



ONE BATTERSEA BRIDGE

PLANNING STATEMENT

October 2024

Revision 02



1 Battersea Bridge Road

Planning Statement

Revision 2
October 2024

DP9 Ltd

DP9 Ltd
100 Pall Mall
London
SW1Y 5NQ



Contents

1.	Introduction.....	3
2.	Site and Surrounding Context	6
3.	Pre-Application Engagement.....	8
4.	The Proposed Development.....	12
5.	Planning Policy Framework	15
6.	Planning Policy Assessment.....	18
7.	Section 106 Draft Heads of Terms.....	39
8.	Summary and Conclusions	40

Appendix 1 – Planning History

Appendix 2 – Affordable Housing Statement

Appendix 3 – Tall Building Impact Assessment



1. Introduction

1.1 This Planning Statement (Revision 2) has been prepared by DP9 Limited ('DP9') on behalf of Promontoria Battersea Limited ('the Applicant') to accompany revisions to the planning application ('the Application') for the redevelopment of 1 Battersea Bridge, London, SW11 2BZ ('the Site') located in the London Borough of Wandsworth ('LBW').

1.2 In response to feedback received from key stakeholders, including the GLA and Historic England, since the submission of the Application, it is proposed to amend the proposals principally to reduce the overall building height to 28 storeys (plus ground and basement levels) and increase the affordable housing provision to 50% affordable (all of which is social rented tenure). The revised description of development ('the Proposed Development') is set out below:

'Comprehensive redevelopment of the site to include demolition of existing building and erection of a part 10 storey, part 28 storey building (plus ground floor and basement levels) comprising residential use (Class C3), office use (Class E), community use (Class F2), and a restaurant (Class E), with associated car parking, cycle parking, public realm, landscaping and other associated works.'

1.3 In addition to this Planning Statement, a full suite of planning drawings and technical reports has been prepared to accompany this Application, as summarised below. A schedule clarifying which submission documents have been subject to full revisions (thereby superseding the original submission documents); which are addenda (to supplement the original submission documents); and those which remain unchanged since the original submission is set out within the supporting cover letter.

- Affordable Housing Statement (see Appendix 2), prepared by DP9;
- Affordable Workspace Management Plan, prepared by DP9;
- Air Quality Impact Assessment, prepared by Temple;
- Application Form and Ownership Certificate, prepared by DP9;
- Arboricultural Impact Assessment, prepared by Temple;
- Archaeological Desk-Based Assessment, prepared by Pre-Construct Archaeology;
- Be Seen Spreadsheet, prepared by Ridge Consulting;
- Biodiversity Metric Calculation, prepared by Temple;
- Biodiversity Net Gain Plan, prepared by Temple;
- BREEAM Pre-Assessment (Appendix A of Sustainability Statement), prepared by Ridge Consulting;
- CIL Additional Information Form, prepared by DP9;



- Circular Economy Statement, prepared by Temple;
- Construction Environmental Management Plan, prepared by Temple;
- Commercial Report (inc. Marketing Evidence), prepared by Houston Lawrence;
- Daylight, Sunlight and Overshadowing Report, prepared by GIA;
- Delivery and Servicing Plan, prepared by Velocity;
- Design and Access Statement, prepared by Farrells;
- Draft Park Management Plan, prepared by Velocity;
- Drainage Strategy, prepared by Yellowsub;
- Energy Statement, prepared by Ridge Consulting;
- Existing & Proposed Drawings (see Drawing Issue Sheet), prepared by Farrells;
- External Lighting Plan, prepared by LED Linear;
- Fire Safety Strategy, prepared by Ashton Fire;
- Flood Risk Assessment, prepared by Yellowsub;
- Framework Travel Plan, prepared by Velocity;
- Gateway 1 Fire Statement, prepared by Ashton Fire;
- GLA Carbon Emission Reporting Spreadsheet, prepared by Temple;
- Health Impact Assessment, prepared by Temple;
- Heliport Information Plan, prepared by Farrells;
- Heritage, Townscape and Visual Impact Assessment, prepared by Montagu Evans;
- Internal Daylight, Sunlight and Overshadowing Report, prepared by GIA;
- Land Quality Desk Study, prepared by Yellowsub;
- Landscaping Strategy (included within Design and Access Statement), prepared by Exterior Architecture;
- Noise Impact Assessment, prepared by Temple;
- Operational Waste Management Strategy, prepared by Velocity;
- Outline Arts and Culture Action Plan, prepared by DP9;
- Outline Construction Logistics Plan, prepared by Velocity;
- Outline Construction Management Plan, prepared by Velocity;
- Outline Site Waste Management Plan, prepared by Velocity;
- Preliminary Ecological Appraisal, prepared by Temple;
- Pre-Redevelopment and Pre-Demolition Audit, prepared by Velocity;
- Social and Community Infrastructure Study, prepared by Temple;
- Statement of Community Involvement, prepared by Concilio;
- Sustainability Statement, prepared by Ridge Consulting;
- Tall Building Impact Assessment (see Appendix 3), prepared by DP9;
- Transport Assessment, prepared by Velocity;
- Utilities Statement, prepared by Premier Energy;
- Whole Life Carbon Assessment, prepared by Temple;
- Wind Microclimate Assessment Report, prepared by GIA.



1.4 The purpose of this Planning Statement is to assess the planning considerations associated with the Proposed Development in the context of national, regional and local planning policy and guidance. This Planning Statement comprises the following:

- Section 1 provides the introduction and scope;
- Section 2 describes the Site and surroundings;
- Section 3 summarises the pre-application consultation;
- Section 4 provides a description of the Proposed Development;
- Section 5 sets out the planning policy relevant the Proposed Development;
- Section 6 assesses the Proposed Development against planning policy;
- Section 7 sets out the draft Section 106 Heads of Terms; and
- Section 8 provides a summary and conclusions.



2. Site and Surrounding Context

Application Site

- 2.1 The Site is located to the east of Battersea Bridge Road in the London Borough of Wandsworth. The broadly rectangular Site currently comprises a part five-storey, part six-storey 1980s office building (Class E) with a basement level car park providing 33 car parking spaces, accessed from Hester Road from the south. The main access to the existing building is provided via a stepped entrance from Battersea Bridge Road.
- 2.2 At present, only 7% of the building is leased at commercial office rates, whilst the remaining floorspace is either vacant or let on non-commercial terms to cover rates, utilities and service charges only.
- 2.3 The Site is bounded to the north by the River Thames and Thames Path and to the south by Hester Road and the Royal College of Art Dyson Building. A six-storey residential building is situated to the immediate east, with the nine-storey Albion Riverside development situated beyond.
- 2.4 The existing building is dated and is not considered to be of any architectural merit. The Site is not within a Conservation Area however, Westbridge Road Conservation Area is located to the southwest of the Site along Battersea Church Road. Battersea Bridge to the immediate north is Grade II listed. A number of the dwellings within the Westbridge Road Conservation Area are also Grade II listed.
- 2.5 The Site is situated within Flood Zone 3 but is protected by flood defence measures, meaning that, despite being in an area with a high probability of flooding from tidal and fluvial flooding, the Site would be protected up to the 1 in 1000-year standard by the River Thames defences.

Surrounding Context

- 2.6 The surrounding area is mixed-use in character. The area to the east and west is predominantly residential, with the Royal College of Art campus and a range of retail uses located to the south.
- 2.7 Building heights in the immediate surrounding area vary from around two storeys up to nine storeys. Along the river, there are a number of existing tall buildings, including the Montevetro Building (20 storeys) to the west and Chelsea Waterfront (37 storeys) situated on the north bank of the Thames.



Transport

- 2.8 The Site has a Public Transport Accessibility Level (PTAL) of 3. The closest stations to the Site are Imperial Wharf Station, situated 0.9 miles (18-minute walk) to the west via Battersea Bridge, and Clapham Junction Station, situated 1.2 miles (25-minute walk) to the south.
- 2.9 The Site is well served by a number of London bus routes, with Battersea Bridge Road served by bus nos. 19, 49, 319, 345, N19 and N31.

Planning History

- 2.10 The Site has a detailed planning history, mainly relating to planning applications for minor alterations to the existing building, and two prior approval applications in 2018 for the change of use of the existing building to residential (Class C3), both of which have since expired. A full schedule of the available planning history is included in Appendix 1.



3. Pre-Application Engagement

- 3.1 This section should be read in conjunction with the Statement of Community Involvement, prepared by Concilio, and the Statement of Community Involvement Addendum, prepared by DP9 which accompanies the Application and explains the public consultation that has been carried out during the pre-application stage.
- 3.2 Chapter 4 of the National Planning Policy Framework (NPPF) emphasises that early engagement and good quality pre-application discussion enables better coordination between public and private resources. In addition, the participation of other consenting bodies in pre-application discussions should enable early consideration of all the issues relating to whether a development will be acceptable.
- 3.3 All matters associated with the Proposed Development were discussed at length at the pre-application stage, with early engagement helping to inform the overall design.

Mayoral Referral

- 3.4 The Application is referable to the GLA as it exceeds the tall building thresholds (outside Central London and more than 30 metres high) set out in the Town and Country Planning (Mayor of London) Order 2008 (as amended). In response, formal pre-application engagement has been undertaken with the GLA.

LBW Pre-Application Meetings

- 3.5 Formal pre-application discussions and design workshops have been held with LBW on the evolving scheme since an initial meeting in September 2021. The meetings have focused on a number of topics, including the following:
- Land uses and layout;
 - Height, massing and townscape;
 - Transport, parking and servicing;
 - Energy and sustainability;
 - Public realm and landscaping; and
 - Materiality and detailed design.
- 3.6 In total, 12 pre-application meetings and design workshops have been held with LBW officers to develop the scheme design and address any issues raised. In response to LBW feedback, the proposed building height has been reduced, the massing



composition has been altered, whilst the articulation and materiality of the proposed building façade has been revised, principally in relation to the base of the building.

- 3.7 Additionally, a programme of consultation has been undertaken with a number of key stakeholders, including (but not limited to) the GLA, TfL and Historic England ('HE').

LBW Design Review Panel

- 3.8 As part of a comprehensive approach to developing the design of the Proposed Development, the Applicant engaged in a two sessions with the LBW Design Review Panel (DRP), held in December 2023 and February 2024. Written advice has been issued following each Design Review Panel session and this has helped inform the evolution of the design.

- 3.9 In response to DRP feedback, the extent of public realm was increased through the reduction in building footprint, whilst the private residential lobby was reduced in area to provide a more generously scaled restaurant unit and affordable residential lobby. The design of the building base was also developed further to give a more robust appearance.

Public Consultation

- 3.10 Extensive consultation has been undertaken to initiate a dialogue between the Applicant, key stakeholders and the local community in order to understand their objectives, aspirations and expectations, which have helped inform the evolution of the Proposed Development.

- 3.11 There have been two rounds of public consultation which have included delivery of consultation flyers, creation of a website and a series of meetings held both in person and online. Members of the project team were in attendance for the duration to describe the proposals and answer questions.

- 3.12 The first round was undertaken during September 2022 and constituted:

- The creation of a consultation website which had received over 400 views from 210 unique users;
- The targeted delivery of a flyer to an area of 3,804 addresses inviting local residents to join public consultation events;
- Two public consultation events which were hosted at the Site. The first event was held on 27 September 2022, with the second event held on 29 September 2022. In total, the events were attended by 54 people.



3.13 The second round of public consultation was undertaken during November 2023 and December 2023 and constituted:

- The updates to the consultation website which at the time of 7 December 2023 had received 6,478 views from 3,643 unique users;
- The targeted delivery of a flyer to an area of 7,251 addresses inviting local residents to join public consultation events;
- A freephone number was issued to residents within the consultation letter to ensure those without internet access could still provide comments;
- As part of the Applicant's efforts to raise awareness on the consultation, a social media campaign with targeted social media advertising in the area. Google platforms received 292,534 impressions and 3,777 clicks and Meta platforms an additional 111,779 impressions and 1,742 clicks;
- The first event was held on 22 November 2023, with the second event held on 25 November 2023. In total, the events were attended by 159 people;
- The Applicant also hosted online webinar on 27 November 2023 between 18:00-19:00. The webinar was attended by 23 people.

3.14 A round of post-submission public consultation was undertaken in October 2024 to present the revisions to the Application and constituted:

- Three emails to a database of 574 subscribers, the first of which was issued on 5th October to announce the public exhibition event, which was opened by 307 subscribers. A second reminder on the day of the public exhibition event (12th October) was opened by 254 subscribers. And a third email on the day of the webinar event (14th October 2024) was opened by 256 subscribers;
- Three social media posts (to align with the above) were shared on social media platforms X, Facebook and Instagram;
- The targeted delivery of a consultation flyer to 7,251 local addresses inviting residents to join public consultation events. 7,090 were successfully delivered due to two inaccessible buildings;
- The public exhibition event, which was held in-person from 10am to 2pm on 12th October at the Site, was attended by a total of 126 people.
- The webinar was held at from 7pm to 8pm on 14th October and had 45 concurrent viewers, with a peak attendance of 68 viewers.

3.15 In addition, emails were sent to key political and local community stakeholders outlining the Proposed Development and extending an invitation to meet with the Applicant team. The following local stakeholders were contacted:



- Battersea Society
- Wandsworth Society
- Leonie Cooper AM
- Cllr Simon Hogg – Leader of Wandsworth Council
- Cllr Kemi Akinola – Deputy Leader of Wandsworth Council
- Cllr Aydin Dikerdem – Cabinet Member for Housing
- Cllr Juliana Annan – Battersea Park Ward (Mayor of the Council)
- Cllr Tony Belton – Battersea Park Ward
- Cllr Maurice McLeod – Battersea Park Ward
- Cllr Ravi Govinda – East Putney Ward
- Cllr Guy Humphries – Southfields Ward
- Cllr Caroline De La Soujeole- St Mary’s Ward
- Cllr Jamie Colclough- St Mary’s Ward
- Cllr Jessica Lee- St Mary’s Ward
- Friends of Battersea Park
- Clapham Junction Action Group
- Ethelburga Community Residents Association
- Ethelburga Tower Residents Association
- Royal College of Art

3.16 A detailed breakdown of all the consultation engagement that has been carried out with the public as well as key community and political stakeholders in relation to the Proposed Development is set out in the Statement of Community Involvement, prepared by Concilio and the Statement of Community Involvement Addendum, prepared by DP9.

Key Themes from the Consultation Process

3.17 Overall, whilst there were concerns with regards to the proposed height and massing, there was strong support for the proposed provision of new homes, particularly affordable homes. Consultation feedback was also broadly positive in relation to the proposed public realm enhancements and activation of the ground floor through provision of a restaurant and community space.

3.18 The Applicant remains committed to consulting and engaging with local residents, businesses and other stakeholders, as demonstrated through the post-submission consultation events. The intention is to maintain the dialogue with those individuals and organisations who have expressed an interest in the scheme and to keep people up to date with the project.



4. The Proposed Development

- 4.1 This section should be read in conjunction with the Design and Access Statement, prepared by Farrells, and the Landscape Strategy (included within the Design and Access Statement), prepared by Exterior Architecture, both of which are submitted to accompany the Application and describe the principal components of the Proposed Development. Planning permission is sought for the following:

‘Comprehensive redevelopment of the site to include demolition of existing building and erection of a part 10 storey, part 28 storey building (plus ground floor and basement levels) comprising residential use (Class C3), office use (Class E), community use (Class F2), and a restaurant (Class E), with associated car parking, cycle parking, public realm, landscaping and other associated works.’

- 4.2 The Proposed Development seeks to optimise the development potential of the Site through a design-led approach, delivering a residential-led development which will deliver a plethora of public benefits which focus on high-quality architecture and significantly improved public realm.

Proposed Land Uses

- 4.3 The Proposed Development proposes the delivery of 110 high quality residential units, 54 of which are affordable, all located in a well serviced location adjacent to the Thames Path. The ground and first floor levels will include the provision of commercial and community uses, with the residential component located on the floors above.
- 4.4 The proposal includes the provision of a community space, affordable workspace and a restaurant, located at ground and first floors of the development and would serve to activate and enliven the ground floor of the Proposed Development and surrounding area. A breakdown of the proposed areas is set out below.

Use	Existing (GIA sqm)	Proposed (GIA sqm)
Residential (C3)	0	20,094
Community (Class F2)	0	274
Restaurant (Class E)	0	189
Office (Class E)	4877.1	535
Shared	0	349
Plant	0	365
Total	4877.1	21,807



- 4.5 The residential element will include the provision of 50% as affordable (calculated by habitable room). A breakdown of the proposed unit mix is set out in the table below.

Unit Type	1B1P	1B2P	2B3P	2B4P	3B4P	3B5P	4B5P	Total	%
Market	4	0	0	26	0	24	2	56	50
Social Rent	0	9	15	3	9	10	8	54	50
Total	4	9	15	29	9	34	10	110	100

- 4.6 The units will benefit from a range of internal and external amenity spaces and communal facilities including reception spaces, a podium garden, play space, gym and internal communal amenity space. The units will be of the highest quality, whilst providing a variety of room sizes and layouts, including the provision of wheelchair units across all tenures.

Transport

- 4.7 The Application seeks to reduce the number of existing car parking spaces. A total of 18 car parking spaces will be provided, including 5 are blue badge spaces. All non-residential uses are proposed to be car-free.
- 4.8 Servicing will take place via the existing service road to the east of the Site, accessed via Hester Road.
- 4.9 In addition, 238 cycle parking spaces are proposed, comprising 212 residential long stay spaces and 4 short stay (visitor) spaces within the public realm. For non-residential uses 10 long stay spaces will be provided, in addition to 12 short stay spaces.

Design Approach

- 4.10 The Proposed Development has been subject to a rigorous design process led by award-winning practice, Farrells, which has evolved throughout the pre-application stage. The Proposed Development will result in the delivery of a building of exemplary architectural quality, comprising a podium and tower form extending from 10 to 28 storeys (plus ground floor and basement), with the tower elements situated towards north of the Site fronting the River Thames, stepping down to the south to respond to surrounding context. The form of the Proposed Development has been carefully considered and developed, responding to both strategic and local views as well as the setting of nearby designated heritage assets.



- 4.11 The material palette that has been thoughtfully selected and has been led by the aspiration to have a graceful and visually interesting building which will change in response to various weather and lighting conditions. Moreover, several steps have been undertaken during the design development to ensure that the tower element in particular appears elegant in the townscape setting. The location of the building acts as an important wayfinding point as an entry into the borough over Battersea Bridge.

Landscaping and Public Realm

- 4.12 Providing a high-quality public realm and improved pedestrian links is one of the key objectives and are primary public benefits of the Proposed Development. From the project's inception, a key focus has been on how the Proposed Development could enhance the surrounding area, particularly the Thames Path. As the current state of the Thames Path in this location is compromised with regard to accessibility, the proposal will significantly enhance the Thames Path and wider public realm.
- 4.13 The improved Thames Path will benefit from the addition of high quality landscaping, with the opportunity for public artwork in collaboration with the RCA, increased planting, improved lighting and incidental play space. The intention is to retain any trees of value, where possible, whilst delivering a net uplift of over 20 trees across the Site.
- 4.14 Outdoor play space is also proposed in support of the residential development, contained on the top of the podium level of the building. This purpose designed area is accessible to residents of the affordable tenure only and will provide quality spaces for the younger age groups. This play area includes areas for the children to appreciate nature, and to provide sensory play and space for movement and adventure.



5. Planning Policy Framework

5.1 This section provides a summary of the key planning policies relevant to the Site and its redevelopment. The planning policy and guidance context comprises three levels—national, regional and local. Within each level, there is both planning policy and guidance which combine to provide the framework for consideration of the Proposed Development.

National Planning Policy and Guidance

5.2 The National Planning Policy Framework (NPPF) is a material consideration in the determination of planning applications. It sets out the government’s overarching planning policies for England and how they are to be applied. The NPPF was last updated in December 2023 and is supported by Planning Policy Guidance (PPG), which provides further detail, clarification and guidance on national policy contained within the NPPF.

5.3 At the heart of the NPPF is a presumption in favour of sustainable development (Paragraph 11), with three overarching objectives: economic, social and environmental. These are to be delivered through the preparation and implementation of plans and the application of the policies within the Framework.

5.4 For decision taking, the presumption in favour of sustainable development means approving development proposals that accord with the development plan without delay and where the development plan is absent, silent or out of date, granting planning permission unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits of development, or specific policies in the NPPF indicate otherwise.

Development Plan

5.5 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) states that the determination of planning applications should be in accordance with the Development Plan unless material considerations indicate otherwise. The adopted Development Plan for LBW is as follows:

- London Plan (2021)
- LBW Local Plan (2023)



Emerging Planning Policy

- 5.6 LBW is also undertaking a partial review of the LBW Local Plan ('Local Plan Partial Review'). The Local Plan Partial Review principally relates to adopted Policy LP23 (Affordable Housing). The Regulation 18 consultation concluded in December 2023. The next stage of formal consultation is to take place in mid-late 2024. Given the early status of the emerging Local Plan Partial Review, little weight is currently afforded to the draft policies in the decision making process.

Supplementary Planning Guidance

- 5.7 A range of supplementary planning documents have been taken into consideration in developing the Proposed Development and these are referred to in this Planning Statement, where relevant. The following adopted GLA Documents (LPG & SPG documents) have been considered:

- Play and Informal Recreation (September 2012);
- 'Be Seen' energy monitoring guidance (2021);
- Circular Economy Statements (2022);
- Whole Life-Cycle Carbon Assessments (2022);
- Sustainable Transport, Walking and Cycling (2022);
- Optimising Site Capacity: A Design-led Approach LPG (2023);
- Characterisation and Growth Strategy LPG (2023);
- Housing Design Standards LPG (2023);
- Air Quality Neutral (2023);
- Air Quality Positive (2023);
- Urban Greening Factor (UGF) LPG (2023)
- Fire Safety LPG (Draft)
- Development Viability LPG (Draft)
- Affordable Housing LPG (Draft)

- 5.8 LBW has also published several adopted Supplementary Planning Documents (SPD). Of relevance to this Site and the Proposed Development are the following:

- Housing SPD (2016)
- Historic Environment SPD (2016)
- Planning Obligations SPD (2020)
- Refuse and Recyclables SPD (2014)



Historic England

5.9 Historic England has prepared a number of guidance notes which have informed the Proposed Development, as summarised below.

- Advice Note 3, published March 2015, sets out guidance with regards to the setting of heritage assets, and managing change within the settings of heritage assets. It gives general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated.
- Advice Note 4, published March 2022, provides advice on tall buildings, as an update to previous advice published by CABI and Historic England. The note establishes a number of criteria which tall buildings should adhere to in order to achieve architectural quality and address the historic environment.

Site Designations

5.10 The Site is subject to the following designations, as defined by the LBW Proposals Map:

- Area Strategy - Wandsworth's Riverside
- Focal Point of Activity – Ransomes Dock
- Mid Rise Building Area
- Archaeological Priority Area
- Thames Policy Area
- Flood Zones 2 and 3a



6. Planning Policy Assessment

6.1 This chapter assesses the Proposed Development in the context of key national, regional and local planning policy and guidance relevant to the determination of the Application. This section draws together the range of information and technical assessment work that forms the planning application submission and considers the extent to which the Proposed Development complies with the policies of the Development Plan and considers other material considerations. The key planning issues it examines are set out below:

- Principle of Development
- Land Use;
- Residential Quality;
- Principle of Tall Building;
- Heritage and Townscape;
- Landscaping and Public Realm;
- Transport;
- Energy and Sustainability; and
- Environmental Considerations.

Principle of Development

6.2 The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development and that, at a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs (Paragraph 7).

6.3 At the heart of the NPPF is a presumption in favour of sustainable development. Paragraph 119 promotes the effective use of land to meet the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. This paragraph states that strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.

6.4 The draft revised NPPF published 30th July 2024 reiterates the same principles of brownfield first and further enforces the need for affordable homes.



- 6.5 Similarly, London Plan Principle GG2 states that those involved in planning and development must enable the development of brownfield land and prioritise sites which are well-connected by existing or planned public transport.
- 6.6 It is proposed to optimise the development potential of an underutilised brownfield site in an accessible location which would, in turn, support a significant number of new homes and jobs for which there is a clearly identified need. The Proposed Development therefore accords with the central theme of policy which seeks to deliver sustainable growth and is compliant with the Government's overarching objectives for sustainable growth. Considering the above, the principle of development should be strongly supported.

Land Use

Principle of Residential Use

- 6.7 Chapter 5 of the NPPF outlines the Government's vision to meet the objective of significantly boosting the supply of homes. Paragraph 60 states that the overall aim should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community.
- 6.8 Chapter 11 promotes the effective use of land for meeting the need for homes and other uses. Paragraph 120 gives 'substantial weight' to the value of using suitable brownfield land within settlements for homes and other identified needs.
- 6.9 Policy GG2 of the London Plan encourages making the best use of land, including enabling the development of brownfield land and proactively exploring the potential to intensify the use of land for homes and workspaces by higher density development on well-connected sites.
- 6.10 To ensure that boroughs achieve their housing targets, London Plan Policy H1 encourages plans and decisions to optimise the potential for housing on all suitable and available brownfield sites.
- 6.11 At local level, the Area Strategy for Wandsworth's Riverside set out in the Local Plan states that development within Wandsworth's Riverside will help meet the borough's housing target, as set out in Local Plan Policy SDS1. The area has capacity to provide 904 homes by 2032/2033, over the first 10 years of the Plan period. The Policy also seeks to promote residential-led development in the borough's Focal Points of Activity.



- 6.12 Chapter 17 of the Local Plan sets out the strategic context of housing delivery in the Borough. The chapter acknowledges that delivering high-quality, affordable homes to meet the needs of Wandsworth's existing and future households is a key challenge for the Plan.
- 6.13 Maximising the delivery of new homes is the primary objective of the Proposed Development, which will provide a total of 110 units in a mix of unit sizes and tenures on an accessible brownfield site, positively contributing to the regional and borough-wide housing targets. A balanced and integrated mix of new homes will be provided to support a mixed and balanced community, which will also include a significant contribution of family-sized affordable units where there is the greatest need.
- 6.14 It is therefore considered that the Proposed Development compiles with all levels of policy with regards to the delivery of new homes, which should be afforded significant weight by LBW as a key public benefit.

Affordable Housing

- 6.15 With regards to affordable housing, the NPPF outlines the need to create mixed and balanced communities. Paragraph 62 requires planning policies to specify the type of affordable housing required and expects it to be met on Site.
- 6.16 Policy H4 of the London Plan sets a strategic target for 50% of all new homes delivered across London to be genuinely affordable. Part A(1) of Policy H4 goes on to state amongst other things that major developments which trigger affordable housing are required to provide affordable housing through the 'threshold approach' to viability. London Plan Policy H5 sets out the Mayor's threshold approach to affordable housing. The Policy stipulates that the threshold level of affordable housing on gross residential development is initially set at a minimum of 35%. To follow the Fast Track Route of the threshold approach, applications must meet the following criteria:
1. meet or exceed the relevant threshold level of affordable housing on site without public subsidy;
 2. be consistent with the relevant tenure split (as addressed below);
 3. meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor where relevant; and
 4. demonstrate that they have taken account of the strategic 50% target in Policy H4 and have sought grant to increase the level of affordable housing.



- 6.17 The Proposed Development will deliver 50% affordable housing, calculated on a habitable room basis, far exceeding the threshold to allow the Application to progress via the Fast Track Route, thereby not requiring the submission of any financial viability information.
- 6.18 In addition to the above, London Plan Policy H6 requires the following split of affordable products to be applied to residential development:
1. a minimum of 30% low cost rented homes, as either London Affordable Rent or Social Rent;
 2. a minimum of 30% intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared ownership;
 3. the remaining 40% to be determined by the borough as low cost rented homes or intermediate products based on identified need.
- 6.19 In addition to the tenure mix requirements set out in London Plan Policy H6, LBW Local Plan Policy LP23 states that LBW will require an affordable housing tenure split of at least 50% low-cost rent products, with a balance other intermediate product.
- 6.20 In response to the above requirements, the 50% of affordable provision to be delivered by the Proposed Development will comprise 100% social rented units, significantly exceeding the 50% social rented requirement set out in Policy LP23.
- 6.21 The proposed affordable housing will include a broad range of unit types and sizes (as detailed in Section 4.0 of this Planning Statement), which has been informed through engagement with LBW's Occupational Health Officer and has had regard to the requirements of Local Plan Policy LP24, which sets out LBW's expectations with regards to unit mix (the policy does also acknowledge that unit mix requirements will be considered on a site by site basis). Further details of the proposed affordable housing offer are set out in the Affordable Housing Statement, prepared by DP9, which is included at Appendix 2 of this Planning Statement.
- 6.22 In conclusion, the Proposed Development will comply with the NPPF, London Plan Policy H4 and LBW Policies LP23 and LP24. The overprovision of social rented units also represents a significant public benefit of the Proposed Development which should be afforded very significant weight.

Principle of Community Use



- 6.23 With regards to the provision of community facilities, Paragraph 97 of the NPPF states that planning policies and decisions should plan positively for the provision and use of shared spaces, community facilities to provide the social, recreational and cultural facilities and services the community needs.
- 6.24 Policy GG1 of the London Plan seeks to provide good quality community spaces, services, amenities and infrastructure that accommodate, encourage and strengthen communities. Additionally, Local Plan Policy LP17 states that social and community facilities and services should be provided where a lack of capacity has been identified in existing infrastructure.
- 6.25 The Proposed Development will include the delivery of a purpose-built community space (274sqm) at ground floor level, which was introduced to the proposals following initial pre-application engagement with the local community. The Applicant continues to engage with local charities with the aim to identifying and accommodating a suitable tenant to occupy and manage the space, which would be subject to peppercorn rent levels, secured by legal agreement. To date, three local charities have expressed interest in the space.
- 6.26 It is therefore considered that the proposed community space would comply with the requirements of the NPPF, London Plan Policies GG1 and GG6 and Local Plan Policy, and should therefore be strongly supported.

Reduction in Employment Floorspace

- 6.27 Chapter 6 of the NPPF sets out a presumption in favour of creating conditions to help build a strong, competitive economy, with Paragraph 85 stating that 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.
- 6.28 London Plan Policy E1 states that the scope for the re-use of otherwise surplus large office spaces for smaller office units should be explored, and that the redevelopment, intensification and change of use of surplus office space to other uses is supported.
- 6.29 In relation to Wandsworth's Riverside where the Site is located, Local Plan Policy PM9 states that existing economic floorspace within, *inter alia*, Focal Points of Activity (where the Site is located) should be protected in accordance with Policy LP33. However, it is important to highlight that Local Plan Policy LP33 does not specifically reference designated Focal Points of Activity as locations where existing employment floorspace will be protected, and therefore, the policy protection which seeks to restrict the loss of office floorspace under Policy LP33 does not apply in this instance.



- 6.30 Notwithstanding this point, the Application is supported by marketing evidence which demonstrates that the employment floorspace within the existing building has been marketed since April 2021. In the majority of instances, potential tenants have discounted the floorspace due to the lack of quality of the space and lack of general amenities nearby. At present, only 7% of the building is leased at commercial office rates, whilst the remaining floorspace is either vacant or let on non-commercial terms to cover rates, utilities and service charges only. As such, it is considered to be surplus to requirements.
- 6.31 The Proposed Development includes the provision of 535 sqm (GIA) of employment floorspace, which will be delivered as affordable workspace in its entirety (secured by legal agreement), and of significantly greater quality than the existing office. The proposed floorspace will be flexible and adaptable, ensuring it is suitable for a wider range of tenants, including start-ups and SMEs. The final occupants will be agreed through consultation with LBW in accordance with the aspirations of the Local Plan and LBW's vision for the 'Wandsworth's Riverside' area.
- 6.32 In light of the above, the commercial elements of the Proposed Development are entirely in accordance with the provisions set out in the NPPF, London Plan Policy GG1 and GG2 as well as Local Plan Policies LP33, LP37 and LP38.

Principle of Restaurant Use

- 6.33 Chapter 6 of the NPPF sets out a presumption in favour of creating conditions to help build a strong, competitive economy. This is reflected in London Plan Policy GG1, which seeks to build strong and inclusive communities, stating that development must provide access to good quality services and amenities that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation. The policy adds that development must plan for places that provide important opportunities for face-to-face contact and social interaction during the daytime, evening and night-time.
- 6.34 The Proposed Development includes the provision of a small restaurant space at ground floor level which will extend to 189 sqm (GIA). The proposed restaurant has been designed to activate the ground floor and enliven the public realm adjacent to the Thames Path. Not only will the restaurant serve future residents of the scheme, it will also be of benefit to the local community and wider public.
- 6.35 It is noted that the Site is not within a designated town centre and as such the proposal to incorporate commercial space must be assessed against the requirements of Policy



LP43. Local Plan Policy LP43 sets out that development proposals for town centre uses, including extensions to existing retail and leisure developments of more than 200sqm (gross), that are located outside of the borough's Town and Local Centres or the Important Local Parades ('out-of-centre'), will not be permitted unless they have been clearly justified. As the proposed restaurant unit is under the 200sqm threshold, it is considered acceptable in this instance.

- 6.36 Given the scale of the proposed restaurant, which will enable the delivery of a rich mix of uses within the Proposed Development, it is considered that the use would contribute positively to the local area and would not undermine the vitality and viability of nearby town centres. As such, it is considered that the proposed restaurant is entirely in accordance with the provisions set out in the NPPF, London Plan Policy GG1 and GG2 as well as Local Policies LP43.

Residential Quality

- 6.37 Policy D6 of the London Plan sets out the Mayor's requirements in relation to residential standards and minimum space requirements for both unit sizes and outdoor amenity space requirements. The Mayor's Housing Design Standards LPG, adopted in June 2023, provides further detail and guidance with regards to ensuring the delivery of high quality homes in London. Local Policy LP27 broadly aligns with the London Plan policy and guidance with regards to residential standards.
- 6.38 With regards to play space, London Plan Policy S4 encourages opportunities to increase play and informal recreation, incorporating accessible play for all ages, recommending 10sqm of play space per child, as detailed in the Mayor's Providing for Children and Young People's Play and informal Recreation SPG, adopted in 2012. Similarly, Local Plan Policy LP19 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. The policy goes on to note that a financial contribution may be made where onsite provision of play space would not be feasible or appropriate.
- 6.39 This section should be read in conjunction with the Design and Access Statement and Architectural plans, prepared by Farrells. In short, the Proposed Development has been informed through extensive engagement with LBW, including LBW's Occupational Health Officer, to ensure all residential units provide a very high standard of residential accommodation. The key points have been summarised below.
- All units have been designed to meet or exceed the minimum space standards;



- All units will benefit from policy-compliant private amenity space, accessed directly from the living room, as either a garden, balcony or roof terrace;
- All residents (regardless of tenure) will benefit from high-quality internal communal amenity space, equitable between private and affordable tenures;
- Of the 110 residential units proposed, 81 units meet the recently adopted GLA guidance with regards to dual aspect (74%), representing a high proportion of the proposed units, particularly given the Site's dense urban location. In addition, there are no single aspect north facing units;
- As set out in the supporting Internal Daylight and Sunlight Assessment, prepared by GIA, 97% out of a total of 273 habitable rooms tested across the Proposed Development achieve the minimum levels of Median Daylight Illuminance (MDI);
- For sunlight, all of the tested dwellings will have at least one habitable room achieving 1.5 hours of sunlight on the 21st March;
- 90% of all units are designed to be Part M4(2) compliant (accessible and adaptable dwellings), whilst the remaining 10% (14 units) are designed to be Part M4(3) compliant, incorporating all the space requirements necessary for wheelchair user dwellings;
- The Proposed Development will include the provision of 231.5sqm of play space at podium level serving the affordable housing element. The shortfall for the private housing and older age groups will be addressed through a financial contribution, in line with Local Plan Policy LP19.

6.40 Having regard to the above, the Proposed Development will deliver homes of the highest quality for all tenures in a unique riverside location which meet, and where possible, exceed the requirements and standards set out in London Plan and Local Plan policy and guidance. The Proposed Development is therefore considered acceptable in this regard.

Principle of Tall Building

6.41 The Proposed Development is the provision of a 28-storey building (plus ground and basement levels, which is considered a tall building by both LBW and the GLA.

6.42 London Plan Policy D9 sets London-wide policy in relation to the development of tall buildings. The policy is arranged into four parts (A-D) and requires boroughs to determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan.

6.43 Local Plan Policy LP4 represents the borough's strategic policy in relation to tall and mid-rise buildings, and seeks to respond to the requirements of Part B of Policy D9.



The policy defines tall buildings as well as providing criteria for assessment of tall building proposals in terms of visual impacts, spatial hierarchy, environmental impacts and design. It is noted that Map 23.31 in Appendix 2 of the Local Plan designates the Site as being identified for mid-rise buildings of up to 6 storeys (18m), which broadly reflects the height of the existing building.

- 6.44 In response to the above policy requirements, a Tall Building Impact Assessment has been prepared by DP9 (included in Appendix 3 of this Planning Statement) which provides a detailed assessment of the Proposed Development against the requirements of Policy D9 and Policy LP4.
- 6.45 In summary, the Assessment clearly demonstrates that the Proposed Development accords with the requirements of both the London Plan and LBW planning policy in respect of tall buildings, and the provision of a tall building in this location should therefore be supported.

Heritage and Townscape

- 6.46 Section 66 of the Planning (Listed Buildings and Conservation Area Act) 1990 requires that in granting planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 6.47 The NPPF establishes national level policy on the conservation and preservation of the historic environment. Paragraph 200 requires applicants to describe the significance of any heritage assets affected, including any contribution made by their setting. Paragraph 203 further states that the desirability of new development should make a positive contribution to both local character and distinctiveness.
- 6.48 Paragraph 205 provides that 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. It emphasises that the weight given to an asset's conservation should be proportionate to its significance, and that clear and convincing justification will be required for loss and harm to heritage assets.
- 6.49 Under Paragraph 212 of the NPPF, when considering the impact of a proposed development on the significance of a designated heritage asset, LPAs should look for opportunities for new development in Conservation Areas and the setting of heritage assets to enhance or better reveal their significance and proposals that preserve or better reveal the significance of heritage assets should be treated favourably.



- 6.50 The London Plan promotes development of the highest architectural quality. London Plan Policy D9 states that proposals should take account of and avoid harm to the significance of London's heritage, and buildings should positively contribute to the character of the area. Part C of London Plan Policy HC1 states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.
- 6.51 At local level, Local Plan LP3 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.
- 6.52 Central to the assessment of the impact of the Proposed Development on relevant heritage assets is Paragraph 208 of the NPPF. Where harm is caused to a heritage asset, the NPPF requires decision makers to determine whether the harm is substantial, or less than substantial. If the harm is deemed to be less than substantial, Paragraph 208 of the NPPF requires that harm to be weighed against the public benefits of the proposals.
- 6.53 The Application is supported by a Heritage, Townscape and Visual Impact Assessment ('HTVIA'), prepared by Montagu Evans. The HTVIA notes that whilst the Proposed Development does not have any direct impacts on heritage assets, there are heritage assets in the wider area, and the HTVIA considers the impact of the Proposed Development upon their setting and the contribution of these assets. The HTVIA concludes that the Proposed Development does not give rise to any adverse effects on the heritage assets in the study area, whilst the architectural qualities of the Proposed Development are considered to demonstrably improve the appearance of the townscape.
- 6.54 As noted in the HTVIA, if harm was to be found, it would be less than substantial and at the very low end of that scale. It is our view that any harm identified would be far outweighed by the plethora of significant economic, social and environmental public benefits of the Proposed Development, which have been summarised in Section 8.0 of this Planning Statement. In addition, the Proposed Development will be of the highest architectural quality, positivity responding to the surrounding context.
- 6.55 For these reasons, the Proposed Development is considered to be in accordance with national, regional and local policies and guidance in respect of design, heritage and conservation.



Landscaping and Public Realm

- 6.56 Paragraph 102 of the NPPF states that access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities and can deliver wider benefits for nature and support efforts to address climate change. NPPF Paragraph 135 requires developments to 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.
- 6.57 With regards to trees, Paragraph 136 acknowledges the important contribution which trees make to the character and quality of urban environments, and can also help mitigate and adapt to climate change. It further states that planning policies and decisions should ensure that new streets are tree-lined.
- 6.58 Within the London Plan, Policy G4 promotes the creation of new areas of publicly accessible open space, particularly green space, ensuring that future open space needs are planned for, especially in areas with the potential for substantial change. London Plan Policy D8 requires development proposals to encourage and explore opportunities to create new public realm where appropriate. Proposals should ensure the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain. Landscape treatment, planting, street furniture and surface materials should be of good quality, fit-for-purpose, durable and sustainable.
- 6.59 Regarding ecology and biodiversity enhancements, London Plan Policy G5 addresses Urban Greening Factor requirements. It states that major developments of predominantly residential use should achieve an urban greening factor of 0.4. Part D of London Plan Policy G6 encourages developments to manage impacts on biodiversity and aim to secure net biodiversity gain. Policy G7 of the London Plan seeks to retain existing trees wherever possible and encourages the planting of additional trees in new developments.
- 6.60 At present, despite its prominent location adjacent to the Thames Path, the Site suffers from a very poor public realm offer resulting from inadequate pedestrian and cycle links and extensive inactive frontage. In response, the proposed landscaping and public realm strategy forms a key component, and one of the primary public benefits, of the Proposed Development. The proposals seek to transform this part of the Thames Path through a provision of a generous and accessible public space adjacent to the River, with clear and legible routes which link the Site to the existing Thames



Path and along Battersea Bridge Road. The proposed landscape design focuses on improving functionality of the Thames Path whilst providing activity and interest for the local community and wider public. This includes an opportunity for public art developed in collaboration with students of the Royal College of Art.

- 6.61 The proposed public realm will benefit from thoughtfully designed hard and soft landscaping, tree planting, lighting and street furniture, creating a generous and accessible public space where members of the public can dwell and relax, whilst benefitting from enhanced pedestrian and cycle routes. The proposed use of materiality and choice of planting will be both contextual and durable, ensuring the proposals enhance the surrounding area and respond positively to the existing streetscape and public realm.
- 6.62 The proposed landscape strategy will deliver a 39.24% increase biodiversity net gain, an Urban Greening Factor score of 0.40, and a net uplift of 20 trees, exceeding the policy requirements set out in the London Plan and LBW Local Plan.
- 6.63 Overall, it is considered that the delivery of these public realm and landscape improvements is strongly supported in planning policy terms and should therefore be encouraged by LBW.

Energy and Sustainability

- 6.64 The provision of sustainable development is a key principle of the NPPF, with Chapter 14 requiring the planning process to support the transition to a low carbon future.
- 6.65 Policy SI2 of the London Plan states that major development should be net zero-carbon, reducing greenhouse gas emissions in operation and minimising energy demand in accordance with an energy hierarchy which requires development to be lean (use less energy and manage demand during operation); be clean (exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly); be green (maximise opportunities for renewable energy by producing, storing and using renewable energy on-site); and, be seen (monitor, verify and report on energy performance).
- 6.66 Policy SI 2 goes on to state that major developments must achieve a minimum on-site reduction of at least 35% beyond Building Regulations 2013, with 10% achieved through energy efficiency measures for residential development and 15% for non-residential. Any shortfall against 100% should be provided in agreement with the



borough, either through a cash in lieu contribution to the borough's carbon offset fund or an off-site provided that an alternative proposal is identified and delivery is certain.

- 6.67 London Plan Policy SI 4 states that major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with a cooling hierarchy that seeks (in order of priority) to reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation and the provision of green infrastructure; minimise internal heat generation through energy efficient design; manage the heat within the building through exposed internal thermal mass and high ceilings; provide passive ventilation; provide mechanical ventilation; and, provide active cooling systems.
- 6.68 The LBW Local Plan sets out several energy-related requirements which generally align to the requirements of the London Plan. In addition to these requirements, LBW Local Plan Policy LP10 seeks that any non-residential buildings over 100 sqm meet BREEAM 'Outstanding' standard, unless it can be demonstrated that this would not be technically feasible.
- 6.69 The Application is supported by a host of documents which outline the Applicant's ambitions to deliver a genuinely sustainable development which exceeds the requirements of the London Plan and LBW Local Plan. The Energy Statement sets out the proposed strategy for reducing the energy consumption of the Proposed Development, utilising low carbon and renewable energy sources, reducing cooling demands and maintaining comfortable conditions for residents and building users.
- 6.70 Figure 7 of the Energy Statement demonstrates that the Proposed Development meets and significantly exceeds the GLA and LBW total on-site target improvements over Part L 2021 for the domestic element. The Proposed Development will achieve a 65% carbon emissions saving and ensuring an improvement above and meeting the 35% improvement target over Part L 2021.
- 6.71 In summary, the Proposed Development will meet the relevant policy standards set out at national, regional and local level, and should therefore be supported by LBW.

Transport

- 6.72 This Section should be read in conjunction with the Transport Assessment (and its supporting documentation), prepared by Velocity, which is submitted in support of the Application and provides a comprehensive review of the Proposed Development and a robust assessment of the highways impacts.



- 6.73 Paragraph 108 of the NPPF states that development should assess the potential impacts of development on transport networks. Paragraph 115 goes on to state that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 6.74 London Plan Policy T2 Part D states that development proposals should demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with TfL guidance, reduce the dominance of vehicles on London's streets whether stationary or moving, and be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport. Policy T4 of the London Plan states that development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity. It goes on to state that development proposals should not increase road danger.
- 6.75 London Plan Policy T5 states that development proposals should help to remove barriers to cycling by securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located. London Plan Policy T6 requires development proposals as a starting point to be car free.
- 6.76 At local level, Local Plan Policy LP49 sets out LBW's strategic direction in relation to encouraging more sustainable methods of transport. Local Plan Policy LP50 describes transport related requirements for development based on their respective trip generation. Local Plan Policy LP51 sets out specific requirements for developments in relation to parking and servicing.
- 6.77 In response to the above policy context, one of the key objectives of the Proposed Development is to promote the use of sustainable transport methods and encourage car-free travel by reducing the proposed car parking provision and promoting sustainable travel through improved pedestrian links and the extensive provision of cycle parking. Each element of the proposed transport strategy is considered in turn below.



Public Transport and Active Travel

- 6.78 A key element of planning at a national and local level is to ensure that development is accessible by public transport, walking and cycling to a range of amenities. This includes food services, and healthcare. This analysis is presented in the ATZ section of the supporting Transport Assessment. The ATZ assessment demonstrates that the Site is located within suitable walking distance of local centres, public transport infrastructure, food outlets, healthcare facilities and places of worship. Based on the findings of the assessment, it is considered that the location of the Site is conducive to an 'active travel' lifestyle.

The Highway Network

- 6.79 The trip generation assessment shows that the Proposed Development will result in a decrease in total person trips, with a reduction of six two-way total person trips in the AM peak and five two-way total person trips in the PM peak. Overall, the transport impact of the Proposed Development cannot be considered severe and in accordance with policy within the NPPF the project should not be prevented on grounds of transport impacts.

Pedestrian and Cycle Network

- 6.80 A key benefit of the Proposed Development is the significant improvement of the pedestrian and cycling permeability along the Thames Path. The Proposed Development will prioritise pedestrians and cyclists through the series of public realm enhancements and will create new pedestrian and cycle routes, thereby improving connectivity and opening up the Site to integrate successfully with the wider area. This will enable the Proposed Development to promote the Healthy Streets philosophy by providing high quality, car-free alternatives in the form of enhanced walking and cycling routes.

Parking Provision

- 6.81 The development will include a total of 18 parking spaces, including five accessible parking spaces. Based on the provision of 110 dwellings, this equates to 16% of the total number of dwellings, and represents a significant decrease in the existing provision of 33 spaces. The parking spaces would be provided within a secure car park at basement level.



- 6.82 In accordance with Policy T6.1 of the London Plan, 20% of car parking spaces associated with the residential development would be provided with active charging facilities, with passive provision provided for all remaining car parking spaces.

Cycle Parking

- 6.83 Cycle parking for the Proposed Development will be provided in line with the London Plan standards for long stay and short stay spaces, with a variety of cycle parking provided to meet the needs of a wide range of needs. Long-stay cycle parking will be provided in a safe and secure store at basement level. Short stay cycle parking provision will be provided in publicly accessible locations within the public realm.

Deliveries and Servicing

- 6.84 A Delivery and Servicing Plan (DSP) prepared by Velocity accompanies the Application and sets out objectives and measures for how the impact of servicing activities within the Site will be minimised. In summary, the Site would be serviced from the basement, access via Hester Road, in line with the existing arrangements. It is envisaged that the Site would receive a maximum of 22 service/delivery vehicle arrivals a day.

Waste

- 6.85 A Waste Management Strategy has been submitted in support of the Application which confirms the overall impact of waste generation through the recycling of materials from the operational phase of the Proposed Development meets the requirements of relevant waste policy and follows applicable guidance.
- 6.86 In line with above, the Proposed Development will therefore comply with London Plan Policies T2, T4 and T5, Local Plan Policies LP49, LP50, LP51 and LP52 in respect of highways impacts, its contribution to the local pedestrian and cycle network, its provision of car and cycle parking, and its strategy for managing servicing and deliveries. It should therefore be considered acceptable in this respect.

Environmental Considerations

- 6.87 This section provides a summary of the comprehensive assessment of the environmental impacts which have been robustly assessed as part of the Application, specifically in relation to daylight and sunlight impacts, overshadowing impacts, noise impacts, microclimate, air quality and flood risk.



- 6.88 Paragraph 135 of the NPPF stipulates that planning policies and decisions should seek to create places with a high standard of amenity for existing and future users. National guidelines for daylight and sunlight issues are contained within the BRE guidelines. Regional and local policies refer to these guidelines as the accepted standard.
- 6.89 Paragraph 180 of the NPPF seeks to prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability, whilst Paragraph 191 of the NPPF states that planning decisions should aim to mitigate and reduce to a minimum potential adverse impact resulting from noise from new development.
- 6.90 Paragraph 192 states that development proposals should contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas (AQMA).
- 6.91 At regional level, London Plan Policy D9 relating to tall buildings states that wind, daylight, sunlight penetration and temperature conditions around buildings must be carefully considered and not compromise comfort and the enjoyment of open spaces around the building. Buildings should also not cause adverse reflected glare and should be designed to minimise light pollution from internal and external lighting.
- 6.92 Policy D13 of the London Plan relates to the 'Agent of Change' which places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development.
- 6.93 Policy SI1 of the London Plan seeks to improve air quality and for proposed development to be air quality neutral. Part 9 of London Plan Policy D3 requires proposals to help prevent or mitigate the impacts of poor air quality.
- 6.94 Policy SI13 of the London Plan states 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.
- 6.95 At a local level, Policies LP2, LP15 and LP27 of the Local Plan require adequate levels of daylight and sunlight for new residential developments, including amenity spaces. Moreover, these policies note that development should not result in an unacceptable material deterioration of the sunlight and daylight conditions of surrounding development and not resulting in an unacceptable level of overshadowing to surrounding open space and private outdoor space.



6.96 Local Plan Policy LP14 seeks to ensure that the local environmental impacts of all development proposals do not lead to detrimental effects on the health, safety and amenity of existing and new users or occupiers of the development site, or the surrounding land. These impacts include, but are not limited to, air pollution, noise and vibration, light pollution, odours and fumes, solar glare and solar dazzle, and land contamination.

Daylight, Sunlight and Overshadowing

6.97 This Section should be read in conjunction with the Daylight, Sunlight and Overshadowing Assessment, prepared by GIA.

6.98 With regard to daylight and sunlight impact on neighbours and upon successful completion of the Proposed Development will perform well and is considered to be in accordance with the relevant guidance, as summarised below:

- 524 of the 744 windows analysed (70%) will meet the BRE Guidelines for the Vertical Sky Component (VSC)
- 360 of the 431 rooms assessed (84%) will achieve BRE compliance in relation to the No Sky Line (NSL).
- 269 of the 280 rooms (96%) relevant for the Annual Probable Sunlight Hour (APSH) assessment will achieve BRE compliance in relation to sunlight.

6.99 In conclusion, whilst there are some noticeable changes in daylight, the greatest impacts are to bedrooms with main living spaces experiencing minor losses or retaining reasonable daylight values. In some instances, the building's existing architecture (balconies, external walkways, eaves etc) is having some effect on the receipt of daylight and sunlight.

6.100 In relation to overshadowing impact on neighbours, six areas surrounding the Site were tested and all but one of the six areas tested are minimally or not affected at all, and therefore, the overshadowing effects are BRE compliant.

6.101 When the impacts are viewed in these terms, the reductions in daylight and sunlight do not represent unacceptable harm and therefore accord with Policies D3, D6 and D9 of the London Plan 2021 and Policies LP2, LP15 and LP27 of the Local Plan. The Proposed Development is therefore acceptable in this regard.

Noise



- 6.102 The Application is supported by a Noise Impact Assessment, prepared by Temple, which presents an assessment of the noise and vibration effects of the Proposed Development. In particular, it considers potential effects predicted from construction activities and predicted noise levels from the completed and operational stage of the Proposed Development.
- 6.103 Baseline noise conditions have been established through a number of years of surveys, the results of which are appended to the Noise Impact Assessment. The report concludes that for the Proposed Development in isolation, potential noise and vibration effects arising during the construction activities are predicted to be not significant. Once the Proposed Development is complete and occupied, noise effects that are likely to arise as a result of changes in road traffic noise or building services plant that are part of the Proposed Development are also not significant.
- 6.104 It can therefore be concluded that the Proposed Development would not cause unacceptable noise disturbance and should be considered acceptable in the context of London Plan Policy SD13, D14 and Local Plan Policy LP14.

Wind

- 6.105 This section should be read in conjunction with the Wind Microclimate Assessment Report, prepared by GIA, which was informed by a wind tunnel test. The report concludes that, even in the absence of landscaping and mitigation measures, conditions would be suitable for the intended use for all off-site entrances, existing amenity, bus stops, the Thames Path and the proposed entrances to the restaurant and residential lobbies and the proposed.
- 6.106 With the proposed mitigation measures incorporated into the proposals, there are no wind safety risks around the Site or surrounding area, and all wind conditions are suitable for the intended use.



Air Quality

- 6.107 This section should be read in conjunction with the Air Quality Assessment, prepared by Temple, which is submitted in support of the Application and provides an assessment of the potential effects of the Proposed Development upon local air quality during the demolition and construction phase and the completed and operational development.
- 6.108 The assessment concludes that, for the construction phase, the residual effect of dust emissions following the implementation of appropriate environmental management controls would be negligible under most circumstances. Due to the high background level of pollutants, the residual effect on air quality of construction traffic and plant arising during the construction period would be negligible following mitigation. Following completion and during operation of the Proposed Development, the building will utilise a Mechanical Ventilation and Heat Recovery system (MVHR) within all homes to provide fresh air and ensure a more stable, comfortable environment is achieved for all future residents.
- 6.109 The building and transport related emissions associated with the Proposed Development are both below the relevant benchmarks. The Proposed Development therefore complies with the requirement that all new developments in London should be at least air quality neutral.

Flood Risk and Drainage

- 6.110 The Application is supported by a Flood Risk Assessment, prepared by YellowSub. The Site is predominantly in Flood Zone 3, indicating a high probability of fluvial/tidal flooding. However, the Flood Map for Planning also shows that the Site benefits from the presence of defences, and therefore the risk is a residual risk of breach of the Thames tidal defences. The EA breach modelling shows that flood levels of up to 5.76mAOD and flood depths of up to 1.63m could be expected in the event of a breach. The Site is also at risk of flooding due to a catastrophic failure of a water body, such as a reservoir, and is also at risk of groundwater flooding to property situated below ground level. The Site is at low risk of surface water flooding and sewer flooding.
- 6.111 The Site falls within the London Borough of Wandsworth's Area Strategy area 'Wandsworth's Riverside' and therefore is considered to have passed the Sequential Test. The Proposed Development will support the Borough's sustainability appraisal objectives of providing more housing for Wandsworth residents and providing employment space.



6.112 In order to ensure that the proposed development will be safe for the lifetime of the development, and does not increase flood risk elsewhere, the flood risk strategy introduces a number of measures to mitigate and manage flood risk, including the placement of 'More Vulnerable' uses such as residential accommodation above the ground floor in the proposed building, and preparation of a Sustainable Drainage Strategy for the Site that meets LBW requirements. It is therefore considered that the Proposed Development is acceptable in terms of flood risk and drainage.



7. Section 106 Draft Heads of Terms

7.1 This section sets out a summary of the draft Section 106 Heads of Terms for the Proposed Development and identifies where financial contributions could be made and where works 'in-kind' are proposed in lieu of payment. The draft Heads of Terms have been informed by the LBW Planning Obligations SPD, adopted October 2020.

- Affordable Workspace Management Plan – In-kind;
- Carbon Off-Setting Contribution – Financial Contribution;
- Community Space Management Plan – In-kind;
- Detailed Arts and Culture Action Plan – In-kind;
- Detailed Travel Plan – In-kind;
- Local Labour and Apprenticeships – In-kind;
- Play Space Contribution – Financial Contribution;
- Provision of Affordable Housing – In-kind;
- Provision of Affordable Workspace – In-kind;
- Provision of Community Space – In-kind;
- Public Realm Update and Highways Improvements – In-kind;
- Legal Costs and Monitoring Fee.

7.2 It is envisaged that discussions relating to the draft Heads of Terms will continue with LBW during the determination of the Application.



8. Summary and Conclusions

- 8.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the development plan unless other material considerations indicate otherwise. The Proposed Development has been subject to detailed assessment against national, regional and local planning policy and guidance and has been found to be in general accordance with the development plan and other material considerations.
- 8.2 The proposals have been subject to a comprehensive pre-application and post-submission consultation process involving engagement with LBW officers, key consultees, local residents, and amenity groups. Feedback received from these groups has been considered in the development of the final proposals, where practicable. Consultation will continue throughout the determination period.
- 8.3 In summary, the Proposed Development will deliver the following policy objectives and public benefits:
- Optimising development potential of an underutilised brownfield site in a key gateway location through the delivery of a sustainable, high-quality development of exceptional architectural quality.
 - Significant contribution towards borough's housing target through provision of 110 much needed homes in a range of unit sizes.
 - Provision of 50% of homes as affordable, 100% of which are social rented, exceeding the adopted LBW policy requirement.
 - Provision of high-quality, flexible workspace, all of which will be affordable and suitable for start-ups and SMEs, contributing positively to the surrounding creative quarter.
 - Provision of a free-to-access community space serving the local community which is to be provided to a charity on peppercorn lease.
 - Provision of a ground floor restaurant serving the local area and activating this section of the Thames Path.
 - Significant upgrades along the Thames Path, delivering multifunctional public realm and enhanced pedestrian and cycle routes.
 - An improved streetscape and pedestrian experience along Battersea Bridge Road.
 - Provision of a space for public artwork within the public realm, to be co-designed in collaboration with RCA students.
 - Delivery of an exemplar of sustainability, incorporating a range of net zero carbon measures in construction and operation.



- Promotion of sustainable travel options through the provision of extensive cycle facilities which will cater to all age groups and levels of mobility.
- Increased local expenditure each year resulting from the Proposed Development, including increase in jobs during construction and in operation.
- Significant Community Infrastructure Levy (CIL) and Section 106 contributions to assist in the provision of infrastructure improvements for the borough.

8.4 The impacts of the Proposed Development have been fully assessed in the supporting application documents, and mitigation measures have been identified where necessary and practicable. The Proposed Development is considered to be entirely appropriate for the Site and the surrounding area.

8.5 Overall, the Proposed Development would deliver an exemplary scheme which would have many regenerative and economic benefits for the borough and wider London. For the reasons outlined above, the Proposed Development is considered to be acceptable and should be granted planning permission.

Produced by: Tom Green

Approved by: David Shiels

Date: 16 October 2024



APPENDIX 1 – PLANNING HISTORY



Planning Reference	Description	Status/Decision
2000/2533	Siting and appearance of 8 proposed BT Cellnet equipment cabins (overall height 1.4m) in 3 banks.	Permission not required
2000/2925	Siting and appearance of proposed 0.4m diameter microwave dish and support pole.	Permission not required
2001/1069	Replacement of Vodafone cabin on roof with a larger cabin.	Permission not required
2002/0040	Installation of six wall-mounted antennae; four x 0.6m diameter transmission dishes, seven equipment cabins and associated equipment on the roof of the building.	Permission not required
2004/3608	Installation of telecommunications equipment on the roof of the building, comprising six panel antennae, four dish antennae, and an equipment cabinet.	Refuse
2007/0722	Alterations to entrance on Battersea Bridge Road frontage replacing revolving doors with swing doors, and construction of access ramp.	Approve with Conditions
2007/2527	Installation of one 0.2m diameter dish onto existing base station.	Permission not required
2011/1333	Installation of electronic communications apparatus.	Permission not required
2014/3806	Replacement of four existing plant units to the roof with three new units and associated acoustic screen.	Withdrawn
2014/4843	Replacement of four existing plant units to the roof with six new units and associated acoustic screen.	Approve with Conditions
2015/4534	Notification of intention to install a replacement rooftop cabinet.	Permission not required
2015/6079	Notification of intention to remove and replace two antennas, re-siting of three antennas and installation of one antenna, internal equipment	Permission not required



	within existing rooftop cabin and ancillary works.	
2018/1212	Determination as to whether prior approval is required for change of use from offices on first, second, third, fourth and fifth floors (Class B1(a)) to residential (Class C3) to provide 13 x 1-bedroom, 14 x 2-bedroom, 1 x 3-bedroom and 1 x 4-bedroom flats with associated basement bin/cycle storage and 23 parking spaces.	Prior Approval Given
2018/1311	Determination as to whether prior approval is required for change of use from offices on first, second, third and fourth floors (Class B1(a)) to residential (Class C3) to provide 13 x 1-bedroom, 14 x 2-bedroom and 1 x 3-bedroom flats with associated basement bin/cycle storage and 23 parking spaces.	Prior Approval Given
2018/5328	Notification of intention to install three antennas, one dish and equipment.	Permission not required
2019/2028	Communication Station 0096 On Roof Of The Glassmill Battersea Bridge Road London	Permission not required
2019/2336	Communication Station 5242 On Roof At The Glassmill Battersea Bridge Road	Permission not required
2020/3746	Telecommunication Station 0096 On Roof Of The Glassmill Street Furniture Battersea Bridge Road London	Approve No Conditions
2022/0592	Notification of intention to replace two antennas and two equipment cabinets with two new antennas, one new cabinet and associated ancillary equipment.	Permission not required
2023/4628	EIA Scoping Opinion in accordance with the Town and County Planning (Environmental Impact Assessment) Regulations 2017 (as amended) for	Withdrawn



	the comprehensive redevelopment including demolition of all existing structures; construction of a residential-led, mixed use development, providing up to 170 new homes, within a building height of up to 38 storeys plus ground floor; public realm and associated landscaping. THIS IS NOT A PLANNING APPLICATION.	
2024/0764	EIA Screening in accordance with requirements of Reg. 6(2) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) for the comprehensive redevelopment of the site including demolition of all existing structures; construction of a residential-led, mixed use development, providing up to 142 new homes, within a building height of up to ground and 33 storeys (34 storeys total); public realm and associated landscaping. [THIS IS NOT A PLANNING APPLICATION]	EIA not required
79/AN/2410	TEMPORARY HOARDING.	Granted – Conditional
79/N/2284	REDEVELOPMENT FOR OFFICES (OUTLINE) AT LAND BOUNDED BY BATTERSEA BRIDGE ROAD & HESTER ROAD.	Refusal
80/AN/2519	ERECTION OF 1 X 20FT X 26FT AND 1 X 10FT X 8FT ESTATE AGENTS BOARDS FOR 2 YEARS	Granted – Conditional
80/N/2129	ERECTION OF MIXED DEVELOPMENT COMPRISING OFFICES, 15 RESIDENTIAL UNITS AND A PUB/RESTAURANT. (NOT IMPLEMENTED)	Approve with Conditions
81/N/2441	Bridge House Wharf Battersea Bridge Road/Hester Road Wandsworth	Approve with Conditions



82/AN/2573	ILLUMINATED SIGN PLACED ON JIB OF CONSTRUCTION SITE TOWER CRANE FOR PERIOD OF 1 YEAR.	Granted – Conditional
82/N/2088	Details pursuant to condition C of permission dated 27/11/1981	Details – Granted
82/N/2499	Alterations and amendments to the detailed planning permission of 15/07/1982. (1) At roof level fourth floor to provide office and plant rooms.(2) To the elevations of the residential block.	Approve with Conditions
84/N/2105	SCULPTURAL GROUP DEPICTING 2 SWANS POSITIONED IN FRONT OF OFFICE BUILDING.	Approve with Conditions
87/N/2765	Externally illuminated sign fixed onto the roof level of the office block, facing the River Thames	Refuse
88/N/0307	Internally illuminated sign 6.3x1.4M reading "SKILLION" fixed onto the roof level of the office block facing the River Thames.	Withdrawn
95/N/0358	Installation of two internally illuminated estate agents signs at first floor level until 30/09/1997	Approved
95/N/0396	Siting and appearance of proposed telecommunications apparatus.	Approved
N/98/0159	Siting and appearance of three proposed Vodafone cross polar directional non-microwave antennae poles on side of lift motor room and removal of existing cabin and erection of a larger equipment cabin.	Approved
N/98/0315	Installation of a '48 sheet' Ultravision advertisement on the southern flank wall.	Refuse

APPENDIX 2 - AFFORDABLE HOUSING STATEMENT



ONE BATTERSEA BRIDGE

AFFORDABLE HOUSING STATEMENT

October 2024

Revision 02



One Battersea Bridge

Affordable Housing Statement

Revision 2

October 2024

DP9 Ltd

DP9 Ltd
100 Pall Mall
London
SW1Y 5NQ



Contents

1.	Introduction.....	3
2.	Planning Application Context	4
3.	Relevant Planning Policy.....	6
4.	Affordable Housing Proposals	9
5.	Summary and Conclusions	11



1. Introduction

- 1.1 This Affordable Housing Statement ('the Statement') has been prepared by DP9 Limited ('DP9') on behalf of Promontoria Battersea Limited ('the Applicant') in support of a revised application for full planning permission ('the Application') for the redevelopment of 1 Battersea Bridge, London SW11 3BZ ('the Site').
- 1.2 The purpose of this Statement is to set out details of the proposed affordable housing, including the amount and type that will be provided and to analyse this against relevant policy and other material planning considerations.
- 1.3 The Statement is structured as follows:
- Section 1 provides an introduction and scope;
 - Section 2 describes the Site and the Proposed Development;
 - Section 3 provides an overview of the planning policies relevant to the Application;
 - Section 4 sets out the proposed affordable housing offer;
 - Section 5 sets out the overall conclusions.
- 1.4 This Statement should be read in conjunction with the Planning Statement, also prepared by DP9, submitted in support of the Application.



2. Planning Application Context

- 2.1 This Section of the Statement provides an overview of the Site, its surrounding context and the Proposed Development.

The Application Site

- 2.2 The Site is situated to the east of Battersea Bridge Road in the London Borough of Wandsworth. The broadly rectangular Site comprises a part five-storey, part six-storey 1980s office building (Class E) with a basement level car park providing 33 car parking spaces, accessed from Hester Road from the south. The main access to the existing building is provided via a stepped entrance from Battersea Bridge Road
- 2.3 The Site is bounded to the north by the River Thames and Thames Path and to the south by Hester Road and the Royal College of Art Dyson Building. A six-storey residential building is situated to the immediate east, with the nine-storey Albion Riverside development situated beyond.
- 2.4 The surrounding area is mixed-use in character. The area to the east and west is predominantly residential, with the Royal College of Art campus and a range of retail uses located to the south. In the wider context, there are a number of well-established design practices.

Proposed Development

- 2.5 The Application relates to proposals for comprehensive redevelopment of the Site to provide a residential led mixed-use scheme comprising market and affordable housing, community, office and restaurant premises which will be delivered alongside landscaping and public realm improvements. The description of development ('the Proposed Development') is set out below:

'Comprehensive redevelopment of the site to include demolition of existing building and erection of a part 10 storey, part 28 storey building (plus ground floor and basement levels) comprising residential use (Class C3), office use (Class E), community use (Class F2), and a restaurant (Class E), with associated car parking, cycle parking, public realm, landscaping and other associated works.'

- 2.6 A breakdown of proposed floorspace is provided in the table below.



Use	Existing (GIA sqm)	Proposed (GIA sqm)
Residential (C3)	0	20,094
Community (Class F2)	0	274
Restaurant (Class E)	0	189
Office (Class E)	4877.1	535
Shared	0	349
Plant	0	365
Total	4877.1	21,807

- 2.7 In terms of the residential component of the development It is proposed to redevelop the Site to provide a residential-led scheme delivering 110 residential dwellings, with 56 market tenure units and 54 affordable units. See the table below for a breakdown of the proposed tenure split by habitable room:

Proposed Tenure Split			
Tenure	Units	Habitable Rooms	% by Habitable Room
Private	56	188	50
Affordable	54	188	50
Totals	110	376	100%



3. Relevant Planning Policy

3.1 This section provides an overview of the development plan and relevant policies relating the affordable housing provision.

National Planning Policy

3.2 National planning policy is set out in the form of the revised National Planning Policy Framework (NPPF), which was last amended in December 2023. At the heart of the NPPF is a presumption in favour of sustainable development (Paragraph 08), with three overarching objectives: economic, social and environmental. These are to be delivered through the preparation and implementation of plans and the application of the policies within the Framework.

3.3 Paragraph 64 states that planning policies should specify the type of affordable housing required and expect it to be met on-site unless off-site provision or an appropriate financial contribution in lieu can be robustly justified; and the agreed approach contributes to the objective of creating mixed and balanced communities.

3.4 Where major development involving the provision of housing is proposed, the NPPF (Paragraph 66) expects at least 10% of the total number of homes to be available for affordable home ownership unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups. Exemptions to this 10% requirement should also be made where the site or proposed development:

- a) provides solely for Build to Rent homes;
- b) provides specialist accommodation for a group of people with specific needs (such as purpose-built accommodation for the elderly or students);
- c) is proposed to be developed by people who wish to build their own homes; or
- d) is exclusively for affordable housing, an entry-level exception site or a rural exception site.

Development Plan

3.5 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) states that the determination of planning applications should be in accordance with the development plan, unless material considerations indicate otherwise. The adopted development plan for London Borough of Wandsworth ('LBW') currently comprises the following:

- London Plan (2021);
- Wandsworth Local Plan (2023).



- 3.6 Other material considerations include the National Planning Policy Framework (Amended December 2023), and the Planning Obligations SPD (published September 2020).

London Plan

- 3.7 The London Plan recognises that affordable housing is central to allowing Londoners of all means and backgrounds to play their part in community life. Providing a range of high quality, well designed, accessible homes is important to delivering 'Good Growth', ensuring that London remains a mixed and inclusive place in which people have a choice about where to live.
- 3.8 Policy GG4 seeks to ensure that more homes are delivered and supports the delivery of the strategic target of 50% of all new homes being genuinely affordable. Furthermore, there is emphasis to create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing.
- 3.9 The London Plan sets out the ten-year targets for net housing completions which each local planning authority should plan for. Boroughs must include these targets in their Development Plan documents. This sets a ten year housing target of 34,730 new homes for LBTH, or 3,473 per annum.
- 3.10 Policy H4 sets a strategic target of delivering 50% of all new homes delivered across London to be affordable. The affordable housing should be delivered as genuinely affordable housing. Footnote 29 states that the NPPF defines affordable housing for planning purposes. Within this broad definition, section 4.6.3 – 4.6.9 of the London Plan sets out the Mayor's preferred affordable housing tenures and other genuinely affordable housing products.
- 3.11 Paragraph 4.6.7 states that other affordable housing products may be acceptable if, as well as meeting the broad definition of affordable housing, they also meet the London Housing Strategy (dated 2018) definition of genuinely affordable housing and are considered by the borough to be genuinely affordable.
- 3.12 Policy H5 of the London Plan refers to what is known as the Viability Tested Route and Fast Track Route. To follow the Fast Track Route, applications must be all the following criteria:
- Meet or exceed the relevant threshold level of affordable housing on site without public subsidy;
 - Be consistent with the relevant tenure split;
 - Meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor where relevant; and
 - Demonstrate that they have taken account of the strategic 50% target in Policy H4 Delivering affordable housing and have sought grant to increase the level of affordable housing.



LBW Local Plan

- 3.13 LBW Local Plan Policy LP23, Part A states ‘The Council will seek to maximise the delivery of affordable housing in accordance with the London Plan. This will contribute to securing the Mayor’s strategic target of 50 per cent of all new homes to be affordable.’
- 3.14 Part B of LP23 further sets out that Development that creates 10 or more dwellings (gross) on individual sites must provide affordable housing on-site in accordance with the threshold approach set out in London Plan Policy H5.
- 3.15 Part C of Policy LP23 describes that LBW will require an affordable housing tenure split of at least 50% low-cost rent products, with a balance other intermediate products.
- 3.16 Part E of Policy LP23 sets out that in line with the threshold approach of London Plan Policy H5, applications not delivering the relevant minimum threshold must undergo the Viability Tested Route.
- 3.17 Part F of the Policy sets out that Where a Registered Provider is required for the management of affordable housing, it should be undertaken by a Preferred Partner of the Council, unless otherwise agreed by the Council.
- 3.18 Local Plan Policy LP24, which sets out LBW’s expectations with regards to unit mix (the policy does also acknowledge that unit mix requirements will be considered on a site by site basis).



4. Affordable Housing Proposals

4.1 This Section of the Statement provides an overview of the affordable housing proposals and analysis against relevant policy and other material planning considerations.

Overview of Affordable Housing Proposals

4.2 The proposed provision of 54 affordable residential units would represent 50% of the total number of residential units to be delivered on-site by habitable room, exceeding policy requirement. The Proposed Development includes a mix of one, two, three and four-bed units, suitable for a range of tenants and providing a significant contribution to the Borough's housing stock by meeting a clearly identified need for affordable housing.

Proposed Tenure Split

4.3 The proposed tenure split is described in the table below. The proposed tenure of 100% social rented significantly exceeds the policy requirements described in Policy LP23 which seeks a minimum of 35% affordable units, of which 50% should be low cost housing. The agreed tenure will be secured via section 106 agreement.

Proposed Affordable Tenure Split			
Tenure	No of units	Hab room counts	%
Social Rent	54	188	100
Totals	54	188	100%

Proposed Unit Mix

4.4 The proposed unit mix across tenures is described in the table below.

Unit Type	1B1P	1B2P	2B3P	2B4P	3B4P	3B5P	4B5P	Total
Market	4	0	0	26	0	24	2	56
Social Rent	0	9	15	3	9	10	8	54
Total	4	9	15	29	9	34	10	110

Proposed Design and Management

4.5 All proposed units will meet or exceed the design standards set out in the Development Plan, with all units meeting or exceeding the National Space Standards. Each unit will benefit from access to private and/or communal amenity space.

4.6 The proposed affordable housing will include a broad range of unit types and sizes, which has been informed through engagement with LBW's Occupational Health Officer and has had



regard to the requirements of Local Plan Policy LP24, which sets out LBW's expectations with regards to unit mix (the policy does also acknowledge that unit mix requirements will be considered on a site by site basis).

- 4.7 The affordable homes will be managed by a Registered Provider of Affordable Housing. All residents will have the ability to access the high-quality community amenities, including outdoor amenity space at podium level, children's play space and a gym. The Proposed Development has also been designed to ensure estate service charges are as affordable as possible, whilst allowing all residents the right to access onsite amenities.

Distribution of Proposed Units

- 4.8 All affordable units will be located within the podium element of the Proposed Development, located to the south of the Site and separate from the market units, ensuring both uses can be managed separately. Details of the proposed location and layout of each unit are provided in the supporting proposed floorplans, prepared by Farrells.



5. Summary and Conclusions

- 5.1 This Affordable Housing Statement has been prepared by DP9 to set out the proposed affordable housing provision to be delivered as part of the Proposed Development at 1 Battersea Bridge, London SW11 3BZ.
- 5.2 The Proposed Development will deliver up to 54 much-needed affordable residential units, which comprises 50% of the residential units to be delivered as part of the Proposed Development. The proposed tenure is 100% socially rented. Both the overall provision and tenure split significantly exceed the policy requirements described in Policy LP23
- 5.3 The Proposed Development will deliver a mix of one, two, three and four-bed units, suitable for a wide range of tenants, meeting a clearly identified housing need. The proposed rental levels of the units will be agreed with LBW during the determination of the Application, secured by section 106 agreement.
- 5.4 Overall, this Statement demonstrates the affordable housing proposals are appropriate for the Site in accordance with relevant planning policy and other material considerations. The affordable housing proposals should therefore be afforded very significant weight in the determination of the Application.

Appendix 3 - TALL BUILDING IMPACT ASSESSMENT



ONE BATTERSEA BRIDGE

TALL BUILDING IMPACT ASSESSMENT

October 2024

Revision 02



One Battersea Bridge

Tall Building Impact Assessment

Revision 2

October 2024

DP9 Ltd

Produced by DP9 Ltd for Promontoria Battersea Limited

DP9 Ltd
100 Pall Mall
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Contents

1. Introduction.....	3
2. Tall Building Policy Assessment.....	4
3. Conclusion	18



1. Introduction

1.1 This Tall Building Impact Assessment has been prepared by DP9 Limited ('DP9') on behalf of Promontoria Battersea Limited ('the Applicant') in support of an application for full planning permission ('the Application') for the redevelopment of 1 Battersea Bridge, London, SW11 2BZ ('the Site') located in the London Borough of Wandsworth ('LBW').

1.2 The proposals relate to the comprehensive redevelopment of the Site to provide new residential dwellings, restaurant, community space and affordable workspace, alongside the provision of high quality public realm and other associated works ('the Proposed Development'). The proposed description of development is set out below.

'Comprehensive redevelopment of the site to include demolition of existing building and erection of a part 10 storey, part 28 storey building (plus ground floor and basement levels) comprising residential use (Class C3), office use (Class E), community use (Class F2), and a restaurant (Class E), with associated car parking, cycle parking, public realm, landscaping and other associated works.'

1.3 The submission of this Application follows extensive engagement with a wide range of stakeholders and statutory consultees, including (but not limited to) LBW, the Greater London Authority ('GLA'), Historic England ('HE'), LBW's Design Review Panel, Transport for London ('TfL'), local ward councillors and local residents. The proposed design approach, particularly in relation to the tall building, has evolved through engagement with these key stakeholders.

1.4 The purpose of the Tall Building Impact Assessment is to assess the proposed provision of a tall building against the relevant planning policy and guidance at national, regional and local level. To this end, the document comprises the following:

- Section 1 provides the introduction and scope;
- Section 2 assesses the Proposed Development against relevant tall building policies;
- Section 3 provides a summary and overall conclusions.



2. Tall Building Policy Assessment

2.1 The Proposed Development includes the provision of a part 10 storey, part 28 storey building (plus ground floor and basement levels). This is considered a tall building by both LBW and the GLA. Therefore, the Proposed Development has been assessed against the relevant tall building policies, as summarised below:

- London Plan Policy D9
- LBW Local Plan Policy LP4

London Plan Policy D9

2.2 London Plan Policy D9 sets London-wide policy in relation to the development of tall buildings. The policy is arranged into four parts (A-D).

2.3 Part A states that boroughs should define what is considered a tall building in specific localities. It states that this should be based on local context but not less than 6 storeys or 18 metres.

2.4 Part B states that boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the plan. The policy requires boroughs to identify such locations on maps in Development Plans and seeks to ensure that tall buildings are only developed in locations identified in such locations.

2.5 Part C of the policy sets out a range of impacts which must be considered in assessing the acceptability of tall building proposals. These are considered in further detail below.

2.6 Finally, Part D states that free-to-enter publicly accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings where they should normally be located at the top of the building to afford wider views across London.

2.7 In relation to Part A of Policy D9, LBW defines a tall building as one that is 7 storeys or over, or 21 metres or more from the ground level to the top of the building (whichever is lower). The Proposed Development therefore exceeds this threshold, and the Application is considered to include a 'tall building' as per GLA and LBW definitions.



- 2.8 In relation to Part B of Policy D9, the Site is not located within an area designated as appropriate for a tall building. Therefore, the Proposed Development does not comply with Part B of the policy. However, it is important to highlight the Site's unique location on the river, immediately adjacent to Battersea Bridge which represents an important river crossing and key gateway into the borough. In addition, the Proposed Development seeks to optimise a vastly underutilised brownfield site to deliver much needed homes (50% of which are affordable), community floorspace and affordable workspace floorspace to meet clearly identified need. The Proposed Development would also be delivered alongside a plethora of significant public benefits. Therefore, when considered as a whole, it is considered that strong justification exists for the delivery of a tall building in this location.
- 2.9 This position is also supported by the recent clarifications on the interpretation of Policy D9 in the Master Brewer Case High Court Judgement (issued December 2021) which established that technical noncompliance with Part B does not preclude a proposal being supported in consideration of the planning balance, in other words, that it is not a 'gateway' to consideration of a proposal against Part C or the Development Plan as a whole.
- 2.10 In relation to Part C, proactive engagement has taken place with key stakeholders at pre-application stage, including the GLA, LBW and LBW's Design Review Panel, which has influenced the design of the Proposed Development. A full assessment of the Proposed Development against the criteria set out in Part C of Policy D9 has been provided below.

C) Development proposals should address the following impacts:

1) Visual impacts

a) The views of buildings from different distances -

i. Long-range views

ii. Mid-range views

iii. Immediate views from the surrounding streets

The visual impacts of the tall building have been considered from the earliest stages of the project. The form and architectural approach of the tall building has been developed to ensure a positive legibility and elegant appearance, and the materiality selected has been carefully considered to ensure its positive townscape contribution. A robust assessment of the townscape impacts is provided in the supporting Heritage, Townscape and Visual Impact Assessment (HTVIA) and subsequent addendum, both prepared by Montagu Evans, which conclude that the Proposed Development would demonstrably improve the appearance of the townscape.



b) Whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding:

The tall building is proposed to act as a metropolitan marker as the entry into the London Borough of Wandsworth across Battersea Bridge. The tall building is therefore expected to perform an important wayfinding role, particularly for those approaching the Site from Chelsea Embankment.

c) Architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan:

Architectural quality and materials are of an exemplary standard, which respond to the surrounding context and the Site's riverside location. The proposed architectural approach has been informed through engagement with the LBW Design Review Panel and LBW design officers, and feedback on the architectural approach and choice of materials has been broadly supportive.

d) Proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area:

The Application has considered impacts of the Proposed Development on the setting of a wide range of heritage assets. The HTVIA concludes that the Proposed Development does not give rise to any adverse effects on the heritage assets in the study area. If harm were to be found, it would be 'less than substantial', using the terminology set out at Paragraph 208 of the NPPF, and far outweighed by the wide variety of public benefits to be delivered by the scheme, as detailed in the supporting Planning Statement.

e) Buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it:

The Proposed Development is not within the setting of any World Heritage Sites.



f) Buildings near the River Thames, particularly in the Thames Policy Area, should protect and enhance the open quality of the river and the riverside public realm, including views, and not contribute to a canyon effect along the river:

The Site is located immediately adjacent to the River Thames and Thames Path. The Proposed Development seeks to deliver significant enhancements to the Thames Path, providing an increase in public realm by setting back the existing building line to create a larger, more accessible public space, allowing greater appreciation of the river itself.

e) Buildings should not cause adverse reflected glare:

It is not anticipated that the building will cause adverse reflected glare due to the proposed solid and void ratio associated with residential development.

f) Buildings should be designed to minimise light pollution from internal and external lighting:

It is considered that the impacts would be negligible as the proposed use is primarily residential and further details could be secured by planning condition.

2) The functional impacts

a) the internal and external design, including construction detailing, the building's materials and its emergency exit routes must ensure the safety of all occupants:

The Application is supported by a Fire Statement and addresses accessibility within the design and access statement, both of which demonstrate that the proposed design would ensure the safety of all occupants.

b) buildings should be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm. Servicing, maintenance and building management arrangements should be considered at the start of the design process:

The tall building has been designed to ensure seamless servicing and maintenance, as set out in the supporting transport assessment and addendum. The service lane to the east of the Site which is used for the current building will be utilised for the proposal ensuring no conflict.



c) entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding areas:

Entrances, access routes and ground floor uses are designed in order to ensure no unacceptable crowding or isolation.

d) it must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building:

The Application is supported by a detailed Transport Assessment and Addendum, both of which demonstrate that the Proposed Development will not have an adverse effect on the operation of the highway, public transport or pedestrian and cycle networks in the vicinity of the Site or on road safety.

e) jobs, services, facilities and economic activity that will be provided by the development and the regeneration potential this might provide should inform the design so it maximises the benefits these could bring to the area, and maximises the role of the development as a catalyst for further change in the area:

While the Proposed Development will provide some non-residential space and associated jobs, services, facilities and economic activity; it should be noted that the proposal is not within a town centre or other location where significant non-residential space would be encouraged. The Application is supported by a Health Impact Assessment which details the many benefits which would be delivered as part of the Proposed Development.

f) buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental effect on solar energy generation on adjoining buildings:

Initial discussions have been held with London Heliport to better understand any impact of the development on their operation. The application has been referred to the London Heliport as part of the public consultation process. It is anticipated that aviation specific requirements would be required by condition.



3) The environmental impacts

a) wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building:

Wind, daylight, sunlight penetration and temperature conditions around the building have been considered in detail and this information is summarised within the Planning Statement and associated technical documents. The Proposed Development is considered to be acceptable in terms of daylight, sunlight and overshadowing impacts.

The Application is also supported by a Wind and Microclimate Assessment and Technical Note, prepared by GIA, which conclude that all proposed wind conditions are acceptable.

b) Air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect street-level conditions:

The proposal is supported by both an air quality assessment as well as a Wind and Microclimate Assessment which consider this matter in detail. The proposal is acceptable in relation to air movement.

c) noise created by air movements around the building(s), servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the building:

Noise and vibration is addressed in the Noise Impact Assessment, which concluded that the Proposed Development is acceptable in terms of noise and vibration impacts.

4) cumulative impacts

a) the cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals and when developing plans for an area. Mitigation measures should be identified and designed into the building as integral features from the outset to avoid retro-fitting:



The submitted HTVIA addresses the cumulative impacts of the Proposed Development and there were no cumulative impacts identified.

- 2.11 With regards to Part (D), which seeks that free to enter publicly accessible areas are incorporated into tall buildings where appropriate, it is considered that the provision of a public-accessible rooftop is not appropriate in this instance, given potential safety and security issues relating to the provision of such public access. Instead, the Proposed Development is supported by the provision of an extensive public realm offer which exceeds any policy requirements.

LBW Local Plan Policy LP4

- 2.12 Policy LP4 establishes tall and mid-rise building zones across the borough; with ‘tall’ buildings defined as 7-storeys or 21m (whichever is the lower) and ‘mid-rise’ (for 1 Battersea Bridge Road) defined as 5-storeys or 15m (whichever is the lower). This approach was formulated by LBW between the Regulation 18 and Regulation 19 versions (‘the Draft Plan’) of the adopted Local Plan.
- 2.13 LBW undertook its Regulation 18 consultation of the draft plan in early 2021. As a part of this consultation, the Site was located within an opportunity area for tall buildings and/or landmark buildings. In the submission version of the Draft Plan, the Site had been removed from the area earmarked for tall and/or landmark buildings and the Site placed within a midrise building zone.
- 2.14 Following the publication of the London Plan (post Reg 18 consultation), LBW considered the Regulation 18 consultation comments and the advice of the GLA and Historic England. LBW then produced an updated Urban Design Study which allowed for the consideration of setting maximum heights for locations acceptable for Tall Buildings.
- 2.15 The Inspector's Report on the Examination of the Wandsworth Local Plan dated 23 June 2023 sets out (paragraphs 109 – 119) that there has been consideration of the use to LP4 in prescribing building heights and that in order to be in conformity with the London Plan that there should be sufficient flexibility to undertake performance-based assessments of proposals on a case by case basis. The report goes on to state:

‘The modification (MM146) will allow a degree of flexibility and thus, providing opportunities for tall buildings where one can demonstrate other material considerations in support of a tall building beyond an identified tall building zone.’



2.16 In forming a view on the appropriateness of this Site and proposal for a tall building, it is relevant to refer to the pre-application response from LBW dated 09/11/2018 (Reference: WD\2018\ENQ\00812) the view of LBW as follows:

'A tall building in this location next to Battersea Bridge - a gateway to the borough - would act as a landmark and reference point. This location is therefore considered appropriate for a tall building'

2.17 In support of the exceptionality of the Site and the opportunity presented by the proposal in townscape terms, please refer to the tall building assessment below and HTVIA submitted in support of the proposal. More particularly, paragraph 9.8 of the THVIA summarises the exceptional case for a tall building in this location, noting:

- The Proposed Development stands at Battersea Bridge, a key arrival point that marks arrival in the Borough from Kensington and Chelsea and the north through;
- The proposed height is a result of local townscape studies and an assessment of the sensitivities of surrounding heritage assets, particularly the Chelsea Royal Hospital, Battersea Park, Albert Bridge, Battersea Bridge and conservation areas nearby;
- The Proposed Development is not near an existing group of tall buildings, but would establish a successful relationship with the taller elements nearby, particularly at Lots Road, Chelsea Waterfront, and Lombard Wharf. Together, these tall buildings would make a positive – and varied – contribution to London's skyline;
- The Proposed Development would not adversely impact on strategic or local views;
- Design excellence is achieved: The building is successfully sculpted and split into a clearly legible base, middle and top zone, using high quality, durable materials;
- The Proposed Development presents active frontages onto the surrounding streets that contribute to an animated streetscape along Battersea Bridge Road and the interface with the Thames Path, Hester Road and the Royal College of Art. An improved access point would be established from the Site to the Thames Path, providing improved connectivity for pedestrians and cyclists, planting, trees and a terrace from where to enjoy the views across the river.

2.18 Part B of LBW Local Plan Policy LP4 states that proposals for tall buildings will only be appropriate in tall building zones identified on tall building maps included at Appendix 2 to the Local Plan, where the development would not result in any adverse visual, functional, environmental and cumulative impacts. We note that Part C the policy states that the Council *'will seek to restrict'* proposals for tall buildings outside the



identified tall building zones. This is not an absolute prohibition on tall buildings being located outside of the tall building zones. We note that the Examination Inspector recommended modifications to the policy wording to change *'will not be permitted'* to *'will seek to restrict'* to allow *'a degree of flexibility and thus, providing opportunities for tall buildings where one can demonstrate other material considerations in support of a tall building beyond an identified tall building zone'* (para 116 of the Inspector's Report). He went on to say that such opportunities are likely to be extraordinary rather than ordinary. We submit that the case for a tall building in this key landmark location is extraordinary.

- 2.19 Part B of the policy continues, stating that planning applications for tall buildings will be assessed against the criteria set out in Parts C and D of the London Plan Policy D9 and those set out below as follows:

Visual Impacts

- 1. That the proposal respects and responds to key views and their associated corridors towards and from strategic landmarks and heritage assets across both the borough and neighbouring boroughs.***

The visual impacts of the tall building have been considered from the earliest stages of the project. The form and architectural approach of the tall building has been developed to ensure a positive legibility and elegant appearance, and the materiality selected has been carefully considered to ensure its positive townscape contribution. A robust assessment of the townscape impacts is provided in the supporting HTVIA and addendum, both of which conclude that the Proposed Development would demonstrably improve the appearance of the townscape.

- 2. The proposed location of the tall building(s) must avoid creating substantial visual interruptions in areas with otherwise very consistent building heights and/or roof lines.***

The location of the tall building will not create visual interruptions as the area does not have an 'otherwise very consistent building height and/or roof line'. In addition, the proposal is located in an area identified for buildings of scale – being identified for a mid-rise building.

- 3. Proposals should be designed to reflect and respond to an analysis of relevant key view corridors towards the site to ensure the location, form, detailing and prominence of the tall building(s) are appropriate within the wider context.***



A robust assessment of the townscape impacts is provided in the HTVIA and addendum, both of which conclude that the Proposed Development would demonstrably improve the appearance of the townscape. The views contained within the assessment were agreed with LBW through an extensive pre-application process and therefore are considered to address relevant view corridors.

- 4. *The design of the lower, middle and upper parts of any tall building should result in the creation of a visually coherent scheme both in terms of the building itself, how it relates to the surrounding area and how it would appear in any mid-range and long-range views.***

The proposed design has been developed through an extensive pre-application process and attendance at two rounds of review through the LBW Design Review Panel. The proposed building has been designed with a clear 'base', 'podium' and 'tower'; each of which have been designed to relate to their surrounding context and with regard to long, mid and short range views.

- 5. *Planning applications should be supported by graphic 3D modelling. The 3D modelling must incorporate any existing tall buildings or those where an extant planning permission is in place to ensure that the individual and cumulative impact of the proposal is fully assessed including in relation to its impact on the existing skyline.***

The relevant 3D model files are submitted in support of the Application.

- 6. *Development proposals affecting the setting and approaches of the Westminster World Heritage Site, will be required to address all criteria set out in Part B of Policy LP3.***

The proposal does not affect the setting or approach of the Westminster World Heritage Site.

Spatial Hierarchy

- 7. *The massing of any proposed tall buildings should be proportionate to the local environment, including when taking into consideration the width of publicly accessible areas adjacent to the proposed building(s) as well as the proximity to public open spaces, parks and watercourses, and should be designed so as not to create an overbearing impact having regard to its context.***



The massing of the proposed tall building has been designed to be proportionate to the local environment. The surrounding context to the site includes the River Thames and associated paths, a feature the scale of the Thames provides opportunities for other built form elements of a commensurate scale. Careful consideration has been given to the form and materiality of the building to ensure that it will sit comfortably in its surroundings. It is submitted that the proposal does not create an overbearing impact having regard to its context and is compliant with this element of the policy.

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

The proposed building is located adjacent to the Thames Path which is a publicly accessible pedestrian thoroughfare. A key focus of the design development of the proposal has been the relationship of the proposed building to the Thames Path and a package of public realm improvements associated with the proposal coming forward. The proposed public realm will provide a larger and more accessible public realm and greatly improve upon existing conditions.

Tall Buildings Near the River Thames Frontage

9. *Tall buildings should not result in the creation of development which would impede the outlook and/or amenity of occupiers of existing buildings or users of public spaces having regard to their relationship with the river frontage.*

By virtue of the location of the development, the proposal will not impede the outlook and/or amenity of occupiers of existing buildings or users of public spaces have regard to their relationship with the river frontage.

10. *Where appropriate, the massing of proposed tall buildings should take into account their landward facing orientation and provide sufficient articulation, including through devices such as a 'step down,' in order to provide an appropriate transition between the proposed building(s) and those of a lower height.*

The proposed development provides a podium and tower form with the podium toward the landward facing orientation. The podium will be 10 storeys in height above



ground level and provides a suitable transition from the Riverside corridor back towards the surrounding Albion Riverside and RCA buildings and beyond those to wider Battersea.

11. Where relevant any proposed tall building(s) should be set back from the Thames Path to ensure that it continues to provide a welcoming public route or where it would provide an opportunity to enhance its attractiveness and usability.

The existing building and relationship to the Thames Path is unattractive and performs poorly in terms of useability. The proposal will be a wholesale improvement over existing conditions in this respect. The proposed development increases the setback between the building line and the river over the existing condition. This increased setback has been meaningfully addressed through landscape design and will provide for greater pedestrian accessibility, planting and amenity for passers-by. The proposed public realm will successfully integrate the restaurant coming forward with the proposal to provide an active and vibrant placemaking experience.

Microclimate and Lighting

12. The design of any tall building should avoid including lighting features which adversely impact on the occupiers of surrounding buildings (particularly those in residential use), as well as on night-time vistas and panoramas and fauna.

Microclimate and lighting have been considered in detail this information is summarised within the Planning Statement and associated technical documents. It is anticipated that details of proposed lighting will be secured by planning condition to ensure that they do not adversely impact on the occupiers of surrounding buildings.

13. The design and glazing of any proposed tall building should take into account its use at night, minimise light spill that would result in light pollution and avoid creating unacceptable solar glare onto any publicly accessible areas or where it would have an adverse effect on the amenity of occupiers of adjoining buildings.

Given the residential nature of the building and the associated solid to void ratio required it is not anticipated that the development will give rise to any issues relating to light spill, light pollution or Solar Glare.

14. Building materials should be capable of ensuring that the proposals would not contribute to the urban heat island effect as a result of thermal radiation or the



release of anthropogenic (waste) heat. Regard should be had to Policy LP10 (Responding to the Climate Crisis).

The proposal is supported by an Energy Statement and Sustainability Strategy which consider the proposed building materials and their relationship to LP10 and the Climate Crisis. It is anticipated that final materials will be required to be agreed through the submission of further details in response to a condition on any consent issued.

15. Planning applications should be supported by a shade analysis that clearly demonstrates that any shadow created by a proposed tall building(s) would not give rise to solar gain such as to cause thermal discomfort for users of publicly accessible and private spaces.

The proposed development is accompanied by a Daylight, Sunlight and Overshadowing Assessment, prepared by GIA, which details any relevant shadowing caused by the building. With regard to shading, the proposal is considered to be acceptable.

Ground Floor Uses and Public Realm

16. Proposals for tall buildings should incorporate active frontages at ground floor. The main access to any proposed tall building should be located within a frontage facing a main street or publicly accessible area and should provide a safe, welcoming and clearly defined entrance.

The proposal incorporates a mix of active frontages at ground floor level which have been designed to encourage interaction between the public realm and the building. The primary entrance is located along Battersea Bridge Road and is a safe, welcoming and clearly defined entrance.

17. The lower sections of any tall building should provide for pedestrian weather protection (such as colonnades) along the main frontages of the building and should incorporate the use of high-quality materials and human-scale detailing that encourages social interaction and animates the ground floor external environment.

A colonnade has been included along the Battersea Bridge Road frontage, this will provide pedestrian weather protection. The design of the building, particularly the



base of the building, has considered human scale detailing and incorporates design features including visual links through the building which animate the development.

18. *Where ground floor non-residential uses are proposed, the public realm should be enhanced through the incorporation of public spaces such as plazas at their entrance unless it can be clearly demonstrated that such an approach would not be appropriate.*

Where ground floor non-residential uses are proposed, the public realm has been enhanced through the incorporation of public spaces. Most notably, the Thames Path adjacent the development will be improved and provide for incidental play, sculpture in association with the RCA and interaction between the proposed restaurant.

19. *Sites which have existing through routes or are capable of accommodating through routes must ensure that such routes are maintained or provided to support ease of movement and connectivity.*

The existing through route, the Thames Path, is proposed to be upgraded as part of the proposal. Wider accessibility along Battersea Bridge Road is also improved as part of the proposal.

2.20 Having regard to the above, it has been clearly demonstrated that the Proposed Development accords with the requirements of both the London Plan and LBW planning policy in respect of tall buildings, and the provision of a tall building in this location should therefore be supported.



3. Conclusion

- 3.1 The Proposed Development, particularly the proposed tall building, has been subject to a comprehensive consultation process involving engagement with LBW officers, key consultees, local residents, and amenity groups. Feedback received from these groups has been considered in the development of the final proposals, where practicable.
- 3.2 It is relevant to note that the Site has, until very recently, been deemed appropriate in policy terms for the location of a tall building.
- 3.3 Even though there has been a policy change, the LBW Local Plan Policy LP4 does not impose a prohibition against tall buildings being located outside a tall building zone. Policy LP4 allows flexibility where material considerations can be demonstrated to support a tall building.
- 3.4 Further, recent case law ¹(which has not been overtuned) has confirmed that London Plan Policy D9 does not provide a veto to tall buildings where they are to be located outside of a borough's tall building zone. A tall building proposal can still be supported if it satisfies the requirements of D9.C even if it is to be located outside a tall building zone. D9.B is not a gateway or pre-requisite for satisfaction of D9.C. The policy is not written in that way and the courts have confirmed that. Rather, the court held that Policy D9 is to be interpreted in a way where a tall building can still be supported notwithstanding it does not fall within a tall building zone.
- 3.5 Having regard to Section 2.0 of this Study, it has been clearly demonstrated that the Proposed Development accords with the requirements of both the London Plan and LBW planning policy in respect of tall buildings, and the provision of a tall building should therefore be supported.
- 3.6 The impacts of the proposed tall building have been fully assessed in the supporting documentation and mitigation measures have been identified where necessary and practicable. The proposed tall building is considered to be entirely appropriate for the Site and the surrounding area.
- 3.7 Overall, the proposed tall building, coupled with the wider Proposed Development, would deliver an exemplary scheme which would have many regenerative and economic benefits for the borough and wider London. For the reasons outlined above, the proposed tall building is considered to be acceptable.

¹ R (London Borough of Hillingdon) v Mayor of London [2021]