managed PBSA scheme in the Borough which is very low for an Inner London borough.

The outcome of our overconcentration assessment demonstrates that should planning permission be granted, the percentage of student homes in the VNEB area of Wandsworth would equate to 4.3 % of all housing development granted since 2011 – a low proportion.

Moreover, not accounted for in this assessment is existing residential housing stock that was either granted planning permission or built before 2012.This includes, amongst other developments, large housing estates such as Patmore and Savona which, if included, would reduce the percentage of student homes relative to C3 homes even further.

It is clear therefore that granting planning permission would not result in an overconcentration of students in the Borough.

LOCATION:
41-49 Nine Elms Lane and
49-59 Battersea Park Road, SW8

DATE:
July 2024

SCALE:
1:7,500 @ A3

▲ **NORTH**

MONTAGU EVANS
CHARTERED SURVEYORS
70 ST MARY AXE,
LONDON, EC3A 8BE
T: +44 (0)20 7493 4002
WWW.MONTAGU-EVANS.CO.UK

APPENDIX 5.0

AFFORDABLE HOUSING FAST TRACK CALCULATION

Affordable Housing Fast-Track Threshold Approach

Site	Site Area	Affordable Fast-Track Threshold
Bookers (Sui Generis – Retail Warehouse)	5,681	35%
BMW Garage (B2)	2,414	50%
	8,095	

Blended Approach for Threshold (consistent with Practice Note on Public Land)

Bookers (5,681 / 8,095 X 35	24.56%
BMW (2,414 / 8,095 X 50	14.91%
	39.47%

Habitable Rooms

Habitable Rooms	Rooms
C3	171
Student	762
Total Habitable Rooms	933

C3 Unit Breakdown	Total (Unit)
One Bed	13
Two Bed	26
Three Bed	13
Four Bed	3
Total Units	55

Affordable Requirement to reach Fast-Track Threshold

	Habitable Rooms	Percentage	Percentage by Use Class
C3 Affordable	171	18.33%	100%
Affordable Student	198	21.22%	25.98%
Total Habitable Rooms	369	39.55%	

APPENDIX 6.0
DESIGN REVIEW PANEL LETTER

Wandsworth
Design Review Panel
C/o Wandsworth Council
Environment and Community Services Department
The Town Hall
Wandsworth High Street
London SW18 2PU

Please ask for/reply to:
Telephone: 020 8871 6000
Direct Line: 020 8871 7564
Fax: 020 8871 6003

Email: barry.sellers@richmondandwandsworth.gov.uk
Web: www.wandsworth.gov.uk

Our ref: ECS/
Your ref:
Date: 20 February 2023

Sam Stackhouse
Montagu Evans LLP
70 St Mary Axe
London
EC3A 8BE

Dear Sam,

Wandsworth Design Review Panel – DRP 3:
Booker BMW site, 41-49 and 49-59 Battersea Park Road, SW8 5AL

The Panel is grateful to you and your development team for submitting your proposal to the Wandsworth Design Review Panel (WDRP) for a third design review on 6 February 2023. The DRP was held online on this occasion and the Panel provided feedback in a virtual open session with the applicant present to hear the Panel's views. We thank the applicant team and, in particular the architects, Glen Howells, for a clear and comprehensive presentation. As a formal planning application has been submitted, this letter will be uploaded to the application website.

As context, the site lies on the western end of the Vauxhall Nine Elms Battersea (VNEB) opportunity area and has an area of 0.81ha. The site falls within a built-up area, with the majority of it covered by building footprint. There are six mature trees at the front of the site. These are all subject to a Tree Preservation Order (TPO) and comprise a mix of four London Plane and two Lime Trees.

The northern part of the site fronting Battersea Park Road is currently occupied by Booker Cash & Carry which is a retail warehouse club totalling 3,209m² (GIA). The southern part of the site adjacent to the railway line is occupied by a BMW service centre totalling 1,224m² (GIA) of a Sui-Generis use class. The BMW maintenance garage is accessed by the New Covent Garden Market Access Road, which is the only point of access.

The application ref. 2022/1835 is for the following: “Demolition of the existing building and construction of three new buildings (between 15 and 22 storeys in height), together comprising 81 residential units (Use Class C3) and Student Accommodation comprising 779 student bedrooms (Sui Generis) along with 515sqm (GIA) flexible Commercial, Business and Service (Use Class E) and/or Local Community and Learning (Class F) floorspace with associated works including hard and soft landscaping, car parking, new vehicular access/servicing, and other ancillary works”.

General Principles

The Panel is pleased to see the updated proposals for the three plots in particular on issues of sustainability, landscape and design response. Having reviewed the scheme twice before, we feel invested in ensuring that high-quality and sustainable design is achieved, and we appreciate the team’s approach to addressing the issues raised by the Panel in the previous reviews and very much welcome the level of care and engagement demonstrated since work commenced.

- We are pleased the overarching vision for the three blocks has been retained as well as the choice of using high-quality pre-cast for the buildings.
- We welcome the new vision for the landscape strategy, and especially applaud retaining the mature trees on Battersea Park Road. We encourage the developer to ensure that the landscaping scheme is managed and maintained to an appropriate standard.

The detailed comments of the Panel have been collated as follows under the three main headings of the review:

Sustainability

We are pleased with the integrated approach for sustainability and welcome the team following through many aspects raised at the last review.

- In terms of mechanical cooling, we welcome how this has been designed out and omitted from the majority of the accommodation. However, having developed an integrated façade design approach for this we urge the team commit to eliminating it from all the buildings.
- As for sitewide carbon improvement over Part L 2021, achieving 50% for the residential is in line with the new GLA requirements and is welcomed, but we encourage the team to try and achieve the same for the student accommodation – given the same fabric details have been proposed. The embedded carbon calculation should include all elements on the site, not just the structure. Particularly ensure the materiality for the public realm is in line with the sustainability strategy adopted.
- In regard to the wind analysis undertaken, in order to fully understand the impact on people and vegetation we suggest further testing balconies at upper floors. As some are at the corner, these could need some element of protection. Equally ensure the wind movement in between Plot 1 and Plot 2 in proximity to the entrances is not creating unpleasant conditions.
- On the amenity levels, we recommend all additional elements such as the external air-source heat pumps are located and designed in from the onset and do not appear later on as an afterthought or where it could become a noise nuisance. Plan in for maintenance so that all technical equipment as well as PVs on roofs or elsewhere is accessed easily without disruption for landscape and residents.
- The new location for the plant equipment within each block is welcomed but these need to be shown in the drawings.

- As part of the landscape strategy, we welcome the approach that facilitates tree canopies growing together as they mature to provide continuous shade for the main pedestrian routes in anticipation of climate change adaptation.
- We encourage developing a robust water strategy for the site and invest into a water recycling system for irrigation of the landscape.
- In Plot 1, we note there is a need for a second core to address the new fire regulations and we are comfortable with the additional length to the building to accommodate this.

Landscape and Public Realm

- We are pleased that the landscape is now responding in a much more convincing way to the site and welcome the remodelling of Plot 1 to retain the protected trees. We support the proposal to design the planting close to the base of the buildings, but note the technical difficulties that this might bring, especially in terms of maintenance at a later stage when vents or other plant may need to be accessed. We therefore strongly encourage that the collaboration between the architects and landscape teams is retained up to delivery so that the construction requirements can be coordinated, and the landscape preserved and safeguarded in the long run.
- Equally, given the proximity of the mature trees to the blocks, routes for construction vehicles and the impact of cranes on site needs to be assessed and managed.
- We strongly encourage the team to prepare the management and maintenance strategy as stewarding the site in perpetuity is a way to enable the new community to thrive and strengthen its sense of belonging. We recommend compliance with the Public London Charter for the management of privately owned public space.
- As for The Glade, in the heart of the site, we recommend that the space is designed to be fully inclusive, safe and comfortable for young teenage girls as well as for students and children. How these groups coexist could be further articulated. We also suggest creating a stronger narrative for the landscaping by unravelling the underlying story of the ancient river that once flowed under the site. This could enrich the character of the place and provide further inspiration for the landscape.
- Creating biodiverse planting on rooftops is positive, but we are concerned that the selection of species is appropriate for the environmental conditions experienced at such high levels. As for the grouping of planting, select a mixture of both young and mature trees and plants that work well together and benefit from each other. We recommend a strong replacement strategy.
- In Plot 1 we are not convinced by the service and delivery arrangement and suggest that this should be reviewed, including how it is managed.

Design Response

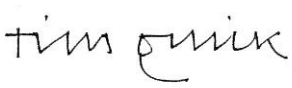
- We welcome the improvements and positive changes to the design. We are particularly pleased with the changes to Plot 1 which now feels more appropriate in scale, height and arrangement on the site.
- The dark glazed band wrapping around Plots 2 & 3 at the amenity level is slightly unconvincing and needs further resolution.

Moving Forward

We are very pleased how the scheme has evolved and applaud the applicant and client through their team of consultants for responding positively to the officer’s and Panel’s feedback.

The revised vision and strategies presented for the landscape have transformed the scheme and promise a high-quality development. Continuity through the delivery stage is important and for that reason we would encourage the client to engage the team as the scheme proceeds.

Yours sincerely



Tim Quick
Director, Formation Architects
Chair, Wandsworth Design Review Panel

Panel Members

Chris Twinn	Principal, Twinn Sustainability Innovation
Deborah Nagan	Landscape Architect
Marcus Claridge	Director, Claridge Architects

Panel Admin

Barry Sellers	Principal Planner and Panel Secretary
Daniela Lucchese	Senior Urban Designer and Panel Coordinator

Applicant Team

Ben Wrighton	Watkin Jones
Simon Lovell	Watkin Jones
Sandeep Shambi	Glen Howells Architects
Robert King	Glen Howells Architects
Alex Smith	Glen Howells Architects
Sally Itani	Glen Howells Architects
David Reid	Glen Howells Architects
Hannah Vincent	Planit-IE
James King	Planit-IE
Bernie Carr	Atelier Ten
Zac Vandevoir	Atelier Ten
Joseph Lazell	Atelier Ten
Simon Marks	Montagu Evans

Attendees (invited to observe)

Mark Hunter	Head of Strategic Developments
Janet Ferguson	Planning Manager
Stephen Hissett	Principal Planner
Sharon Molloy	Principal Urban Design Officer

Cllr Tony Belton

APPENDIX 7.0
DAYLIGHT AND SUNLIGHT REVIEW

DELVA PATMAN REDLER
Chartered Surveyors

Our Ref: 24321

5 August 2024

One George Yard
London
EC3V 9DF
020 7936 3668

info@delvapatmanredler.co.uk
www.delvapatmanredler.co.uk

Ms A Bernard
Principal Planning Officer
Strategic Development Team
London Borough of Wandsworth
The Town Hall
Wandsworth High Street
London SW18 2PU

By email

Dear Ms Bernard,

Planning Application Ref. 2022/1835 – 41-49 (Bookers) & 49-59 (BMW) Battersea Park Road, London SW8
Independent review of daylight, sunlight and overshadowing assessment

As instructed, I have reviewed the Daylight, Sunlight and Overshadowing Report dated January 2024 prepared by the Applicant's consultant, Point 2 Surveyors, ("the Report") submitted in support of the revised submission dated 26 April 2024 for planning application for the proposed development at 41-49 (Bookers) & 49-59 (BMW) Battersea Park Road, London SW8. I have also reviewed the objections you sent me.

My instructions are to advise on the suitability of the scope and method of assessment, criteria used, results produced, and conclusions reached to assist the Council in understanding the potential effects of the proposed development, and the levels of natural light provision to proposed new dwellings, so it may make an informed judgement as to their acceptability.

I have not been supplied with or checked the consultant's 3D computer model or calculations; nor have I run any calculations of my own. I have assumed the assessment is accurate and report on the results and conclusions; although, if I feel there is reason to seek confirmation on matters affecting accuracy I have stated so below. I have undertaken a site inspection with you.

I am aware of the original assessment and report by Point 2 Surveyors dated April 2022 ("the 2022 Report") submitted with the original application. I am also aware of the earlier planning consent reference 2015/6813 and supporting assessment and report by Point 2 Surveyors dated November 2015 ("the 2015 Report"). I have not been asked to review either of those earlier reports, though I have looked at them briefly to understand the background.

Guidelines for daylight, sunlight, overshadowing

I have included at Appendix 1 a glossary of key terminology and acronyms used in this letter, and at Appendix 2 a summary of the relevant guidelines for daylight, sunlight, and overshadowing. The leading guidelines on daylight and sunlight are published by the Building Research Establishment in BR209 *'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice'* (third edition, 2022).

The Applicant's assessment also summarises the relevant guidelines, which it appears to do appropriately.

Planning policy and guidance

Local plans typically seek to ensure provision of adequate daylight and sunlight for future occupiers of new residential development and avoid unacceptable deterioration in daylight and sunlight to surrounding buildings and unacceptable levels of overshadowing to surrounding amenity space.

To the extent that the proposed development may be considered to provide housing, regard should be had for the National Planning Policy Framework (NPPF), the London Plan, and the Mayor of London's *'Housing Supplementary Planning Guidance'*. These encourage a flexible approach in applying daylight/sunlight policies or guidance where they would otherwise inhibit making efficient use of land for housing, provided the resulting scheme would provide acceptable living standards. Account should be taken of local circumstances, the need to optimise housing capacity, and the scope for the character and form of an area to change over time.

Scope of the assessment

The Report includes assessments of daylight and sunlight within the proposed dwellings (Block 1) and student accommodation (Blocks 2 and 3) and sunlight to proposed amenity spaces.

The Report includes assessments of the potential impacts on:

- daylight and sunlight to existing surrounding residential properties:
  - Viridian Apartments, 75 Battersea Park Road
  - Battersea Power Station Phase 4A (Buildings A1.1 - 1.5)
  - Battersea Power Station Phase 4A (Building A2)
  - Battersea Power Station Phase 4A (Building A3)
  - 142-192 Thessaly Road
- daylight and sunlight to facades of proposed buildings within surrounding development sites that have outline planning permission:
  - Battersea Power Station Phase 3
  - New Covent Garden Market
- sunlight/overshadowing to neighbouring amenity spaces.

I consider the scope of the assessment to be appropriate.

The Report uses the names "Buildings A1.1 to A1.5", "Building A2" and "Building A3" and "Battersea Power Station Phase 4A", which is a hangover from the earlier reports, rather than the building names they have come to be known by since the New Mansion Square development was completed. This is unhelpful but, more critically, the Report does not identify them on the appended drawings, which makes it impossible to correlate the tabulated results with the relevant buildings.

To overcome this, I had to look up the Phase 4a planning application and obtain the key plan shown in Figure 1 below, which corresponds with the nomenclature used in the Report.

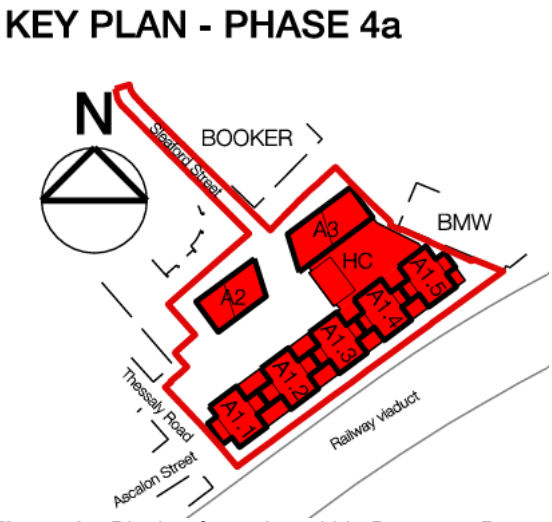


Figure 1 – Block referencing within Battersea Power Station Phase 4a

I was then been able to correlate the building numbers with their current building names, as shown on the location plan in Figure 2 below, observed during our site visit.

Figure 2 – Location plan for New Mansion Square (Battersea Power Station Phase 4a) showing building names

To assist your understanding of the results and aid your reporting to committee members, I have labelled the buildings in the 3D images below from the Report with both the nomenclature used in the Report and the building names they are now known by. Figure 3 shows the revised proposed development and Figure 4 shows the extant consent (ref. 2015/6813).

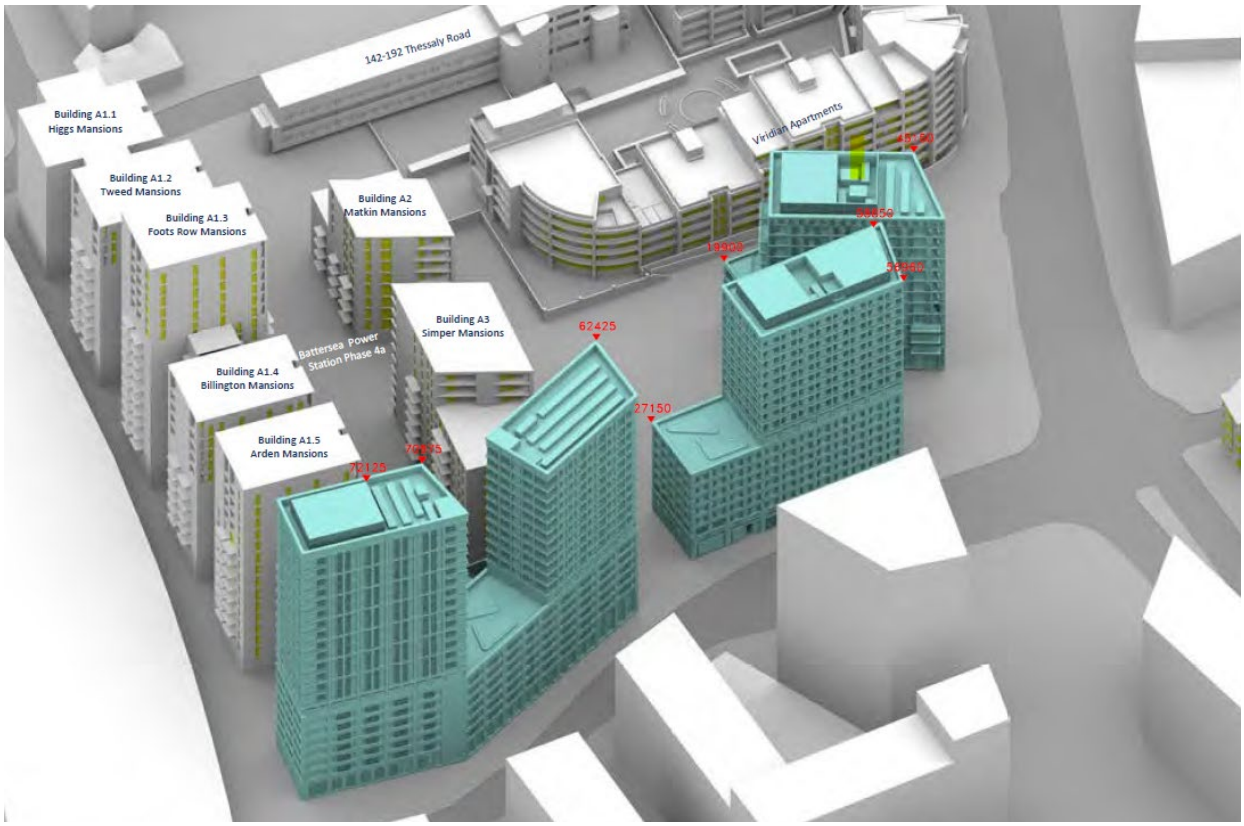


Figure 3 – Proposed development and surrounding context (block referencing & naming within BPS Phase 4a added by me)

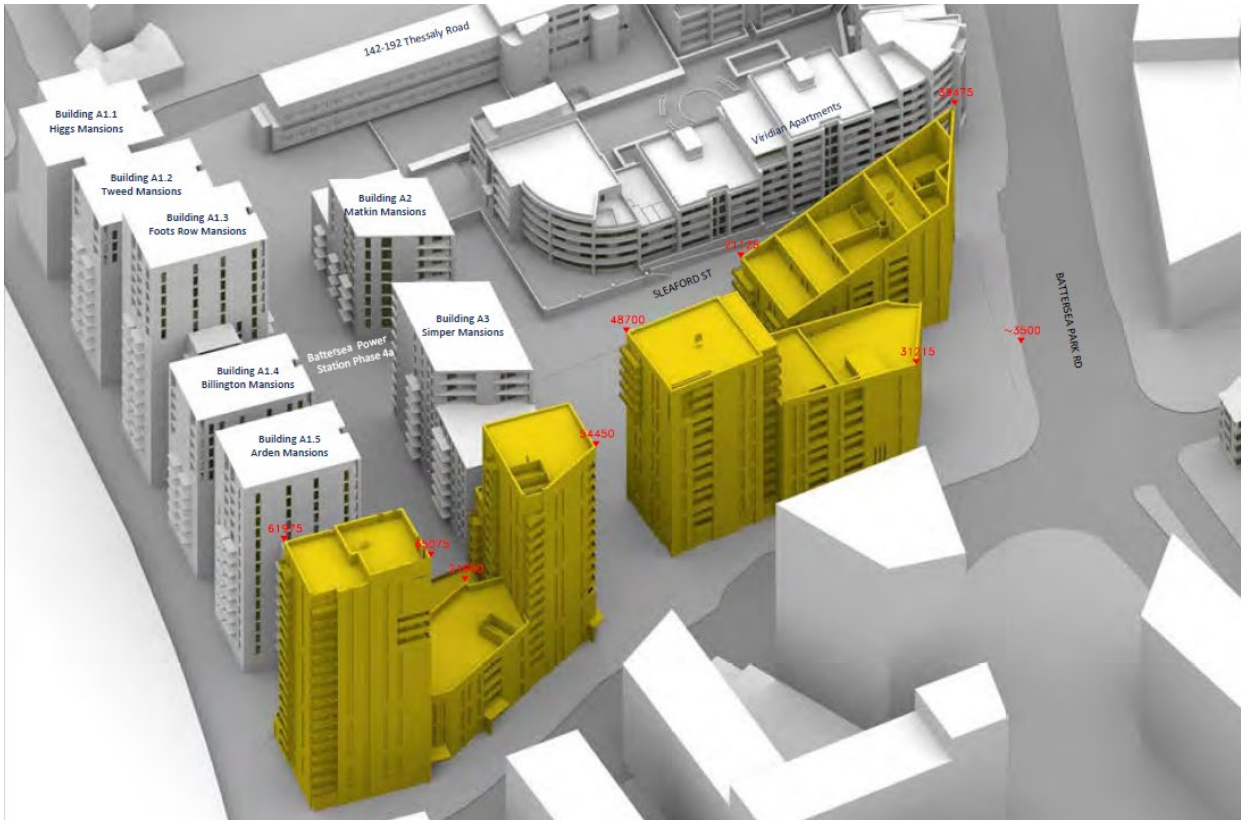


Figure 4 – Consented development and surrounding context (block referencing & naming within BPS Phase 4a added by me)

The Report does not include any window maps, making it impossible to identify and understand which windows and rooms are affected. (Window maps were also missing from the 2022 Report but included in the 2015 Report.) For expedience, I contacted the Applicant's consultant and asked them to provide window location drawings urgently, which they say they will do today (5 August 2024).

Applicant's assessment methodology and application of the guidelines

I have reviewed the assessment methodology and am generally satisfied that it is appropriate and in accordance with the guidelines.

3D modelling and sources information

The 3D computer model used in the assessment was built from various sources of information including 3D measured survey, site photos, planning consented drawings of neighbouring developments, estate agents details of neighbouring properties, and internal measurements where access was obtained. I have no reason to doubt it is sufficiently accurate for its intended purpose.

The Report notes that where floor plans could not be found from research, room sizes and uses have been assumed and/or deduced from external observation. This is an acceptable approach. Arguably, less weight should be applied to NSL results for rooms whose layouts have been assumed, as they may be less accurate. Unfortunately, the Report does not state which buildings/rooms are based on assumed layouts, so I cannot say which NSL results should be given less weight.

Assessment methodology – daylight and sunlight within the proposed development

Daylight and sunlight within the proposed development have been assessed using the following methodologies assessed in accordance with the current BRE guidelines (3rd edition, 2022):

- daylight illuminance (climate-based daylight modelling, CBDM) to habitable rooms
- sunlight exposure on 21 March to habitable rooms
- sun hours on ground on 21 March to amenity spaces

The Report correctly explains at paras. 4.27 and 4.28 that the daylight illuminance (CBDM) methodology replaced the ADF methodology (when the BRE guide was updated in 2022) and that the ADF method is no longer recommended. Nevertheless, it also includes an ADF assessment for the proposed habitable rooms *"for reference purposes only … to show how they would have performed against the previously adopted and recognised internal daylighting criteria"*. Presumably, this is so it is easier to directly compare the results and levels of adherence with those of the original application contained in the 2022 Report and of the extant consent contained in the 2015 Report, in the event you wish to make such a comparison.

For accurate and meaningful daylight results, it is essential that the guidance on the use of appropriate window and room parameter values is followed when running the calculations. The parameters used in the Applicant's daylight assessments, which are stated in paragraphs 8.4 to 8.7 of the Report, are acceptable.

Assessment methodology – impacts on surrounding environment

Principal assessments

The BRE assessment methodology has been used for assessing daylight and sunlight effects, including:

- vertical sky component (VSC) and daylight distribution (also known as no-sky line, NSL) – a two-part daylight assessment – to existing neighbouring buildings
- annual probable sunlight hours (APSH) over the whole year and in the winter months to existing neighbouring buildings
- VSC and APSH façade analysis to neighbouring outline consented development
- sun-on-ground to surrounding amenity spaces.

Alternative target values – acceptable level of retained daylight in proposed condition

The Report notes the following at para.7.6 regarding alternative targets in certain contexts, such as that in which the Site is situated:

> *In inner-urban locations and Opportunity Areas in particular, is has been widely acknowledged at local, mayoral and Planning Inspectorate level that VSC levels in the midteens are generally considered reasonable in such contexts, and it is also recommended to consider alternative targets by reference to similar building typologies.*

The principle is a valid one. Use of a mid-teen VSC benchmark has been held to be appropriate in denser, more built-up areas, whilst a higher benchmark (c. 20% VSC) has been held to be more appropriate in more suburban areas (see Appendix 2, paragraphs 37 and 38). The Council may have its own view as to an appropriate benchmark in this location.

Supplementary assessments

The Report includes the following supplementary assessments in accordance with the BRE guidelines:

- a comparison with the extant consent for the site, the purpose of which is to establish whether the proposed development will result in better or worse daylighting and sunlighting conditions to surrounding properties (see Appendix 2 to this letter, paragraphs 26 to 29); and

- a 'without balconies' test for properties with balconies, the purpose of which is to investigate whether the balconies or other daylight-inhibiting projections are the main factor in the relative light loss (see Appendix 2 to this letter, paragraphs 34 and 35).

I am satisfied that the supplementary assessments are appropriate and appear to have been run correctly.

Internal daylight and sunlight to proposed accommodation and sunlight to proposed amenity spaces

Daylight and sunlight to the proposed dwellings has been assessed to the proposed dwellings in Building 1 and student accommodation in Buildings 2 and 3, plus sunlight to proposed amenity spaces.

The Report has assessed a total of 1,024 rooms across Blocks 1, 2 and 3 as follows:

Building 1 - residential
- 55 LKDs
- 116 bedrooms

Building 2 – student accommodation
- 231 studios
- 2 dining/studies
- 4 student amenity

Building 3 – student accommodation
- 525 cluster study-bedrooms
- 85 cluster living rooms
- 4 dining rooms/studies
- 2 lounges

Daylight amenity to accommodation

Numerical guidelines for daylight

The BRE guide recommends the following minimum daylight targets in dwellings (median illuminance over 50% of the reference plane):
- Bedrooms – 100 lux
- Living rooms – 150 lux
- Kitchens – 150 lux

For rooms with shared uses, the BRE guide advises (at paragraph C17):

> *"Where a room has a shared use, the highest target should apply. For example in a bed sitting room in student accommodation, the value for a living room should be used if students would often spend time in their rooms during the day. Local authorities could use discretion here. For example, the target for a living room could be used for a combined living/dining/kitchen area if the kitchens are not treated as habitable spaces, as it may avoid small separate kitchens in a design. The kitchen space would still need to be included in the assessment area."*

The Mayor of London's *'Housing Design Standards LPG'* (June 2023) states "*it does not provide guidance on other specialist forms of housing such as shared living, temporary accommodation and student accommodation"*. It may therefore be appropriate to exercise a greater degree of flexibility when applying the BRE numerical guidelines to daylight and sunlight provision within the student accommodation in Buildings 2 and 3.

The Report assesses compliance against default application of daylight targets in the guidelines and against flexible application of lower daylight targets for certain room types, as summarised in the table below. I have provided justification for applying lower targets to some rooms in the final column, which I consider to be reasonable.

Use / room type	**Daylight target**		Justification for flexible application of a lower daylight target (BRE paragraph C17)
	Default application	Flexible application	
Residential			
LKD	200 lux	150 lux	Kitchen not treated as habitable space.
Bedroom	100 lux	-	-
Student accom.			
Studio	200 lux	150 lux	Median of targets for kitchen, living and bedroom uses.
Dining/study	150 lux	-	-
Amenity	150 lux	-	-
Cluster study-bedroom	150 lux	100 lux	Bedroom is primary use. Students can access other study spaces.
Cluster living room	150 lux	-	-

Also, whilst I have not seen the architectural floor plans for the proposed student buildings, it is often the case in study-bedrooms that the study desk is close to the window in the better lit part of the room, further advancing the justification of a 100-lux target to such rooms.

Daylight to Building 1 – residential

In the residential Building 1:

- 42 out of 55 LKDs (76%) would meet a 200-lux target (default application of higher target), and 49 (89%) would meet a 150-lux target (flexible application of lower target)
- 85 out of 166 bedrooms (73%) would meet the guidelines (100 lux).

Building 1 would achieve 74% compliance with default application of higher targets, or 78% compliance with flexible application of lower targets where applicable.

The rooms that would be below target on a flexible application of the guidelines, with lower targets where applicable, are listed below with their illuminances, also expressed as a percentage of the default target and conditional formatting to highlight the poorer lit rooms.

Room Label	Room Use	Target Illum. Lux	Median Illum. Lux	% of target
Block 1				
R5/2002	BEDROOM	100	99.6	100%
R6/2002	BEDROOM	100	90.3	90%
R7/2002	BEDROOM	100	49.1	49%
R8/2002	BEDROOM	100	40.4	40%
R9/2002	BEDROOM	100	22.4	22%
R10/2002	LKD	200	92.8	46%
R15/2002	BEDROOM	100	96.1	96%
R16/2002	LKD	200	32.1	16%
R6/2003	BEDROOM	100	85.2	85%
R7/2003	BEDROOM	100	52.9	53%
R8/2003	BEDROOM	100	41.8	42%
R9/2003	BEDROOM	100	22.6	23%
R10/2003	LKD	200	104.5	52%
R16/2003	LKD	200	47.9	24%
R6/2004	BEDROOM	100	86.8	87%
R7/2004	BEDROOM	100	46.7	47%
R8/2004	BEDROOM	100	47.8	48%
R9/2004	BEDROOM	100	50.4	50%
R16/2004	LKD	200	65.5	33%
R6/2005	BEDROOM	100	88.7	89%
R7/2005	BEDROOM	100	34	34%
R8/2005	BEDROOM	100	63	63%
R11/2005	LKD	200	144	72%
R6/2006	BEDROOM	100	92.9	93%
R7/2006	BEDROOM	100	35.9	36%
R8/2006	BEDROOM	100	68	68%
R6/2007	BEDROOM	100	94.6	95%
R7/2007	BEDROOM	100	38.2	38%
R8/2007	BEDROOM	100	73.6	74%
R7/2008	BEDROOM	100	42	42%
R8/2008	BEDROOM	100	80.2	80%
R7/2009	BEDROOM	100	46.5	47%
R8/2009	BEDROOM	100	89.8	90%
R7/2010	BEDROOM	100	52.1	52%
R8/2010	BEDROOM	100	96.4	96%
R7/2011	BEDROOM	100	56.3	56%
R6/2012	BEDROOM	100	78.8	79%

Daylight to Building 2 – student accommodation

In the student Building 2:

- 120 out of 231 studios (52%) would meet a 200-lux target (default application of higher target), and 165 (71%) would meet a 150-lux target (flexible application of lower target)
- Both dining room/studies (100%) would meet the guidelines (150 lux)
- All four student amenity spaces (100%) would meet the guidelines (200 lux).

Building 2 would achieve 53% compliance with default application of higher targets, or 72% compliance with flexible application of lower targets where applicable.

The rooms that would be below target on a flexible application of the guidelines, with lower targets where applicable, are listed below with their illuminances, also expressed as a percentage of the default target and conditional formatting to highlight the poorer lit rooms.

Room Label	Room Use	Target Illum. Lux	Median Illum. Lux	% of target
Block 2				
R3/2101	STUDIO	200	132.5	66%
R4/2101	STUDIO	200	130.4	65%
R5/2101	STUDIO	200	91.4	46%
R6/2101	STUDIO	200	83.8	42%
R7/2101	STUDIO	200	72.6	36%
R8/2101	STUDIO	200	69.9	35%
R9/2101	STUDIO	200	67.6	34%
R13/2101	STUDIO	200	147.6	74%
R15/2101	STUDIO	200	69.9	35%
R16/2101	STUDIO	200	65.2	33%
R17/2101	STUDIO	200	46.9	23%
R3/2102	STUDIO	200	138.9	69%
R4/2102	STUDIO	200	137.7	69%
R5/2102	STUDIO	200	96.5	48%
R6/2102	STUDIO	200	91.3	46%
R7/2102	STUDIO	200	80.5	40%
R8/2102	STUDIO	200	76.5	38%
R9/2102	STUDIO	200	74.3	37%
R10/2102	STUDIO	200	73	37%
R19/2102	STUDIO	200	79.3	40%
R20/2102	STUDIO	200	73.1	37%
R21/2102	STUDIO	200	53.5	27%
R3/2103	STUDIO	200	147	74%
R4/2103	STUDIO	200	141.8	71%
R5/2103	STUDIO	200	104.1	52%
R6/2103	STUDIO	200	97.6	49%
R7/2103	STUDIO	200	86.5	43%
R8/2103	STUDIO	200	82.3	41%
R9/2103	STUDIO	200	80.8	40%
R10/2103	STUDIO	200	78.1	39%
R19/2103	STUDIO	200	87.6	44%
R20/2103	STUDIO	200	78.7	39%
R21/2103	STUDIO	200	57.1	29%
R4/2104	STUDIO	200	148.6	74%
R5/2104	STUDIO	200	111.2	56%
R6/2104	STUDIO	200	103.6	52%
R7/2104	STUDIO	200	93.4	47%
R8/2104	STUDIO	200	89.6	45%
R9/2104	STUDIO	200	88.9	44%
R10/2104	STUDIO	200	86.6	43%
R19/2104	STUDIO	200	95.5	48%
R20/2104	STUDIO	200	86.3	43%
R21/2104	STUDIO	200	61.5	31%
R5/2105	STUDIO	200	116.2	58%
R6/2105	STUDIO	200	110.3	55%
R7/2105	STUDIO	200	100.5	50%
R8/2105	STUDIO	200	95.6	48%
R9/2105	STUDIO	200	93.8	47%
R10/2105	STUDIO	200	92.6	46%
R19/2105	STUDIO	200	100.4	50%
R20/2105	STUDIO	200	94.8	47%
R21/2105	STUDIO	200	64.9	32%
R5/2106	STUDIO	200	120	60%
R6/2106	STUDIO	200	115.5	58%
R7/2106	STUDIO	200	106.3	53%
R8/2106	STUDIO	200	102.7	51%
R9/2106	STUDIO	200	103.2	52%
R10/2106	STUDIO	200	96.6	48%
R19/2106	STUDIO	200	104.6	52%
R20/2106	STUDIO	200	97.8	49%
R21/2106	STUDIO	200	69.4	35%
R11/2108	STUDIO	200	130.8	65%
R12/2108	STUDIO	200	133	67%
R13/2108	STUDIO	200	90.2	45%
R11/2109	STUDIO	200	139.4	70%
R13/2109	STUDIO	200	117.5	59%

Daylight to Building 3 – student accommodation

In the student Building 3:

- 73 out of 85 cluster living rooms (86%) would meet the guidelines (150 lux)
- 1 out of 2 lounges (50%) would meet the guidelines (150 lux)
- 3 out of 4 dining rooms/studies (75%) would meet the guidelines (150 lux)
- 411 out of 525 cluster study-bedrooms (78%) would meet a 150-lux target (default application of higher target), and 489 (93%) would meet a 100-lux target (flexible application of lower target)

Building 3 would achieve 79% compliance with default application of higher targets, or 92% compliance with flexible application of lower targets where applicable.

The rooms that would be below target on a flexible application of the guidelines, with lower targets where applicable, are listed below with their illuminances, also expressed as a percentage of the default target and conditional formatting to highlight the poorer lit rooms.

Room Label	Room Use	Target Illum. Lux	Median Illum. Lux	% of target
Block 3				
R1/2201	CLUSTER_LIVING	150	72.9	49%
R3/2201	CLUSTER	150	95.5	64%
R4/2201	CLUSTER	150	85.1	57%
R5/2201	CLUSTER_LIVING	150	32.4	22%
R11/2201	CLUSTER_LIVING	150	68.2	45%
R21/2201	CLUSTER	150	97	65%
R22/2201	CLUSTER	150	85.9	57%
R23/2201	CLUSTER	150	92.8	62%
R24/2201	CLUSTER	150	81.4	54%
R26/2201	CLUSTER	150	83.4	56%
R27/2201	CLUSTER	150	35.6	24%
R28/2201	CLUSTER	150	79.6	53%
R30/2201	CLUSTER	150	72.3	48%
R32/2201	CLUSTER	150	85	57%
R33/2201	CLUSTER	150	83.2	55%
R34/2201	CLUSTER	150	55.5	37%
R35/2201	CLUSTER	150	40.4	27%
R36/2201	CLUSTER	150	30	20%
R15/2202	CLUSTER_LIVING	150	80.3	54%
R28/2202	CLUSTER	150	95.8	64%
R30/2202	CLUSTER	150	96.3	64%
R31/2202	CLUSTER_LIVING	150	32.1	21%
R32/2202	CLUSTER	150	90.2	60%
R34/2202	CLUSTER	150	84.5	56%
R36/2202	CLUSTER	150	98.1	65%
R37/2202	CLUSTER	150	99.8	67%
R38/2202	CLUSTER	150	63.5	42%
R39/2202	CLUSTER	150	52.9	35%
R40/2202	CLUSTER	150	35.9	24%
R41/2202	CLUSTER	150	37.8	25%
R42/2202	CLUSTER	150	42.3	28%
R15/2203	CLUSTER_LIVING	150	94	63%
R31/2203	CLUSTER_LIVING	150	33.6	22%
R32/2203	CLUSTER	150	96.5	64%
R34/2203	CLUSTER	150	91.7	61%
R38/2203	CLUSTER	150	79.8	53%
R39/2203	CLUSTER	150	75.5	50%
R40/2203	CLUSTER	150	50.4	34%
R41/2203	CLUSTER	150	54.4	36%
R43/2203	CLUSTER	150	49.4	33%
R15/2204	CLUSTER_LIVING	150	115.3	77%
R31/2204	CLUSTER_LIVING	150	34.2	23%
R40/2204	CLUSTER	150	91.2	61%
R41/2204	CLUSTER	150	95.8	64%
R43/2204	CLUSTER	150	79.5	53%
R15/2205	CLUSTER_LIVING	150	135.9	91%
R31/2205	CLUSTER_LIVING	150	35.8	24%
R31/2206	CLUSTER_LIVING	150	36.8	25%
R1/2207	LOUNGE	150	91.7	61%
R3/2207	STUDY	150	134.7	90%

Overall, the development appears to provide a reasonable level of adherence to daylight guidelines for a dense housing and student accommodation development.

Sunlight amenity to accommodation

Numerical guidelines for sunlight to dwellings

The BRE guide recommends that in dwellings, at least one habitable room, preferably a main living room, should be able to receive a minimum of 1.5 hours of direct sunlight on 21st March. Arguably, the sunlight guidelines do not apply to student accommodation, not being residential dwellings.

Sunlight to Building 1 – residential

Out of 55 units in Building 1, 44 (80%) would meet the BRE target.

Sunlight to Building 2 – student

Out of 237 student rooms in Building 2, 184 (78%) would meet the BRE target.

Sunlight to Building 3 – student

Out of 616 student rooms in Building 3, 338 (51%) would meet the BRE target. The lower rate of adherence in this building is on account of the proportion of north-facing rooms being higher.

Overall, the development appears to provide a reasonable level of adherence to sunlight guidelines for a dense housing and student accommodation development.

Sunlight to amenity areas and open spaces

The Report has assessed sunlight to the ground floor public realm area and the rooftop/podium amenity gardens within Buildings 1, 2 and 3. All spaces will comfortably exceed the BRE recommendations and benefit from good levels of sunlight.

6. Daylight and sunlight impacts to existing neighbouring properties

6.1. Daylight to existing neighbouring properties

Appendix 1 of the Report contains detailed tabulated results showing the daylight levels to existing neighbouring properties in the existing and proposed conditions, the absolute loss *(existing value minus proposed)* and relative loss *(absolute loss as a percentage of existing value)*. Appendix 2 provides similar data for the consented scheme, so that a direct comparison can be made.

The BRE standard numerical guidelines have been applied to establish the number of impacts on each property (or group of properties) that are within the guidelines and the number that are outside the guidelines.

To assist your understanding of the magnitude of the impacts, in this review report I will use the terms 'negligible', 'low', medium' and 'high' for the magnitude of impact, based on the categorisation set out in Table 1 below.

Table 1 – Categorisation of magnitudes of effect used in this review

Impact satisfies the BRE guidelines	**Impact does not satisfy the BRE guidelines**		
	0.79 to 0.70 times former value i.e. **21% to 30%** loss	0.69 to 0.60 times former value i.e. **31% to 40%** loss	<0.60 times former value i.e. **more than 40%** loss
Negligible impact	**Low** magnitude impact	**Medium** magnitude impact	**High** magnitude impact

The Report uses the same numerical bandings to categorise impacts on Battersea Power Station Phase 4a. However, it does not provide a breakdown for individual blocks, nor does it apply the same approach to other neighbouring properties. I have therefore analysed the results data in Excel and produced the summary tables below for the Existing v Proposed assessment (Table 2) and Existing v Consented assessment (Table 3) to allow a comparison to be made between the impacts of the two schemes.

Table 2 – Daylight summary - VSC & NSL – proposed scheme

Property address	No. of windows tested	No. of rooms tested	**VSC (windows)**					**NSL (rooms)**				
			Windows inside guidelines		Windows outside guidelines			Rooms inside guidelines		Rooms outside guidelines		
					21%-30% loss 'Low'	*31%-40% loss 'Medium'*	*>40% loss 'High'*			*21%-30% loss 'Low'*	*31%-40% loss 'Medium'*	*>40% loss 'High'*
Viridian Apartments	221	157	74	33%	34	24	89	88	56%	20	22	27
BPS Phase 4A - Buildings A1.1 - 1.5	692	396	523	76%	35	33	101	359	91%	9	16	12
BPS Phase 4A, Building A2	140	72	127	91%	10	2	1	69	96%	3	0	0
BPS Phase 4A, Building A3	269	174	100	37%	36	29	104	123	71%	20	3	28
142-192 Thessaly Road	52	50	37	71%	7	4	4	46	92%	3	1	0
Totals:	**1374**	**849**	**861**		**122**	**92**	**299**	**685**		**55**	**42**	**67**
			63%		9%	7%	22%	81%		6%	5%	8%

Table 3 – Daylight summary - VSC & NSL – consented scheme

Property address	No. of windows tested	No. of rooms tested	**VSC (windows)**					**NSL (rooms)**				
			Windows inside guidelines		Windows outside guidelines			Rooms inside guidelines		Rooms outside guidelines		
					21%-30% loss 'Low'	*31%-40% loss 'Medium'*	*>40% loss 'High'*			*21%-30% loss 'Low'*	*31%-40% loss 'Medium'*	*>40% loss 'High'*
Viridian Apartments	221	157	51	23%	24	38	108	73	46%	10	14	60
BPS Phase 4A - Buildings A1.1 - 1.5	692	396	570	82%	30	37	55	376	95%	7	5	8
BPS Phase 4A, Building A2	140	72	131	94%	6	0	3	71	99%	1	0	0
BPS Phase 4A, Building A3	269	174	118	44%	22	40	89	117	67%	15	21	21
142-192 Thessaly Road	52	-	37	71%	7	4	4	-	-	-	-	-
Totals:	**1374**	**799**	**907**		**89**	**119**	**259**	**637**		**33**	**40**	**89**
			66%		6%	9%	19%	80%		4%	5%	11%

For the proposed scheme:

- Out of 1374 windows tested for VSC, 861 (63%) would in inside the guidelines. The magnitudes of VSC impact on the remaining windows would be low to 122 (9%), medium to 92 (7%), and high to 299 (22%).
- Out of 849 rooms tested for NSL, 685 (81%) would in inside the guidelines. The magnitudes of NSL impact on the remaining rooms would be low to 55 (6%), medium to 42 (5%), and high to 67 (8%).

For the consented scheme:

- Out of 1374 windows tested for VSC, 907 (66%) would in inside the guidelines. The magnitudes of VSC impact on the remaining windows would be low to 89 (6%), medium to 119 (9%), and high to 259 (19%).
- Out of 799 rooms tested for NSL, 637 (80%) would in inside the guidelines. The magnitudes of NSL impact on the remaining rooms would be low to 33 (4%), medium to 40 (5%), and high to 89 (11%).

It is evident from this high-level comparison that compared with the consented scheme the proposed scheme would result in:

- Fewer adverse VSC and NSL impacts on Viridian Apartments
- More adverse VSC and NSL impacts on BPS Phase 4A, Buildings A1.1 to A1.5 and A2
- More adverse VSC impacts but fewer NSL impacts on BPS Phase 4A, Building A3
- Very similar impacts on 142-192 Thessaly Road

According to the BRE guide, bedrooms have a lower requirement for daylight than main living rooms and kitchens. I have therefore analysed the results data to look at the number of main living rooms and kitchens in existing surrounding properties with medium or high daylight impacts (either VSC or NSL). The numbers for the proposed and consented schemes are set out in Table 4 below.

Table 4 – Number of main living rooms in existing neighbouring properties with medium or high daylight impacts (VSC or NSL) – proposed scheme

Building	No. of living rooms or kitchens with medium or high daylight impacts	
	Proposed scheme	Consented scheme
Viridian Apartments	38	50 *(+12)*
BPS Phase 4A, Buildings A1.1 - 1.5	58	40 *(-18)*
BPS Ph4A, Building A2	3	3 *(=)*
BPS Ph4A, Building A3	34	33 *(-1)*
142-192 Thessaly Road	8	8 *(=)*
Total	**141**	**134** *(-7)*

Comparing the number of main living rooms and kitchens with medium or high daylight impacts for the proposed and consented schemes respectively, it is evident that the proposed scheme would result in:

- Fewer such impacts on Viridian Apartments (12 fewer)
- More such impacts on BPS Phase 4A, Buildings A1.1 to A1.5 (18 more)
- The same or similar such impacts on BPS Phase 4A, Buildings A2 and A3
- The same or similar such impacts on 142-192 Thessaly Road

I will now look at each building in turn.

a) Viridian Apartments

Daylight has been assessed to 221 windows serving 157 rooms in Viridian Apartments.

The following daylight impacts would be inside the VSC and NSL guidelines respectively:

- Proposed scheme: 74 windows (33%) and 88 rooms (56%)
- Consented scheme: 51 windows (23%) and 73 rooms (46%)

The following daylight impacts would be outside the VSC and NSL guidelines respectively:

- Proposed scheme:
  - VSC: low (21%-30% loss) for 34 windows, medium (31%-40% loss) for 24 windows, and high (>40% loss) for 89 windows
  - NSL: low for 20 rooms, medium for 22 rooms, and high for 27 rooms
  - 38 main living rooms or kitchens with medium or high impacts
- Consented scheme:
  - VSC: low for 24 windows, medium for 38 windows, and high for 108 windows
  - NSL: low for 10 rooms, medium for 14 rooms, and high for 60 rooms
  - 50 main living rooms or kitchens with medium or high impacts

The level of adherence of the proposed scheme to the VSC and NSL guidelines would be relatively low for Viridian Apartments. It would, however, be materially better than for the consented scheme, with adverse impacts that are fewer in number and lower in magnitude.

The slightly improved performance of the proposed scheme relative to the consented scheme is further illustrated in Table 5 below, which shows the mean VSC values across the windows on each floor level in the existing, proposed and consented scenarios, and the mean percentage losses for the proposed and consented schemes.

Table 5 – Viridian Apartments - mean VSC and percentage loss per floor – existing, proposed, and consented

Floor level	**Mean VSC**			*Mean % loss*	
	Existing	Proposed	Consented	*Proposed*	*Consented*
Ground	12.0%	7.3%	5.8%	*36.7%*	*45.9%*
1st	14.4%	8.0%	7.0%	*41.8%*	*47.0%*
2nd	16.3%	9.2%	8.6%	*40.6%*	*43.0%*
3rd	17.2%	10.4%	9.8%	*39.8%*	*39.0%*
4th	18.7%	13.5%	12.8%	*25.9%*	*29.7%*
5th	21.1%	14.5%	13.4%	*30.4%*	*35.7%*
6th	20.4%	15.4%	14.7%	*25.1%*	*28.1%*
7th	19.5%	18.0%	17.1%	*8.6%*	*13.4%*
8th	18.7%	18.4%	18.1%	*1.8%*	*3.0%*
All windows	**16.3%**	**10.4%**	**9.61%**	*34.9%*	*39.1%*

It is evident that the retained levels of VSC would generally be slightly better with the proposed scheme than the consented scheme, and that the relative loss of daylight would generally be lower for the proposed scheme than the consented scheme.

The Report includes a comparative assessment of daylight levels in the proposed and consented conditions, with results data at Appendix 4 and commentary at paragraphs 6.17 to 6.20. The purpose of such a test is explained at Appendix F of the BRE guide as follows:

> *Sometimes there may be an extant planning permission for a site but the developer wants to change the design. In assessing the loss of light to existing windows nearby, a local authority may allow the vertical sky component (VSC) and annual probable sunlight hours (APSH) for the permitted scheme to be used as alternative benchmarks. However since the permitted scheme only exists on paper, it would be inappropriate for it to be treated in the same way as an existing building, and for the developer to set 0.80 times the values for the permitted scheme as benchmarks.*

The difference in VSC values between the consented scheme and the proposed scheme ranges from +6.3% VSC (better) to -8.8% VSC (worse) with an average of -.0.8% VSC (imperceptible).

The Report rightly notes at paragraph 6.11 that a factor in the number and magnitude of some of the larger relative losses of daylight is the design of the neighbouring buildings, many of whose windows have a restricted view of sky because of projecting balconies above them and lateral privacy screens either side – see Figure 3 below.

Figure 5 – The view of sky from the windows of Viridian Apartments (right) over the site (left) is restricted by the balconies above and lateral privacy screens (brick pillars) either side.

The Report notes:

> *6.12 The above was acknowledged in respect of the Consented Scheme for the Site and as a result it was demonstrated that any meaningful form of development of this currently under-utilised site (even a development of similar height and proportions to Viridian Apartments) would result in some significant departures from the default numerical targets set out in the BRE guidelines.*
>
> *6.13 The Officers' Committee Report dated October 2016 for the Consented Scheme further acknowledged this by stating:*
>
> > *"Considering the characteristics of the site context, the level of compliance noted in the baseline condition is not surprising that any meaningful form of massing on the site will inevitably give rise to reductions to the existing daylight levels. This is further exacerbated by the presence of the balconies and privacy screens which materially reduce the availability of light".*
> >
> > *"It is therefore considered as the proposed development matches the height and massing of the existing surrounding buildings, as well as the consented developments, then the daylight effects of the proposal should be considered in the context of the urban location in which the site is positioned."*

The VSC results of the 'without balconies' assessment are at Appendix 1 (existing v proposed), Appendix 2 (existing v consented), and Appendix 3 (consented v proposed) of the Report.

The results for the existing v proposed scenario without balconies show that, were it not for the balconies, the VSC impacts to 137 windows (62%) would be inside the guidelines. Those that would be outside the guidelines comprise 12 low, 21 medium, and 51 high-magnitude VSC impacts. Compared to the results with balconies (which show 74 windows (33%) inside the guidelines, plus 34 low, 24 medium, and 89 high-magnitude impacts outside the guidelines), it is evident that the balconies and lateral privacy screens cause the number of VSC transgressions to almost double. They are therefore a significant factor in the relative light loss, though not the main factor.

b) <u>BPS Phase 4A, Buildings A1.1-A1.5 (Higgs/Tweed/Foots Row/Billington/Arden Mansions)</u>

Daylight has been assessed to 692 windows serving 396 rooms in Buildings A1.1-A1.5.

The following daylight impacts would be inside the VSC and NSL guidelines respectively:

- Proposed scheme: 523 windows (76%) and 359 rooms (91%)
- Consented scheme: 570 windows (82%) and 376 rooms (95%)

The following daylight impacts would be outside the VSC and NSL guidelines respectively:

- Proposed scheme:
  - VSC: low for 35 windows, medium for 33 windows, and high for 101 windows
  - NSL: low for 9 rooms, medium for 16 rooms, and high for 12 rooms
  - 58 main living rooms or kitchens with medium or high impacts
- Consented scheme:
  - VSC: low for 30 windows, medium for 37 windows, and high for 55 windows
  - NSL: low for 7 rooms, medium for 5 rooms, and high for 8 rooms
  - 40 main living rooms or kitchens with medium or high impacts

The level of adherence of the proposed scheme to the VSC and NSL guidelines appears to be reasonably high for Buildings A1.1 to A1.5. However, it is worse than for the consented scheme, with adverse impacts that are greater in number and in magnitude.

The slightly worse overall performance of the proposed scheme relative to the consented scheme is further illustrated by comparing Tables 6 and 7 below. Table 6 shows the mean VSC values across the windows on each floor level on each façade in the existing and proposed scenarios, and the mean percentage losses for the proposed scheme. Table 7 shows the same but for the existing v consented scenario.

I have grouped the results by façade; however, until the Applicant provides window maps, I am unable to confirm which is which.

Table 6 – Buildings A1.1-A1.5 (Higgs/Tweed/Foots Row/Billington/Arden Mansions) - mean VSC and percentage loss per floor and façade – existing v proposed

Floor level	Mean VSC										*Mean % loss*				
	Exising					Proposed									
	Façade 1	Façade 2	Façade 3	Façade 4	All	Façade 1	Façade 2	Façade 3	Façade 4	All	*Façade 1*	*Façade 2*	*Façade 3*	*Façade 4*	*All*
Level 1	15.5%	7.9%	9.9%	13.3%	12.0%	8.7%	5.5%	8.8%	12.5%	9.1%	*43.9%*	*32.2%*	*13.5%*	*7.3%*	*24.0%*
Level 2	18.0%	9.6%	8.9%	14.6%	13.2%	10.9%	7.1%	7.8%	13.7%	10.3%	*41.5%*	*29.6%*	*13.9%*	*6.8%*	*22.8%*
Level 3	18.6%	10.9%	12.2%	16.0%	14.8%	11.6%	8.2%	10.9%	15.1%	11.8%	*38.6%*	*27.6%*	*11.4%*	*6.1%*	*20.8%*
Level 4	19.7%	12.4%	13.5%	17.3%	16.1%	12.8%	9.6%	12.2%	16.5%	13.1%	*35.7%*	*25.7%*	*10.1%*	*5.5%*	*19.1%*
Level 5	20.5%	14.2%	14.8%	18.5%	17.3%	13.6%	11.1%	13.6%	17.7%	14.3%	*33.1%*	*23.9%*	*8.8%*	*5.0%*	*17.6%*
Level 6	21.9%	17.4%	17.4%	21.1%	20.1%	14.8%	13.9%	16.2%	20.3%	16.2%	*31.1%*	*21.1%*	*7.3%*	*4.3%*	*18.6%*
Level 7	32.3%	24.9%	18.9%	22.3%	22.8%	27.3%	21.2%	17.8%	21.5%	20.8%	*15.0%*	*15.3%*	*6.3%*	*4.0%*	*8.6%*
Level 8	23.9%	12.4%	19.2%	23.3%	19.7%	17.2%	11.2%	18.2%	22.4%	17.2%	*27.5%*	*9.7%*	*5.9%*	*4.2%*	*12.0%*
Level 9	30.8%	13.3%	21.4%	30.1%	24.0%	23.9%	12.2%	20.2%	29.2%	21.4%	*21.8%*	*8.8%*	*5.5%*	*3.3%*	*9.9%*
Level 10	27.0%	14.4%	23.0%	18.8%	20.1%	17.3%	13.2%	21.7%	18.3%	17.3%	*33.5%*	*8.1%*	*5.7%*	*2.7%*	*11.5%*
Level 11	27.6%	15.3%	30.5%	19.1%	22.1%	18.3%	14.3%	29.3%	18.8%	19.4%	*31.2%*	*7.0%*	*3.7%*	*2.3%*	*10.2%*
Level 12	28.0%	18.8%	26.9%	22.3%	23.4%	19.3%	18.0%	26.1%	22.0%	21.1%	*28.6%*	*4.5%*	*2.9%*	*1.6%*	*8.5%*
Level 13	28.4%		28.8%		28.6%	20.4%		27.8%		23.9%	*25.7%*		*3.2%*		*15.0%*
Level 14	31.9%		29.2%		30.6%	24.7%		28.2%		26.4%	*20.3%*		*2.9%*		*12.0%*
Level 15			29.5%		29.5%			28.6%		28.6%			*2.6%*		*2.6%*
All	23.6%	14.4%	21.2%	19.7%	19.9%	16.2%	12.3%	20.1%	19.0%	17.1%	*31.7%*	*16.4%*	*6.4%*	*4.4%*	*14.7%*

Table 7 – Buildings A1.1-A1.5 (Higgs/Tweed/Foots Row/Billington/Arden Mansions) - mean VSC and percentage loss per floor and façade – existing v consented

Floor level	Mean VSC										*Mean % loss*				
	Exising					Consented									
	Façade 1	Façade 2	Façade 3	Façade 4	All	Façade 1	Façade 2	Façade 3	Façade 4	All	*Façade 1*	*Façade 2*	*Façade 3*	*Façade 4*	*All*
Level 1	16.9%	7.9%	9.9%	13.3%	12.4%	10.4%	5.9%	9.3%	12.8%	9.9%	*41.8%*	*26.8%*	*7.8%*	*4.1%*	*20.2%*
Level 2	18.0%	9.6%	8.9%	14.6%	13.2%	11.5%	7.7%	8.3%	14.1%	10.8%	*38.3%*	*23.5%*	*7.6%*	*3.6%*	*18.3%*
Level 3	18.6%	10.9%	12.2%	16.0%	14.8%	12.4%	8.8%	11.5%	15.5%	12.4%	*34.2%*	*21.1%*	*6.1%*	*3.2%*	*16.2%*
Level 4	19.7%	12.4%	13.5%	17.3%	16.1%	13.8%	10.3%	12.8%	16.9%	13.7%	*30.3%*	*19.7%*	*5.3%*	*2.6%*	*14.5%*
Level 5	20.5%	14.2%	14.8%	18.5%	17.3%	14.6%	11.9%	14.2%	18.1%	15.0%	*28.3%*	*18.3%*	*4.6%*	*2.3%*	*13.4%*
Level 6	21.9%	17.4%	17.4%	21.1%	20.1%	16.0%	14.8%	16.8%	20.8%	17.1%	*25.6%*	*15.7%*	*3.7%*	*1.8%*	*14.2%*
Level 7	32.3%	24.9%	18.9%	22.3%	22.8%	27.7%	22.3%	18.4%	22.0%	21.5%	*13.8%*	*10.7%*	*3.1%*	*1.4%*	*5.4%*
Level 8	23.9%	12.4%	19.2%	23.3%	19.7%	18.7%	11.6%	18.8%	23.0%	18.0%	*21.4%*	*6.7%*	*2.6%*	*1.3%*	*8.1%*
Level 9	30.8%	13.3%	21.4%	30.1%	24.0%	26.0%	12.6%	20.9%	29.8%	22.4%	*14.9%*	*5.4%*	*2.3%*	*1.1%*	*6.0%*
Level 10	27.0%	14.4%	23.0%	18.8%	20.1%	20.5%	13.8%	22.4%	18.6%	18.3%	*22.2%*	*4.3%*	*2.5%*	*0.8%*	*6.8%*
Level 11	27.6%	15.3%	30.5%	19.1%	22.1%	21.8%	14.8%	30.0%	19.0%	20.5%	*18.9%*	*3.2%*	*1.5%*	*0.7%*	*5.5%*
Level 12	28.0%	18.8%	26.9%	22.3%	23.4%	23.1%	18.5%	26.8%	22.2%	22.2%	*15.4%*	*1.6%*	*0.6%*	*0.4%*	*4.0%*
Level 13	28.4%		28.8%		28.6%	24.4%		28.6%		26.4%	*11.7%*		*0.5%*		*6.4%*
Level 14	31.9%		29.2%		30.6%	29.0%		29.0%		29.0%	*7.8%*		*0.5%*		*4.3%*
Level 15			29.5%		29.5%			29.3%		29.3%			*0.6%*		*0.6%*
All	23.7%	14.4%	21.2%	19.7%	20.0%	18.2%	12.9%	20.8%	19.4%	18.0%	*24.6%*	*11.9%*	*3.0%*	*1.9%*	*10.3%*

It is evident that the retained levels of VSC with the proposed scheme would be lower (poorer) than with the consented scheme and that the percentage loss would be higher (worse) for the proposed scheme than the consented scheme. However, on facades 2, 3 and 4, the differences would less than 1% VSC worse on average across all windows on each floor level and therefore imperceptible. On façade 1, the differences would be greater, reaching around 4% VSC worse on average across all windows on each of the 13th and 14th floor levels. However, at that level the main living rooms and kitchens would mostly retain VSC values of around 20% VSC or more.

Logically, façade 1 is the northeast-facing façade of Building A1.5 (Arden Mansions) as it shows the greatest percentage loss of VSC.

The results for the existing v proposed scenario without balconies show that, were it not for the balconies, the VSC impacts to 625 windows (90%) would be inside the guidelines. Those that would be outside the guidelines comprise 22 low, 17 medium, and 28 high-magnitude VSC impacts. Compared to the results with balconies (which show 523 windows (76%) inside the guidelines, plus 35 low, 33 medium, and 101 high-magnitude impacts outside the guidelines), it is evident that the balconies and lateral privacy screens cause the number of VSC transgressions to increase by about a fifth (around 100 windows). They are therefore a factor in the relative light loss, though not the main factor.

c) BPS Phase 4A, Building A2 (Matkin Mansions)

Daylight has been assessed to 140 windows serving 72 rooms in Building A2.

The following daylight impacts would be inside the VSC and NSL guidelines respectively:

- Proposed scheme: 127 windows (91%) and 69 rooms (96%)
- Consented scheme: 131 windows (94%) and 71 rooms (99%)

The following daylight impacts would be outside the VSC and NSL guidelines respectively:

- Proposed scheme:
    - VSC: low for 10 windows, medium for 2 windows, and high for 1 window
    - NSL: low for 3 rooms
    - 3 main living rooms or kitchens with medium or high impacts
- Consented scheme:
    - VSC: low for 6 windows, and high for 3 windows
    - NSL: low for 1 room
    - 3 main living rooms or kitchens with medium or high impacts

The level of adherence of the proposed scheme to the VSC and NSL guidelines is high, with only a few low and medium-magnitude daylight impacts outside the guidelines. Furthermore, the impacts are similar to the consented scheme.

The results for the existing v proposed scenario without balconies show that, were it not for the balconies, the VSC impacts to all 140 windows (100%) would be inside the guidelines. Compared to the results with balconies (which show 127 windows (91%) inside the guidelines, plus 10 low, 2 medium, and 1 high-magnitude impacts outside the guidelines), it is evident that the balconies and lateral privacy screens are the main factor in the relative light loss.

d) BPS Phase 4A, Building A3 (Simper Mansions)

Daylight has been assessed to 269 windows serving 174 rooms in Building A3.

The following daylight impacts would be inside the VSC and NSL guidelines respectively:

- Proposed scheme: 100 windows (37%) and 123 rooms (71%)
- Consented scheme: 118 windows (44%) and 117 rooms (67%)

The following daylight impacts would be outside the VSC and NSL guidelines respectively:

- Proposed scheme:
    - VSC: low for 36 windows, medium for 29 windows, and high for 104 windows

- NSL: low for 20 rooms, medium for 3 rooms, and high for 28 rooms
- 34 main living rooms or kitchens with medium or high impacts

- Consented scheme:
  - VSC: low for 22 windows, medium for 40 windows, and high for 89 windows
  - NSL: low for 15 rooms, medium for 21 rooms, and high for 21 rooms
  - 34 main living rooms or kitchens with medium or high impacts

The level of adherence of the proposed scheme to the VSC and NSL guidelines is low for Building A3.and worse than for the consented scheme, with adverse impacts that are greater in number and in magnitude.

The slightly worse performance of the proposed scheme relative to the consented scheme is further illustrated in Table 8 below, which shows the mean VSC values across the windows on each floor level in the existing, proposed and consented scenarios, and the mean percentage losses for the proposed and consented schemes.

Table 8 – Building A3 - mean VSC and percentage loss per floor – existing, proposed, and consented

Floor level	Mean VSC			*Mean % loss*	
	Existing	Proposed	Consented	*Proposed*	*Consented*
1st	18.3%	9.2%	10.0%	*48.1%*	*42.7%*
2nd	19.6%	10.1%	10.9%	*46.8%*	*41.8%*
3rd	20.5%	11.0%	11.8%	*44.2%*	*39.6%*
4th	21.4%	12.1%	12.8%	*41.6%*	*37.3%*
5th	22.3%	13.2%	13.9%	*39.0%*	*35.0%*
6th	23.5%	14.6%	15.4%	*36.3%*	*32.3%*
7th	29.0%	20.1%	21.0%	*29.3%*	*25.7%*
8th	28.8%	22.9%	24.4%	*21.8%*	*15.9%*
9th	29.8%	24.3%	26.0%	*19.8%*	*13.5%*
10th	30.6%	25.6%	27.4%	*17.9%*	*11.3%*
All windows	23.4%	14.8%	15.7%	*37.3*	*32.5%*

It is evident that the retained levels of VSC would generally be slightly worse with the proposed scheme than the consented scheme, and that the relative loss of daylight would generally be higher for the proposed scheme than the consented scheme.

The results for the existing v proposed scenario without balconies show that, were it not for the balconies, the VSC impacts to 196 windows (73%) would be inside the guidelines. Those that would be outside the guidelines comprise 28 low, 13 medium, and 32 high-magnitude VSC impacts. Compared to the results with balconies (which show 100 windows (37%) inside the guidelines, plus 36 low, 29 medium, and 104 high-magnitude impacts outside the guidelines), it is evident that the balconies and lateral privacy screens cause the number of VSC transgressions to almost double. They are therefore a significant factor in the relative light loss, though not the main factor.

e) 142-192 Thessaly Road

Daylight has been assessed to 52 windows serving 50 rooms in 142-192 Thessaly Road.

The following daylight impacts would be inside the VSC and NSL guidelines respectively:

- Proposed scheme: 37 windows (71%) and 46 rooms (92%)
- Consented scheme: 37 windows (71%) (rooms not tested for NSL)

The following daylight impacts would be outside the VSC and NSL guidelines respectively:

- Proposed scheme:
  - VSC: low for 7 windows, medium for 4 windows, and high for 4 windows
  - NSL: low for 3 rooms, medium for 1 room
  - 8 main living rooms or kitchens with medium or high impacts
- Consented scheme:
  - VSC: low for 7 windows, medium for 4 windows, and high for 4 windows
  - NSL: rooms not tested for NSL
  - 8 main living rooms or kitchens with medium or high impacts

The level of adherence of the proposed scheme to the VSC and NSL guidelines is not unreasonable for 142-192 Thessaly Road and is the same for the proposed and consented schemes.

The results for the existing v proposed scenario without balconies show that, were it not for the balconies, the VSC impacts to all 52 windows (100%) would be inside the guidelines. Those that would be outside the guidelines comprise 28 low, 13 medium, and 32 high-magnitude VSC impacts. The balconies are therefore the main factor in the relative light loss.

6.2. Sunlight to existing neighbouring properties

I have analysed the sunlight results data in Excel and produced the summary tables below for the Existing v Proposed assessment (Table 9) and Existing v Consented assessment (Table 10) to allow a comparison to be made between the impacts of the two schemes.

Table 9 – Sunlight summary - APSH - Existing v Proposed

Property address	No. of rooms tested	Rooms inside **annual & winter** guidelines		APSH - annual (rooms)			APSH - winter (rooms)		
				Rooms outside annual			Rooms outside winter guidelines		
				21%-30% loss 'Low'	*31%-40% loss 'Medium'*	*>40% loss 'High'*	*21%-30% loss 'Low'*	*31%-40% loss 'Medium'*	*>40% loss 'High'*
Viridian Apartments	15	15	100%	0	0	0	0	0	0
BPS Phase 4A - Buildings A1.1 - 1.5	105	105	100%	0	0	0	0	0	0
BPS Phase 4A, Building A2	32	32	100%	0	0	0	0	0	0
BPS Phase 4A, Building A3	96	55	57%	5	3	33	0	0	21
142-192 Thessaly Road	2	2	100%	0	0	0	0	0	0
Totals:	**250**	**209**		**5**	**3**	**33**	**0**	**0**	**21**
		84%		2%	1%	1%	0%	0%	8%

Table 10 – Sunlight summary - APSH - Existing v Consented

Property address	No. of rooms tested	Rooms inside **annual & winter** guidelines		APSH - annual (rooms)			APSH - winter (rooms)		
				Rooms outside annual			Rooms outside winter guidelines		
				21%-30% loss 'Low'	*31%-40% loss 'Medium'*	*>40% loss 'High'*	*21%-30% loss 'Low'*	*31%-40% loss 'Medium'*	*>40% loss 'High'*
ı Apartments	15	15	100%	0	0	0	0	0	0
ase 4A - Buildings A1.1 - 1.5	105	105	100%	0	0	0	0	0	0
ase 4A, Building A2	32	32	100%	0	0	0	0	0	0
ase 4A, Building A3	96	55	57%	7	3	31	0	0	12
2 Thessaly Road	-	-	-	-	-	-	-	-	-
Totals:	**248**	**207**		**7**	**3**	**31**	**0**	**0**	**12**
		83%		3%	1%	1%	0%	0%	5%

The only building with sunlight impacts outside the BRE guidelines would be Phase 4A, Building A3. Of the 96 rooms tested, 55 (57%) would be inside the guidelines. The remaining rooms would mostly experience high magnitude impacts. However, all but three of them are bedrooms or kitchens, which have a lower requirement for sunlight. Just three are main living rooms, and in each case it would be low magnitude loss to annual sunlight only, with winter sunlight unaffected.

Sunlight to existing neighbouring amenity spaces

The amenity area within the Battersea Power Station Phase 4a (New Mansion Square) is largely to the south of the propped development. Nevertheless it has been assessed for sunlight in the Report. The results demonstrate that more 50% of its area could receive at least two hours of sunlight on 21 March, which satisfies the BRE guidelines. The result is much the same as that for the extant consented scheme.

7. Daylight and sunlight impacts to outline consented neighbouring developments

Chapter 7 of the Report presents the results of the VSC and APSH façade assessments of daylight and sunlight impacts on the outline consented neighbouring developments at Battersea Power Station Phase 3 and New Covent Garden Market.

7.1. Daylight to proposed neighbouring buildings

Battersea Power Station Phase 3

The VSC façade analyses for Battersea Power Station Phase 3 shows the façade fronting Battersea Park Road would retain in excess of 20% VSC and in most cases in excess of the BRE numerical guideline of 27% VSC following implementation of the proposed development.

New Covent Garden Market

The New Covent Garden Market scheme has been designed in closer proximity to the site and as such daylight availability would be lower. Whilst in some areas VSC would be below the mid-teens (≤15% VSC) on the lower levels of some elevations closest to the site, they are nonetheless in keeping with daylight levels to other facades within that masterplan. Most floors should retain VSC in excess of 15%.

Such VSC levels are not unreasonable for denser, modern development in opportunity areas and other urban environments.

7.2. Sunlight to buildings

The APSH façade analyses for Battersea Power Station Phase 3 and New Covent Garden Market schemes show that both schemes would enjoy levels of sunlight in excess of the BRE numerical guidelines to their facades that face the proposed development.

7.3. Sunlight to proposed neighbouring amenity spaces

New Covent Garden Market

The main linear park in the New Covent Garden Market scheme would meet the sun-on-ground guidelines on 21 March with more than 50% of its area able to receive at least two hours of sunlight on that date.

The two podium areas would be below the guidelines with the proposed development in place, with 19.4% and 17.2% of their area respectively receiving at least two hours of sunlight on 21 March – see Figure 6 below. This is less than for the consented scheme (36.8% and 28.8% respectively) – see Figure 7 below.

Figure 6 – Two-hour sunlit area on 21 March in New Covent Garden site – proposed scheme

Figure 7 – Two-hour sunlit area on 21 March in New Covent Garden site – extant consent scheme

The two podium spaces would reach the threshold of two hours sunlight to 50% of their area on 21st April and 8th May respectively, some 4 to 6 weeks later than the guidelines.

Conclusions

The assessment has been undertaken in accordance with the published guidelines.

Clarifications

The Applicant should be asked to provide window maps to identify the location of the windows in existing neighbouring properties. The consultant has promised to provide them today.

Internal daylight and sunlight within the proposed development

Overall, daylight and sunlight provision would be reasonable for a dense housing and student accommodation development and amenity spaces would be well sunlit

Effects on existing surrounding properties and amenity spaces

The proposed development would result in materially adverse impacts on daylight and sunlight to existing surrounding properties.

The impacts of the proposed development on Viridian Apartments would be less than the impacts of the consented scheme. However, the impacts on the northeast elevations of Battersea Power Station Phase 4 (New Mansion Square) would be greater than those of the extant consent.

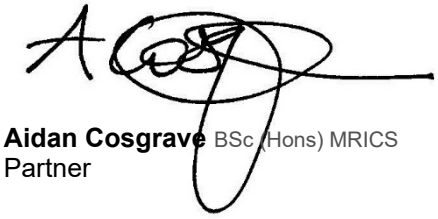
The balconies present on the neighbouring buildings are a factor in the magnitude of the relative light loss. The level of adherence to the guidelines would be greater but for their presence, as they limit the view of sky and increase the sensitivity of the window that sits beneath them.

Planning balance

The question for you and, ultimately, the Council's decision makers is whether, in the site context, the effects are acceptable. Ultimately it comes down to a matter of judgment and overall planning balance, which is beyond my remit as it brings into play broader considerations. Certainly, being an opportunity area, a greater degree of obstruction is to be expected, and the extant planning consent provides an appropriate benchmark with which to compare the pros and cons of the proposed development.

I trust this provides you with what you need. If you have any queries, please let me know.

Yours sincerely



Aidan Cosgrave BSc (Hons) MRICS
Partner

Encs: Appendix 1 – Glossary of terms
Appendix 2 – Summary of guidelines for assessing daylight, sunlight, and overshadowing

Appendix 1 – Glossary of terms

The daylight and sunlight terminology used in our review is explained below.

Term	Meaning
Annual probable sunlight hours (**APSH**)	The long-term average of the total number of hours during a year in which direct sunlight is expected to shine on the unobstructed ground, allowing for average levels of cloudiness for the location in question.
Daylight factor (D)	Ratio of total daylight illuminance at a reference point on the working plane within a space to outdoor illuminance on a horizontal plane due to an unobstructed CIE standard overcast sky.
Illuminance	The angular altitude of the top of an obstruction above the horizontal, measured from a reference point in a vertical plane in a section perpendicular to the vertical plane.
KD, LD, LKD	Acronyms for kitchen-diner, living/dining room, living/kitchen/dining room.
No-sky line (**NSL**)	The outline on the working plane inside a room of the area from which no sky can be seen. It divides points on the working plane which can and cannot see the sky.
Obstruction angle	The angular altitude of the top of an obstruction above the horizontal, measured from a reference point in a vertical plane in a section perpendicular to the vertical plane.
Sky factor	Ratio of the parts of illuminance at a point on a given plane that would be received directly through unglazed openings from a sky of uniform luminance, to illuminance on a horizontal plane due to an unobstructed hemisphere of this sky. The sky factor does not include reflected light, either from outdoor or indoor surfaces.
Sun on ground (**SOG**)	The measure of sunlight potential to gardens and amenity spaces. It is measured in hours on the spring equinox (21 March) at a point on the ground accounting for the latitude of the site location. Sunlight below an altitude of 10° is usually discounted as it is likely to be prevented from reaching the ground by fences, plants or other low-level obstructions.
Target illuminance (E_T)	Illuminance from daylight that should be achieved for at least half of annual daylight hours across a specified fraction of the reference plane in a daylit space.
Vertical sky component (**VSC**)	The amount of daylight falling on a vertical wall or window. It is the ratio of that part of illuminance, at a point on a given vertical plane (e.g. window), that is received directly from a CIE standard overcast sky, to simultaneous illuminance on a horizontal plane due to an unobstructed hemisphere of this sky. The VSC does not include reflected light, either from the ground or from other buildings. The ratio is usually expressed as a percentage. The maximum value is almost 40% for a completely unobstructed vertical wall.
Working plane	Horizontal, vertical or inclined plane in which a visual task lies. Normally the working plane may be taken to be horizontal, 0.85 m above the floor in housing.

Appendix 2 – Summary of guidelines for assessing daylight, sunlight and overshadowing

1. The key guidelines relating to daylight, sunlight and overshadowing and solar glare, are contained in *'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice'* (Building Research Establishment (**BRE**), BR209, third edition, 2022).

Guidelines on daylight and sunlight within new buildings

Detailed design

Daylight Illuminance

2. Daylight illuminance method involves using climate data for the location of the site (weather file within the software) to calculate the illuminance from daylight at each point on an assessment grid on the reference plane at an at least hourly interval for a typical year.

3. A target illuminance (E_T) should be achieved across at least half of the reference plane in a daylit space for at least half of the daylight hours.

4. Appendix C, *Interior daylighting recommendations,* of the BRE guide gives guidance on how to calculate the illuminance. This methodology require assessment via detailed computer modelling to simulate the illuminance or daylight factor at calculation points within a proposed space. Appropriate simulation settings must be used. The calculation model should include all the room surfaces, and any surface outside the room that could affect the light received.

5. The BRE guide 2022 gives the target illuminance recommendations of 200 lux for kitchens, 150 lux for living rooms and 100 lux for bedrooms in UK dwellings. These values to be exceeded over at least 50% of the assessment points in the room for at least half of the daylight hours.

6. Living rooms and kitchens need more daylight than bedrooms. Areas without a special requirement for daylight, like bathrooms, stairwells, garages and storage areas, need not be assessed.

7. Internal and external surfaces and obstructions should be modelled including appropriate surface reflectance. Glazing transmission factors, including maintenance factors, need to be included in the simulation along with account for, or modelling of, window framing.

8. The calculation of illuminance or daylight factor needs to be carried out on a grid of points on a reference plane within each room assessed. The calculation plane should normally be 0.85m from the floor level and is sometimes described as a working plane.

9. It is recommended that a band of 0.3m should be excluded. Professional judgement should be used in cases with irregular-shaped spaces or rooms with corridors or annexe areas. For example, in a room with a corridor, the corridor need not be included in the assessment grid area if it is less than 1.5m).

Sunlight to new dwellings

10. The BRE guide states:

> *In housing, the main requirement for sunlight is in living rooms, where it is valued at any time of day but especially in the afternoon. Sunlight is also required in conservatories. It is viewed as less important in bedrooms and in kitchens, where people prefer it in the morning rather than the afternoon.*
>
> *Sensitive layout design of flats will attempt to ensure that each individual dwelling has at least one main living room which can receive a reasonable amount of sunlight.*
>
> *The overall sunlighting potential of a large residential development may be initially assessed by counting how many dwellings have a window to a main living room facing south, east or west. The aim should be to minimise the number of dwellings whose living rooms face solely north, north east or north west, unless there is some compensating factor such as an appealing view to the north.*

11. The BRE guide recommends that space should receive a minimum of 1.5 hours of direct sunlight on 21st March. For dwellings, at least one habitable room, preferably a main living room, should meet at least the minimum criterion.

12. Where groups of dwellings are planned, site layout design should aim to maximise the number of dwellings that meet this recommendation.

13. Although the criteria applies to rooms of all orientations, if a room faces significantly north of due east or west, the guide notes they are unlikely to be met.

14. When calculating the sunlight, the BRE guide advises that:

> *…if window positions are already known, a reference point on the inside face of the window aperture at the centre of the opening width and at least 1.2m above the floor and 0.3 m above the sill (whichever is the higher) is used.*

15. It also advises that:

> *Sunlight blocked by window reveals and balconies or overhangs above the window should not be included, but the effect of window frames and bars can be discounted. Surrounding obstructions should be modelled in detail, and if this is done a minimum solar altitude, as suggested in BS EN 17037, need not apply. If a room has multiple windows, the amount of sunlight received by each can be added together provided they occur at different times and sunlight hours are not double counted.*

Amenity spaces

16. Proposed amenity spaces should be assessed on the equinox (21 March). The sunlighting requirements of each space may differ depending on use, but in general it will be considered adequately sunlit if at least half its area can receive at least two hours of sunlight on 21 March (the two-hours sun-on-ground test). Normally trees and shrubs, fences or walls less than 1.5 metres high and sunlight at an altitude of 10° or less are all ignored.

17. Where a large building is proposed, it can be illustrative to plot shadow plots at different times of day and year, with the equinox (21 March) being the best assessment date. Summer and winter solstices (21 June and 21 December) are optional additional dates.

Guidelines on impact of development on daylight, sunlight and overshadowing to neighbouring properties

18. The BRE guide provides methodologies and numerical guidelines for assessing the effects of development on daylight and sunlight to neighbouring properties and sunlight to amenity spaces.

Effects on daylight and sunlight to buildings

19. Where some part of the proposed development will subtend an angle greater than 25° to the horizontal measured from the level of the centre of the lowest neighbouring windows, the effect on daylight and sunlight to the habitable rooms should be assessed using the following tests:

    - Daylight:
        - vertical sky component (**VSC**) at the window, which assesses the total available skylight; and
        - no-sky line contour (**NSL**) on the working plane inside rooms (where layouts are known[1]), which assesses the distribution of daylight around the room.
    - Sunlight:
        - percentage of annual probable sunlight hours (**APSH**) at the window, where it faces within 90° due south, both annually and in the winter months.

[1] The author of the BRE Guide, Dr Littlefair, recommends not running the NSL test using estimated layouts because it can give inaccurate findings. (BRE Client Report dated 5 March 2019 for a review at Reardon and Lowder Houses, Wapping on behalf of London Borough of Tower Hamlets - planning application reference PA/18/03541/A1)

20. The assessments are run in the existing and proposed scenarios on an absolute scale, followed by a comparative scale measuring the factor of former value (or percentage reduction), so that the magnitude of impact is quantified.

21. For daylight, all habitable rooms should be assessed. For sunlight, all main living rooms and conservatories should be assessed.

22. The BRE numerical guidelines work on the principle that, unless certain minimum values will be retained with the proposed development in place (27% VSC and 25% APSH with 5% APSH in winter), or in the case of sunlight the annual loss will be no greater than 4% APSH, a reduction to less than **0.8 times former value** (i.e. relative losses exceeding 20% of the existing value) will be noticeable to occupiers.

Effects on sunlight to gardens and amenity spaces

23. The effects on sunlight to gardens/amenity spaces can be checked by calculating the percentage of each area that can receive at least two hours of sunlight on 21 March. If, after development, it will reduce to less than 50% and less than 0.8 times its former value, the loss of sunlight will be noticeable to users of the space.

24. Where a large building is proposed, shadow plots can be produced at different times of day and year. The equinox (21 March) is the best assessment date. Summer and winter solstices (21 June and 21 December) are optional additional dates.

Cumulative effects

25. If planning consent has been granted for other nearby developments that have not yet been built, it is customary to assess the cumulative effects of the proposed development and nearby consented developments on the surrounding receptors so that the combined effects can be understood.

Setting alternative target values

26. Appendix F of the BRE guide provides advice on setting alternative target values for daylight and sunlight. This notes that the numerical target values are purely advisory and different targets may be used based on the special requirements of the proposed development or its location.

27. Alternative targets may be generated from the layout dimensions of existing development or be based on an extant planning permission. Table F1 of the BRE guide gives various building-to-building angles of long, uniform obstructions and their corresponding VSC values. An example is given of a narrow mews in an historic city centre where the VSC values derived from the obstruction angle could be used as a target vale for development in that street if new development is to match the existing layout.

28. The guide notes that a similar approach may be adopted in cases where an existing building has windows that are unusually close to the site boundary and taking more than their fair share of light. This is an acknowledgement that the first built scheme of a local cluster could otherwise prevent the full potential of adjacent sites from being realised. In such cases, a greater reduction in daylight and sunlight may be unavoidable if one site is not to be unfairly prejudiced by how another has been developed.[2] In such circumstances where it is appropriate to enable new development to match the height and proportions of existing buildings, alternative target values for VSC and APSH for the relevant windows may be set to those for a **'mirror-image'** building of the same height and size, an equal distance away on the other side of the boundary.[3]

29. Where there is an **extant planning consent** for the application site and the developer wishes to change the design, the BRE guide states:

> *In assessing the loss of light to existing windows nearby, a local authority may allow the vertical sky component (VSC) and annual probable sunlight hours (APSH) for the permitted scheme to be used as alternative benchmarks. However, since the permitted scheme only exists on paper, it would be inappropriate for it to be treated in the same way as an existing building, and for the developer to set 0.8 times the values for the permitted scheme as benchmarks.*

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[2] Appeal Reference APP/E5900/W/17/3191757, **Enterprise House, 21 Buckle Street**, London E1 8NN, London Borough of Tower Hamlets, Inspector's decision dated 17 December 2018, https://acp.planninginspectorate.gov.uk/ViewDocument.aspx?fileid=30276955

[3] BRE Guide, Appendix F, paragraph F5

Environmental Impact Assessments (EIAs)

30. Appendix H of the BRE guide provides advice on ascribing a significance to effects in **EIAs**. The guide states:

> *Adverse impacts occur when there is a significant decrease in the amount of skylight and sunlight reaching an existing building where it is required, or in the amount of sunlight reaching an open space.*
> *The assessment of impact will depend on a combination of factors, and there is no simple rule of thumb that can be applied.*
>
> *Where the loss of skylight or sunlight fully meets the guidelines in this document, the impact is assessed as negligible or minor adverse. Where the loss of light is well within the guidelines, or only a small number of windows or limited area of open space lose light (within the guidelines), a classification of negligible impact is more appropriate. Where the loss of light is only just within the guidelines, and a larger number of windows or open space area are affected, a minor adverse impact would be more appropriate, especially if there is a particularly strong requirement for daylight and sunlight in the affected building or open space.*
>
> *Where the loss of skylight or sunlight does not meet the guidelines in this document, the impact is assessed as minor, moderate or major adverse. Factors tending towards a minor adverse impact include:*
>
> - *only a small number of windows or limited area of open space are affected;*
> - *the loss of light is only marginally outside the guidelines;*
> - *an affected room has other sources of skylight or sunlight;*
> - *the affected building or open space only has a low level requirement for skylight or sunlight; and*
> - *there are particular reasons why an alternative, less stringent, guideline should be applied, for example an overhang above the window or a window standing unusually close to the boundary.*
>
> *Factors tending towards a major adverse impact include:*
>
> - *a large number of windows or large area of open space are affected;*
> - *the loss of light is substantially outside the guidelines;*
> - *all the windows in a particular property are affected; and*
> - *the affected indoor or outdoor spaces have a particularly strong requirement for skylight or sunlight, e.g. a living room in a dwelling or a children's playground.*

Acceptability of impacts on daylight and sunlight

31. The assessment of impact on daylight and sunlight amenity is a two-part process[4]: first, as a matter of calculation, whether there would be a material deterioration in conditions by reference to the BRE guidelines; and second, as a matter of judgment, whether that deterioration would be acceptable in the circumstances.

32. The first stage can be addressed by applying the BRE assessment methodology and numerical guidelines, as explained above.

33. The second stage brings into play much wider considerations, such as:

    i) Whether the neighbouring building stands unusually close to the site boundary, including the highway, taking more than its fair share of light, such that a greater reduction in light may be unavoidable if one site is not to be prejudiced by how another has been developed. (A '**mirror-image**' study can be informative in such cases – see paragraph 28 above.)

    ii) Whether windows in neighbouring buildings are self-obstructed by overhanging or inset balconies or other projections such as to make relatively larger reductions unavoidable even if there is a modest new obstruction opposite - in effect themselves taking away more than their fair share of light. (A '**without balconies**' study can be informative in such cases – see paragraph 34 below.)

    iii) In historic city centres or areas characterised by modern tall buildings, high density and close proximity, a higher degree of obstruction may be unavoidable if new buildings are to match the height and proportion of existing buildings.

[4] ***Rainbird**, R (on the application of) v The Council of the London Borough of Tower Hamlets* [2018], https://www.bailii.org/ew/cases/EWHC/Admin/2018/657.html

iv) In areas that are designated by planning authorities for substantial growth or providing opportunities for change and sustainable regeneration, the sort of change that would be brought about by the introduction of taller, denser development is to be expected, including reductions in daylight and sunlight levels, closer proximity, loss of outlook, etc.

34. Balconies and projecting wings on an existing neighbouring building may mean larger relative reductions in daylight and sunlight are unavoidable. That is because they limit the available daylight and sunlight and may amplify relative reductions in light caused by development. Whether they are the main factor in the relative light loss can be checked by carrying out a supplementary assessment in the existing and proposed situations without the balcony or other projection in place. If, with the balcony, wing, or other projection in place, the proposed VSC/NSL/APSH value would be less than 0.8 times the existing value, yet with it removed the ratio would be well over 0.8, then the balcony, wing or other projection is the main factor in the relative loss of light, rather than purely the size of the new obstruction. [5]

35. When judging whether an adverse impact is acceptable, it may be appropriate to consider the levels of daylight and sunlight that would be retained with the proposed development in place and whether the resulting living conditions would nonetheless be acceptable, in context.

36. One benchmark that is commonly used in denser, inner-urban areas is to check whether retained VSC values would be in the mid-teens or greater. An example of this approach is the Whitechapel Estate Appeal [6]. There the Inspector noted that development that resulted in a proportion of residual VSC values in the mid-teens, with a smaller proportion in the bands below 15% VSC, have been found acceptable in major developments across London. He stated:

> *108. The BRE document offers guidance on generally acceptable standards of daylight and sunlight, but advises that numerical values are not to be rigidly applied and recognises the importance of the specific circumstances of each case. Inner city development is one of the examples where a different approach might be justified. This is specifically endorsed by the [Mayor of London's] Housing SPG, which calls for guidelines to be applied sensitively to higher density developments, especially in (among others) opportunity areas and accessible locations, taking into account local circumstances, the need to optimise housing capacity, and the scope for the character and form of an area to change over time. … I agree with the appellants that blanket application of the BRE guide optimum standards, which are best achieved in relatively low-rise well spaced layouts, is not appropriate in this instance.*
>
> *109. The SPG advises that the daylight impact on adjacent properties should be assessed drawing on "broadly comparable residential typologies within the area and of a similar nature across London"...*
>
> *112. The figures [from comparable typologies from a range of example sites across Central London analysed by the appellants, comprising both traditional urban streets and recently permitted areas of significant development] show that a proportion of residual Vertical Sky Component ('VSC') values in the mid-teens have been found acceptable in major developments across London. This echoes the Mayor's endorsement in the preSPG decision at Monmouth House, Islington that VSC values in the mid-teens are acceptable in an inner urban environment. They also show a smaller proportion in the bands below 15%...*
>
> *113. I acknowledge that a focus on overall residual levels could risk losing sight of individual problem areas. It is accepted that light is only one factor in assessing overall levels of amenity, but I consider that the trade-off with other factors, such as access to public transport or green space, is likely to be of more relevance to an occupier of new development than to an existing neighbour whose long-enjoyed living conditions would be adversely affected by new buildings. However, I also consider that Inner London is an area where there should generally be a high expectation of development taking place. This is particularly so in the case of the appeal site, where the Whitechapel Vision Masterplan and the City Fringe Opportunity Area Planning Framework have flagged the desirability of high density development. Existing residents would in my view be prepared for change and*

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[5] BRE Guide, paragraphs 2.2.11 to 2.2.12 and paragraph 3.2.9

[6] Appeal reference APP/E5900/W/17/3171437, **Varden Street and Ashfield Street**, London E1, London Borough of Tower Hamlets, Inspector's decision dated 21 February 2018, https://acp.planninginspectorate.gov.uk/ViewDocument.aspx?fileid=25711269

would not necessarily expect existing standards of daylight and sunlight to persist after development.

37. Whilst use of the mid-teen VSC benchmark may be appropriate in denser and more built-up areas, a higher benchmark may be more appropriate in more suburban areas. [7]

38. Another approach to judging acceptability is to consider the retained ADF values in the proposed condition against those recommended in the BRE guide for new dwellings. Such an approach is advocated by the author of the BRE guide, Dr Paul Littlefair, because it relates to the level of daylight actually experienced by an occupant inside their property, rather than the amount of light falling on the outside face of the window. Arguably, it gives a better indication of residual daylight levels as it takes account of window design and room layout. [8]

39. Residual ADF values appear to have been a key factor in the dismissal of the Appeal at 8 Albert Embankment. In that case, the impact on a social housing block, which houses families and people with vulnerabilities, would have satisfied the mid-teen VSC benchmark; however, 23 out of 25 living rooms would have been left with daylight levels below minimum recommended ADF values. The Inspector and Secretary of State considered the daylight impacts to be unacceptable. [9]

40. In the Appeal at Graphite Square, the Inspector considered several important factors when judging very significant losses of light to be acceptable: [10]

    a. In relation to a neighbouring social housing block, the relevant factors were:

        i. the flats were dual aspect, with the affected rooms being predominantly small kitchens, kitchen/diners, bathrooms, and second bedrooms, whilst the main living areas and main bedrooms, which faced in the opposite direction and received much more significant amounts of daylight and sunlight, would be completely unaffected;

        ii. many of the affected kitchens were too small to qualify as habitable rooms for the purpose of the calculations; and

        iii. the kitchens and second bedrooms received little daylight due to the overhanging deck-access or roof and relied on electric lighting most of the time to facilitate use, such that the loss of daylight would not make a great difference to their pattern of use or enjoyment.

    b. In relation to a neighbouring modern private housing block, the relevant factors were:

        i. the impacts must be seen in the context that the building had a rather privileged position facing minimal massing on the relevant part of the appeal site, as a result of which it received much higher levels of daylight and sunlight than one might reasonably expect in such an urban location;

        ii. the design of the building contributed to the impacts, because the worst affected rooms were those awkwardly located at an internal corner of the building or below overhanging balconies; and

        iii. whoever designed that building ought to have considered the strong likelihood that the appeal site, given its central London location and obvious potential, would not remain underused.

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7 Appeal reference APP/A5840/W/19/3225548, **Burgess Business Park**, Parkhouse Street, London SE5, London Borough of Southwark, Secretary of State's decision dated 29 April 2020, paragraphs IR247 and IR248, https://acp.planninginspectorate.gov.uk/ViewDocument.aspx?fileid=37313536

8 Appeal reference APP/E5900/W/17/3190685, land at **1 Cambridge Heath Road**, London E1, London Borough of Tower Hamlets, Secretary of State's decision dated 10 June 2019, https://acp.planninginspectorate.gov.uk/ViewDocument.aspx?fileid=32778055

9 Appeal reference APP/N5660/V/20/32542038, **8 Albert Embankment**, London SE1, London Borough of Lambeth, Secretary of State's decision dated 23 June 2021, https://acp.planninginspectorate.gov.uk/ViewDocument.aspx?fileid=43043066

10 Appeal references APP/N5660/W/18/3211223 and APP/N5660/W/19/3225761, **Graphite Square**, London SE11, London Borough of Lambeth, Inspector's decision dated 25 September 2019, https://acp.planninginspectorate.gov.uk/ViewDocument.aspx?fileid=34348840

APPENDIX 8.0
SOCIO-ECONOMIC REPORT

SUBSTITUTED SOCIO-ECONOMIC STATEMENT

BATTERSEA PARK ROAD

PREPARED ON BEHALF OF WATKIN JONES GROUP

24 JANUARY 2024

THIS IS THE CONTENTS

EXECUTIVE SUMMARY

- The Proposed Development is expected to deliver a number of socio-economic benefits for new and existing residents and businesses within the local community. Key benefits based on the **revised scheme** (design finalised in March 2023) are summarised below. These key figures below supersede equivalent figures within the original report (dated April 2022). **A further update has been made in this Substituted report in January 2024 to account for changes in local and national planning policy.**

CONSTRUCTION PHASE BENEFITS

- The construction of the Proposed Development represents a significant investment in the local economy by the applicant, which will generate temporary jobs both directly (employed by contractors on-site) and indirectly (within the construction supply chain and elsewhere within the local economy). In total, it is estimated that the Proposed Development will create the equivalent of **280 Full Time construction jobs**, sustained for the duration of the anticipated three year build period.

- Furthermore, the scheme will generate an estimated **£68m in Gross Value Added** (GVA), benefitting the London economy, and create an estimated 7-10 apprenticeships over the course of the build. In line with the LBW Planning Obligations SPD, the applicant will endeavour to create at least **42 jobs and apprenticeships for LBW residents** during the construction phase.

POPULATION AND HOUSING IMPACTS

- On completion the Proposed Development will deliver **762 Purpose-Built Student Accommodation (PBSA) units**[1], alongside **55 affordable homes** split between London Affordable Rent (LAR) and Shared Ownership tenures. This will make a valuable contribution to the supply of affordable housing within the Borough, and provision of PBSA will help to **reduce pressure on the existing and future general housing stock** created by student households occupying family homes and HMOs.

- In total, the Proposed Development is estimated to yield a population of 907, assuming full occupancy of the PBSA accommodation (one student per room – 762 residents), and affordable housing occupancy levels derived from the GLA population yield calculator (145). On a 'worst case' scenario basis, this would lead to 907 additional registrations with local GP practices. In reality, it is likely that some new residents will already be registered locally (for example where an individual moves out of their family home), whilst students are usually encouraged to register with GP practices linked to their place of study. Our analysis of capacity within local GP practices has shown that local population growth associated with **the Proposed Development would not lead to these GP practices becoming over-subscribed** relative to the Royal College of GPs benchmark of 1 GP per 1,800 registered patients.

- No children will be permitted to live within the PBSA, meaning that the only pressure on school places will arise from the 55 LAR and Shared Ownership units. According to the GLA Population Yield Calculator, these 55 units will yield 45 residents aged under 18, of whom c.33 are expected to be aged 11 or under. Our analysis of capacity within local schools has also concluded that this **small increase in the number of children living locally could comfortably be absorbed by existing spare capacity in existing local schools**.

[1] Equivalent to 305 residential units (at 1:2.5) for LBW's Housing Delivery Test

- The Site is located in close proximity to Battersea Park, which offers a range of open space and recreation opportunities for all ages, in addition to **374 sq.m of play space** proposed on-site for children of all ages.

PERMANENT EMPLOYMENT CREATION

- The Proposed Development is also expected to create permanent jobs on completion, both within the proposed flexible ground floor Class E/F space, and in the operation and management of the PBSA. It is estimated that a PBSA operator would employ 8 FTE staff to manage the block and provide cleaning and maintenance services, whilst c.7-23 jobs could be created within the commercial space if let for retail use – **a total expected maximum of 31 new jobs**. If used for co-working space, the number of jobs could exceed this, whilst a community use would likely generate fewer jobs.

- It has been estimated that the Site in its current use also sustains c.30 jobs, based on applying a retail warehouse employment density to the existing floorspace. On this basis, the Proposed Development is expected to be broadly neutral in terms of number of permanent jobs sustained, owing to the potential to sustain higher density employment from a smaller space.

WIDER BENEFITS

- In addition to the above, the new resident population is expected to make a positive contribution to the local economy. New residents will control an estimated **£4.9m per annum of retail, leisure and F&B expenditure**, a portion of which will be spent with local businesses. Construction workers and permanent workers will also spend money locally during and before/after their shifts, further boosting the local economy.

- Students in particular will also have an opportunity to contribute to local community groups through volunteering – with NUS research indicating that around a third of students volunteer regularly, contributing an average of 44 hours per year. If a third of the PBSA residents was to volunteer for 44 hours per year, this would total more than **11,000 hours of volunteering hours – worth more than £115k per annum** if valued at the national living wage.

- According to ONS, around 70% of LBW residents aged 16-64 are degree educated, and as a consequence local residents earn wages approximately 11% more than the average for London – helping to sustain the local economy and supporting the viability of local businesses. By encouraging students to live in Wandsworth for one or more years of study, the Borough has an **excellent opportunity to make its case for the highly skilled residents of the future to choose Wandsworth as their home**.

1.0 INTRODUCTION

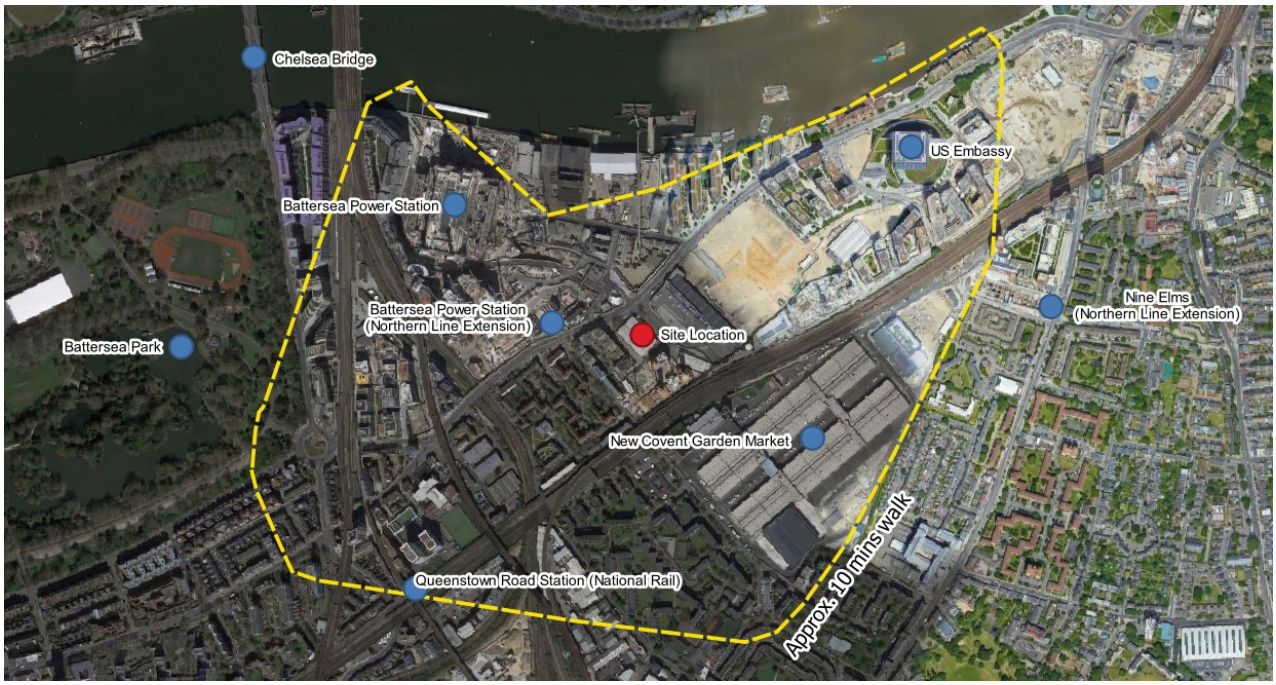
1.1 This Substituted[2] Socio-Economics statement has been prepared by Montagu Evans on behalf of Watkin Jones Group ('the applicant'). It sets out the potential social and economic impacts associated with Proposed Development at 41-49 / 49-59 Battersea Park Road ('the site'), within the Nine Elms area of the London Borough of Wandsworth (LBW).

THE SITE AND PROPOSED DEVELOPMENT

1.2 The site is currently occupied by a Booker cash and carry warehouse (41-49 Battersea Park Road), which supplies food and non-food goods in bulk to business customers within central and south west London. Members of the general public are not eligible for membership. A BMW service centre was also previously located on the Site (at 59-59 Battersea Park Road), but this has now been demolished.

1.3 The Booker unit extends to c. 3,200 sq.m[3]. Approximately 95% of gross internal floorspace is classified as warehouse or cold storage, with the remainder classified as ancillary office space. It is estimated that the current floorspace sustains around 30 jobs – a very low employment density consistent with the space-intensive nature of cash and carry operations.

1.4 The area surrounding the Site is currently undergoing transformational change as a result of several major development and regeneration projects, including Battersea Power Station, the new American Embassy, and the extension of the Northern Line with new stations at Nine Elms and Battersea Power Station (the latter being located adjacent to the site). The map below shows the approximate site location within this local context.



[2] This Socio-Economic Statement was updated in January 2024 to account for changes to local and national planning policy since the original submission. The Proposed Development remains unchanged, and the original assessment and conclusions continue to apply.
[3] Source: VOA

1.5 The current use of the Site is not considered to make the best use of land within one of Inner London's key regeneration areas, and development is proposed which responds both to LBW's local housing need as well as the opportunity contribute to (and reap the rewards of) the growth of Higher Education in the capital.

1.6 The Proposed Development is described as follows:

> *"Application for Phased Full Planning Permission for: Demolition of existing building and construction of three new buildings, together comprising Residential (Use Class C3) and Student Accommodation (Sui Generis) along with Commercial, Business and Service (Use Class E) and/or Local Community and Learning (Class F) floorspace. Associated works include hard and soft landscaping, car parking and new vehicular access / servicing, and other ancillary works."*

1.7 More specifically, the Proposed Development comprises the following accommodation:

- 762 Purpose Built Student Accommodation bedrooms (equivalent to 305 residential units for LBW's Housing Delivery Test)
- 55 Affordable Housing Apartments (27 Social Rent, 28 Intermediate Rent)
- Ancillary amenity space relating to the above
- Flexible Class E/F units at ground floor level totalling 551 sq.m
- 374 sq.m of play space for children of all ages, in addition to general public realm and accessibility improvements

1.8 In total, the Proposed Development extends to approximately 0.8 ha, whilst at the same time opening up the site for public realm improvements and play space.

NATIONAL AND REGIONAL CONTEXT

1.9 The Higher Education Statistics Agency (HESA) recorded that in 2020/21 there were a total of 2.75m students in the UK, a 9% increase from the previous year.[4] Within London, the number of students has risen even more rapidly, with 11% year-on-year growth in overall numbers – demonstrating that the attractiveness of London as a place to study has not been diminished by Covid-19. There are now 85,000 more students enrolled at London universities compared with 2015/16 – an increase of 21%.[5]

1.10 The need to provide accommodation for London's growing Student population is recognised in the London Plan, and Policy H15 (Purpose Built Student Accommodation) requires PBSA development to contribute to mixed communities and not result in an over concentration of one housing type within the locality. Further detail can be found within the submitted PBSA Market Briefing Note (Cushman & Wakefield).

1.11 The National Planning Practice Guidance (NPPG) also highlights the need to provide sufficient student accommodation to meet demand, and the benefits of doing so for local residents:

> "Encouraging more dedicated student accommodation may provide **low cost housing** that **takes pressure off the private rented sector** and **increases the overall housing stock**. Strategic policy-making authorities are encouraged to consider options which would support both the needs of the student population as well as local residents before imposing caps or restrictions on students living outside university-provided accommodation"[6] (our emphasis)

[4] Students in Higher Education, 2020/21. Higher Education Statistics Agency Limited (HESA)
[5] Ibid.
[6] DLUHC, National Planning Practice Guidance, 'Housing Needs of Different Groups'

1.12 LBW's Adopted Local Plan (adopted 2023) supports the development of purpose-built student accommodation provided it meets various criteria set out in policy LP28 – Purpose-Built Student Accommodation. Criteria of relevance to Socio-Economics include:

- [The Proposed Development] Is accompanied by a site management and maintenance plan which demonstrates that the accommodation will be managed and maintained over its lifetime so as to ensure an acceptable level of amenity and access to facilities for its occupiers, and would not give rise to unacceptable impacts on the amenities of existing residents in the neighbourhood;
- Has access to good levels of public transport, and to shops, services and leisure facilities appropriate to the student population;
- Would not result in an over-concentration of single-person accommodation at the neighbourhood level which may be detrimental to the balance and mix of uses in the area or place undue pressure on local infrastructure; and
- Provides a high-quality living environment, including the provision of adequate functional living spaces and layouts, well-integrated internal and external communal areas, and a high level of amenity (providing good levels of daylight and sunlight, and natural ventilation).[7]

1.13 As noted above, the Site is ideally located to take full advantage of the new Northern Line extension to Battersea Power Station, which provides rapid links to most of Central London's higher education institutions. Furthermore, Wandsworth's own institutions (including Roehampton University and St. George's medical school) can be reached by direct rail (from nearby Queenstown Road station), bus services or via the Borough's cycling infrastructure.

1.14 The growing number of students also adds value to the economy at national, regional and local scales. The National Union of Students (NUS) indicates that student spending supports over £80bn of UK economic output, and supports over 830,000 jobs. In London specifically, London Higher indicates that London-based higher education institutions generate £17bn per annum for the London economy, including £2.9bn in export earnings.[8]

REPORT STRUCTURE

1.15 This statement identifies the ways in which the Proposed Development, as a mixed use scheme, can make a positive contribution to the local community whilst supporting local and regional economic development needs and objectives.

1.16 This statement explores potential impacts across four themes:

- Construction Phase Impacts, which are temporary in nature;
- Population and Housing Impacts, arising from the provision of new homes;
- Employment Impacts, arising from the provision of Class E/F floorspace; and
- Wider Impacts, generated indirectly as a result of the Proposed Development proceeding.

1.17 The conclusion section of this statement then summarises key findings.

[7] LBW, Local Plan 2023-2038, p.361
[8] London Higher, Facts & Figures, https://www.londonhigher.ac.uk/london-he/facts-figures/

2.0 CONSTRUCTION PHASE IMAPCTS

CONTEXT

2.1 The construction sector within LBW is relatively small. There are an estimated 4,000 construction jobs based within LBW (3.4% of total jobs), working for an estimated 1,250 construction firms (including sole traders). As such, it is likely that the majority of direct construction labour will be drawn from outside of LBW, notwithstanding the requirements of the LBW Planning Obligations SPD 2020, which requires at least 5 local construction jobs or apprenticeships to be created per 1,000 sq.m of gross internal floor area developed.

2.2 The construction sector across London as a whole, however, is large, with more than 171,000 construction jobs based within the capital and 61,000 construction firms. According to a Construction Industry Training Board (CITB) survey, around 71% of construction workers working on projects within London also live within London, and the vast majority of the remainder are drawn in from neighbouring regions[9].

2.3 On this basis, and given the nature of the applicant, it is likely that the construction of the Proposed Development will draw on labour and expertise from within London and surrounding regions, with local labour and supply chain businesses employed where possible in line with the requirements of the LBW Planning Obligations SPD.

CONSTRUCTION JOBS

2.4 It is estimated that the construction project will require 427 person years of labour to complete. This has been derived from the estimated build cost and ONS data on the work done per FTE per annum within the construction sector nationally. This labour will be spread across an estimated 3 year (36 month) programme – creating an average of 142 FTE jobs sustained for the entire build period. In practice, it is likely that there will be a peak in construction activity towards the middle of the programme, with lower numbers of workers at the beginning and end of the programme.

2.5 The project will also create jobs indirectly, through the construction supply chain (e.g. supply of materials, plant hire, site security etc.), as well as induced jobs created through direct and indirect workers spending their wages within the wider economy – creating (or sustaining) jobs in sectors such as retail, hospitality and leisure. Table 1 below summarises the total jobs expected to be created during construction.

Table 1 – Construction Jobs Summary

Total Person Years of Construction Labour required	**427**
Construction Duration (Years)	**3**
Direct FTE Construction Jobs (person years ÷ duration)	**142**
Indirect and Induced Construction Jobs	**138**
Total FTE Construction Jobs	**280**

[9] CITB, Workforce Mobility and Skills in the UK Construction Sector

2.6 As noted above, LBW has a relatively small construction sector, and as such it is likely that the majority of the construction supply chain will be drawn from across London and the wider region.

GROSS VALUE ADDED

2.7 Construction activity will also generate 'Gross Value Added' for the regional economy, due to the value-added nature of construction (which, broadly speaking, involves converting raw construction materials into property which is more valuable than the sum of its parts, taking into account the cost of labour in construction). It is estimated that the construction project will generate £35.6m in GVA directly, with a further £28.8m generated indirectly (through the supply chain) and £3.6m through induced worker spending.

2.8 Table 2 below summarises total GVA generation associated with the construction phase.

Table 2 - Construction GVA Summary

Direct Construction GVA	**£35.6m**
Indirect Construction GVA	**£28.8m**
Induced Construction GVA	**£3.6m**
Total GVA	**£68.0m**
Average GVA per annum	**£22.7m**

APPRENTICESHIPS AND LOCAL EMPLOYMENT

2.9 Finally, the Proposed Development will generate new apprenticeship opportunities during construction, enabling young people to learn valuable skills which could equip them for their future careers. It is estimated that the project could generate around 7-10 apprenticeship starts over the course of the construction programme.

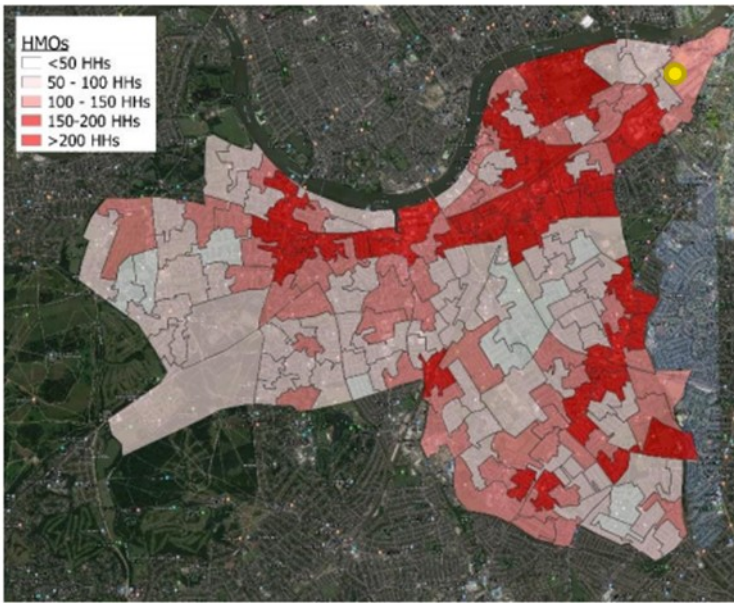
3.0 POPULATION AND HOUSING IMPACTS

CONTEXT

3.1 As of mid-2020, LBW had a population of 330,000, of whom 21,000 were estimated to live within Queenstown Ward. The Borough population has grown rapidly in recently years, increasing by 7.2% since 2011. With Nine Elms being a focal point for development within the Borough, the local population (Queenstown Ward) has grown even more rapidly, increasing by 28.5% since 2011. This highlights the attraction of LBW as a place to live, and the contribution the Borough is making to housing London's growing population (which in turn underpins its economic competitiveness).

3.2 The most recent robust estimate of the local student population is from the 2011 Census (2021 Census data is not due for publication until Summer 2022). According to the Census, students account for 7.1% of LBW residents – the lowest proportion of any Inner London Borough (only City of London has a lower percentage).

3.3 According to the LBW Local Housing Needs Assessment (December 2020), around 30% of the LBW population lives within the private rented sector, and indicates that around a third of private renters are living within Homes in Multiple Occupancy (HMOs). It can therefore be inferred that around 10% of the LBW population lives in HMOs. As shown below, however, HMOs are not uniformly distributed within the Borough, and the strongest concentrations can be found in northern and eastern areas. Many students ultimately end up in HMOs, owing to their relative affordability, which can in turn place pressure on the general housing stock, reducing choice for families and other households in need of larger properties.



3.4 According to the 2020 Local Housing Needs Assessment, 20% of the population lives within Social Rented housing (based on Census 2011 data). Since 2011/2, around 2,415 affordable dwellings have been delivered within LBW – around 18% of total completions. Despite this growth of the affordable housing stock, more than 10,000 households remain on the LBW Council Housing waiting list – demonstrating the acute need for additional affordable housing within the Borough.

NEW RESIDENT POPULATION

3.5 The new resident population of the Proposed Development has been calculated using the GLA Population Yield Calculator v.3.2 (for the affordable housing element), and an assumed 1 resident per bed space for the PBSA element. Furthermore, it has been assumed that all students will be within the 18-64 age group. Table 3 below summarises the profile of the expected resident population.

Table 3 - Proposed Development Resident Population by Age Group

	Affordable Housing	PBSA	Total
Age 0-4	18	0	18
Age 5-11	15	0	15
Age 12-15	8	0	8
Age 16 & 17	4	0	4
Age 18-64	97	762	859
Age 65+	2	0	2
Total	**145**	**762**	**907**

3.6 In total, it is estimated that 907 people will live within the completed development. The vast majority (95%) are expected to be within the 18-64 age group. A further 2 adults aged 65+ are predicted to live within the affordable housing element, whilst 45 under 18s are also predicted.

3.7 This increase in local population has the potential to impact on local service provision – including on local primary healthcare provision and education provision, which are considered below.

IMPACT ON PRIMARY HEALTHCARE

3.8 Figure 1 overleaf shows the locations of local GP practices, derived from the NHS Digital dataset (January 2022 update). The dataset shows a total of six GP Practices based within c. 1km of the Site. Please note that although Battersea Fields Practice is located outside the 1km radius, it has been included in this analysis as it is one of the closest practices in terms of walk time from site. It is also important to note that a new £13m NHS health centre is to be provided as part of phase 4a of the Battersea Power Station redevelopment, which on completion will meet the primary care needs of 20,000 patients.[10]

3.9 A worst case scenario would see all 907 new residents (as summarised in Table 3 above) requiring registration with local GP Practices. However, in practice it is likely that a number will already be registered locally, or in the case of students choose to remain registered closer to their parents' address, or to register with a GP linked to their place of study (see Table 4 below).

Table 4 – Primary Healthcare Recommendations by Institution

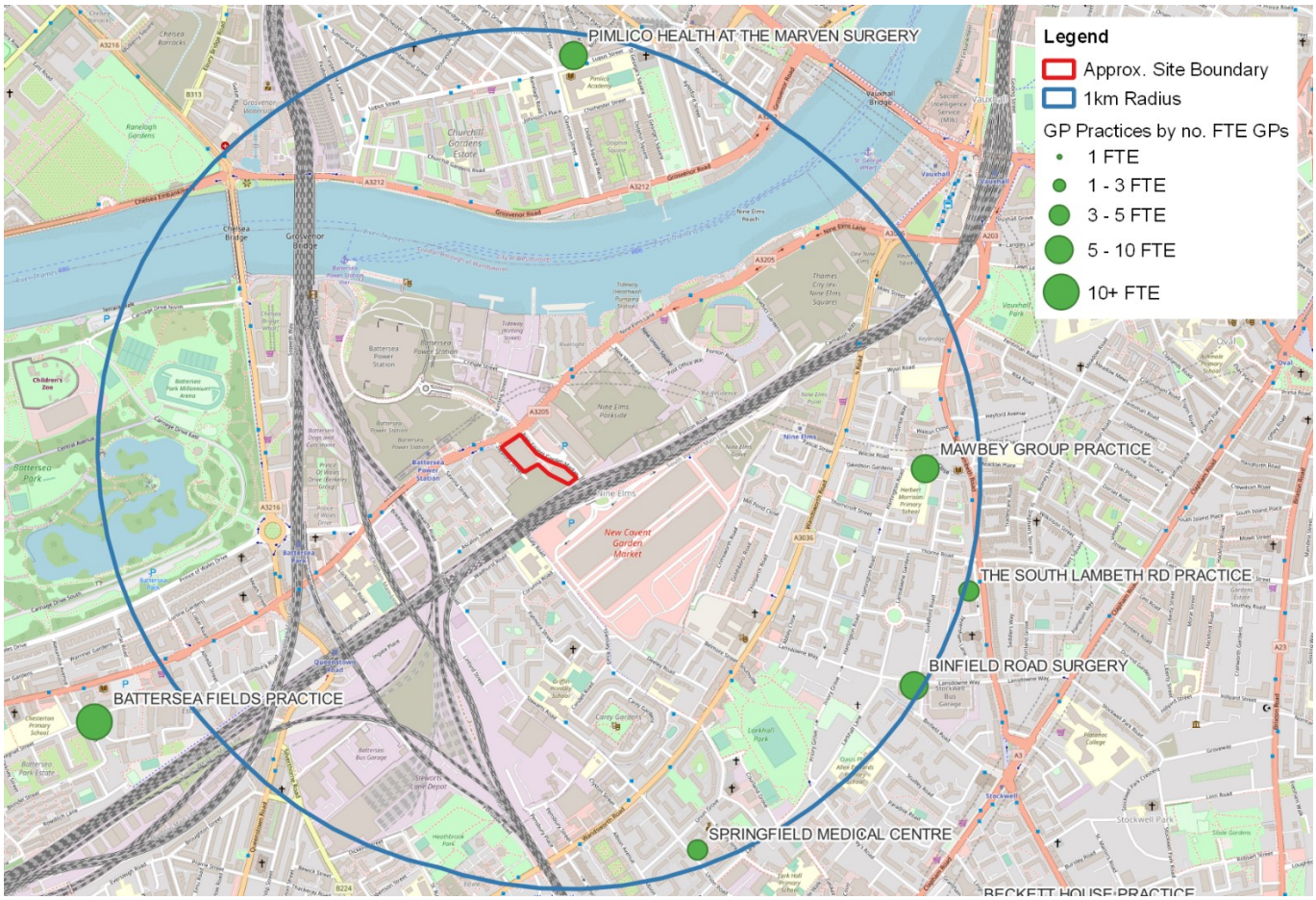
Institution	Health Care Recommendations / Provision
Roehampton University	On campus provision of NHS medical centre, offering doctor and nurse-led services.
Southbank University	Princess Street Surgery recommended as the closest option to campus.
St George's University	Provide their own occupational health service for students.

[10] https://www.wandsworth.gov.uk/news/2020-news/news-nov-2020/council-invests-13m-in-new-nine-elms-nhs-health-centre/#:~:text=The%20new%20health%20centre%20on,Station%20%C2%A39bn%20regeneration%20project.

University College London	Ridgmount Practice works in partnership with the university to provide student healthcare.
University of Westminster	Recommend a number of GP practices; Marylebone and Westend, Harrow, Raffles House Wembley, and Alexander Flemming Hoxton
Kings College London	On campus NHS Health Centre (including an NHS GP surgery) for students and staff.
LSE	Recommends use of the local GP surgery, closest to place of residence.
Imperial College London	Recommends use of the local GP surgery, closest to place of residence.
University of Arts London	Recommends use of the local GP surgery, closest to place of residence.

Source: Institution / Students' Union Websites

Figure 1 - GP Practices within Local Area



Source: NHS Digital; Contains Ordnance Survey Data. © Crown Copyright and Database Right 2021. © OpenStreetMap Contributors

Practice Name	Patients	GP FTE	Patients per FTE	Capacity	Unused Capacity	Walk Time from Site
Mawbey Group Practice	11,038	7.5	1,482	13,410	2,372	18
Springfield Medical Centre	6,760	4.7	1,441	8,442	1,682	18
Battersea Fields Practice	12,499	11.01	1,135	19,818	7,319	18
The South Lambeth Rd Practice	9,148	3.65	2,506	6,570	-2,578	23
Binfield Road Surgery	8,428	5.6	1,510	10,044	1,616	24
Pimlico Health at The Marven Surgery	14,533	5.7	2,559	10,224	-4,309	31
TOTAL	**62,406**	**38.2**	**1,635**	**68,508**	**6,102**	-

3.10 Overall, there is significant 'spare' capacity – including at the three nearest GP Practices. This means that the anticipated new resident population of 907 could be accommodated in full should the worst case scenario come to pass. Further new provision at Battersea Power Station will further add to local capacity.

3.11 For further details on the potential health impacts of the Proposed Development, please see the submitted Health Impact Assessment.

IMPACT ON EDUCATION

3.12 Growth in the local population could also have an impact on the availability of school places within the local area. Figure 2 below shows the locations of the nearest Primary and Secondary schools to the Site, as well as local nursery provision.

Figure 2 - Schools within Local Area

Source: DfE; Contains Ordnance Survey Data. © Crown Copyright and Database Right 2021. © OpenStreetMap Contributors

	Practice Name	Phase of Education	Capacity	Pupils	Spare Capacity
1	Chesterton Primary School	Primary	420	426	-6
2	St Mary's RC Voluntary Aided Primary School	Primary	222	188	34
3	Heathbrook Primary School	Primary	420	366	54
4	St George's CofE Primary School	Primary	240	222	18
5	Griffin Primary School	Primary	420	226	194
6	Larkhall Primary Campus	Primary	509	365	144
7	Allen Edwards Primary School	Primary	430	355	75
8	Herbert Morrison Primary School	Primary	236	219	17
9	Wyvil Primary School	Primary	556	508	48
10	St Stephen's Church of England Primary School	Primary	236	213	23
	TOTAL PRIMARY SCHOOLS		**3,689**	**3,088**	**601**
11	Lilian Baylis Technology School	Secondary	900	835	65
12	Archbishop Tenison's School	Secondary	460	328	132
13	Harris Academy Battersea	Secondary	1,150	1,071	79
14	Sir Simon Milton Westminster University Technical College	Secondary	550	154	396
	TOTAL SECONDARY SCHOOLS		**3,060**	**2,388**	**672**

3.13 In total, there are a combined 3,689 Primary School and 3,060 Secondary School places within the schools shown in Figure 2. Only one Primary School – Chesterton Primary School – is currently operating above capacity. All other schools (Primary and Secondary) have surplus capacity, according to data published by the Department for Education. Overall, local Primary Schools have a surplus capacity of 601, whilst local Secondary Schools have surplus capacity of 672.

3.14 A number of nurseries are also located nearby, providing day-care for under 5s (capacity statistics are not routinely published for nurseries). The nearest Further Education college is South Bank College, located close to Clapham Common tube station approximately 3km to the south of the Site.

3.15 Overall, there is evidence of surplus Primary and Secondary school capacity, which will be comfortably sufficient to accommodate the small number of children expected to live within the completed development as summarised in Table 3 (i.e. 14 Primary-aged and 5 Secondary-aged children).

OPEN SPACE AND PLAY SPACE

3.16 The proposal provides 374sq.m of play spaces suitable for all ages with a range of play functionality. The play space includes climbing, swinging, bouncing, balancing and active play. For young people, the play area provides equipment such as table football and table tennis as well as suitable areas for socialising with friends with platform seating, sun loungers and bleacher seating suitable for small performances.

3.17 Furthermore, the site is located less than 10 minutes' walk from Battersea Park, which also offers a wide range of recreation, sports and exercise facilities for children and adults. The Thames Path is also located a short distance away, which connects the local area with destinations along the river.

4.0 EMPLOYMENT IMPACTS

CONTEXT

4.1 LBW has a healthy local economy, underpinned by its young and highly skilled resident workforce. According to ONS, 70% of LBW residents are educated to degree level or higher, and 71% work in managerial, professional, or associate professional / technical occupations.

4.2 85% of LBW working age residents are economically active (compared with 79% average across London), and unemployment at 4.3% is also lower than London average (5.6%). Claimant unemployment is also significantly lower than London average at 3.7%, though 8,860 people were claiming out of work benefits in March 2022, including 1,000 people aged 18 to 24.

4.3 Local residents who are in full time employment earn an average of £843 per week, significantly higher than the average pay of jobs within the Borough (£671 per week). This highlights how many LBW residents commute to highly paid jobs in London's main office hubs (West End, City and Canary Wharf). As of 2020, the largest industry sectors in LBW are Health (22%), Retail (14%) and Education (11%) – sectors which primarily provide services to resident populations. By contrast, the Financial and Insurance Activates sector, which accounts for 7.5% of London jobs, accounts for just 1.1% of jobs within the Borough.

NET JOBS CREATED

4.4 As noted within the Introduction section, it is estimated that the Site in its current use sustains approximately 30 jobs, based on applying typical Retail Warehouse employment densities (from the HCA Employment Densities Guide 3rd Edition) of 90 sq.m NIA per FTE to the total floorspace reported by the Valuation Office Agency.

4.5 Though the Proposed Development would result in a significant reduction in the overall quantum of employment-sustaining floorspace, the commercial and community use spaces proposed, alongside jobs created in the management and maintenance of PBSA, are expected to significantly offset and/or exceed levels of employment currently sustained by Booker.

4.6 Table 5 below summarises potential job creation associated with the Proposed Development. Low estimates are based on 20 sq.m NIA per FTE (the lower end of the density range indicated by the HCA Employment Densities Guide 3rd Edition) for Class E space and zero jobs for community space (i.e. assuming it will be used solely for community meetings etc.), whilst the High Estimate is based on 15 sq.m NIA per FTE (the upper end of the retail density range from the HCA Guide).

Table 5 - Proposed Development - Jobs Created from Commercial / Community Units

	Floorspace (sq.m NIA)	Jobs - Low Estimate	Jobs - High Estimate
Unit 1 – Class E	68	3.4	4.5
Unit 2 – Class E/F	137	0*	9.2
Unit 3 – Class E	68	3.4	4.5
Unit 4 – Class E/F	73	0*	4.9
Total	**347**	**6.8**	**23.1**

Note: Should Units 2+4 be used as a community meeting places, they are unlikely to generate any jobs directly

4.7 In addition to employment created from the proposed Class E/F floorspace, it is estimated that a PBSA operator would employ approximately 8 staff (FTE) to manage the block and provide cleaning and maintenance services.

4.8 Overall, it is estimated that the Proposed Development could sustain between 15 and 31 jobs on completion.

5.0 WIDER IMPACTS

RETAIL AND LEISURE EXPENDITURE

5.1 Growth of the local population will bring an increased amount of household spending to the Nine Elms area, which in turn will support new and existing businesses through increased opportunities for trade. As shown in Table 6 below, the average LBW household spends around £16,000 per annum on Comparison and Convenience retails goods, plus Food & Beverage away from the home and Leisure Activities. We have adjusted this average spend to account for average household size (1.1 residents per unit, including PBSA, compared with 2.3 average occupancy across the Borough), plus a further reduction of 25% to account for the likelihood that students and LAR tenants in particular are likely to have below-average levels of disposable income in an affluent borough such as Wandsworth.

Table 6 - Potential Retail and Leisure Spending

	Spend per Average LBW Household	Adjusted Spend per Household	Total Estimated Spend
Comparison Goods	£8,218	£3,010	£2.5m
Convenience Goods	£4,191	£1,535	£1.3m
Food & Beverage	£3,094	£1,133	£0.9m
Leisure Activities	£655	£240	£0.2m
Total	**£16,158**	**£5,919**	**£4.9m**

Source: Aspinal & Aspinal

5.2 As summarised above, the Proposed Development could bring around £5.1m in additional spending power to Nine Elms, a portion of which will be captured by existing and new retail, leisure and hospitality businesses, supporting their ongoing viability and underpinning the vitality of local centres.

VOLUNTEERING ACTIVITY

5.3 Many students choose to volunteer during their time at university, which can provide valuable support for local charitable organisations and community groups. According to NUS research, around a third of students choose to volunteer during their studies, committing an average of 44 hours per year (approx. 1 hour per week during term time). As summarised in Table 7 below, the assumed student population of the Proposed Development could volunteer around 11,200 hours per year. If volunteer time was to be valued at the National Living Wage, this would represent a social value of around £115k per annum.

Table 7 - Estimated Value of Student Volunteers

Total Student Population	**762**
% of Students Volunteering Regularly (NHS)	**33%**
Total Student Volunteers	**254**
Average Hours per annum	**44**
Total Volunteer Hours per annum	**11,174**
Value per hour (National Living Wage)	**£10.42**
Total Social Value of Volunteering (per annum)	**£116,442**

Source: NUS, Montagu Evans Calculations

GRADUATE RETENTION

5.4 According to HESA, London's higher education institutions produce over 130,000 skilled graduates each year, and many choose to remain in the capital after completing their studies. According to recent research by Knight Frank/UCAS, more than two thirds (67%) of London graduates are retained. Graduate retention (and attraction) is important in maintaining London's highly skilled workforce, which in turn sustains business activity and further employment throughout the business supply chain.

5.5 According to ONS, around 70% of LBW residents aged 16-64 are degree educated, and as a consequence local residents earn wages approximately 11% more than the average for London. By encouraging students to live in Wandsworth for one or more years of study, the Borough has an excellent opportunity to make its case for the highly skilled residents of the future to choose Wandsworth as their home.

6.0 CONCLUSION

6.1 The Proposed Development will make a positive contribution to the local economy and community, delivering a number of tangible benefits which have been defined within this statement.

6.2 The construction phase of development will bring further new investment to the local area, creating jobs and contract opportunities which will benefit construction workers and businesses within the London and wider South East region. Construction will also create apprenticeship opportunities, which will provide a chance for young people (including young people living within LBW) to gain valuable skills which will benefit their future careers. Local businesses will also benefit from a boost in local spending from the temporary construction workforce.

6.3 On completion, the new resident population is expected to contribute positively to the creation of a mixed and balanced community within the local area. Furthermore, it is not anticipated that the increase in local population resulting from the Proposed Development will cause difficulties for local community infrastructure providers (GP Practices, Primary Schools and Secondary Schools have all been demonstrated to have sufficient capacity to accommodate the Proposed Development).

6.4 The Proposed Development will also open up the site, which is currently impermeable and not generally accessible to members of the public. This will be further enhanced through the provision of public realm improvements and play space for children of all ages.

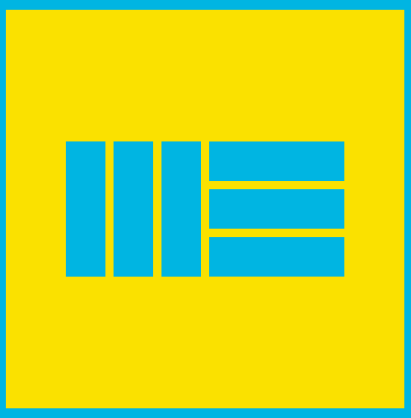
6.5 Though the Proposed Development will result in a net loss of employment-sustaining floorspace, the current cash and carry use has a very low employment density, and as a consequence the proposed ground floor Class E/F units, combined with operational jobs in operating the PBSA, are expected to largely offset and/or slightly increase total employment on site.

6.6 New residents will control an estimated £4.9m per annum in retail spending, a portion of which will be spent locally, helping to sustain new and existing local businesses – particularly in the retail and hospitality sectors. Resident students could also play an important role in supporting local charities and community groups – with the NUS estimating that around a third of students volunteer for an average of 44 hours per year. Finally, by encouraging students to live within LBW during their studies, it is likely that a number will choose to make Wandsworth their home in the longer term – sustaining and enhancing the Borough's highly skilled resident workforce.

6.7 Taken as a whole, the Proposed Development is therefore expected to make a positive contribution to the Nine Elms and wider Wandsworth community – providing much needed new affordable housing, reducing the need for student HMOs, and boosting the pool of local resident spending power. Local community infrastructure is capable of absorbing the proposed population in full, and further mitigation will be provided through the Community Infrastructure Levy (CIL). The provision of affordable commercial space alongside community space, as well as broadly maintaining current employment levels, also means that the Proposed Development is not expected to lead to a reduction in the economic contribution made by the site.

MONTAGU EVANS

70 ST MARY AXE
LONDON
EC3A 8BE



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APPENDIX 9.0
WIDER CONNECTIONS PLAN

Wider Connections

Thames Riverside

To Vauxhall

Battersea Power Station

Prospect Place playground

Nine Elms linear Park
(F&B offer)

Linear Park

School

Battersea Power
Station Tube station

Health centre
& Phase 4A

Future Cycleway

Thessaly Road

To Clapham

Patmore Estate

- Destinations
- Pedestrian movement - primary
- Pedestrian movement - secondary
- New destinations
- Pedestrian crossings
- New pedestrian crossings
- Future Cycleway

APPENDIX 10.0
RESPONSE TO BATTERSEA SOCIETY

PD13291/SS/JA
email: sam.stackhouse@montagu-evans.co.uk
james.ainsworth@montagu-evans.co.uk

15 July 2024

70 St Mary Axe London
EC3A 8BE

Tel: 020 7493 4002
Fax: 020 7312 7548
www.montagu-evans.co.uk

The Secretary
The Battersea Society
c/o 29 Beauchamp Society
London
SW11 1PG

Planning Application Ref. 2022/1835

Dear Sir / Madam,

41-49 (BOOKERS) AND 49-59 BATTERSEA PARK ROAD APPLICATION REF. 2022/1835

On behalf of our client, Watkin Jones Group ('WJG" / "Applicant"), we write in response to your letter addressed to the London Borough of Wandsworth's ("LBW" / "the Council") Planning Officer, Anastasia Bernard, dated June 2024, which we have been sent a copy of by LBW (**Appendix 1**). Your letter is in response to the consultation of the live planning application (ref. 2022/1835) at 41-49 Battersea Park Road (Booker Cash & Carry) and 49-59 Battersea Park Road (the former BMW Car Service Garage), London, SW8 5AL (hereafter referred to as "the Site").

We thank the Battersea Society ("the Society) for its continued engagement with the project since we started this journey in 2021. We are grateful for the Society's positive comments on some of the revision made to the original application made in 2022.

Notwithstanding, your letter states that the Society remains strongly opposed to the development and objects to this application. Your letter then proceeds to set out the reasons for your objection. As you know, via the Applicant's community engagement consultants, Kanda Consulting, the Applicant has proposed a meeting with the Society to discuss the concerns raised, however, this has been declined by the Society. Whilst the offer of a meeting remains on the table, we thought that it would also be helpful to comment on the reasons for your objection from the Applicant's perspective.

Background

As you are aware, in May 2022 we submitted an application to the Council for the redevelopment of the Site. The current description of development is as follows:

> *"Demolition of the existing building and construction of three new buildings (between 12 and 22 storeys in height), together comprising 55 residential units (Use Class C3) and Student Accommodation comprising 762 student bedrooms (Sui Generis) along with 495sqm (GIA) flexible Commercial, Business and Service (Use Class E) and/or Local Community and Learning (Class F) floorspace with associated works including hard and soft landscaping, car parking, new vehicular access/servicing, and other ancillary works."*

Following careful review of the comments and responses raised during the statutory consultation, a series of amendments were proposed by the Applicant. The amendments were presented to a third Design Review Panel meeting in February 2023, followed by a LBW Design Workshop in March 2023.

Whilst the principles of the amendments were supported by LBW and the Design Review Panel, the submission of amended drawings and documents was stalled as a result of ongoing economic pressures until April 2024. These amendments have now been submitted and are currently subject to public consultation.

Responses to matters raised by the Society

We comment on the matters raised by the Society in order they appear in your letter.

Housing Need

We endorse the Society's comments that there is a housing need and as the Society will be aware, Purpose-Built Student Accommodation ("PBSA") is a housing tenure that is supported in the London Plan (Policy H15 / paragraph 4.15.1 / paragraph 4.15.2) and Local Plan (Policy LP28 / paragraph 17.35). The London Plan (paragraph 4.1.9) states that PBSA contributes towards housing needs at a ratio of 2.5 beds to 1 home. The PBSA therefore delivers the equivalent of 305 homes, not to mention that the provision of purpose-built accommodation will reduce pressure on the private rented sector in the Borough and encourage the return of HMOs to family housing. This indirect benefit is also recognised by national planning guidance. The proposals now benefit from three supportive Universities – most recently from the London School of Economics.

Combined with the 55 affordable dwellings, the development would deliver the equivalent of 360 homes, exceeding the 307 homes under the extant permission granted in 2019 (ref. 2015/6813) and directly contributing to the LBW Housing Land Supply figures. We note that whilst the extant planning permission had approval for a traditional residential scheme alongside a mix of commercial uses, this permission is not viable to develop which is why Watkin Jones is now investing in this Site.

In addition to providing more homes than the extant permission, the proposed development provides affordable housing that meets those tenures in greatest need. Indeed, whilst the extant permission offered 77 affordable units, just 20 were affordable rented units, with the remaining being intermediate shared ownership units. Furthermore, the extant permission offered a smaller number of family sized units than currently being proposed. The proposed development provides 55 affordable homes of which 27 are Social Rent and 28 are London Living Rent. A comparison between the two schemes is outlined in **Figure 1** below and which we consider the proposed development provides a betterment overall serving those in greatest need. In addition, we also note that the proposed development would deliver 171 much needed affordable student bedrooms.

More detail on this is included in the submitted Planning Statement and demonstrates that the application is not "*dismissive of the need for housing"*.

Figure 1: Proposed vs Extant Affordable Housing Provision

Provision	Proposed Scheme	Extant Permission
Total Affordable Units	55 units	77 units
Social Rent	49% (27 units)	0%
Affordable Rent	0%	26% (20 units)
London Living Rent	51% (28 units)	0%
Shared Ownership	0%	74% (57 units)
Family Sized Units (3+ Bed)	29% (16 units)	5% (4 units)

The Development in its context

We note your comment that the submission does not show the development in its wider context, however, we kindly direct you to the Visual Assessment within Section 10 of the Heritage, Townscape and Visual Impact Assessment submitted as

part of the application. This presents the scheme in the context of its wider surroundings, with the views assessed having been discussed and agreed with the Local Planning Authority.

New Mansion Square

We can reassure you that the impact of the proposed development on New Mansion Square has been considered in the technical assessment of the application. This includes an assessment of impacts of overlooking, privacy and daylight, sunlight and overshadowing. With regards to overlooking and privacy, the separation distances between Building 3 and New Mansion Square represents a betterment on the extant permission and whilst Building 3 is slightly taller than the corresponding building approved under the extant permission, the residual daylight, sunlight and overshadowing impacts are still considered acceptable in a high-density urban environment. This is set out in the assessment prepared by Point2Surveyors.

We would note that the Council has commissioned an independent review of the daylight, sunlight and overshadowing assessment submitted by the Applicant.

With regards to dialogue with Peabody, the Applicant has been in dialogue for over two years and has resultantly made some significant changes to the proposals. We maintain contact and do not anticipate any objection from Peabody in respect of the current proposals.

Principle of Student Accommodation

We acknowledge your concerns relating to the need for PBSA and the potential overconcentration of PBSA in the local area.

Firstly, in relation to PBSA need, the Applicant is a leading operator of PBSA in the UK and has undertaken extensive market assessment which concluded that there is indeed a strong need for PBSA. The Student Demand Assessment submitted as part of the application expands upon the current levels of demand for PBSA in London, which is reinforced by letters of support by Higher Education Institutions.

In terms of over-concentration of PBSA uses, please note that Appendix 3.0 of the Planning Statement sets out the assessment of student housing concentration. The results of this assessment is within the Wandsworth administrative area of the Vauxhall Nine Elms Battersea ("VNEB") Opportunity Area, student homes represent just 4.3% of the total residential homes granted since 2012 – the date that the VNEB Opportunity Area Planning Framework was published. Our Planning Statement (Appendix 3.0) also includes an assessment of overconcentration against the criteria in the most recent Wandsworth Local Plan and further concludes that the grant of planning permission for PBSA on the Site would not lead to an over-concentration of such uses. This takes into account Palmerstone Court – the first and only PBSA scheme in the Borough to date.

BREEAM Rating

We appreciate your queries regarding the BREEAM level that is being targeted. The Applicant has been exploring ways to deliver a highly sustainable scheme, and as you reference, the proposal is to achieve 'outstanding' for the PBSA. Whilst the Applicant has the same aspirations for the commercial units this cannot be confirmed until an occupier is secured for the units since several of the credits are reliant on the end occupier.

Traffic Planning

In relation to comments on Sleaford Street, we can confirm that the road will not be any narrower than as existing, with the public footway to be re-provided. A turning point is provided for vans at the southern end of the site. It should also be noted that a footway is provided on the eastern side of Sleaford Street and it is intended that this will be adopted for public highway.

The proposed location of disabled parking has been discussed throughout the pre-application and at Design Review Panel and is born out of a desire to create a high quality and safe public realm for use by future residents of the Site, as well as the surrounding community, in the centre of the Site. As such, to adapt for these other objectives, the proposal is to provide

the disabled parking along Sleaford Street (as part of existing highway infrastructure) to allow the public realm and play space provision to be maximised and secured as a safe environment in the centre of the Site.

The anticipated delivery and servicing trips have been determined based on TRICS data, which is a database of surveyed sites. Following consultation with TfL, a higher delivery and servicing trip profile has also been used for residential trips, based on TfL data. With regards to student housing and the demand for fast-food deliveries, these will mainly be undertaken by smaller vehicles, including bicycles (including electric) and mopeds. This is outlined and acknowledged in the Delivery and Servicing Plan, with a marked area between Blocks C and D. It should also be noted that the large majority of servicing movements occur outside of the network peak periods. This position will be further assessed by the Council and TfL through the consultation process.

Design Review Panel

Firstly, we would like to assure you that we agree that the Design Review Panel is a vital part of assessing design proposals, which the Applicant has been entirely supportive of throughout the formation of the current proposals. We also appreciate that you may not have been made aware that a further a further DRP was held on 6 February 2023 to discuss the current design proposals (as outlined earlier in this letter). Moreover, a follow-up design workshop was undertaken with LBW design officers before the scheme was finalised for re-submission.

The conclusions of the 2023 DRP were positive with regard to design teams' response to feedback and the resultant evolution of the scheme, for which the formal DRP response can be found at **Appendix 2.** Since the meeting, there have been no substantive changes to the scheme and the comments are therefore considered to be directly relevant to the current proposals.

Closing

We trust that this letter clarifies your queries, however, we would welcome arranging a meeting to discuss further if it would be useful. Should you have any questions or queries, please do not hesitate to contact Sam Stackhouse (sam.stackhouse@montagu-evans.co.uk / 07826 947 254) or James Ainsworth (james.ainsworth@montagu-evans.co.uk / 07901 791 800) at this office.

Yours faithfully

Montagu Evans

Montagu Evans LLP

APPENDIX 1 - BATTERSEA SOCIETY CONSULTATION RESPONSE

Reply to: planning@batterseasociety.org.uk

6 June 2024

Anastasia Bernard
Planning Department
Wandsworth Town Hall
London SW18 1DA

Dear Ms Bernard

Booker and BMW sites, 2022/1835 revised

While we welcome and acknowledge the small changes made to the plans, the Battersea Society remains strongly opposed to the development and objects to this application. The plans remain an unneighbourly over development of the site with a heavy concentration of small rooms for students rather than the housing which is so much needed. The paperwork appears to concentrate on the way that the one building directly on Battersea Park Road relates to the Viridian building and to the Battersea Power Station development to the north rather than showing the whole development in a wider context as a major development on the south side of Battersea Park Road.

New Mansion House Square

This development, built and partially occupied in January 2024 is one key example of the way in which the paperwork diminishes the impact of their development on its neighbours to the south. It is referred to throughout as 'Phase 4A. We cannot find any reference to recent dialogue with Peabody. In its analysis of the surrounding area the Planning Statement says:

> "To the south, the Site is bound by a railway line, beyond which lies a mixture of industrial units associated with New Covent Garden Market. To the west, the Site is bound immediately by Sleaford Street, beyond which lies a mixture of existing residential development fronting Battersea Park Road and construction ongoing adjacent to the railway and
>
> Battersea Power Station Phase 4: 2.12 The Battersea Power Station (BPS) development occupies all the land to the north of Battersea Park Road. Immediately across Battersea Park Road and to the north of the Site is Phase 4"

The Daylight and Sunlight report appears to blame balconies at New Mansion Square on poorer levels of daylight and to suggest that residents knew they would be overshadowed and moved in on this understanding.

Student Housing

The paperwork in support of this change is unconvincing and incomplete. It does not include a proper review of the many student residences around Vauxhall and Albert Embankment, and makes little reference to the Palmerston Court student development just along Battersea Park Road to the west. It includes a long list of colleges within London but provides no evidence about volumes of demand for student housing in the area. It makes no reference to concerns about falling student rolls and to the increasing restrictions on visas for overseas students. On the other hand, it is almost arrogantly dismissive of the need for housing within Wandsworth, a point which I am sure that the Council will review in greater detail as the application process continues.

BREEAM rating

We cannot understand why only the student accommodation is targeting 'Outstanding' while the rest is merely Excellent. We trust the applicant will think again.

Traffic Planning

The site is bounded by the heavily trafficked New Covent Garden Market access road to the east and by Sleaford Street to the west. This latter is a narrow road with limited turning space and is a cul-de-sac ending at the carparking area of New Mansion Square. It can be expected to become increasingly busy with domestic traffic. Even if this were not the case, it is inconsiderate for the applicant to take up space on this public road for blue badge parking and delivery drop offs rather than provide for these on site.

Any estimate of deliveries based on 2014 surveys is totally inadequate as deliveries have increased exponentially over the past 10 years. Approval of 2015/6813 in March 2019 for a residential scheme on this site pre-dates Covid which accelerated the move towards home deliveries. We were told by Urbanest, developers of Palmerston Court and other student housing, that they experience high demand for delivery space, including for fast food deliveries. The details they give in their Delivery and Servicing Plan, application 2024/1874, bear this out and paints a very different picture. This emphasises the importance of the applicant providing space on site for delivery and turning.

Design Review Panel

The most recent review in 2022 remained critical of elements of the design. We are disappointed that there has not been a review of these latest plans.

In conclusion

We very much hope that this application will be refused in its current form. In the (hopefully) unlikely event of student housing being approved we would wish there to be a further review of the surrounding landscaping and provision of play areas for children.

Yours sincerely

Chair, Planning Committee, Battersea Society

APPENDIX 2 – 2023 DRP RESPONSE

Wandsworth
Design Review Panel
C/o Wandsworth Council
Environment and Community Services Department
The Town Hall
Wandsworth High Street
London SW18 2PU

Please ask for/reply to:
Telephone: 020 8871 6000
Direct Line: 020 8871 7564
Fax: 020 8871 6003

Email: barry.sellers@richmondandwandsworth.gov.uk
Web: www.wandsworth.gov.uk

Our ref: ECS/
Your ref:
Date: 20 February 2023

Sam Stackhouse
Montagu Evans LLP
70 St Mary Axe
London
EC3A 8BE

Dear Sam,

Wandsworth Design Review Panel – DRP 3:
Booker BMW site, 41-49 and 49-59 Battersea Park Road, SW8 5AL

The Panel is grateful to you and your development team for submitting your proposal to the Wandsworth Design Review Panel (WDRP) for a third design review on 6 February 2023. The DRP was held online on this occasion and the Panel provided feedback in a virtual open session with the applicant present to hear the Panel's views. We thank the applicant team and, in particular the architects, Glen Howells, for a clear and comprehensive presentation. As a formal planning application has been submitted, this letter will be uploaded to the application website.

As context, the site lies on the western end of the Vauxhall Nine Elms Battersea (VNEB) opportunity area and has an area of 0.81ha. The site falls within a built-up area, with the majority of it covered by building footprint. There are six mature trees at the front of the site. These are all subject to a Tree Preservation Order (TPO) and comprise a mix of four London Plane and two Lime Trees.

The northern part of the site fronting Battersea Park Road is currently occupied by Booker Cash & Carry which is a retail warehouse club totalling 3,209m² (GIA). The southern part of the site adjacent to the railway line is occupied by a BMW service centre totalling 1,224m² (GIA) of a Sui-Generis use class. The BMW maintenance garage is accessed by the New Covent Garden Market Access Road, which is the only point of access.

The application ref. 2022/1835 is for the following: “Demolition of the existing building and construction of three new buildings (between 15 and 22 storeys in height), together comprising 81 residential units (Use Class C3) and Student Accommodation comprising 779 student bedrooms (Sui Generis) along with 515sqm (GIA) flexible Commercial, Business and Service (Use Class E) and/or Local Community and Learning (Class F) floorspace with associated works including hard and soft landscaping, car parking, new vehicular access/servicing, and other ancillary works”.

General Principles

The Panel is pleased to see the updated proposals for the three plots in particular on issues of sustainability, landscape and design response. Having reviewed the scheme twice before, we feel invested in ensuring that high-quality and sustainable design is achieved, and we appreciate the team’s approach to addressing the issues raised by the Panel in the previous reviews and very much welcome the level of care and engagement demonstrated since work commenced.

- We are pleased the overarching vision for the three blocks has been retained as well as the choice of using high-quality pre-cast for the buildings.
- We welcome the new vision for the landscape strategy, and especially applaud retaining the mature trees on Battersea Park Road. We encourage the developer to ensure that the landscaping scheme is managed and maintained to an appropriate standard.

The detailed comments of the Panel have been collated as follows under the three main headings of the review:

Sustainability

We are pleased with the integrated approach for sustainability and welcome the team following through many aspects raised at the last review.

- In terms of mechanical cooling, we welcome how this has been designed out and omitted from the majority of the accommodation. However, having developed an integrated façade design approach for this we urge the team commit to eliminating it from all the buildings.
- As for sitewide carbon improvement over Part L 2021, achieving 50% for the residential is in line with the new GLA requirements and is welcomed, but we encourage the team to try and achieve the same for the student accommodation – given the same fabric details have been proposed. The embedded carbon calculation should include all elements on the site, not just the structure. Particularly ensure the materiality for the public realm is in line with the sustainability strategy adopted.
- In regard to the wind analysis undertaken, in order to fully understand the impact on people and vegetation we suggest further testing balconies at upper floors. As some are at the corner, these could need some element of protection. Equally ensure the wind movement in between Plot 1 and Plot 2 in proximity to the entrances is not creating unpleasant conditions.
- On the amenity levels, we recommend all additional elements such as the external air-source heat pumps are located and designed in from the onset and do not appear later on as an afterthought or where it could become a noise nuisance. Plan in for maintenance so that all technical equipment as well as PVs on roofs or elsewhere is accessed easily without disruption for landscape and residents.
- The new location for the plant equipment within each block is welcomed but these need to be shown in the drawings.

- As part of the landscape strategy, we welcome the approach that facilitates tree canopies growing together as they mature to provide continuous shade for the main pedestrian routes in anticipation of climate change adaptation.
- We encourage developing a robust water strategy for the site and invest into a water recycling system for irrigation of the landscape.
- In Plot 1, we note there is a need for a second core to address the new fire regulations and we are comfortable with the additional length to the building to accommodate this.

Landscape and Public Realm

- We are pleased that the landscape is now responding in a much more convincing way to the site and welcome the remodelling of Plot 1 to retain the protected trees. We support the proposal to design the planting close to the base of the buildings, but note the technical difficulties that this might bring, especially in terms of maintenance at a later stage when vents or other plant may need to be accessed. We therefore strongly encourage that the collaboration between the architects and landscape teams is retained up to delivery so that the construction requirements can be coordinated, and the landscape preserved and safeguarded in the long run.
- Equally, given the proximity of the mature trees to the blocks, routes for construction vehicles and the impact of cranes on site needs to be assessed and managed.
- We strongly encourage the team to prepare the management and maintenance strategy as stewarding the site in perpetuity is a way to enable the new community to thrive and strengthen its sense of belonging. We recommend compliance with the Public London Charter for the management of privately owned public space.
- As for The Glade, in the heart of the site, we recommend that the space is designed to be fully inclusive, safe and comfortable for young teenage girls as well as for students and children. How these groups coexist could be further articulated. We also suggest creating a stronger narrative for the landscaping by unravelling the underlying story of the ancient river that once flowed under the site. This could enrich the character of the place and provide further inspiration for the landscape.
- Creating biodiverse planting on rooftops is positive, but we are concerned that the selection of species is appropriate for the environmental conditions experienced at such high levels. As for the grouping of planting, select a mixture of both young and mature trees and plants that work well together and benefit from each other. We recommend a strong replacement strategy.
- In Plot 1 we are not convinced by the service and delivery arrangement and suggest that this should be reviewed, including how it is managed.

Design Response

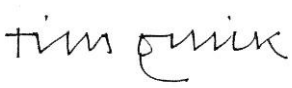
- We welcome the improvements and positive changes to the design. We are particularly pleased with the changes to Plot 1 which now feels more appropriate in scale, height and arrangement on the site.
- The dark glazed band wrapping around Plots 2 & 3 at the amenity level is slightly unconvincing and needs further resolution.

Moving Forward

We are very pleased how the scheme has evolved and applaud the applicant and client through their team of consultants for responding positively to the officer’s and Panel’s feedback.

The revised vision and strategies presented for the landscape have transformed the scheme and promise a high-quality development. Continuity through the delivery stage is important and for that reason we would encourage the client to engage the team as the scheme proceeds.

Yours sincerely



Tim Quick
Director, Formation Architects
Chair, Wandsworth Design Review Panel

Panel Members

Chris Twinn	Principal, Twinn Sustainability Innovation
Deborah Nagan	Landscape Architect
Marcus Claridge	Director, Claridge Architects

Panel Admin

Barry Sellers	Principal Planner and Panel Secretary
Daniela Lucchese	Senior Urban Designer and Panel Coordinator

Applicant Team

Ben Wrighton	Watkin Jones
Simon Lovell	Watkin Jones
Sandeep Shambi	Glen Howells Architects
Robert King	Glen Howells Architects
Alex Smith	Glen Howells Architects
Sally Itani	Glen Howells Architects
David Reid	Glen Howells Architects
Hannah Vincent	Planit-IE
James King	Planit-IE
Bernie Carr	Atelier Ten
Zac Vandevoir	Atelier Ten
Joseph Lazell	Atelier Ten
Simon Marks	Montagu Evans

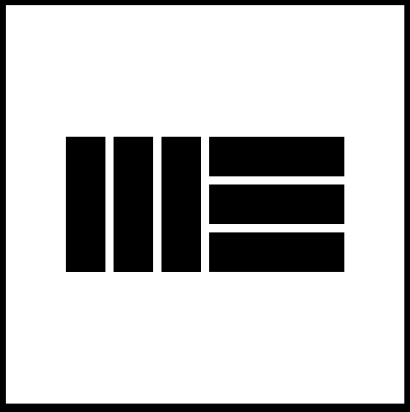
Attendees (invited to observe)

Mark Hunter	Head of Strategic Developments
Janet Ferguson	Planning Manager
Stephen Hissett	Principal Planner
Sharon Molloy	Principal Urban Design Officer

Cllr Tony Belton

MONTAGU EVANS

70 ST MARY AXE
LONDON
EC3A 8BE



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