



## Planning Appeal relating to 1 Battersea Bridge Road, London, SW11 3BZ

Application 2024/1322, Appeal reference number: 6002127

### Outline Statement of Case by the Consortium of Civic Societies and amenity groups led by the Battersea Society

1. The consortium submitting this statement comprises the Battersea Society, the Chelsea Society, the Cheyne Walk Trust, the Friends of Battersea Park, the Putney Society and the Wandsworth Society. The members are formally-constituted civic societies and amenity groups, and details about each of them are provided at the end of this statement. Each of them submitted detailed objections to the planning application.
2. Our roles are to represent the interests of all who live and work in our areas of interest, and to conserve and enhance their unique characters. To that end, we often support high-quality developments that respect and enhance the urban environments in our areas. The current proposal does not meet that test. As representatives of our local communities, we have not in the last two decades seen such a strong negative reaction to a proposed development.
3. Our consortium therefore does not accept the arguments put forward by the Appellant's Statement of Case for overturning Wandsworth Council's refusal of Application 2024/1322. Rather, the consortium agrees with the Council's key reason for refusal, as repeated in its Statement of Case: that the proposal's excessive height and scale, its failure to take account of the spatial character of the area, and the surrounding built environment, makes it incompatible with policies set out in the NPPF dated December 2024 (in particular para 135), the London Plan (in particular policy D9), and the Local Plan (in particular policies PM9 and LP4 and the evidence base on which they are founded). We also note that at least until a Section 106 agreement is signed, there is no guarantee that the promised volume of affordable housing will actually be delivered.
4. Drawing on the unique experience of our local communities, we wish to raise issues beyond the Council's main reason for refusal, especially concerning
  - **the harm to heritage assets** surrounding the proposed building;
  - **the limited development capacity** of the site;
  - **the use of the whole footprint** of the building to be demolished;
  - the unique position of the site and the claimed **need for a metropolitan marker** building; and
  - **the limited improvements to the public realm.**

## **Heritage Assets**

5. Heritage will be a key part of our case against the development. The appellants acknowledge that the site is surrounded by a large number of listed buildings, parks and gardens; and more broadly, of conservation areas. In individual cases but also cumulatively, these heritage assets would suffer significant harm. We do not accept the conclusions of the two *Built Heritage, Townscape and Visual Impact Assessments* prepared for the appellants by Montagu Evans. The claim that “The Proposed Development does not give rise to any adverse effects on the heritage assets in the study area” (paragraph 11.7 of the assessment of the original proposal) is, we believe, demonstrably wrong.
6. We also believe that the assessments of the impact on heritage assets presented in the report by officers to Wandsworth Council’s Planning Applications Committee, and repeated in its Statement of Case, significantly understate the harm to settings of listed buildings, parks and gardens that will be caused by the proposed 96.6-metre-tall tower. The report fails to appreciate the unique quality of the riverside and surrounding conservation areas in Chelsea. This uniqueness relates partly to the number of Grade 1, Grade 2\* and Grade 2 listed buildings which are clustered in the area; but also to the special role which this part of the River Thames has played in London’s history.
7. From our community perspective we believe that some of the benefits – including community space, flexible office space and public realm - have also been given too much weight in seeking to balance harms and benefits. Hence we do not accept the report’s conclusion (paragraph 20.35), repeated in the Council’s *Statement of Case* (5.41), that the benefits of the proposed development – some of which we believe to be overstated - will balance the harms to the heritage. Nor do we agree with paragraph 10.37 of the Statement of Common Ground which restates that conclusion. We shall present evidence to support our case.

## **Limited development capacity**

8. The appellants admit that the site has ‘limited development capacity’ (DAS p.31). But instead of accepting the obvious limitations of a small site, the appellants argue that a building over 96 metres tall is required to “optimise the opportunity”. That is a logical absurdity. It amounts to an argument that on any site in Battersea or elsewhere, however small and thus with limited development capacity, a tower block should be built to ‘optimise the opportunity’. One of the purposes of the planning regime is to prevent such an absurd outcome.

## **Footprint of the existing building**

9. The over-development is exacerbated by the proposal to build on the whole footprint of the existing building, but to an unprecedented height. Utilising the whole footprint limits the

proposal’s ability to meet the requirements of policies relating to trees and landscaping, biodiversity and BNG, and urban greening, as well as those relating to enhancing the public realm (see below). At a fundamental level, the proposal takes no account of NPPF 135e, which requires that proposals should ‘optimise the potential of the site to sustain an appropriate *amount* (emphasis added) and mix of development’.

**Metropolitan marker**

10. The site is, as the appellants acknowledge, at a prominent location on a bend of the River Thames as it turns from a generally northerly to an easterly direction. The developers also claim (6.5 in the Statement of Case) that bridges along the River Thames are often signposted by tall to very tall developments, and that it would therefore be desirable to erect such a “Metropolitan Marker” at the foot of Battersea Bridge. But the claim is simply false: relatively few London bridges have tall or very tall marker buildings, and there is no need at all for one at the foot of Battersea Bridge. Rather the reverse: the location at the apex of the bend in the river means that the proposed tower would be especially prominent, and visible from afar. It therefore contravenes London Plan policy D9 C 1f. If it were to be built, it could also limit LPAs’ ability to resist further tall buildings in the area.

**Public Realm**

11. The claim that the development will make significant improvements to the public realm is overstated. We agree with the GLA’s assessment that – largely because the proposed building has not been set back within the current building’s footprint - the amount of public realm being provided is insufficient to provide the public benefit that would be expected for a building of this scale. The improvements to the Thames Path are minimal, and they do not nearly meet the Local Plan Policy LP52, which requires that the path should be three metres wide, and accesses linking the Path to the surrounding area six metres wide. A significant opportunity would be lost if the proposal were to go ahead.

**Conclusion**

12. We shall present evidence on these and other issues that may arise in order to support but also enhance and amplify the case for refusal set out by Wandsworth Council. Our standpoint will be as representatives of the local communities that would be affected by the proposed building.

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**Members of the consortium**

**The Battersea Society** is a registered charity no. 1103560 with some 500 household members. Details of its constitution and its activities can be found on the website <https://www.batterseasociety.org.uk/>, and via the Charity Commission

**The Chelsea Society** is a registered charity no. 276264. Details of its constitution and its activities can be found on the website <https://chelseasociety.org.uk/> and via the Charity Commission.

**The Cheyne Walk Trust** was formed in 1975 and has some 200 members. Details of its constitution and its activities can be found on the website <https://cheynewalktrust.org/>

**The Friends of Battersea Park** is a registered charity no. 802905, with over 700 members. Details of its constitution and its activities can be found on the website <https://friendsofbatterseapark.org/> and via the Charity Commission.

**The Putney Society** was founded in 1959. Details of its constitution and its activities can be found on the website <https://www.putneysociety.org.uk/>

**The Wandsworth Society** is a registered charity no. 263737, with some 400 members. Details of its constitution and its activities can be found on the website <https://wandsworthsociety.org/> and via the Charity Commission