

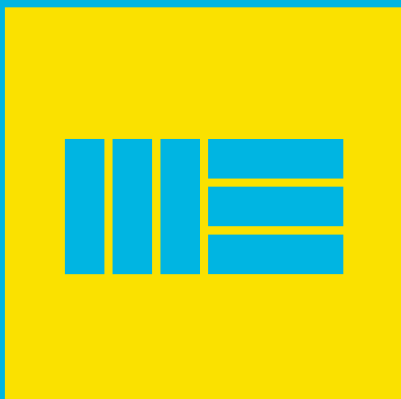
41-49 AND 49-59

BATTERSEA PARK ROAD

PLANNING STATEMENT

WATKIN JONES GROUP

APRIL 2024



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1.0 INTRODUCTION

1.1 This Planning Statement (“the Statement”) has been prepared by Montagu Evans on behalf of Watkin Jones Group (“WJG” / “Applicant”) to support an application (“the Application”) for Full Planning Permission for the proposed redevelopment of 41-49 Battersea Park Road (Booker Cash & Carry) and 49-59 Battersea Park Road (the former BMW Car Service Garage) SW8 5AL (hereafter referred to as “the Site”).

1.2 The Statement supports the substitution of application drawings and documentation submitted under Application Reference 2022/1835 and under the following description of development:

“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.”

1.3 The Application was registered by the London Borough of Wandsworth (“the Council”) on 26 May 2022 and following the outcome of statutory consultation and engagement with key stakeholders, the Applicant has undertaken a number of amendments to the originally submitted scheme. In summary, the principal amendments to the scheme are as follows:

- Reduction in height of Building 1 from 14 to 12 storeys, reduction in footprint, and reconfiguration of building 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, including an increased Low-Cost rent offer with a Low-Cost Rent : Intermediate split of 49:51 compared to the originally submitted 48:52 split;
- Increase in community floorspace;
- Increased student internal amenity space;
- Changes to landscaping, play space and public realm;
- Increase in biodiversity net gain from 35.26% to 147.56%;
- Urban Greening Factor from 0.38 to 4, making the scheme now policy complaint;
- 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; and
- Increase in 274 sqm of PV to further increase carbon savings.

1.4 This Statement assesses the merits of the Application as a whole and supersedes the Planning Statement dated April 2022.

- 1.5 The formal description of development remains as originally submitted.

THE APPLICANT

- 1.6 WJG is the UK's leading developer of 'residential for rent' and is a very experienced developer and operator of purpose-built student accommodation. WJG has delivered over 48,000 student beds across 135 sites schemes across the UK, including several developments in London, including at Elephant and Castle, Stockwell and Stratford. Almost all projects are commenced on site within six months of the grant of planning permission.
- 1.7 WJG successfully works across every part of the UK and closely engages with local authorities, neighbours, and a wide range of relevant stakeholders to focus on investing in brownfield sites that make the best use of land, and create high quality, appropriately designed places. Its end-to-end delivery model means that it acquires, designs and build places, and often stays to manage them as a valuable long-term member of the community.
- 1.8 Its management business, Fresh, was formed in 2010 and manages over 20,000 student beds. Fresh is its multi award-winning operator and manager of residential for rent schemes and works on behalf of a wide range of clients, managing over 22,000 rental homes and student bed spaces at over 70 sites across the UK and Ireland. Fresh achieves 95% customer satisfaction, and cares for its residents with a range of wellbeing and community building activities, which also seeks to integrate students into local communities.

DESCRIPTION OF DEVELOPMENT

- 1.9 The Application seeks the demolition of the existing building on the Site and redevelopment 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 units, of which 27 are Social Rent (London Affordable Rent) and 28 are Intermediate (London Living Rent);
 - 495sqm (GIA) of flexible commercial and community floor space with Unit 1 91 sqm Class E use, Unit 2 187 sqm Class E and/or Class F floorspace, Unit 3 91sqm of Class E and Unit 4 of 97sqm Class E and/or Class F floorspace;
 - In Plot 1 there is 14 sqm shared commercial bin store which is apportioned 5 sqm to Unit 1 and 9 sqm to Unit 2;
 - In Plot 2 there is a 14.6 sqm shared commercial bin store which is apportioned 7.1 sqm to Unit 3 and 7.5 sqm to Unit 4;
 - 3 buildings ranging in height from 12 to 22 storeys;
 - Car free development, except for 4 accessible car parking spaces and 1 car club space;
 - 678 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;
 - 1,434 sqm internal and 665 sqm external communal amenity space associated with the PBSA;
 - Landscaping and planting of 73 new trees; and
 - New vehicular servicing route between Sleaford Street and New Covent Garden Access Road.

KEY IMPROVEMENTS TO THE APPLICATION AS A RESULT OF AMENDMENTS

1.10 Whilst this Application focusses on the merits of the scheme as a whole and afresh from the originally submitted scheme, the amendments proposed to the scheme deliver a number of tangible environmental improvements over and above the originally submitted scheme. These include:

- Increase in Biodiversity Net Gain, from 35.26% to 147.56%;
- Increase in Urban Greening Factor, from 0.38 to 0.4;
- Improvements in Carbon Reductions. The non-domestic element of the new scheme would achieve 54% carbon reductions against 2013 Building Regulations baseline, exceeding the 35% London Plan policy target, and 33% carbon reductions against 2021 Building Regulations baseline. The domestic element would also be in excess of the 50% policy target against both the 2013 and 2021 Building Regulations baseline, achieving 63% carbon reductions against the 2021 baseline;
- Increase in PVs from 66 sqm to 340 sqm;
- Retention of existing trees alongside Battersea Park Road;
- Reorientation of Building 1 away from Viridian apartments improving the neighbouring outlook across Sleaford Street and significant improvements to retained levels of daylight; and
- Improved townscape as a result of the improved frontage along Battersea Park due to the rotation and setback of Building 1.

1.11 Please refer to the comprehensive summary of all the scheme benefits at the end of this statement.

PURPOSE AND FORMAT OF THE PLANNING STATEMENT

1.12 The purpose of the Statement is to provide information to allow the necessary consideration of the proposed development against all relevant planning policy and other material considerations. The Statement sets out how the planning policies and all other material considerations relevant to the determination of the Application have been taken into account in the evolution of the scheme. It also demonstrates that the Application is compliant with all such considerations, to help inform the overall planning balance judgement.

1.13 This Statement forms part of the information which has been submitted with the Application and should be read in conjunction with the following documents:

Ref.	Submission Document	Author	Original Submission	Revised Submission	Addendum or Substituted Version
1.	Schedule of Application Documentation	Montagu Evans	29 April 2022	April 2024	Substituted
2.	Covering Letter	Montagu Evans	29 April 2022	April 2024	Substituted

3.	Application Form (including completed ownership certificates)	Montagu Evans	29 April 2022	No update required.	No update required.
4.	Site Location Plan	Glen Howells Architects	See Drawing Schedule	No update required.	No update required.
5.	Application Drawing Schedule	Glen Howells Architects	April 2022	April 2024	Substituted
6.	Proposed Drawings	Glen Howells Architects	See Drawing Schedule	April 2024	Substituted
7.	Design and Access Statement inc. Area and Accommodation Schedule (GEA and GIA)	Glen Howells Architects	April 2022	April 2024	Addendum
8.	Landscaping Strategy inc. Urban Greening Factor calculation	Planit (previously Exterior Landscaping)	April 2022	April 2024	Substituted
9.	Planning Statement inc. Tall Buildings Assessment and Draft HoTs	Montagu Evans	April 2022	April 2024	Substituted
10.	Heritage and Townscape Assessment inc. AVRs	Montagu Evans / Miller Hare	April 2022	April 2024	Addendum
11.	Statement of Community Involvement	Kanda	April 2022	April 2024	Addendum
12.	Draft Student Management Plan	Fresh	April 2022	April 2024	Substituted
13.	Student Demand Assessment	Cushman and Wakefield	April 2022	April 2024	Substituted
14.	Socio-Economic Assessment	Montagu Evans	29 April 2022	April 2024	Substituted
15.	Noise and Vibration Assessment	PDA	April 2022	April 2024	Substituted
16.	Air Quality Assessment inc. Air Quality Neutral Statement	Redmore Environmental	27 April 2022	April 2024	Substituted
17.	Preliminary Ecological Appraisal	Greengage (previously JFA Environmental Planning)	April 2022	April 2024	Substituted
18.	Biodiversity Impact Assessment	Greengage (previously JFA Environmental Planning)	April 2022	April 2024	Substituted
19.	Contaminated Land Assessment	Tier Consult	March 2022	April 2024	Substituted
20.	Cultural Strategy	Future City	April 2022	April 2024	Substituted
21.	Fire Statement	Atelier Ten	April 2022	April 2024	Substituted
22.	Flood Risk Assessment	Apex Consulting	April 2022	April 2024	Substituted
23.	Drainage Strategy inc. Foul Sewage	Apex Consulting	April 2022	April 2024	Substituted

24.	Utilities Statement	Atelier Ten	29 April 2022	April 2024	Substituted
25.	Health Impact Assessment	Montagu Evans	29 April 2022	April 2024	Substituted
26.	Archaeological Assessment	RPS	April 2022	April 2024	Substituted
27.	Energy Statement	Atelier Ten	29 April 2022	April 2024	Substituted
28.	Sustainability Statement and BREEAM & HQM Assessments	Atelier Ten	29 April 2022	April 2024	Substituted
29.	Whole Life Carbon Assessment	ADW	April 2022	April 2024	Substituted
30.	Overheating Assessment	Atelier Ten	29 April 2022	April 2024	Substituted
31.	Transport Assessment	SLR	29 April 2022	April 2024	Substituted
32.	Travel Plan	SLR	29 April 2022	April 2024	Substituted
33.	Delivery and Servicing Management Plan	SLR	29 April 2022	April 2024	Substituted
34.	Construction Logistics Plan	SLR	29 April 2022	April 2024	Substituted
35.	Arboricultural Survey	Arbtech	29 April 2022	No update required.	No update required.
36.	Arboricultural Impact Assessment, Tree Protection Plan and Arboricultural Method Statement	Arbtech	29 April 2022	April 2024	Substituted
37.	Waste Strategy	Equilibria	29 April 2022	April 2024	Substituted
38.	Daylight and Sunlight Assessment inc. Overshadowing Assessment (Internal and External)	Point 2 Surveyors	April 2022	April 2024	Substituted
39.	Wind Assessment	GIA	29 April 2022	April 2024	Substituted
40.	Circular Economy Statement	ADW	29 April 2022	April 2024	Substituted
41.	Draft Construction and Waste Management Plan	Watkin Jones Group	April 2022	April 2024	Substituted
42.	Car Park Management Plan	SLR	29 April 2022	April 2024	Substituted
43.	CIL Form	Montagu Evans	29 April 2022	April 2024	Substituted

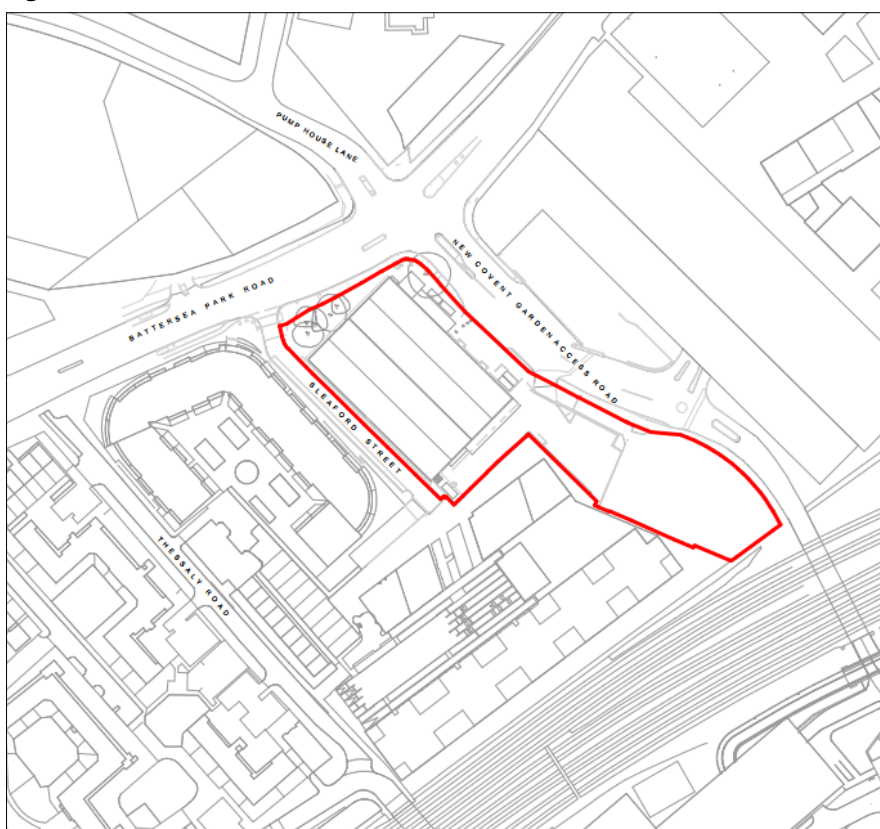
1.14 **Section 2.0** of this Statement provides background information on the Site, while **Section 3.0** details the pre-application discussions with the Council and **Section 4.0** outlines the proposed development. **Section 5.0** summarises the legislation and guidance relevant to the Site and then the land use proposals are assessed against the relevant policies in **Section 6.0**. **Section 7.0** provides an assessment of the technical elements of the scheme against the relevant policies. **Section 8.0** outlines the Draft Heads of Terms and **Section 9.0** considers the Planning Balance. **Section 10.0** presents a conclusion which summarises the planning justification for this scheme.

2.0 APPLICATION SITE & SURROUNDING AREA

The Application Site

- 2.1 The northern part of the Site fronting Battersea Park Road contains Booker Cash & Carry which is a retail warehouse club totalling 3,209 sqm (GIA) (sui generis). The warehouse is a large, corrugated orange metal building on a brick base which provides a double height space. The southern part of the Site adjacent to the railway line was previously occupied by a BMW service centre (Class B2) which totalled 1,224 sqm (GIA), however, this has since been demolished. The Site is accessed by the New Covent Garden Market access road, which is located to the east of the Site.

Figure 2.1: Site Location Plan



- 2.2 The Site is located in Flood Zone 3 (albeit benefitting from flood defences). Likewise, the risk of surface water flooding is low.
- 2.3 None of the buildings located on the Site are listed and the Site it is not located in a Conservation Area. However, the Site is located approximately 250m south-east of Battersea Power Station (Grade II*) and approximately 400m east of the Battersea Park Conservation Area. The impact of the proposed development on the setting of these heritage assets has been considered in this application.
- 2.4 The Site is calculated to have a PTAL rating of 5 (see Transport Assessment for methodology). The Site is located opposite the new Battersea Power Underground Station which provides regular Northern Line Services to Edgware and High Barnet. In addition, the Site is opposite Battersea Power Bus Station which provides the following services:

- 156 – Vauxhall Bus Station to Wimbledon Bus Station (daily);
- 344 – Clapham Junction Station to Liverpool Street Station (daily); and
- 436 – Moleworth Street to Battersea Park Station (daily).

- 2.5 In addition to the above, there is a Cycle Hire Docking Station located approximately 95m west of the Site.
- 2.6 The Site can therefore be considered to be highly sustainable on the basis that it constitutes previously developed land within walking distance of various public transport modes.

The Surrounding Area

- 2.7 The Site is bound by Battersea Park Road to the north, beyond which lies Battersea Power Station Underground Station, Battersea Power Station and various sites that are undergoing development (discussed further below). To the east, the Site is bound by an unnamed road serving the New Covent Garden Market which lies beyond. 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.
- 2.8 The Site lies in an area that is currently undergoing extensive redevelopment and therefore, the Site is surrounded by numerous developments either under construction or subject to planning approval. Accordingly, the Site is within an evolving context with the surrounding schemes shaping the proposals put forward as part of this application. This evolving context is discussed in detail below.

New Covent Garden Entrance Site

- 2.9 To the east of the Site is part of the New Covent Garden Market site which benefits from a hybrid planning permission granted under planning reference 2014/2810.
- 2.10 The eastern boundary of the Site sits opposite the development plot known as the Entrance Site. This site is currently the temporary home for the relocated flower market, but also benefits from outline planning permission for residential led mixed use development. The outline approval proposes at its tallest point an 18 storey (double ground floor) building of 65.5m AOD with adjacent buildings of varying height from 6 to 13 storeys. The scheme also includes a permitted pedestrian crossing that links the scheme to the Application Site.
- 2.11 At the time of writing, an application for reserved matters has yet to come forward and we understand that vacant possession is not due until 2026.

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.

Viridian Apartments

- 2.13 Viridian Apartments is a 4-9 storey block of flats located west of the Site, at 75 Battersea Park Road between Sleaford Street and Thessaly Road. It was built in 2009 on the former site of the John Milton School. It consists of 240 flats (60 affordable units) designed around courtyard, a podium deck and a basement car park.

Dairy Crest Site (Battersea Power Station Phase 4a)

- 2.14 This site is located immediately to the south and west of the Site and its eastern boundary forms a direct link to the application site.
- 2.15 The Site was granted planning permission (ref 2015/3555) for which development almost been completed. The scheme included demolition of all existing buildings, new buildings to a maximum height of 18 storeys (59m AOD) and will provide 374 new homes. The scheme also includes 1,100 sqm of business incubator space aimed at 'local entrepreneurs', a 1,580 sqm public health centre and 5,600 sqm of new public realm. Vehicle and cycle parking will be in a basement and two new substations will also be provided.
- 2.16 The development has now been completed and is occupied.

Southern Boundary

- 2.17 To the south of the Site is a railway line and beyond is a multi-storey car park and the wider New Covent Garden Market Site. The nearest residential properties to the south of the railway are located 200m to the southwest along Wadhurst Road, Thessaly Road and Patmore Street.

Planning History

- 2.18 A search of LBW's online planning register has highlighted that Site has been subject to several planning applications. The applications relevant to the Site and this proposal are listed in Table 2.1 below.

Table 2.1 – Planning History of the Site

Ref No.	Description	Decision
2003/2257	Alterations to external elevations of existing building including recladding and construction of a single storey extension.	Approved 31/10/2003
2004/1231	Continued use of site for the purposes of vehicle servicing, MoT testing, car valleting and parking including offices and reception area.	Approved 27/05/2004
2014/2158	Construction of temporary structures, comprising two marquee structures with PVC coverings erected against the existing building to provide additional workshop space and a portakabin building located on the car park opposite to provide a customer reception and administration facilities.	Approved 24/07/2014
2015/5273	EIA Screening Opinion for demolition of existing buildings on site, and construction of a residential-led mixed-use development consisting of buildings ranging from 5 to 18 storeys, providing approximately 350 residential units and commercial floor space at ground floor level, with associated landscaping and public realm. The anticipated maximum GEA for the overall development is 34,000 sqm.	EIA not required 19/09/2015
2015/6813	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	Approved 28/03/2019 and implemented.

	and cycle parking, plant and associated works, landscaping and a new access onto Sleaford street.	
2022/1062	EIA Screening in accordance with requirements of Reg. 6(2) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for the redevelopment of the site for mixed-use including accommodation for up to 750 students (sui generis), 80 residential units (Class C3), 550sqm of commercial floorspace (Class E) and associated internal amenity/cultural space, service areas, car and cycle parking, together with external landscaping and public realm.	EIA not required 31/03//2022

- 2.19 We have been made aware that the relevant pre-commencement conditions have been discharged for application ref. 2015/6813 and we understand that the permission has since been implemented by the demolition of the BMW service centre building in April 2022.
- 2.20 In addition to the above planning history for the Site, **Appendix 1** outlines surrounding planning history of relevance.

3.0 PRE AND POST APPLICATION ENGAGEMENT

Pre-application Discussions

- 3.1 The Applicant has undertaken extensive pre-application consultation with officers at LBW and the GLA, as well as Wandsworth's Design Review Panel. This has involved consultation on matters such as land use, massing, design, layout, parking, servicing, energy and sustainability, and landscaping. The meetings were structured through a Planning Performance Agreement which was entered in to by the Applicant and LBW.

LBW Pre-application Discussions

- 3.2 The approach to the proposals has been supported by pre-application meetings with LBW on the below dates in the lead up to submission:
- **Pre-app Meeting 1** – 10 December 2020;
 - **Pre-app Meeting 2** – 13 October 2021;
 - **Pre-app Meeting 3** – 14 December 2021;
 - **Pre-app Meeting 4** – 17 January 2022; and
 - **Pre-app Meeting 5** – 2 March 2022.

- 3.3 In addition to the above, there have been a series of informal meetings and design workshops held with various officers at LBW to discuss the proposals.

GLA Pre-application Discussions

- 3.4 Alongside pre-application discussions with LBW two pre-application meetings were also held with the GLA on:
- **In-Principle Meeting** – 24 March 2021; and
 - **Level 2 Meeting** – 11 February 2022.

Design Review Panel

- 3.5 The emerging proposals were presented to the Design Review Panel on 16 March 2022. Please see **Appendix 2** for the formal DRP response.

Public Engagement

- 3.6 There has been a significant amount of public engagement during the development of the proposals. The consultation process included:
- Early engagement with the Queenstown Ward Councillors and the Battersea Society, and subsequent outreach to St Modwen as stakeholders in the New Covent Garden Market, Peabody as the developers of new residential accommodation to the south of the site, the Battersea Power Station Development Company, and DTZ Investors who are acting on behalf of Bookers Wholesale. Wandsworth Chamber of Commerce were also approached.

- A dedicated consultation website www.BatterseaParkRoad.co.uk was launched on 21st January 2022 for residents and businesses to learn more about the proposals, leave feedback and contact the project team.
 - A letter inviting residents to the online consultation, alongside sharing the contact details of the team, was distributed to 2,719 local homes and businesses on 21st January 2022.
- 3.7 Whilst an in-person event at the R.O.S.E. Community Clubroom on Ascalon Street was considered and a booking made, the COVID-pandemic at that time led the project team to proceed with an online-only consultation. However, to ensure no local residents were excluded, the hand-delivered invitation to local people allowed people without access to the internet the ability to get in touch with the project team directly by phone, and for people to request site visits and/or home visits.
- 3.8 During the pre-application phase, in-person meetings were held with Battersea Power Station, the Viridian Apartments Residents Management Board, and three home visits to people living in Viridian Apartments.
- 3.9 Whilst consultation invitations were issued to 2,719 local residents, only 28 community representations were received by the project team. 18 were from residents identifiable as living in Viridian Apartments, with a further 5 submissions from people living elsewhere in the local area. A final 5 comments from people who left no postal address details. Overall, 22 of these submissions were received through the consultation website, and 6 were emails sent directly to the project team.
- 3.10 The submitted **Statement of Community Involvement (SCI)** prepared by Kanda Consulting outlines the public engagement undertaken in greater detail.
- 3.11 **Section 6.0** sets out how the above pre-application, public engagement and DRP feedback has been considered and has informed this submission. The more design related matters are also explained in the greater detail within the **Design and Access Statement**.

Post-Submission Discussions

- 3.12 Following the original submission of this scheme, various responses have been received from LBW officers, statutory consultees, councillors, and other stakeholders, and therefore have resulted in the need for principal amendments to the Application. The revised scheme has been informed by extensive consultation and discussions with officers at LBW through various Design Workshops; through two additional formal Design Review Panel sessions; and through a design and energy meeting with the GLA. These various meetings have been structured through an updated Planning Performance Agreement which is being entered into by the Applicant and LBW.

LBW Discussions

- 3.13 The approach to the revised proposals has been supported by design workshops with LBW on the below dates:
- **Design Workshop 1** – 9 August 2022;
 - **Design Workshop 2** – 14 September 2022;
 - **Design Workshop 3** – 5 October 2022;
 - **Design Workshop 4** – 19 October 2022;

- **Design Workshop 5** – 2 November 2022;
- **Design Workshop 6** – 28 November 2022;
- **Design Workshop 7** – 19 December 2022; and
- **Design Workshop 8** – 1 March 2023.

Design Review Panel

- 3.14 A Design Review Panel was held on 8 June 2022 and 6 February 2023. Please see **Appendix 2** for the formal DRP responses.

GLA Discussions

- 3.15 Alongside discussions with LBW, a meeting was also held with the GLA officers on 7 March 2023 to discuss the design updates and the updated energy strategy.

Public Engagement

- 3.16 There has been a significant amount of public engagement since the submission of the Application to keep the local residents up to date, including regular updates to the dedicated consultation website www.BatterseaParkRoad.co.uk for residents and businesses to learn more about the proposals, leave feedback and contact the project team.
- 3.17 Further to the Council's statutory consultation, the Applicant delivered a newsletter to residents of the neighbouring Viridian Apartments to provide them with an update on the Application submission since several residents from these apartments raised comments during pre-application community consultation events.
- 3.18 Further to various comments received from LBW officers, statutory consultees, councillors, and other stakeholders, the scheme has been revised accordingly, and a further round of letters were issued to residents of the Viridian apartments to update them on the Application status and the revised scheme, which was followed by an invite to over 2,700 local homes and businesses to attend a Resident Update Event in January 2023 to provide a scheme update, allow local people to ask questions about the proposals, and to receive any further feedback to feed into the revised scheme design. In addition to this, a range of wider stakeholders were invited to a pre-meet ahead of the Resident Update Event to inform them of the scheme updates and to obtain any comments including:
- The Nine Elms ward councillors
 - The Shaftesbury and Queenstown ward councillors
 - The Battersea Society
 - The representatives of Bookers Wholesale
 - St Modwen/Vinci as the operators of New Covent Garden Market
 - Battersea Power Station
 - Peabody, as the owner of Battersea Power Station's Phase 4a development
 - The Wandsworth Chamber of Commerce
 - The Viridian Apartments Residents Management Board

- 3.19 Further to the Council's statutory consultation, the Applicant delivered a newsletter to residents of the neighbouring Viridian Apartments to provide them with an update on the Application submission since several residents from these apartments raised comments during pre-application community consultation events.
- 3.20 Please refer to the **Statement of Community Involvement** prepared by Kanda for more detail on pre and post application engagement.

4.0 DEVELOPMENT PROPOSALS

4.1 The Application seeks the demolition of the existing Bookers building on the Site and redevelopment 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 units, of which 27 are Social Rent (London Affordable Rent) and 28 are Intermediate (London Living Rent);
- 495sqm (GIA) of flexible commercial and community floor space with Unit 1 91 sqm Class E use, Unit 2 187 sqm Class E and/or Class F floorspace, Unit 3 91sqm of Class E and Unit 4 of 97sqm Class E and/or Class F floorspace;
- In Plot 1 there is 14 sqm shared commercial bin store which is apportioned 5 sqm to Unit 1 and 9 sqm to Unit 2;
- In Plot 2 there is a 14.6 sqm shared commercial bin store which is apportioned 7.1 sqm to Unit 3 and 7.5 sqm to Unit 4;
- 3 buildings ranging in height from 12 to 22 storeys;
- Car free development, except for 4 accessible car parking spaces and 1 car club space;
- 678 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;
- 1,434 sqm internal and 665 sqm external communal amenity space associated with the PBSA;
- Landscaping and planting of 73 new trees; and
- New vehicular servicing route between Sleaford Street and New Covent Garden Access Road.

4.2 The formal 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).”

4.3 The form and content of the proposed development is described in full in the **Design and Access Statement**, prepared by Glenn Howells Architects, that forms part of this application and should be read in conjunction with this planning statement.

Layout and Scale

4.4 The proposed layout comprises an extensive landscaped public realm within which 3 buildings/plots are positioned, which comprise:

Plot 01 - Affordable residential Building

- Extending up to 12 storeys;
- Providing 91 sqm (GIA) of ‘Use Class E’ (Unit 01) and 187 sqm GIA of flexible ‘Use Class E and/or F’ (Unit 02) on the ground floor level; and

- Providing 55 affordable homes, with a split of 27 London Affordable Rent and 28 London Living Rent, on the upper levels.

Plot 02 - purpose Built student Accommodation

- Extending up to 17 storeys;
- Providing 91 sqm (GIA) 'Use Class E' (Unit 03) and 97 sqm (GIA) of flexible 'Use Class E and/or F' (Unit 04), on the ground floor level; and
- Providing 237 PBSA studio bedrooms on the upper levels.

Plot 03 - purpose Built student Accommodation

- Extending up to 22 storeys; and
- Providing 525 PBSA cluster bedrooms.

4.5 Further information can be found within the **Design and Access Statement**, prepared by Glenn Howells Architects, and the **Landscape Strategy**, prepared by Planit.

Student Accommodation

4.6 The proposal is to provide 762 student accommodation units within Buildings 2 and 3. This provision includes 198 bedrooms (25.98%) as affordable as defined in the London Plan.

4.7 The mix of rooms allows a range of room types to meet differing needs. 5.2% of the rooms are accessible from the outset with a mix of both accessible cluster and studio rooms.

4.8 The **Design and Access Statement**, prepared by Glenn Howells Architects, provides greater detail on the different type of room proposed, along with the services and facilities provided.

Affordable Residential Accommodation

4.9 All (100%) of the proposed 55 Class C3 residential dwellings will be affordable. The units offer a tenure split of 49% Social Rent (London Affordable Rent) and 51% Intermediate (London Living Rent) on both a habitable room basis and unit basis. **Figure 4.1** below sets out the proposed mix of the affordable units.

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%

Figure 4.1: Affordable Housing Unit Mix

4.10 Further detail is provided in the affordable housing part of **Section 6.0**, along with design detail within the **Design and Access Statement**, prepared by Glenn Howells Architects.

Architecture, Landscaping and Public Realm

4.11 The three plots are integrated into a vibrant landscape and new public realm, which has been updated significantly since the original submission to ensure that the landscaping strategy is of the highest design

quality. The proposed building facades have taken inspiration from the surrounding and historic context, and take the form of pre-cast concrete which have been coloured to create separate identities.

- 4.12 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, as well as the potential new school. The scheme has integrated congregation spaces within the landscaping adjacent to student entrances and community facilities and places to pause, rest and socialise throughout the layout.
- 4.13 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. For detailed information on the landscape strategy please refer to the **Landscape Strategy**, prepared by Planit.

Energy and Sustainability

- 4.14 The proposed buildings energy demands have been reduced through the implementation of energy efficiency measures such as high standards of fabric thermal performance and passive design. This includes applying U values and air permeability values significantly better than Part L standards, including heat recovery ventilation, low energy lighting and controls, wastewater heat recovery and renewable on-site energy generation. The scheme will demonstrate an on-site carbon reduction of 46% over the 2021 Part L baseline. More detail on this can be found within the **Energy Statement**, prepared by Atelier Ten.
- 4.15 In addition to the above, as detailed in the **Sustainability Statement and BREEAM & HQM Pre-assessment**, prepared by Atelier Ten, the proposals have evolved through consideration of sustainability strategies which relate to the following areas:
- Health & Wellbeing;
 - Energy;
 - Transport;
 - Water;
 - Materials;
 - Waste;
 - Land Use & Ecology; and
 - Pollution.

Amenity Space

- 4.16 For the affordable residential units, 379 sqm private amenity space is provided in the form of private terraces and private balconies. In addition, communal amenity space is provided within the proposed public realm.
- 4.17 For the proposed PBSA, 1,434 sqm internal and 665 sqm external communal amenity space is proposed, split across Buildings 2 and 3. Students would also have access to the site-wide public realm.
- 4.18 For Building 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 include 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.

- 4.19 For Building 3, there is shared indoor and outdoor amenity at Level 7, including 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.
- 4.20 For detailed information on the landscape strategy please refer to the **Landscape Strategy**, prepared by Planit.

Play Space

- 4.21 The proposals include the provision of 356 sqm of play space for a variety of ages from 0 to 11 years old. 12+ provision is to be provided off site.
- 4.22 The play spaces 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.
- 4.23 Sensory play will also be explored through meandering discovery paths through planting. Play equipment includes 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.
- 4.24 The **Landscape Strategy**, prepared by Planit, provides greater detail on the play space provision.

Car and Cycle Parking

- 4.25 The proposals are for car free development, except for the following located on Sleaford Street in line with London Plan requirements:
- 1 x Car Club space;
 - 1 x disabled / blue badge space for Student Accommodation;
 - 1 x disabled / blue badge space for Commercial use; and
 - 2 x disabled / blue badge space for Residential Use.
- 4.26 The scheme will also offer 2 x loading bays for servicing and delivery vehicles on Sleaford Street and New Covent Garden Market Access Road.
- 4.27 The proposals also include cycle parking in accordance with London Plan requirements. 678 long stay cycle parking spaces will be provided, as well as 50 short stay spaces. The proposed split is outlined as follows:

Long Stay

- 104 x Residential spaces;

- 572 x Student Accommodation spaces; and
- 3 x Commercial spaces.

Short Stay

- 3 x Residential spaces;
- 19 x Student Accommodation spaces; and
- 28 x Commercial spaces.

- 4.28 Long-stay spaces will be provided in dedicated cycle stores at ground floor level within each building and will comprise a mixture of two-tier racks and Sheffield stands.
- 4.29 Short stay spaces will be provided within the public realm and will be placed at suitable locations in relation to entrance points and existing cycle infrastructure.
- 4.30 More detail on car and cycle parking can be found within the **Transport Assessment**, prepared by Vectos.

Movement and Access

- 4.31 As outlined above, the scheme is car-free apart from the provision of disabled blue badge spaces. The layout has been designed to optimise the servicing arrangements considering the car-free nature of the scheme.
- 4.32 Vehicular access will be gained along Sleaford Street, New Covent Garden Market Access Road and the internal link road. As the site is predominantly car-free, the only vehicles expected to be accessing the Site will be delivery and servicing vehicles, vehicles associated with move in / out days for the student blocks, and emergency vehicles. Further details are set out in the **Transport Assessment, Delivery and Servicing and Management Plan**, and **Travel Plan**, prepared by SLR , and the **Student Management Plan**, prepared by Fresh.

Servicing / Refuse Strategy

- 4.33 The proposed development will align with servicing arrangement of the Extant Permission as follows:
- Inset Loading Bay on New Covent Garden Market Access Road;
 - Inset Loading Bay on Sleaford Street; and
 - Through-Route for Service Vehicles between New Covent Garden Market Access Road and Sleaford Street (bollard controlled).
- 4.34 The through route will allow for occasional larger vehicles (circa 3 vehicles per day) to access/egress the site in a forward gear as it is not possible for large vehicles to turn at the end of Sleaford Street.
- 4.35 It is proposed that the route will be controlled by bollards in order to restrict any general through traffic. It is also proposed that this section can also be used as a loading/unloading area when students move in and out at the beginning and end of the student year.
- 4.36 Communal bin stores are located at ground floor level in each building. Refuse collection will access the site via Sleaford Street and will utilise the through route to exit via New Covent Garden Market Access Road. Refuse collections will take place in close proximity to the proposed bin stores for each Building

using the two inset loading bays, as well as an identified section on the servicing route between Sleaford Street and New Covent Garden Market Access Road.

- 4.37 More details on the strategy can be found within the **Delivery and Servicing Management Plan**, prepared by SLR .

Construction Access

- 4.38 It is anticipated that the construction vehicles will use the strategic road network where possible. The route utilises the Transport for London Road Network (TLRN) via Battersea Park Road. All deliveries of materials to site or removal from site shall take place during the specified hours and in the manner specified in the **Construction Logistics Plan**, prepared by SLR . The site will endeavour to take receipt of deliveries during the site working hours of 8:00-18:00 on weekdays and 08:00-13:00 on Saturdays
- 4.39 Access to the site for construction vehicles will be via Battersea Park Road, New Covent Garden Market Access Road and Sleaford Street. All parking, loading and unloading is expected to be accommodated within the site and no construction laybys will be located on the surrounding road network, including Sleaford Street and New Covent Garden Market Access Road. In addition to this, no construction vehicles will enter the site via NCGMAR at any time, and with restricted delivery times, no movements will take place on NCGMAR during the market's peak hours of 11pm to 7am.
- 4.40 In the event that any construction deliveries need to be made on the public highway, this will be agreed in advance with the highway authority. In addition to this, the proposed development will offer two inset loading bays, one on the NCGMAR and another on Sleaford Street. This will help reduce traffic congestion along both these roads.
- 4.41 A through route will be provided to allow for larger vehicles to access/egress the Site in a forward gear as it is not possible for large vehicles to turn at the end of Sleaford Street. This route will be controlled by bollards in order to restrict any general through traffic. It is also proposed that this section can also be used as a loading/unloading area when students move in and out at the beginning and end of the student year to prevent congestion on the public highway.
- 4.42 The Site Manager will be responsible for developing and implementing a Site Traffic Management Plan. The Applicant will work in partnership with TfL, LBW and the supply chain to reduce the impact of the development on the local community, including consultation to confirm the preferred access and egress routes to and from Site.
- 4.43 The site team will be vigilant to ensure that illegal parking on the surrounding roads is avoided and encourage construction workers to use public transport to travel to the site given its high accessibility. During the site induction, personnel will also be advised that parking on local streets is not permitted. During the procurement and site induction process, all operatives will be encouraged to use public transport wherever practicable.
- 4.44 All drivers will be fully trained and will be provided with a copy of a routing plan to ensure that they use the correct roads when driving to and from the site. Drivers will be aware of other road users, including pedestrians and cyclists, particularly when undertaking turning movements at the site
- 4.45 More detail on this can be found within Section 7 of the **Transport Assessment** and **Construction Logistics Plan**, prepared by SLR .

5.0 LEGISLATION, PLANNING POLICY AND GUIDANCE

5.1 This Section considers the legislative framework, planning policy and other material considerations that together provide the context against which the application for the proposed development will be considered.

5.2 Upon submission of the planning application, the Council must consider the policies in the statutory Development Plan and assess the proposal against them. This is a legal requirement set out in the Planning and Compulsory Purchase Act 2004. Section 38(6) states as follows:

“If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.”

5.3 The statutory Development Plan and those considerations which we consider are material to the determination of the Application are set out below.

The Statutory Development Plan

5.4 The relevant statutory Development Plan comprises:

- The London Plan (March 2021); and
- Wandsworth Local Plan 2023-2038 (July 2023).

Site Specific Designations

5.5 The Site is located in the Battersea Parkside district of the Vauxhall Nine Elms Battersea (VNEB) Opportunity Area (OA), as identified in the London Plan and is identified for limited intensification in the VNEB OA Planning Framework (OAPF) (March 2012). The Council’s adopted Local Plan (2023) allocates sites where development is anticipated and where the Council has particular objectives and proposals. The Site subject to this Application is allocated (Allocation Ref: NE2) for a *“mixed use development including residential and commercial uses”*.

5.6 The Site also falls within the Central Activities Zone (CAZ), a Tall Buildings Zone and an Archaeological Priority Area. The Site is located on Flood Zone 3, albeit benefitting from flood defences.

5.7 As noted earlier, none of the buildings located on the Site are listed and the Site is not located in a Conservation Area. However, the Site is located approximately 250m south-east of Battersea Power Station (Grade II*), approximately 640m east of Battersea Park (Grade II*) and approximately 400m east of the Battersea Park Conservation Area. Under the Extant Permission, it was concluded that there would be no significant harm to the setting of these.

Material Considerations

5.8 The National Planning Policy Framework (the “NPPF” / “the Framework”) (2023) sets out the Government’s approach to planning matters. It is a material consideration in the determination of planning applications.

- 5.9 In March 2014, the Government published the National Planning Practice Guidance (“NPPG”) which is a material consideration in relation to planning applications. The NPPG replaces several previous circulars and guidance to provide a simplified single source of guidance at the national level. The NPPG is a material consideration in the determination of applications.
- 5.10 At the heart of the NPPF is a presumption in favour of sustainable development, to ensure that sustainable development is perceived in a positive way (**Paragraph 11**).
- 5.11 Other material considerations include the below which are either referred to within this Statement or other supporting reports as and when relevant:
- National Design Guide (2021);
 - BRE – Site Layout Planning for Daylight and Sunlight (2022);
 - The Mayor’s Affordable Housing Viability (SPG) (2017);
 - The Mayor’s Housing (SPG) (2016);
 - The Mayor’s Accessible London: Achieving an Inclusive Environment (SPG) (2014);
 - The Mayor’s Shaping Neighbourhoods: Character and Context (SPG) (2014);
 - The Mayor’s Sustainable Design and Construction (SPG) (2014);
 - The Mayor’s Shaping Neighbourhoods: Play and Informal Recreation (SPG) (2012);
 - The Mayor’s Planning for Equality and Diversity in London (2007);
 - The Mayor’s Characterisation and Growth Strategy LPG (June 2023);
 - The Mayor’s Housing Design Standards LPG (June 2023);
 - The Mayor’s Optimising Site Capacity: A Design-led Approach LPG (June 2023);
 - The Mayor’s Sustainable Transport, Walking and Cycling guidance LPG (December 2022);
 - The Mayor’s Air Quality Neutral (AQN) guidance (February 2023);
 - The Mayor’s ‘Be Seen’ energy monitoring guidance (September 2021);
 - The Mayor’s Energy Assessment Guidance (June 2022);
 - The Mayor’s Circular Economy Statements (March 2022);
 - The Mayor’s Whole Life-Cycle Carbon LPG (March 2022);
 - The Mayor’s The Control of Dust and Emissions during Construction and Demolition SPG (July 2014);
 - LBW Planning Obligations SPD (2020);
 - LBW Housing SPD (2016);
 - LBW Historic Environment SPD (2016);
 - LBW Refuse and Recyclables SPD (2014); and
 - LBW Local Views SPD (2014).
- 5.12 There are also some draft guidance documents which are of relevance, but as these are not adopted yet, they carry limited weight as a material consideration:
- The Mayor’s Fire Safety SPD (February 2022);
 - The Mayor’s Affordable Housing LPG (May 2023);
 - The Mayor’s Development Viability LPG (May 2023);
 - The Mayor’s Urban Greening Factor LPG (February 2023); and
 - The Mayor’s Purpose-built Student Accommodation LPG (2023)

5.13 LBW has commenced a Partial Review of the Local Plan and consulted on a Regulation 18 version of the Plan between October 2023 and December 2023. This Partial Review seeks to amend Policy LP23 (Affordable Housing) including a requirement for new development to provide at least 50% cent of dwellings as affordable homes and a tenure split of 70/30 in favour of social rent. No weight has been given to this policy due to its infancy.

6.0 LAND USE ASSESSMENT

Principle of Development

- 6.1 The principle of comprehensive mixed-use redevelopment within the VNEB OA is clearly established in adopted policy, including the Site's specific site allocation. 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 planning permission granted in March 2019.
- 6.2 The NPPF notes that Plans and Decisions should apply a "*presumption in favour of sustainable development*" (**Paragraph 11**), whilst **Paragraph 124, part c**) sets out that planning decisions *should "give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs..."*
- 6.3 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.
- 6.4 The principle of the redevelopment of this brownfield site is therefore wholly acceptable. This has also been agreed with LBW during pre-application discussions through formal pre-application advice.

Loss of existing uses

- 6.5 As previously explained, 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 implemented permission.
- 6.6 Whilst the BMW service centre building has recently been demolished, the lawful use of this part of the Site is still considered to be Class B2. The Site is not identified within a designated employment area and therefore would be considered by London Plan **Policy E7** (Industrial intensification, co-location and substitution) to be 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:
- 1) *there is no reasonable prospect of the site being used for the industrial and related purposes set out in Part A of Policy E4 Land for industry, logistics and services to support London's economic function; or*
 - 2) *it has been allocated in an adopted local Development Plan Document for residential or mixed-use development; or*
 - 3) *industrial, storage or distribution floorspace is provided as part of mixed-use intensification (see also Part C of Policy E2 Providing suitable business space).*
- 6.7 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.

- 6.8 Furthermore, the implemented permission establishes the principle of developing the Site for mixed use development and the loss of the existing uses.
- 6.9 The principle of the loss of the existing uses is also supported by LBW as agreed through pre-application advice discussions.
- 6.10 We explore the acceptability of the proposed uses below.

Principle of Student Accommodation

- 6.11 The proposals incorporate a mix of uses, including purpose built and privately managed student accommodation. The 762 student bedrooms are split between two buildings and benefit from ancillary amenity spaces and facilities in both parts. It is anticipated that the majority of the student accommodation would be directly managed by a London based higher education institution.

PBSA as a contributor towards Housing Land Supply

- 6.12 **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*”.
- 6.13 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).
- 6.14 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.
- 6.15 It 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).
- 6.16 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 will be 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 book1 (Paragraph: 041 Reference ID: 68-041-20190722).

- 6.17 London Plan Supporting **Paragraph 4.15.1** 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 of Purpose-Built Student Accommodation (PBSA) or shared conventional housing, is an element of the overall housing need for London determined in the 2017 London 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.
- 6.18 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 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 this Application, there are not enough PBSA beds in London to meet the needs of the demand pool and so at present HMO properties continue to be a vital source of accommodation for students.
- 6.19 Having established that the delivery of PBSA is a valid contributor toward meeting housing needs and can assist in freeing up larger homes in the borough and making them available for single family households, it is clear that there are significant benefits attached to the delivery of PBSA. This next section sets out that the principle of student accommodation is acceptable when assessed against relevant Development Plan policies

Policy Review – London Plan

- 6.20 **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. Whilst it does not provide specific Borough targets or represent a cap, it is implicit that those Boroughs within suitable commutable distances to Higher Education Providers (HEPs) will contribute to meeting the majority of this demand.
- 6.21 In respect of evidencing need, and in addition to the letters from two HEPs (**Appendix 5**), the Applicant has appointed Cushman and Wakefield to undertake a student demand analysis with the intention to identify current and future demand for student accommodation in London. The analysis (submitted as part of this Application) emphasises that the Site's accessible location is a major draw for student accommodation as it provides an extensive 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;

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.

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.

6.22 Prior to the opening up of the Northern Line Extension, the analysis estimated that there were 50,740 students requiring a bed space within a commutable distance of the Site (considered to be 45-minute travel time) leading to a student to bed ratio need of 2.8 students to 1 bed. This highlighted a significant undersupply of student accommodation within commutable distance of the Site. This has now increased further with the Northern Line Extension operational as it has opened up the Site to more HEPs. Now, the demand pool of students requiring a bed space is estimated to be c.135,000 against a supply of 37,060 beds. This increases the student to bed ratio to 3.64 students to 1 bed within commutable distance of the Site. We therefore consider that there is a compelling evidenced-based demand for additional student accommodation.

6.23 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 a managed environment providing academic and pastoral support for students. Also, 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.

6.24 **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 is set out below in *italic* with our commentary below.

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

6.25 **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, assuming that the main driver of the policy is to promote a mix of uses and avoid scenarios of over-concentrations of singular uses, we have undertaken an analysis of PBSA schemes that have been delivered or granted planning permission in the Wandsworth part of the VNEB OA since 2011. The time-framed adopted is to broadly tie in with the publication of the VNEB OA Planning Framework which was published in 2012 and 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, we have applied the London Plan assumption (Paragraph 4.1.9) that 2.5 student beds equates to 1 single conventional residential household. As this is set out in the London Plan and the NPPG, we consider this approach to be robust. Details of the schemes included in this analysis are set out in **Appendix 2**.

6.26 In summary and based on the data gathered, should planning permission be granted for the proposed development, the percentage of residential homes as student homes would represent 4.3% of all residential homes in the Wandsworth part of the VNEB OA that have been delivered or granted planning permission since 2012.

6.27 At a relatively small percentage of overall residential homes, we consider that this is compelling evidence to demonstrate that the delivery of purpose built student accommodation on the Site would contribute positively to a mixed and inclusive neighbourhood and that it would not in any way undermine this and / or lead to an overconcentration of purpose built student accommodation.

6.28 It should be noted that our analysis is supported by the GLA who stated in their pre-application response that *“it is therefore considered the scheme contributes to a mixed and inclusive neighbourhood”*.

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

6.29 The student part of the proposed development will be secured for use by students (excluding the summer vacation period) in the Section 106 agreement. This is set out in the proposed Section 106 Heads of Terms in **Section 8**. The London Plan at Paragraph 4.15.13 accepts the temporary use of student accommodation during vacation periods for ancillary 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.*

6.30 The Applicant has been in discussions with various HEPs – two of which have expressed support for the proposals, as outlined at **Appendix 4**. The Applicant is committed to using reasonable endeavours to secure a nominations agreement prior to occupation of the accommodation which would be set out through a S106 obligation. This is set out in the proposed Section 106 Heads of Terms in **Section 8**.

6.31 The Applicant, however, does seek some flexibility regarding the extent of nominations, which the policy seeks to cover the majority of the bedrooms. This is on the basis of the particular circumstances of the Application which adopts a blended approach to affordable housing comprising a mixture of affordable student housing alongside conventional affordable housing (Class C3). In effect, rather than 35% of the student bedrooms being affordable under the fast-track policy, 25.98% of the student bedrooms would be affordable with the balance of affordable housing (18.33%) required to benefit from the fast-track policy (39.47%) coming forward as conventional affordable housing.

6.32 To satisfy Policy H15, which requires a HEP to have nomination rights for the majority of bedrooms, would mean that a HEP would need to commit to a greater proportion of market-let bedrooms which is likely to represent a commercial barrier for the HEP. This is evident from commercial discussions that the Applicant has had with HEPs who, despite their overarching support for PBSA, are reluctant to commercially tie themselves into market-let nominations. Instead, we propose that the nominations agreement is restricted to the affordable student bedrooms only. Whilst this would represent some conflict

with Policy H15 in this respect, the particular circumstances of this Application which, in effect, skews the quantum of market-let bedrooms a HEP would need to secure to be policy compliant justifies an alternative approach. We would note that the approach has recently been accepted in relation to a mixed use PBSA and Class C3 housing development in Lewisham at Apollo Business Centre (DC/23/130258 & 2023/0269).

6.33 Furthermore, we would note that the Draft PBSA LPG points to greater flexibility with regards to nomination rights, promoting a “reasonable endeavours” requirement on the basis of the commercial implications and timescale issues associated with securing nominations. Equally, the Draft LPG recognises that the mixed tenure affordable approach of affordable student housing and affordable conventional affordable housing may be acceptable and “even desirable on larger sites as part of the pursuit and mixed and inclusive neighbourhood objectives”. The proposals under this Application are therefore consistent with the direction of travel as set out in the LPG.

6.34 In summary, whilst the nominations would be secured for 25.98% of the student bedrooms and not 51% and therefore conflict with Policy H15, we consider that any harm arising from the policy conflict is limited given that the Application is for a mixed tenure housing scheme in which the affordable housing is proportioned between affordable student housing and conventional affordable housing – an approach endorsed by the Draft LPG. The impact of this approach means that the quantum of market-let accommodation that a HEP is expected to acquire to reach the majority of bedrooms is inflated and commercially challenging.

6.35 Any harm is also significantly outweighed by the fact that in lieu of the nominations agreement for 51% of the student bedrooms is a blend of affordable student bedrooms and conventional Class C3 affordable housing – the latter being of strategic priority in the Borough as evidenced by the Council’s plan to undertake a Partial Review of the Local Plan in an attempt to bolster the delivery of affordable housing. As such, the proposed approach that the nominations is secured for the affordable student housing only is justified.

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*
- 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.*

6.36 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. However, once added to the 171 habitable rooms created by the 55 x C3 residential units, this delivers a total percentage of 39.55% affordable housing based on habitable room across the Site. This meets the fast-track policy target set out in the London Plan.

6.37 For the avoidance of doubt, all of the affordable student accommodation would be allocated to a HEP as part of a nomination agreement(s).

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

6.38 The proposed student accommodation 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 **Chapter 7** and the **Design and Access Statement** which demonstrate that the accommodation provides adequate functional living space and layout. The amenity space which amounts to 1,434 sqm internal and 665 sqm external communal amenity space, including an excellent range of spaces for studying in groups, recreation, break-out space, BBQ areas, fitness etc.

6.39 Since the proposals are for Student Accommodation, there are not any specific minimum size standards of relevance, however, please refer to **paragraph 6.34** above and the **Design and Access Statement** which outlines the design standards of the proposed accommodation and provides comfort that the accommodation proposed is of high quality and is commensurate to the many thousands of rooms that the applicant has developed and now 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.

6.40 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 accessible by walking, cycling and public transport.

Policy Review – Local Plan

6.41 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;

6.42 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;

6.43 The **Student Management Plan** prepared by Fresh (part of Watkin Jones Group), which can be conditioned in any planning permission, 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, and would not give rise to unacceptable impact of nearby residents.

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

6.44 As explained in **Section 2**, 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 uses at the ground floor which will further contribute to the existing local offer. Overall, it is clear that part 3 is satisfied.

4. 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;

6.45 Unlike Policy H15, Policy LP28 (Purpose Built Student Accommodation) of the adopted Local Plan seeks to define “neighbourhood”. The Local Plan (in the Glossary in **Appendix 5**) 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**, 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 3** – 14,573 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.

6.46 Based on the above, it is clear that 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 Proposed Development would contribute to the creation of a mixed and inclusive neighbourhood. We therefore conclude that the proposed development and the delivery of PBSA would contribute positively to the local area at neighbourhood level and would not result in an over-concentration of a particular land use.

5. 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

6.47 See the **Design and Access Statement** which outlines that the proposals include the provision of appropriate standards and facilities, well-integrated internal and external communal areas, and a high level of amenity.

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

6.48 The student accommodation will offer 9.3% wheelchair user bedrooms, including 5.2% as wheelchair accessible in line with BS8300 2018, and 4.1% as wheelchair adaptable from the outset. Although the

overall provision does not quite meet the Local Plan Policy LP28 requirements of 10% of student rooms being readily adaptable for occupation by wheelchair users, the percentage of accessible units (5.2%) provided at completion of the development exceeds policy in this regard.

- 6.49 We are confident that this provision is robust as this has been formulated through the Applicant's understanding of the market demand and through discussions with HEPs. Fresh undertook an audit of all their current PBSA developments which demonstrates that a very small amount of wheelchair accessible rooms are used by a person with a disclosed physical disability (see table below).

Figure 6.1: PBSA Accessible Room Supply vs. Take-Up (bedspaces under Fresh's management)

PBSA Developments Under Fresh Management	22,214
Accessible rooms within these PBSAs	570
No. of Students with Known Disabilities	6
% of Accessible Rooms within these PBSAs	2.57%
% of Students with Known Disabilities to overall PBSAs	0.03%
% of Students with Known Disabilities in Accessible Rooms	1.05%

- 6.50 As such, the provision is adequate and that a combination of readily adapted and future adaptable wheelchair units will meet the required need, noting that whilst the quantum is short of the policy requirement of 10% readily adaptable units, qualitatively the provision is an enhancement as there would be 5.3% provision from day one which goes beyond the policy.
- 6.51 In addition to this, the London Plan requires accessible housing to provide accommodation for disabled people, older people and families with young children, and with the majority of the development providing PBSA, these demographics are not going to be occupying a large portion of the development, and in this context a slightly reduced provision is acceptable.

Principle of Residential Development

- 6.52 The proposed 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.
- 6.53 The NPPF notes the Government's objective of "*significantly boosting*" the supply of housing (**Paragraph 60**). **Paragraphs 7 and 8** of the Framework 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.
- 6.54 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 uses. Likewise, the Policy promotes the development of windfall sites to meet housing need.

- 6.55 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.
- 6.56 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.
- 6.57 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.
- 6.58 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. This was also supported by LBW during pre-application discussions.

Affordable Housing (Class C3)

- 6.59 **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.
- 6.60 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.
- 6.61 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.
- 6.62 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.
 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.
- 6.63 **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.

- 6.64 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.
- 6.65 All of the proposed 55 Class C3 residential dwellings will be affordable, based on a tenure split of 49% Social Rent (London Affordable Rent) and 51% Intermediate (London Living Rent) on both a habitable room basis and unit basis. This is an improvement from the initially submitted scheme which demonstrated a 48:52% split. Whilst not compliant with the tenure split sought by Policy LP23 which seeks at least 50% low-cost rent split, the proposed 49% is just under this policy requirement. That being said, the Scheme is capable of being compliant with Policy H6 of the London Plan which seeks a minimum of 30% of the affordable homes to be low-cost rent, and therefore we consider substantial weight should be given to this in determining this planning application.

Affordable Housing Threshold and Fast-Track

- 6.66 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).
- 6.67 **Appendix 6** shows the split between the land parcels, and which demonstrates that 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.
- 6.68 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.
- 6.69 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 6**.
- 6.70 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.
- 6.71 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.

- 6.72 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.
- 6.73 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

- 6.74 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.
- 6.75 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.
- 6.76 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.
- 6.77 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
Market	30–40%	30-40%	15-25%	5-10%
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%

6.78 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.

6.79 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%

6.80 The mix has been tested through soft marketing with a number of local registered housing provider and it has also been discussed with LBW housing and planning officers during pre-application engagement. Whilst the proposed mix doesn't provide the exact mix outlined in **Figure 6.2**, it complies with London Plan **Policy H10** by providing a range of unit sizes. The mix also reflects the Site's surrounding context and character which we consider justifies a slightly lesser proportion of family sized dwellings (3 bedroom +) since the surrounding area does not currently reflect a family orientated location. Finally, as noted by **Policy LP24**, regard should be given to the overall level of affordable C3 housing proposed. In this instance, conventional affordable housing is not a policy requirement for the proposals, and therefore the affordable housing mix offer should be considered favourably by the Council.

6.81 Overall, we consider that the unit size mix is acceptable.

Principle of Commercial Floorspace (Use Class E)

6.82 **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.

6.83 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.

- 6.84 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.
- 6.85 **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.
- 6.86 As previously explained, the Local Plan site allocation specifies that “commercial uses” are appropriate on this Site.
- 6.87 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.
- 6.88 The proposal seeks to provide 4 commercial units, with two of these under Class E (Units 1 and 3), located in Buildings 1 and 2, and two of these under flexible Class E and/or F (Units 2 and 4), located in Buildings 1 and 2. Units 2 and 4 would be leased at a discount to market rent to provide affordable space. It is anticipated that the commercial units could yield somewhere in the region of between 7 and 23 jobs on a FTE basis.
- 6.89 Overall, it is clear that the principle of commercial uses (Use Class E) are acceptable in this location, which has also been 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.

Principle of Community Use (Use Class F)

- 6.90 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.
- 6.91 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 in order 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.
- 6.92 The proposal seeks to secure two of the ground floor units as flexible commercial / community use (Class E/F) which are located in Building 1 and 2. These units would be rented at an affordable rent level.
- 6.93 A **Cultural Strategy** has been prepared by Future City and is submitted as part of this 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 proposals across ground floor uses and public realm (Section 4.2).

6.94 Overall, it is clear the proposed community use accords with adopted policy, which has been confirmed by LBW during pre-application discussions. Moreover, the use would provide clear community benefit as outlined in the Cultural Strategy, through enhancing the scheme provisions for both future residents and existing nearby residents.

6.95 Therefore, the proposed community use is considered acceptable.

Socio-Economic Benefits of Proposed Development

6.96 As outlined in the **Socio-Economic Report** prepared by Montagu Evans, 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.

6.97 It has been estimated that the Site in its current use also sustains c.30 jobs, based on applying a retail warehouse employment density (90 sqm NIA per FTE, from the HCA Employment Density Guide 3rd Edition) to the existing retail warehouse 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.

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

Construction phase 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.

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;
- 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.

Land Use Summary

- 6.99 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 implemented permission. Furthermore, the mix of uses proposed complies with the adopted site allocation which promotes "mixed use development including residential".
- 6.100 The need for PBSA is evident based on the letters of support from two HEPs within a reasonable travelling distance to the Site and the findings from the Cushman and Wakefield student demand analysis which demonstrates that within a 45-minute commutable distance of the Site, student bed demand outstrips supply by a ratio of 3.64:1.
- 6.101 The introduction of PBSA alongside residential and commercial uses would contribute positively to the mix of uses already in the locality of the Site and it has been clearly demonstrated that there would be no overconcentration of PBSA, both within the Wandsworth part of VNEB OA or within an 800-metre radius of the Site. Further, there is good prospect that the provision of this accommodation would indirectly limit the pressure on traditional housing stock by students already living in the area year on year.
- 6.102 The quality of PBSA would be high and it would be managed responsibly by a reputable business such as Fresh who has extensive experience in student property management.
- 6.103 A reasonable endeavours clause to enter into a nominations agreement with a HEP would be secured in line with Policy H15, although the Applicant does seek flexibility in respect of the quantum to be secured on the basis of the particular circumstances of the Application which spreads the affordable housing across student bedrooms and conventional Class C3 housing. The impact of this approach means that the quantum of market-let accommodation that a HEP is expected to acquire to reach the majority of bedrooms in inflated and commercially challenging to acquire. Any harm arising is limited given that a HEP nominations agreement would still be secured for the 25.98% affordable bedrooms and would also be significantly outweighed by the fact that in lieu of the nominations agreement for 51% of the student bedrooms is a blend of affordable student bedrooms and conventional Class C3 affordable housing – the latter being of strategic priority in the Borough.
- 6.104 The delivery of 55 x Class C3 residential units would further contribute to the mix of uses on the Site and there is an established need for affordable housing in the Borough.
- 6.105 All of the Class C3 residential units would be affordable, with additional affordable student accommodation too, meeting London and LBW policy standards for affordable housing provision, qualifying for the fast track route. The housing mix of the units has been discussed with LBW housing officers and has support from local registered housing providers following a soft market testing exercise.

- 6.106 A blended approach has been agreed with the GLA and LBW with regards to the affordable housing fast-track threshold target on the basis that the Site is part industrial and part retail. This has derived a blended affordable housing threshold target of 39.47% which is met by a combination of Class C3 affordable units and affordable student units.
- 6.107 Four commercial units on ground floor would further contribute to the mix of uses sought by the allocation and provide activity and active frontage throughout the day. Two of these units would be secured as flexible commercial / community space (Use Class E and/or F). These two units would be let at an affordable rent level providing space for small business start-ups and community organisations.
- 6.108 It is expected that the Class E and F units could generate 23 jobs FTE whilst the operation of the PBSA would support 8 jobs FTE. Furthermore, the construction of the scheme is anticipated to create 280 full time construction jobs and local apprenticeship opportunities.
- 6.109 The proposals are not expected to place any undue burden on existing infrastructure provision with both local GP surgeries and schools having sufficient capacity to absorb the limited demand from the development. Notwithstanding this, the proposed development will support future improvements to local infrastructure through CIL.
- 6.110 Finally, it is expected 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 and therefore help boost the local economy.
- 6.111 Overall, we consider that the proposed development from a land use perspective is compliant with the Development Plan, which has also been confirmed/supported by both the GLA and LBW officers during pre-application discussions.

7.0 TECHNICAL ASSESSMENT

7.1 In this section the proposed development is assessed against the statutory Development Plan and other material policy and guidance considerations as outlined in **Section 5.0**.

Tall Buildings

7.2 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.

7.3 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.

7.4 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.

7.5 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*”.

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, in line with Policy LP4 which considers that tall buildings are appropriate on the Site. We therefore consider that the principle of tall buildings continues to be acceptable in principle.

7.6 On the basis that we consider the principle of tall buildings to be acceptable, Part C of **Policy D9** outlines that proposals should address various impacts from tall buildings. **Figure 7.1** outlines these impacts along with 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) <i>the views of buildings from different distances:</i>	
i. <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</i>	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.
ii. <i>mid-range views from the surrounding neighbourhood – particular attention should be</i>	Overall, the HTVIA confirms the Proposed Development would enhance the appearance, character, and function of the townscape.

<p><i>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</i></p> <p>iii. <i>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.</i></p>	
<p>b) <i>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</i></p>	
<p>c) <i>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</i></p>	<p>The DAS outlines that the scheme has been conceived from a design-led approach, whereby materials and quality have formed a strong focus.</p>
<p>d) <i>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 explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area</i></p>	<p>The HTVIA identifies that there is no harm on heritage assets as a result of the proposals.</p>
<p>e) <i>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</i></p>	<p>The site is not located in the setting of a World Heritage Site</p>
<p>f) <i>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</i></p>	<p>The Site is approximately 330m from the River Thames, between which lies a significant amount of recent development. Likewise, the Site falls outside of the Thames Policy Area and therefore, any impact is considered to be limited.</p>
<p>g) <i>buildings should not cause adverse reflected glare</i></p>	<p>The proposal does not include excessive amounts of glazing and where it is included glare has been considered as part of design development and is not considered to be an issue.</p>
<p>h) <i>buildings should be designed to minimise light pollution from internal and external lighting</i></p>	<p>As outlined in the DAS and Landscaping Strategy lighting has been designed to minimise any impact on neighbouring properties.</p>
<p>2. Functional Impact</p>	
<p>a) <i>the internal and external design, including construction detailing, the building’s materials and its emergency exit routes must ensure the safety of all occupants</i></p>	<p>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.</p>
<p>b) <i>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</i></p>	<p>The following reports detail how the scheme will be managed to ensure that there is limited impact on the surrounding area:</p> <ul style="list-style-type: none"> • Student Management Plan; • Refuse and Waste Management Plan; • Servicing and Delivery Plan; and • Travel Plan.
<p>c) <i>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</i></p>	
<p>d) <i>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</i></p>	<p>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 Statement outlines that the</p>

	transport network is capable of accommodating the proposal.
e) <i>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</i>	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) <i>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</i>	The proposals are not expected to have any impacts on these technical matters. This has been explored throughout design development.
3. Environmental Impact	
a) <i>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</i>	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) <i>air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect street-level conditions</i>	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) <i>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</i>	The Noise and Vibration Assessment submitted as part of this application outlines that any noise created by the development would be at an acceptable level.
4. Cumulative Impacts	
a) <i>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.</i>	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.

- 7.7 The Architect has designed the scheme through close engagement with the Applicant as an experienced contracting business who has delivered well over 52,000 homes in the last 10 years and is focussed on buildability and deliverability. As previously explained, the Applicant has a depth of experience delivering student housing schemes of a similar scale and have 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.
- 7.8 Post submission, following various matters raised by LBW Officers, statutory consultees, councillors and other stakeholders, the design has been updated to overcome 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.
- 7.9 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 site, which is further supported by the Local Plan which supports tall buildings in the area.

- 7.10 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.
- 7.11 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

- 7.12 As noted above, **Paragraph 128** of the Framework 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.
- 7.13 **Paragraph 129** 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”*.
- 7.14 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.
- 7.15 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.”*
- 7.16 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.
- 7.17 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).
- 7.18 The Site is located in an extremely sustainable/accessible location and currently comprises an underutilised brownfield site. Moreover, surrounding area has been / is currently subject to a significant

amount of development, which reflects the policy context outlined above which seeks to optimise density in locations such as this.

- 7.19 The proposed 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.
- 7.20 Overall, it is clear that the proposed density is acceptable in this location, which is supported by policy and the Extant Permission.

Design

- 7.21 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.”*

- 7.22 **Paragraph 137** states that *“Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot”*.

- 7.23 **Paragraph 139** outlines that in determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

- 7.24 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*
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*
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.”*

- 7.25 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
- 7.26 As previously explained, 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**
- 7.27 As previously explained, the scheme is split across 3 buildings, within Building 1 providing affordable residential accommodation and Use Class E and F units. Building 2 provides PBSA use and Use Class E and F units, and Building 3 provides PBSA use alone.

- 7.28 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.
- 7.29 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**.
- 7.30 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.
- 7.31 Overall, it is considered that the proposals represent high-quality design and therefore accord with regional and local policy, as well as, with paragraphs 137 and 139 of the NPPF.

Heritage and Townscape

- 7.32 **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..."

- 7.33 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.
- 7.34 Once the significance of a heritage asset affected by proposals has been established, **paragraph 205** 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".

- 7.35 The Annex 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".

- 7.36 Harm to the significance of a heritage asset is discussed at **paragraphs 211-214** of the NPPF in which the extent of harm can either be 'substantial' or 'less than substantial' respectively.

7.37 In the event that harm was found, we would consider this to be less than substantial. In cases of less than substantial harm, **paragraph 202** 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”.

7.38 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.”*

7.39 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.

7.40 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.

7.41

7.42 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.

7.43 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.

7.44 Further information is provided within the **HTVIA**, which demonstrates that the proposals comply with national, regional and local policy and guidance.

Housing Quality

7.45 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
	3p	61	70	

	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	
5b	6p	103	110	3.5
	7p	112	119	
	8p	121	128	

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

7.47 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.”*

7.48 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).

7.49 All of the proposed C3 residential dwellings meet the minimum floorspace policy standards identified above.

7.50 In relation to Plot 1 which contains the Class C3 residential dwellings, there are no single aspect north facing units in this building. Those units that are single aspect have been located to maximise westerly views. In addition, 80% of apartments are dual aspect.

7.51 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.

7.52 Equally, the internal sunlight levels are good for an urban regeneration scheme with 80% of the residential units exceeding the BRE guideline recommendations and 62% of the student rooms meeting the guidance.

- 7.53 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.
- 7.54 In relation to the student units, in line with the requirements of Policy LP28, 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. As well as high quality student rooms, the scheme provides 1,434 sqm internal and 665 sqm external communal amenity space for use by students.

Accessibility

- 7.55 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'.
- 7.56 Local Plan **Policy LP27** (Housing Standards) states that all new residential development should meet the requirements of London Plan **Policy D7**.
- 7.57 Local Plan **Policy LP28** (Purpose Built Student Accommodation) outlines that developments should provide at least 10% of student rooms as readily adaptable for occupation of wheelchair users.
- 7.58 The student accommodation will offer 9.3% wheelchair user bedrooms, including 5.2% as wheelchair accessible in line with BS8300 2018, and 4.1% as wheelchair adaptable from the outset. Although the overall provision does not quite meet the Local Plan Policy LP28 requirements of 10% of student rooms being readily adaptable for occupation by wheelchair users, the percentage of accessible units (5.2%) provided at completion of the development exceeds policy.
- 6.112 We are confident that this provision is robust as this has been formulated through the Applicant's understanding of the market demand and through discussions with HEPs. Fresh undertook an audit of all their current PBSA developments which demonstrates that a very small amount of wheelchair accessible rooms are used by a person with a disclosed physical disability (see table below).

Figure 6.1: PBSA Accessible Room Supply vs. Take-Up (bedspaces under Fresh's management)

PBSA Developments Under Fresh Management	22,214
Accessible rooms within these PBSAs	570
No. of Students with Known Disabilities	6
% of Accessible Rooms within these PBSAs	2.57%
% of Students with Known Disabilities to overall PBSAs	0.03%
% of Students with Known Disabilities in Accessible Rooms	1.05%

- 7.59 As such, the provision is adequate and that a combination of readily adapted and future adaptable wheelchair units will meet the required need, noting that whilst the quantum is short of the policy requirement of 10% readily adaptable units, qualitatively the provision is an enhancement as there would be 5.3% provision from day one which goes beyond the policy.

- 7.60 In addition to this, the London Plan requires accessible housing to provide accommodation for disabled people, older people and families with young children, and with the majority of the development providing PBSA, these demographics are not going to be occupying a large portion of the development, and in this context a slightly reduced provision is acceptable.
- 7.61 In addition to this, Building 1, which comprises the affordable residential homes, will provide 11% (no. 6) M4(3) wheelchair user homes, exceeding London Plan and LBW policy requirements.

Daylight and Sunlight

- 7.62 **Paragraph 135** of the NPPF states that development should create places with a high standard of amenity for existing and future users.
- 7.63 With regard to Daylight and Sunlight specifically, the NPPF states at **Paragraph 129 c)**:
- “c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, 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).”*
- 7.64 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.
- 7.65 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.”*
- 7.66 Local Plan **Policy LP27** (Housing Standards) states single aspect units should provide an acceptable level of daylight for each habitable room, and optimise the opportunity for enabling direct sunlight.
- 7.67 A **Daylight, Sunlight and Overshadowing Report** has been prepared by Point 2 Surveyors and is submitted as part of this Application. The report concludes that the internal daylight analysis demonstrates that the scheme has been designed to maximise natural daylight amenity for its future occupants with over 85% of habitable rooms tested meeting or exceeding the relevant target LUX recommendations, representing a very good rate of compliance against the more recently adopted CBDM assessment criteria and particularly so for a development within an Opportunity Area.

- 7.68 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 planning consent which has been implemented and therefore any daylight and sunlight effects arising from the Proposed Development have been assessed by comparison to the consented scheme, as well as viewed in the context of the urban environment within which the development Site is located.
- 7.69 The re-orientation of Building 01 angled away from the adjacent Viridian Apartments, providing an improved outlook across Sleaford Street towards Battersea Park Road when compared to the Consented Scheme, 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 Consented Scheme.
- 7.70 The detailed technical results show that in respect of the existing residential flats within Viridian Apartments there will be improved levels of compliance both in terms of VSC and NSL assessed against the BRE guidelines, when compared to the Consented Scheme. The majority of windows and rooms will experience improved retained levels of daylight or experience no further alteration by comparison to the Consented Scheme.
- 7.71 Where there are some instances where additional daylight effects will be experienced, these occur to rooms already overhung by projecting balconies and blinkered either side by privacy screens. The actual extent of further reduction is generally very small (less than 6%) and in the majority of instances less than 3% which is arguably unlikely to be noticeable to the occupants. It is also worth noting that the additional height on Building 1, closest to Viridian Apartments will be largely unnoticed by the occupants from within their rooms, particularly on the lower floors due to the underside of the projecting balconies blocking their view of the upper levels of the Proposed Development.
- 7.72 It is considered that the Proposed Development will have a broadly comparable level of daylight and sunlight effect upon Battersea Power Station Phase 4, to that arising from the Consented Scheme for the Site and despite some alterations should continue to be considered acceptable. In addition, the daylight effects upon 142-192 Thessaly Road are limited and only arise to windows that are self-obstructed by their own inherent design features. Without these limiting factors, the daylight effects would be fully BRE compliant.
- 7.73 It is also considered that the daylight and sunlight provision to the neighbouring outline consented developments will remain commensurate for an urban development site within the VNEBOA and largely in excess of the recommended BRE guideline targets with the Proposed Development in place. The neighbouring open spaces and amenity areas will have access to sunlight in March, with the principle linear park exceeding BRE guidance. In the summer months, when the outdoor spaces will arguably be most actively used, all of the neighbouring amenity areas will have access to good levels sunlight to the majority of their areas. It is on this basis therefore that Point 2 contend that the proposed development will not unduly prejudice the amenity of existing residents in the surrounding buildings.
- 7.74 In addition to the above, the Report demonstrates that the proposed open spaces/amenity areas will be sufficiently sunlit throughout the year, such that future occupants will have direct access to well sunlit open spaces, in addition to their own private amenity balconies/winter gardens.
- 7.75 Overall, it is considered that the proposals are acceptable in terms of daylight, sunlight and overshadowing, and accord with the adopted Development Plan in this regard. Furthermore, other material considerations support the acceptability of the results.

Public Realm / Landscaping

- 7.76 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.
- 7.77 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.
- 7.78 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.
- 7.79 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.
- 7.80 **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.
- 7.81 **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.
- 7.82 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.

- 7.83 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.
- 7.84 As outlined in the **Landscape Strategy**, prepared by Planit, 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, as well as the new school.
- 7.85 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.
- 7.86 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.
- 7.87 The proposed development seeks to deliver 4,442 sqm of public realm which we consider is a significant benefit of the scheme.
- 7.88 The submitted **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. We anticipate that this would be secured by an appropriately worded planning condition.

Private and Communal Residential Amenity Space

- 7.89 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.
- 7.90 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.
- 7.91 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).

- 7.92 For the affordable residential units, 379 sqm private amenity space is provided which meets the requirements of Policy D6. 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. 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 private amenity space.
- 7.93 For the proposed PBSA, 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.
- 7.94 For Building 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 include 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.
- 7.95 For Building 3, there is shared indoor and outdoor amenity at Level 7, including 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.
- 7.96 Overall, it is considered that the proposals provide a policy compliant amount of private and communal amenity space, which in-turn contributes to the delivery of a high-quality scheme.

Play Space

- 7.97 **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.
- 7.98 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.
- 7.99 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.

- 7.100 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.
- 7.101 The play spaces 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.
- 7.102 Sensory play will also be explored through meandering discovery paths through planting. Play equipment includes 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.
- 7.103 The **Landscape Strategy** provides greater detail on the play space provision, which accords with adopted London and LBW planning policy.

Transport

- 7.104 Section 9 of the NPPF sets out the Government's policies with regard to transport. **Paragraph 110** sets out that development should be ensured that:
- a) *“appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
 - b) *safe and suitable access to the site can be achieved for all users; and*
 - c) *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.”*
- 7.105 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.
- 7.106 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.
- 7.107 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.
- 7.108 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.

7.109 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.*

7.110 A **Transport Assessment** (TA) has been prepared by SLR and is submitted as part of this Application.

7.111 The TA 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.

7.112 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.

7.113 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. This is a significant improvement to the estimate of movements related to the Extant Permission scheme.

Car Parking

7.114 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.

7.115 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.

7.116 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.

7.117 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.

7.118 In accordance with Regional and Local Policy, the proposal is for car-free development, with the exception of 4 blue badge spaces (meeting the 3% requirement) and 1 car club space. This includes 1x space for the PBSA bedrooms, 1x space for the commercial units and 2x spaces for the affordable residential units.

7.119 As such, when combined with the TP and the cycle parking provision outlined below, it is clear that the proposals promote a move away from car travel, towards more sustainable modes of transport.

Cycle Parking

7.120 **Paragraph 110** of the NPPF requires developments to provide for attractive and well-designed walking and cycling networks and supporting facilities such as cycle parking.

7.121 **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 unit;
- 1.5 spaces per 2 person 1 bed dwelling; and
- 2 spaces per all other dwellings.

Short Stay

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

7.122 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.

7.123 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.

7.124 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)	3	28

Total	678	50
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- 7.125 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.
- 7.126 Overall, the proposed cycle parking provision is compliant with regional and local policy and should therefore be supported.

Delivery, Servicing and Waste Management

- 7.127 Local Plan **Policy LP51** (Parking, Servicing and Car Free Development) states adequate off-street servicing arrangements are made for commercial vehicles and general servicing.
- 7.128 A **Delivery and Servicing Management Plan** (DSMP) has been prepared by SLR as is submitted as part of this Application. The DSMP 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 will be managed accommodation with on-site management.
- 7.129 An **Operational Waste Management Strategy** has been prepared by Equilibria. The report 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.
- 7.130 Overall, the above documents outline an acceptable strategy for managing deliveries, servicing and waste management across the Site.

Energy and Sustainability

- 7.131 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.
- 7.132 **Paragraph 159** 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.

7.133 **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.

7.134 **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.

7.135 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.

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.

7.136 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 beyond 2013 Building Regulations in order to achieve the London Plan's zero carbon requirements. Against this standard, the non-domestic element of the new scheme would achieve 54% carbon reductions, exceeding the 35% policy target, and the domestic element would also be in excess of the 50% policy target against both the 2013 and 2021 baseline, and therefore represents a significant improvement on off-site carbon reductions and compliance with this policy.

- 7.137 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. That being said, it is also important to note that it is recognised by the GLA within this guidance note 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.
- 7.138 Notwithstanding compliance with Policy SI2, in awareness of this guidance, the scheme has also been assessed against the 2021 Part L baseline, where the scheme exceeds the domestic target of 50%, achieving 63%. Against the non-domestic target, the scheme performs just shy of the 35% target, achieving 33% as expected and recognised as acceptable on the basis of the acknowledged challenges within the GLA guidance to meet the 35% target for non-domestic elements.
- 7.139 It is important to note that the Extant Permission and previously submitted scheme were assessed against the 2013 Part L baseline, and similarly the London Plan standards are set against the 2013 standards rather than the more onerous new 2021 baseline sought by the guidance. Compared to the Extant Permission and previously submitted scheme, the revised scheme represents a significant improvement in environmental performance.
- 7.140 In summary, the scheme is complying with Policy SI2 of the London Plan, and the scheme exceeds requirements for domestic elements against the guidance. The slight shortfall for the non-domestic elements against the Guidance is justified for the reasons set out above.
- 7.141 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.
- 7.142 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 £180,177 (based on the GLA standard carbon off-set payment of £95/ Tonne CO₂).
- 7.143 In addition to the above, a **Sustainability Statement and BREEAM & HQM Pre-assessment** has been submitted as part of this application. The report sets out the sustainability strategies which relate to the following areas:
- Health & Wellbeing;
 - Energy;
 - Transport;
 - Water;
 - Materials;
 - Waste;
 - Land Use & Ecology; and
 - Pollution.
- 7.144 The BREEAM pre-assessments confirm that they proposals achieve a BREEAM outstanding rating, as required by Policy, for the student accommodation, retail units, office and community spaces.

- 7.145 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).
- 7.146 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.
- 7.147 Overall, it is clear that 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

- 7.148 **Policy S17** (Reducing waste and supporting the circular economy) of the London Plan states that schemes that are referable 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 disassembled 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.
- 7.149 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.
- 7.150 A **Circular Economy Statement** has been prepared by ADW Developments based on the requirements of **Policy S17** and is submitted as part of this application. 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.
- 7.151 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.

Whole Life Carbon

7.152 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.

7.153 Local Plan **Policy LP10** (Sustainable Construction and Design) states that all major developments should submit a Whole Life Carbon Assessment.

7.154 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)
- External Works

7.155 Overall, the reports outline that in accordance with policy, appropriate action has been taken to reduce life-cycle carbon emissions and should therefore be supported.

Health Impact Assessment

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

- 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
- promote more active and healthy lives for all Londoners and enable them to make healthy choices
- use the Healthy Streets Approach to prioritise health in all planning decisions
- 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
- I. seek to create a healthy food environment, increasing the availability of healthy food and restricting unhealthy options.

7.157 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.

7.158 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, and the Proposed Development is expected to make a positive impact on public health within the local area, and therefore accords with planning policy.

Air Quality

7.159 Section **Paragraph 192** of the NPPF supports opportunities to improve air quality or mitigate impacts where necessary.

7.160 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.

7.161 London Plan **Policy CC10** (Air Quality) states that the Council will seek to reduce the potential adverse air quality impacts of new developments by requiring all developments which may be impacted by local sources of poor air quality or may adversely contribute to local air quality to provide an air quality assessment that considers the potential impacts of pollution from the development site. Part d of the Policy states that the Council will require development to be 'air quality neutral and development which would materially increase exceedance of local air pollutants will be resisted'.

7.162 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.*
- 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.*

7.163 An **Air Quality Assessment** has been prepared by Redmore Environmental Ltd and is submitted as part of this Application. 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.

7.164 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.

7.165 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.

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

Noise and Vibration

7.167 **Paragraph 191** 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.

7.168 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.

7.169 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.*
- 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.”*

7.170 An **Environmental Noise & Vibration Assessment** has been prepared by PDA and is submitted as part of this Application.

7.171 The Assessment outlines that based upon the measured and predicted noise levels, supplemented with previous railway noise data, 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. Calculations suggest that the noise level criteria can be achieved within the proposed accommodation. It is anticipated that noise mitigation could be secured by an appropriately worded planning condition.

7.172 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, BS 6472 would suggest that for levels below the ranges, adverse impact is not expected. This demonstrates that the vibration levels are compliant with policy.

Arboriculture

7.173 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.

7.174 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.

- 7.175 **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.
- 7.176 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.
- 7.177 A **Tree Survey** (TS) and **Arboricultural Method Statement** (AMS) has been prepared by Arbtech and is submitted as part of this Application. The TS 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.
- 7.178 It should be noted that the Extant Permission obtained approval for the removal of five trees, whereby it was found that the replacement planting provided sufficient mitigation.
- 7.179 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.

Ecology and Biodiversity

- 7.180 The NPPF promotes biodiversity in recognition of its role in supporting the natural and local environment, under **Paragraph 180**, by requiring planning policies to protect sites of biodiversity value and provide net gain for biodiversity.
- 7.181 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.
- 7.182 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”*

7.183 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.

7.184 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.

7.185 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 planning policy.

Urban Greening

7.186 **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.

7.187 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.

7.188 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.

- 7.189 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.
- 7.190 The **Landscape Strategy** prepared by Planit outlines that the proposals achieve an UGF of 0.4, meeting the London Plan target. 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.
- 7.191 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

- 7.192 **Paragraph 173** 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.
- 7.193 **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.
- 7.194 **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.
- 7.195 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.

- 7.196 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.
- 7.197 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.
- 7.198 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.
- 7.199 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.
- 7.200 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.
- 7.201 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.
- 7.202 Therefore, the proposals accord with planning policy in relation to flooding and drainage.

Archaeology

- 7.203 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.
- 7.204 **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.
- 7.205 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.
- 7.206 An **Archaeological Desk Based Assessment** has been prepared by RPS and is submitted as part of this Application due to the Site's location in an Archaeological Priority Area The Assessment 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.

7.207 As such, it is considered that the proposals accord with national, regional and local policy/guidance.

Contamination

7.208 **Paragraph 189** 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.

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

7.210 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.

7.211 A **Preliminary Ground Investigation Report** has been prepared by Tier Environmental and is submitted as part of this Application. The report makes a series of recommendations following the findings of the preliminary site investigation, which ensure that the proposals would be acceptable from a contamination perspective. These recommendations can be secured via appropriately worded planning conditions.

Fire Safety

7.212 **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.

7.213 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.

7.214 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.

7.215 A **Fire Strategy** has been prepared by Atelier Ten and is submitted as part of this Application. The document sets out a strategy that has been prepared in accordance with **Policy D12**.

Summary of Technical Considerations

7.216 In summary, the technical elements that form part of these proposals have evolved following significant consultation with the GLA, LBW, the DRP and other stakeholders.

7.217 Overall, it is considered that the technical elements comprise a high quality proposal that meet modern standards/accord with planning policy and should therefore be supported. In particular, we set out below some of the key benefits of the scheme from an assessment against technical considerations:

- 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 high density development that makes best use of accessible previously developed land yet continues to provide a high quality environment with amenity space that exceeds policy requirements;
- 55 affordable housing units;
- Play space provision that exceeds the anticipated age 0-11 child yield for the Site;
- High quality accommodation evidenced by 85% of units meeting ADF BRE guidelines;
- Reduced impact on neighbouring properties in terms of outlook and daylight;
- Provision of 4,442 sqm of new public realm and public access through the Site to enhance wider permeability and pedestrian flow;
- A public realm underpinned by a cultural strategy that will provide opportunities for local artists;
- A 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), a car club space, cycle provision and commitment to a Travel Plan;
- The non-domestic element of the new scheme would achieve 54% carbon reductions against 2013 Building Regulations baseline, exceeding the 35% London Plan policy target, and 33% carbon reductions against 2021 Building Regulations baseline. The domestic element would also be in excess of the 50% policy target against both the 2013 and 2021 Building Regulations baseline, achieving 63% carbon reductions against the 2021 baseline. This will be achieved through the use of renewable energy measures such as air source heat pumps and solar PV;
- 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 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.

8.0 DRAFT SECTION 106 HEADS OF TERMS AND CIL

S106 Planning Obligations

- 8.1 Under S106 of the Town and Country Planning Act 1990, as amended, Local Planning Authorities have the power to enter into planning obligations with any person interested in their land for the purpose of restricting or regulating the development or use of the land.
- 8.2 Regulation 122 (*Limitation on use of planning obligations*) of The Community Infrastructure Levy Regulations 2010 states that a planning obligation may only constitute a reason for granting planning permission for the development if the obligation is:
- necessary to make the development acceptable in planning terms;
 - directly related to the development; and
 - fairly and reasonably related in scale and kind to the development.
- 8.3 **Paragraph 55** of the NPPF states that LPAs should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.
- 8.4 **Paragraph 57** states that planning obligations should only be used where they are necessary, directly related to the development and fair and reasonable in scale and kind to the development.
- 8.5 **Paragraph 58** states that where up to date policies have set out the contributions, planning applications that comply with them should assume to be viable and it's up to the applicant to demonstrate whether circumstances justify the need for a viability assessment.
- 8.6 We anticipate that the following Section 106 obligations may be applicable for the proposed scheme:
- Affordable Housing;
 - 55x Class C3 residential units (27 x social rent and 28 x intermediate)
 - 198 student units
 - HEP nomination agreement for the affordable student accommodation;
 - PBSA restricted to occupation by full time students at HEPs during term time only;
 - Reasonable endeavours not to occupy more than 70% of the PBSA units until we enter in contract with LBW/Registered provider;
 - Reasonable endeavours not to occupy remainder of PBSA units until transfer to LBW/RP;
 - Unit 2 and Unit 4 (both flexible Class E and/or F) be secured as affordable space;
 - Carbon Offsetting Financial Contribution;
 - Capped connection to District Heating Network (DHN);
 - DHN Statement;
 - Employment Skills and Enterprise Training Plan;
 - Employment Financial Contribution (to be finalised by LBW Employment);
 - Arts and Cultural Strategy (including public art strategy);
 - Provision of new publicly accessible space;

- Provision of 1 x car club space;
- Car parking permit restriction for new residential occupants;
- Future cycle link safeguarding (adjacent to railway line);
- Section 278 Highways Work, including Traffic Management Order and commuted sum for Council maintenance of premium materials
- Section 247 Stopping Up Order (Sleaford Street);
- Section 38 Highways Work (Sleaford Street); and
- Healthy Streets Financial Contribution.

Community Infrastructure Levy

- 8.7 The Mayoral Community Infrastructure (CIL) applies to developments across all London Boroughs which propose new build floorspace above 100 sqm. This formally came into effect on 1st April 2012 (MCIL 1) and was later revised in April 2019 (MCIL 2).
- 8.8 The LBW CIL Charging Schedule was approved on 11 July 2012 and became effective on 1 November 2012. The Site falls within the “Nine Elms Residential Area B” for which the following charges apply:
- **Residential (Use Class C3) Development** - £265 per square metre
 - **Office (All B1a) or Retail (All A use classes) Development** - £100 per square metre
 - **All other Development** - £0 per square metre

9.0 THE PLANNING BALANCE

Compliance with the Development Plan

9.1 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 proposed 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 in excess of policy, as well as compliance with policies relating to carbon reduction, 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).

9.2 Where it can be said that there is conflict with policies (or aspects of policies), there is robust justification to the extent that any harm arising from the conflict is limited, particularly when weighed in the context of other development plan policies. This applies to the following policies:

- Part 3 of Policy H15 (PBS) of the London Plan: The Application proposes to secure 25.98% of student bedrooms through a nominations agreements with a HEP, rather than the majority of bedrooms. This is due to the particular circumstances of the Application which spreads the affordable housing across student bedrooms and conventional Class C3 housing. The impact of this approach means that the quantum of market-let accommodation that a HEP is expected to acquire to reach the majority of bedrooms is inflated and commercially challenging to acquire. Any harm is therefore limited and also significantly outweighed by the fact that in lieu of the nominations agreement for 51% of the student

bedrooms is a blend of affordable student bedrooms and conventional Class C3 affordable housing – the latter being of strategic priority in the Borough.

- Policy LP27 (Housing Standards) of the Local Plan: The quantum of private amenity space for Building 1 falls short of the policy by 251sqm but is mitigated by the quantum of communal amenity space within the proposed public realm which could be used by residents in addition to the private amenity space, and is in line with London Plan requirements.
- Part 6 of Policy LP28 (PBSA) of the Local Plan: The quantum of wheelchair adaptable rooms is 0.7% below the target of 10%. Any harm arising from this is limited given that 5.2% of the 9.3% of wheelchair user bedrooms will be built as accessible from the outset (rather than adaptable) and evidence from Fresh's current PBSA developments demonstrates that a very small amount of wheelchair accessible rooms are used by a person with a disclosed physical disability.

9.3 The weight attached to these three conflicts when accounting for the mitigating factors is limited. Therefore, when considered in the context of the other Development Plan policies, not least the Site Allocation and the need to deliver housing to optimise accessible brownfield sites within the VNEB Opportunity Area, we consider that the proposed development is compliant with the Development Plan when read as a whole. In our view, the scheme is a very sustainable form of development, support for which is the golden thread of the NPPF, to which very significant weight must be attached. The design has evolved through consultation and iterative assessment in a manner that also meets policy expectations.

The Planning Balance

9.4 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires determination should be made in accordance with the Development Plan unless material considerations indicate otherwise (the planning balance).

9.5 Notwithstanding our view above that the proposed development is compliant with the Development Plan when read as a whole, should the decision-maker consider otherwise, there are number of material considerations that weigh in favour of planning permission being granted and which we consider outweigh any perceived harm. These are set out below including the relative weight we have given:

Social / Community

- **Regeneration** – Contributing to the wider regeneration of the VNEB OA, delivering new homes creating employment and delivering place-making through high quality landscape anchored by a cultural strategy - **Significant**;
- **Student accommodation** - Delivering much needed student accommodation (both market and affordable), to meet an identified need within a reasonable travelling distance to a number of HEPs, and to ensure that future residents feel safe and secure and assuring that any amenity impacts from the proposed land use on neighbouring uses are mitigated - **Significant**;
- **Affordable Housing** – Delivering much need affordable housing (55 units - 100%) of a range of sizes and tenures, well above the VNEB policy requirement of 15% - **Significant**;
- **Affordable Workspace** – Delivering workspace at an affordable level for use by the local community and small business start-ups - **Moderate**;
- **Community Space** – Delivering designated community spaces which would be available to rent at an affordable level - **Moderate**;

- **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 above policy standards - **Significant**;
- **Amenity space** – Providing 1,434 sqm internal and 665 sqm external communal amenity space for students - **Moderate**; and
- **Volunteering** - Students in particular will also have an opportunity to contribute to local community groups through volunteering. Not only will this promote inclusive social integration, but it will also assist these community groups in resourcing additional help - **Moderate**.

Economic

- **Housing Supply** – the provision of student accommodation contributing toward freeing up conventional housing stock which can help increase overall supply and improve affordability – **Significant**;
- **Viability** – Ensuring deliverability and a viable, long-term occupation for the Site - **Moderate**;
- **Job Creation** - Provision of 280 full time constructions jobs, including jobs for LBW residents - **Significant**;
- **Apprenticeships** – Creation of an estimated 7-10 apprenticeships - **Moderate**;
- **Operational Job Creation** - c.7-23 jobs could be created within the commercial space and 8 FTE staff to manage the PBSA – **Moderate**;
- **Labour for local business** - students could also provide a valuable source of flexible low-cost labour for local businesses – **Moderate**;
- **Construction Economic Spend** - Generation of £68m GVA benefitting the London economy – **Significant**;
- **Construction Worker Spend** - Construction workers and permanent workers will also spend money locally during and before/after their shifts, further boosting the local economy - **Moderate**;
- **Local Business Spending** - New residents will control an estimated £4.9m per annum of retail, leisure and F&B expenditure – **Significant**; and
- **Enhancing Public Infrastructure** - Enhancing local infrastructure through CIL receipts, therefore reducing the impact on existing local infrastructure – **Moderate**.

Environmental

- **Biodiversity** – Delivering Biodiversity Net Gain of 147.56% across the Site – **Significant**;
- **Urban Greening** – Delivering an UGF score of 0.4 - **Moderate**;
- **Arboriculture** – retention of existing trees and planting of 73 new trees – **Significant**;
- **Landscaping** – Providing sensitive landscaping enhancements and new public realm to the benefit of future residents and the wider community – **Moderate**;
- **Use of Previously Developed Land** – In conformity with sustainable planning principles, the proposals make use of previously developed (“brownfield”) land – **Significant**;
- **Architecture** - Providing new buildings of high quality and architectural merit that make a positive contribution to local townscape – **Moderate**;
- **Heritage assets** - Creating an improved setting for the nearby heritage asset - **Moderate**;
- **Car Free Development** – providing car free development except for disabled/blue badge parking and 1 car club space - **Moderate**;
- **Cycle Parking** – parking provision in accordance with the London Plan, consisting of 104 residential spaces, 572 student accommodation spaces, 3 commercial spaces, and 50 short stay spaces located in the public realm - **Moderate**;

- **Sustainability** – Delivering sustainable technologies and renewable energy to drive environmental performance and improve the sustainable performance. The development will achieve a BREEAM “Outstanding” standard – **Moderate**;
- **Carbon Reduction** – the non-domestic element of the new scheme would achieve 54% carbon reductions against 2013 Building Regulations baseline, exceeding the 35% London Plan policy target, and 33% carbon reductions against 2021 Building Regulations baseline. The domestic element would also be in excess of the 50% policy target against both the 2013 and 2021 Building Regulations baseline, achieving 63% carbon reductions against the 2021 baseline. This will be achieved through the use of renewable energy measures such as air source heat pumps and solar PV; and a carbon offset financial contribution of £180,177 - **Moderate**;
- **Sustainable energy** – Use of air source heat pumps and solar panels on the roof - **Moderate**; and
- **Drainage and Water recycling** - The proposal includes SUDS to reduce surface water run-off – **Moderate**.

9.6 It is therefore our strong view that the proposed development is compliant with the Development Plan when read as a whole and, furthermore, that there are many tangible material considerations of ranging weights, that weigh heavily in favour of a positive determination.

10.0 SUMMARY AND CONCLUSIONS

10.1 The Application submitted on behalf of WJG 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 units, of which 27 are Social Rent (London Affordable Rent) and 28 are Intermediate (London Living Rent);
- 495sqm (GIA) of flexible commercial and community floor space with Unit 1 91 sqm Class E use, Unit 2 187 sqm Class E and/or Class F floorspace, Unit 3 91sqm of Class E and Unit 4 of 97sqm Class E and/or Class F floorspace;
- In Plot 1 there is 14 sqm shared commercial bin store which is apportioned 5 sqm to Unit 1 and 9 sqm to Unit 2;
- In Plot 2 there is a 14.6 sqm shared commercial bin store which is apportioned 7.1 sqm to Unit 3 and 7.5 sqm to Unit 4;
- 3 buildings ranging in height from 12 to 22 storeys;
- Car free development, except for 4 accessible car parking spaces and 1 car club space;
- 678 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;
- 1,434 sqm internal and 665 sqm external communal amenity space associated with the PBSA;
- Landscaping and planting of 73 new trees; and
- New vehicular servicing route between Sleaford Street and New Covent Garden Access Road.

10.2 The Application was registered by the London Borough of Wandsworth (“the Council”) on 26 May 2022 and following the outcome of statutory consultation and engagement with key stakeholders, the Applicant has undertaken a number of amendments to the originally submitted scheme. In summary, the principal amendments to the scheme are as follows:

- Reduction in height of Building 1 from 14 to 12 storeys, reduction in footprint, and reconfiguration of building 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; and

- Additional PV to further increase carbon savings.

10.3 This Statement assesses the merits of the Application as a whole and supersedes the Planning Statement dated April 2022.

10.4 The formal description of development remains as originally submitted:

“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.

10.5 The report 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.

10.6 The scheme has been developed with full engagement with the community, LBW, the GLA and the Design Review Panel, as well other local stakeholder groups and organisations.

10.7 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.

10.8 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 Framework, the proposed development accords with the Development Plan when read as a whole and should therefore be granted planning permission.

10.9 However, should it be identified by the determining authority that there is conflict with the Development Plan when read as a whole (notwithstanding we disagree), it is strongly contended that the proposals give rise to significant material planning benefits (as outlined **Section 9**) which weigh heavily in favour of the scheme to the extent that the planning balance would clearly rest in favour of approval.

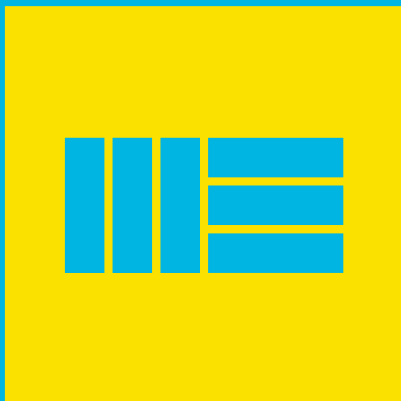
10.10 In conclusion, the scheme and complies with planning policy and delivers significant benefits (as outlined in **Section 9**). We therefore respectfully request the application is granted planning permission on this basis.

MONTAGU EVANS

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

APPENDIX 01

SURROUNDING PLANNING

HISTORY

Surrounding Planning History

Ref No.	Description of Dev	Decision
New Covent Garden Market		
2019/2995	Application for approval of reserved matters (Access, Layout, Appearance, Scale and Landscaping) for the 'Phase 2' of the Northern Site Development Zone pursuant to part outline and part detailed planning permission 2014/2810, dated 11/02/15 for: "(a) Demolition of existing wholesale Fruit and Vegetable...."	Approved 22/11/2019
2019/2722	Application for approval of reserved matters (Access, Layout, Appearance, Scale and Landscaping) for the 'Linear Park' of the Northern Site Development Zone pursuant to part outline and part detailed planning permission 2014/2810, dated 11/02/15 for: "(a) Demolition of existing wholesale Fruit and Vegetable...."	Pending
2019/2459	Application for approval of reserved matters (Access, Layout, Appearance, Scale and Landscaping) for the 'Southern Basement' (the part of the basement which underlies buildings N8, N9 and N10) of the Northern Site Development Zone pursuant to part outline and part detailed planning permission 2014/2810, dated 11/02/15 for: "(a) Demolition of existing wholesale Fruit and Vegetable...."	Approved 31/07/2019
2019/2294	Application for a new joint vehicular access junction on Nine Elms Lane, serving the Nine Elms Square and One Nine Elms development sites.	Approved 21/08/2019
2018/5698	Application for approval of reserved matters (Access, Layout, Appearance, Scale and Landscaping) for Phase 1B of the Northern Site Development Zone pursuant to part outline and part detailed planning permission 2014/2810, dated 11/02/15 for: "(a) Demolition of existing wholesale Fruit and Vegetable...."	Approved 22/03/2019
2018/5429	Application for approval of reserved matters (Access, Layout, Appearance, Scale and Landscaping) for the Northern Basement (north of the Thames Sewer) of the Northern Site Development Zone pursuant to part outline and part detailed planning permission 2014/2810, dated 11/02/15 "For part outline and part detail planning permission for: "(a) Demolition of existing wholesale Fruit and Vegetable...."	Approved 14/01/2019
2018/4158	Section 96A application for non-material amendment to planning permission ref: 2014/2810 dated 12th February 2015 in respect of design variations to Buildings N9, N10 and N12 (Phase 1B parameter plan).	Approved 03/10/2018
2018/3064	Reserved matters application for access, layout, appearance, scale and landscaping in relation to the construction of the southern area of Phase 2 basement within the Northern Site pursuant to planning permission reference 2014/2810 for: : "(a) Demolition of existing wholesale Fruit and Vegetable...."	Approved 28/09/2018
2018/1049	Approval of details pursuant to planning permission 2014/2810 relating to the access, appearance, layout, scale and landscaping of the part of the basement which underlies buildings N8, N9 and N10 (the 'Southern Basement')	Approved 05/06/2018
2019/2995	Application for approval of reserved matters (Access, Layout, Appearance, Scale and Landscaping) for the 'Phase 2' of the Northern Site Development Zone pursuant to part outline and part detailed planning permission 2014/2810, dated 11/02/15 for: "(a) Demolition of existing wholesale Fruit and Vegetable...."	Approved 22/11/2019
2014/2810	Planning application for part outline and part detail planning permission for: (a) demolition of existing wholesale Fruit and Vegetable and Flower Market and ancillary buildings and structures, and residential building on Nine Elms Lane (apart from the existing multi storey car park); (b) Construction of mixed-use redevelopment comprising: a new Fruit and Vegetable Market and Flower Market and ancillary uses, including temporary and permanent façade; refurbishment and extension of existing waste collection area (including rooftop sports pitches); residential dwellings; flexible commercial uses, including retail, financial and professional services, café/restaurant, bar uses and hot food takeaways and offices; non-residential institutions; assembly and leisure uses; temporary storage and distribution buildings and associated works; associated car, cycle and motorcycle parking and servicing and new vehicle accesses, energy centres; and landscaping public realm and open space including part of the Linear Park. All matters reserved apart from access, details of all new markets and supporting buildings, and details of Building N8 and associated landscaping); (c) Site clearance and enabling works. An Environmental Statement has been submitted with the application under The Town and Country Planning (Environmental Impact Assessment) Regulations 2011.	Approved 11/02/2015 RM for parcel next to the site hasn't come forwards yet.
Sleaford Industrial Estate and former Dairy Crest Milk Distribution Depot Sleaford Street London SW8 5AB		
2016/3778	Application under Section 73 of the Town and Country Planning Act (as amended) for Amendments to planning permission (ref: 2015/3555) dated 3rd	Approved 21/11/2016

	<p>December 2015 (as amended by 19th April 2016 approval for non-material amendments under Section 96A - ref: 2016/2065) for the demolition of all existing buildings, and construction of seven new buildings of between 1-storey and 18-storeys, containing residential units; non-residential institution (D1) floorspace; business (B1) floorspace; retail/restaurant & cafe (A1/A3) floorspace); and an electricity substation. The proposals include vehicle/cycle parking, plant, the alteration of the vehicle access from Thessaly Road, and associated works and landscaping. (The Amendments include removal of the primary electricity substation; removal of the basement level; provision of car and cycle parking at grade; replacement of flexible B1/C3 use on ground floor of Block A2 with B1 use and flexible A1/A3/B1 use; reconfiguration of health centre; revised finished floor level to Block A1; reduction in footprint of Block A2; minor alterations to elevations; and reconfiguration of internal layouts resulting in changes to unit and tenure mix and 12 additional residential units overall). An Environmental Statement has been submitted with the application under the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended 2015).</p>	
Battersea Power Station		
2021/0414	<p>Application under Section 73 of the Town and Country Planning Act 1990 submitted pursuant to outline planning permission dated 25th September 2020 (ref. 2020/0579) for variation to Conditions 3 (Reserved Matters), 5 (Architectural Design Code), 6 (Placemaking Code), 7 (Parameter Plans), 8 (Land Uses), 10 (Distribution of Land Uses), 11 (Development Zone Land Uses), 13 (Maximum Residential units), 14 (Residential Mix), 18 (Phasing Plan), 20 (Car Parking), 21 (Residential Car Parking Spaces) and 61 (Approved Drawings) to amend the outline planning permission to facilitate the following changes: - The addition of layout as a reserved matter; - Revised scale parameter plans to allow greater flexibility on the location and scale of development that can come forward within the Development Zones; - Updated design guidance to allow for smaller building plots and greater permeability through additional routes and spaces; - Revised land use parameter plans to allow greater flexibility on the land uses that can come forward; - Increased overall quantum of development, including potential uplifts in the amount of office, medical, hotel and education floorspace that could come forward; - Updating the Phasing Plan to identify the Flower building as Phase 3d instead of part of Phase 3c, and requiring the Phasing Plan to be updated with each reserved matter application to identify the plot being brought forward; - Changing Phase 3c from a detailed phase to an outline phase; - Amendments to the residential unit mix to provide greater flexibility; and - Updating the land use schedule to reflect the Use Classes Order 2020 for those areas to which it will apply. (The planning application is accompanied by an Environmental Statement Addendum.) The following revisions have been made to the planning application since the February 2021 submission: - A reduction in the extent of the scale parameter plans [from the February 2021 submission]; - The introduction of minimum.</p>	<p>Approved 14/03/2021</p>
2009/3575	<p>Restoration, extension, alterations and conversion of the Power Station building to provide retail, residential flats, business, cultural, hotel and conference facilities, event space and incidental accommodation; the demolition of other buildings and development of the land surrounding the Power Station and adjacent/ nearby sites to provide retail, restaurants bars and cafes, offices, hotel, residential, community and cultural space, assembly and leisure space, student housing, serviced apartments, an energy centre and basement plant; parking for cars, coaches, motorcycles and bicycles; new access and internal road system and servicing; 'off-site' highway works; works to the jetty to facilitate river transport and fuel delivery, including alterations to the river wall; provision of open space and landscaping works. (application for outline planning permission with detailed elements provided in relation to the Power Station itself, and the jetty and river structures).</p>	<p>Approved 23/08/2011</p>

APPENDIX 02

DESIGN REVIEW PANEL

FORMAL LETTERS

**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: 4 April 2022

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

Dear Sam,

**Wandsworth Design Review Panel:
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) on 16 March 2022. In light of the Government restrictions following the coronavirus outbreak the Panel was not able visit the site and meet your team in person, however the Panel provided feedback in a virtual open session with the applicant present to hear the Panel's views. We therefore thank the applicant team and, in particular the architects, Glen Howells, for a clear and comprehensive presentation. This letter will remain confidential until a formal planning application has been submitted, whereupon it will be uploaded to the application website.

The site lies on the western end of the Vauxhall Nine Elms Battersea (VNEB) opportunity area and has an area of 0.81ha. Historically the site provided residential terraced houses with its current commercial use established in the 1970s. The site falls within in 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 comprised 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 Booker warehouse is a large and corrugated orange metal building on a brick base which provides a double height space.

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 one point of access.

General Principles

This is an important and very challenging site within the Nine Elms and Battersea Opportunity Area. The site is a small but critical piece in the jigsaw as part of the overall vision for the area, providing an important link from the new developments around the Battersea Power Station and newly opened Battersea underground, to the Nine Elms Park and New Covent Garden Market area.

The Panel appreciates the design team's overarching vision. We generally support the height and massing proposed and welcome the use of high-quality pre-cast for these buildings. However, we think that at this point it seems that some fundamental issues are not adequately explored or justified and would therefore not support a planning application submission until some of these issues are addressed. Our comments centred around three main subjects: sustainability, landscaping, and architectural treatment.

The detailed comments of the Panel have been collated as follows:

Sustainability

In light of the Council's green agenda and aspiration to achieve net-zero carbon by 2030, it is important to consider this aspect from the onset as they are difficult to retrofit into a design. We therefore fully support the sustainability aspirations for the scheme, but while we appreciate the clarity and target expressed in the presentation, we would have expected to see more technical studies to identify the implications at this stage, as we think there is a lack of coordination between the architecture and the aspiration on the sustainability aims. We therefore raise concern that the architectural design is not supported by technical evidence. The technical aspects should be well integrated into the design overall, but at this stage it seems there are some significant omissions.

- We would fully endorse a Passivhaus certified solution for the scheme, particularly as this is a whole-building approach with clear, measured and deliverable targets. We question how the scheme would implement only aspects of it and think this is a misleading use of the Passivhaus label. We also suggest the scheme will need reviewing in light of the new Building Regulations due in June and the GLA uplift on these.
- We note that no outline energy strategy has been presented in anticipation of what will be needed for any planning application and referral to the GLA.
- We are concerned that daylight and wind impacts have not been taken on board in the landscape and in the architectural design. As for overheating avoidance, the fenestration layout may need to respond to different amounts of light and solar exposure given the proximity of tall buildings. We would have expected to see contour analysis of daylight and sunlight exposure on the façades, defining a strategy whereby fenestration sizes change over the height of the façade for areas of daylight deficiency and overheating excess. Within the fenestration framing modules, the extent of glass would be expected to change across a façade.
- We did not see analysis of the wind impact on ground floor, roof amenity areas and balconies and question whether this has been assessed against the newly published Corporation of London Wind Microclimate Guidance. With prevailing winds being distorted by high buildings, the guidance now refers to testing 36 different wind directions. It also introduces a new lower wind speed criteria for seating areas. The analysis may warrant adjustments to some building corners, downdraft canopies or

colonnades at ground floor as mitigation measures. We note that other than very mature trees, vegetation as mitigation measures is rarely effective.

- We are concerned about the acoustic issues related to the lorry movement, particularly overnight, on the road on the Covent Garden Market side and there was no evidence to support that acoustic passive mitigation has been considered in the design of the elevations. One possible solution might be to incorporate inset balconies configured as acoustic attenuation chambers to allow the natural ventilation purge without adding air-conditioning for the critical overheating avoidance periods. This would have an impact on the architectural design and provide an opportunity to break up the rigid pattern of the façades. It could also add a layering effect as the acoustic mitigation measures gradually reduce beyond the lower storeys.
- With regard to the natural ventilation window side panels, we note various of the room views show access across the bed location. This should be reviewed in terms of access for less able occupants and opening clearance over the sleeping position.
- Given the site flood risk designation, we note there are operationally critical electrical installations on the ground floor. While life safety habitable rooms may be addressed, Storm Sandy showed that buildings may be out of use for many months if critical installations are not also appropriately located.
- We support the proposal for sedum roofs, but it is unclear how this would be integrated with what may well be extensive areas needed for any air source heat pumps and associated equipment located on the roofs. There is no plan showing this additional massing and how this will be balanced with the vegetation. The GLA will also be pressing for roof PV areas and while these could be integrated with planting and amenity areas below them, consideration should be given to extra planting depth to avoid overheating the roots.

Landscape and Public Realm

The Panel finds the way the landscape and architecture are integrated interesting but thinks this could be a truly landscape-led approach and calls for a much stronger narrative between landscape and architecture. We would have wished to see more technical details and the use of relevant precedents.

- The site location is at a focal point where there is a diagonal desire line for pedestrian movement from the Linear Park to Battersea Power Station as well as along Nine Elms Lane. We did not see evidence of discussions with Transport for London about the pedestrian connections and that desire lines have been adequately considered.
- We question the decision to remove the category B and C trees along Battersea Park Road. These are high quality trees protected by a Tree Preservation Order and have significant life expectancy. Their retention would strengthen the concept of verdant frontage onto Battersea Park Road.
- We challenge the idea that wind mitigation can be achieved by use of trees in the landscaping. Our opinion is that this is best achieved through architectural design.
- We feel you should consider planting trees along the frontage to the Covent Garden Market Access Road as this will be a harsh environment for pedestrians and will help to improve the Urban Greening Factor for the site.
- We are not convinced about the location of a sensory garden between Plots 01 and 02 as it would appear that it would be overshadowed for most of the afternoon and evening hours.
- We express concern about the children's play area located near the service access route for cycles, refuse and delivery vehicles. We feel greater consideration needs to be

given to the needs of children using this route to school, along with cycles and refuse vehicles and how children would navigate through to and cross the Coven Garden Market Access Road.

- There seems to be a lack of amenity space from level 8 to the top. We suggest a greater use of the rooftop spaces for outdoor amenity perhaps using adjacent rooms to further promote the use of the terraces.
- We like the idea of the ribbon through the landscape spaces and would like to see it closely integrated with the buildings.
- We encourage the preparation of a landscape management and maintenance plan for the public and private spaces.

Design Response

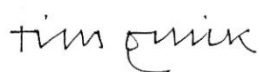
Overall, we are comfortable with the scale and massing of the buildings and support the use of pre-cast concrete as a principal material for the façades. However, while we do understand the architectural language that has been adopted, we do feel that the regular grid is quite 'unrelenting' over such large areas of the proposed elevations and fails to respond to the variety of environmental conditions on different parts of the façades.

- We would have expected a greater variety in the architectural expression between the residential and student accommodation component. In our view more diversification would result in a richer architecture.
- Again, while we understand the architectural language, we regret the choice not to express the cores on certain buildings which in our view would have introduced more variety in these very large expanses of façades.
- We encourage connections with the Peabody scheme to the west of Plot 03 but were unclear how the buildings connect at podium level.
- As the scheme is aimed at a student community, we would expect the scheme to cater more for cyclists and suggest this is explored further.

Moving Forward

The Panel appreciates that a great deal of good work has been done to date by the design team to progress the scheme. However, we were very concerned by the apparent lack of technical substantiation of the architectural design as well as the landscape. We feel that a more thorough analysis would not only reassure the Council that the design is robust but also result in a richer architectural response. We therefore question whether the design is ready for submission and would suggest that the consultant team is given more time to develop the scheme. As a Panel, we would value the opportunity to review the scheme again in the light of the above.

Yours sincerely



Tim Quick

Director, Formation Architects
Chair, Wandsworth Design Review Panel

Panel Members

Vinita Dhume	Associate Director, Levitt Bernstein
Chris Twinn	Principal, Twinn Sustainability Innovation
Angie Jim Osman	Director, Allies & Morrison
Deborah Nagan	Head of Place & Nature, Future Homes Hub
Marcus Claridge	Director, Claridge Architects

Panel Admin

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

Applicant Team

Jonathan Morris	Watkin Jones	Client
Simon Lovell	Watkin Jones	Client
Rob King	Glenn Howells	Architect
Josh Allington	Glenn Howells	Architect
Andy Robinson	Future City	Culture and Place-making
Tessa O'Donnell	Exterior Architecture	Landscape architect
Bernie Carr	Atelier Ten	Energy and Sustainability
James Ainsworth	Montagu Evans	Planning

Attendees (invited to observe)

Mark Hunter	Head of Strategic Developments
Janet Ferguson	Planning Manager
Sharon Molloy	Principal Urban Design Officer
Joanna Chambers	Senior Planner

**Wandsworth
Design Review Panel
C/o Wandsworth Council**
Environment and Community Services
Department
The Town Hall
Wandsworth High Street
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Email: barry.sellers@richmondandwandsworth.gov.uk
Web: www.wandsworth.gov.uk

Our ref: ECS/
Your ref:
Date: 8 July 2022

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

Dear Sam,

**Wandsworth Design Review Panel – Follow-Up:
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 second design review on 8 June 2022. 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. Historically the site provided residential terraced houses with its current commercial use established in the 1970s. 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 Booker warehouse is a large, corrugated metal building with a brick base.

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 proposals are for the 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 appreciates seeing the proposals for a second time but we are disappointed that the scheme has already been submitted as a planning application with many outstanding issues. In the previous design review, we raised some fundamental questions which in our view have not yet been adequately explored or justified.

As previously stated, we welcome the overarching vision and generally support the height and massing proposed as well as the use of high-quality pre-cast for the buildings. We welcome the progress made since the first review on the student blocks, Plots 02 and 03, in particular the refinement of the pre-cast concrete and variations in colour. However, we do not think the progress made is yet sufficient to give us and the Council the confidence of a successful outcome.

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

Sustainability

We acknowledge the additional work done in addressing the sustainability aspects raised in the previous review. We support the aspirations and targets set, but we are still not convinced this has gone far enough as we are missing the evidence to support the choices made. Moreover, we are surprised that the architecture and in particular the fenestration, is similar on all sides of the buildings, despite orientation or context.

- We note the choice to achieve BREAM standard Outstanding for the proposed development. It is important that this is clearly demonstrated.
- We note the limited amount of PV area and would ask that this is checked against GLA standards. As southern facing terraces will need solar shading this could be provided by PVs.
- We are concerned about the stated need for mechanical cooling as this feels like something of an afterthought. Areas that will have a propensity to overheat were not shown, and evidence should be provided as to why mechanical cooling is required.
- Overheating analysis and level of daylight should inform the façade design. Obviously, this varies according to orientation and level. We therefore question the analysis which results in very similar window sizes on all elevations and at all heights.
- We are concerned about the lack of wind analysis and refer again to the Corporation of London Wind Microclimate Guidance. We would have expected contours of wind and wind tunnel analysis to identify potential problem areas.
- More clarity on Urban Greening Factor is required alongside proof of its robustness as well as the net carbon footprint based upon the palette of materials used.

Landscape and Public Realm

Overall, it looks like the landscape has been well developed, but we are concerned about how it will be implemented. There is still not a sufficient and robust enough explanation as to why the proposals are the best achievable for the site.

- The evolution of the landscape solution for the area over the Heathwall Sewer running diagonally across the site still remains unclear. We note the considerable area of seating and kerbs and wonder how those foundations are dealt with as we fear these might be changed and downgraded afterwards.
- Furthermore, we think there is a missed opportunity of creating a stronger narrative and enriching the character of the place by not unravelling the underlining story of the ancient river that once flowed here, and the 150 years old drainage system that replaced it. A river that once was part of the tidal power driving a mill in this location could bring inspiration to the landscape.
- We feel that the category B and C trees protected by a Tree Preservation Order along Battersea Park Road frontage should be retained. There are very few existing trees in the area and we would wish to see a stronger justification about their removal given their 20-40 years lifespan and their contribution to the sustainability, ecological and wellbeing aspects of the scheme.
- We are disappointed the opportunity for adding a line of trees along New Covent Garden Access Road where the space would allow it has not been exploited. These will help mitigate the harsh environment for pedestrians and help visually improve the street scene and the Urban Greening Factor for the site.
- We are concerned about the choice of the proposed planting added as these appear to be largely non-native and the sizing is not clear. We suggest considering SUGI type planting of a variety of indigenous species that can change over time, alongside some larger growing species which managed carefully can provide the height and impact needed to give the site its character.
- The SUDs strategy appears too weak. The technical drawings are not detailed enough to show the falls, how much water is retained, needed etc. A credible SUDs strategy has the opportunity to mitigate extreme weather changes, and this should be sought.
- In terms of play areas, the provision is not clearly detailed and explained. We suggest being more careful in ensuring all age groups are catered for.
- We encourage the preparation of a costing as well as a landscape management and maintenance plan for the public and private spaces. Also, landscape sections would have been useful at this stage, as well as planting plans and lighting strategy.

Design Response

As previously said, we support the scale and massing of the buildings and the use of pre-cast concrete as a principal material for the façades. In principle, we welcome the progress on the use of colour for the pre-cast panels, façade detailing. In particular we very much liked the disposition of the amenity provision in the form of roof terraces to Plots 02 and 03 and the way this breaks up the mass of the building in a coherent way.

- In our view Plot 01, the affordable block, is architecturally the least successful of all the buildings while at the same time being in the most prominent location. While the colours do vary between the buildings, the application of regular grids across every elevation leaves us wanting more variety in such a large scheme. We would have liked to see a different approach to the residential building reflecting its different programme.

- We are somewhat concerned about the lack of active frontages at ground floor level. We appreciate class E and F uses are proposed for the ground floor of Plot 01, however we feel more could be done to create an active ground floor environment. More clarity is needed on how the commercial and community uses are going to relate to the landscape around.
- We would encourage consideration to the treatment of soffits including the possible introduction of colour and pattern.

Moving Forward

Despite the fact that the scheme has now been submitted, we suggest that the applicant continues the dialogue with the Council on further design development to improve design quality and prove its sustainability credentials.

Yours sincerely

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

Panel Members

Chris Twinn	Principal, Twinn Sustainability Innovation
Angie Jim Osman	Director, Allies & Morrison
Deborah Nagan	Head of Place & Nature, Future Homes Hub
Marcus Claridge	Director, Claridge Architects

Panel Admin

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

Applicant Team

Jonathan Morris	Watkin Jones	Client
Simon Lovell	Watkin Jones	Client
Rob King	Glenn Howells	Architect
Josh Allington	Glenn Howells	Architect
Andy Robinson	Future City	Culture and Place-making
Tessa O'Donnell	Exterior Architecture	Landscape architect
Bernie Carr	Atelier Ten	Energy and Sustainability
James Ainsworth	Montagu Evans	Planning
Sam Stackhouse	Montagu Evans	Planning

Attendees (invited to observe)

Mark Hunter	Head of Strategic Developments
Janet Ferguson	Planning Manager
Sharon Molloy	Principal Urban Design Officer
Joanna Chambers	Senior Planner

Cllr Matthew Corner

**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
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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 Vandevour 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 03

STUDENT ACCOMMODATION

OVERCONCENTRATION

ANALYSIS

Student Housing Over Concentration

The proposals will accommodate up to 907 residents in 55 new affordable homes, and 762 student beds of which approximately 168 will be at affordable rents.

We have set out below the impact that the proposed development would have on the overall percentage of residential homes as student homes (constructed or permitted since 2011) in the Vauxhall Nine Elms Opportunity Area (VNEB) Opportunity Area (OA).

We have applied the London Plan assumption that 2.5 student beds equates to 1 single residential household. This is a robust approach as comparing student bedrooms solely against C3 residential units does not reflect the multiple occupancy of C3 residential units.

Wandsworth area only of VNEB OA

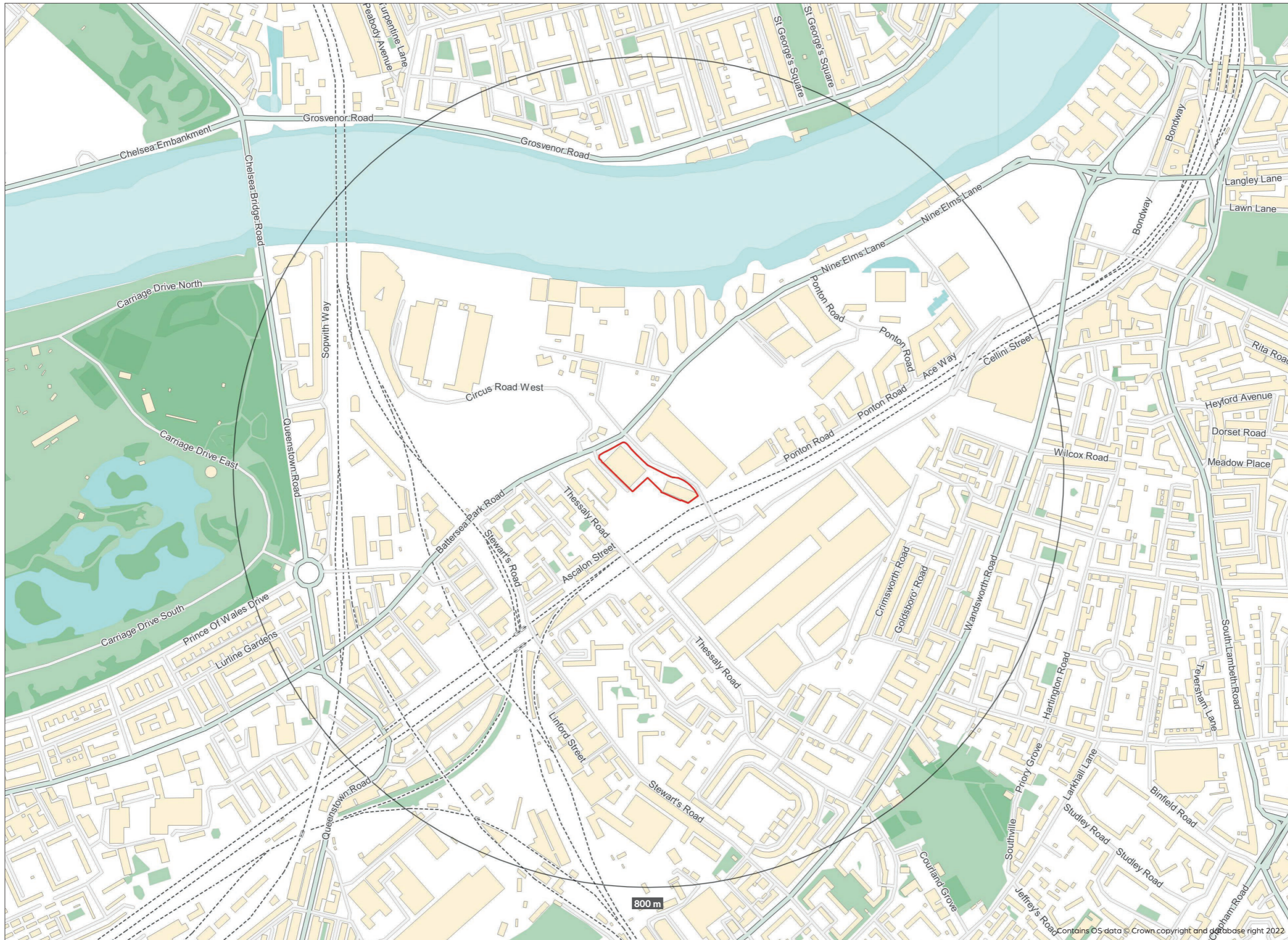
- Number of C3 residential homes since 2011 = **14,628**
- Number of student homes since 2011 = **652** (1,630 / 2.5)
- Total number of residential homes (C3 and student combined) since 2011 = **15,280**
- Percentage of residential homes as student homes = **4.3%**

APPENDIX 04

MAP OF 800M RADIUS OF THE SITE

SITE LOCATION PLAN

Application Site



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

DATE:
February 2022

SCALE:
1:7,500 @ A3

▲ NORTH



MONTAGU EVANS
CHARTERED SURVEYORS
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LONDON, EC3A 8BE
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APPENDIX 05

HEP LETTERS OF SUPPORT

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 06

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

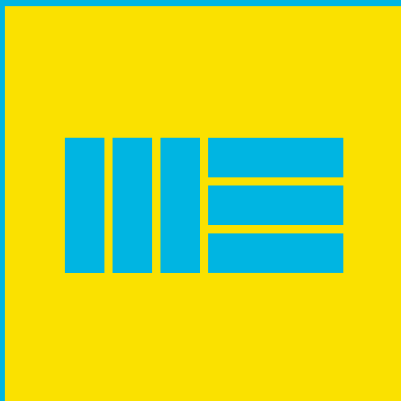
	Habitable Rooms	Percentage	Percentage by Use Class
C3 Affordable	171	18.33%	100%
Affordable Student	198	21.22%	25.98%
Total Habitable Rooms	369	39.55%	

MONTAGU EVANS

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