

## Comment on a planning application

### Application Details

**Application:** 2024/1322

**Address:** The Glassmill 1 Battersea Bridge Road SW11 3BZ

**Proposal:** Comprehensive redevelopment of the site to include demolition of existing building and erection of a part 9 storey, part 33 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.

### Comments Made By

**Name:** Mr. Fabio Filippi

**Address:** D 54 ALBION RIVERSIDE 8 HESTER ROAD LONDON SW11 4AW

### Comments

**Type of comment:** Make a general observation

**Comment:** I am in favour of a new development but 34 floors is way too high ... it should be no more than 25 maximum.  
Thanks

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### Comments Made By

**Name:** Mrs. Margaret Manvell

**Address:** 9 HARTLAND ROAD BARROW-IN-FURNESS LA14 4EP

### Comments

**Type of comment:** Make a general observation

**Comment:** It seems as though it would be an eyesore, and could pose other problems

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### Comments Made By

**Name:** Dr. Edwin Mason

**Address:** FLAT H 7 LAMONT ROAD LONDON SW10 0HP

### Comments

**Type of comment:** Make a general observation

**Comment:** What an incredibly insensitive plan! Totally tone-deaf to the area and its very obvious negative impact to both the already excessive congestion of Battersea Bridge, and also of the aesthetics of the London river skyline. The designers and planners appear impervious to these realities! Focussed only on their own businesses and self-aggrandisement. The affordable housing "pitch" does not stand close inspection at all, the figures are warped. With less greed, and much more sympathy in all respects, a fair proportion of affordable housing could be achieved with a building a quarter of the height - and that would STILL be a bit higher than any other building for a 3 mile stretch along that part of the river banks.

**From:** laurence guillez <laurenceguillez@hotmail.com>  
**Sent:** 11 September 2024 11:42  
**To:** Planning Applications  
**Subject:** Re: Planning Comment

41 Taybridge rd  
SW11 5PR  
Laurence guillez  
+44 (0)7979938190

On 11 Sep 2024, at 10:43, Planning Applications  
<Wandsworthplanningapplications@richmondandwandsworth.gov.uk>  
wrote:

Official

Hi.  
What is your address so I can locate and remove.

**Best Regards**

<image001.png>

**Planning Support Team**

Environment and Community Services

Serving Richmond and Wandsworth Borough Councils

[www.richmond.gov.uk](http://www.richmond.gov.uk) and [www.wandsworth.gov.uk](http://www.wandsworth.gov.uk)

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**From:** laurence guillez <laurenceguillez@hotmail.com>

**Sent:** Tuesday, September 10, 2024 11:31 PM

**To:** Planning Applications

<Wandsworthplanningapplications@richmondandwandsworth.gov.uk>

**Subject:** Re: Planning Comment

You don't often get email from [laurenceguillez@hotmail.com](mailto:laurenceguillez@hotmail.com). [Learn why this is important](#)

Hello

This is a mistake

I know nothing about this development and comment

Please erase

Laurence guillez

+44 (0)7979938190

On 10 Sep 2024, at 17:29, Planning  
<[planning@wandsworth.gov.uk](mailto:planning@wandsworth.gov.uk)> wrote:

Dear Mx. Laurence Guillez,

Please find attached the comments you have submitted for this planning application.

Comments submitted will be available online within a couple of working hours. Please be aware that your name and address will be included with your comment when it is made available online whilst the application is under consideration, but your email address and telephone number will not. These will be available to the Planning Office.

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Wandsworth Council

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<FS646130865.pdf>

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### Comments Made By

**Name:** Ms. susan ekins

**Address:** 33 HERON HOUSE SEARLES CLOSE LONDON SW11 4RJ

### Comments

**Type of comment:** Make a general observation

**Comment:** Recent news releases indicate that some people have asked for support letters, posted by Rockwell and its associates in their names, should be removed, because their names had been wrongly used. and they were not in support. There is no sign of this. here. Is this going to happen?

**From:** Belton, Tony (Cllr)  
**Sent:** 11 November 2024 18:12  
**To:** Bedria Bedri; Planning Applications  
**Cc:** Hogg, Simon (Cllr); marsha.decordova@parliament.uk; Annan, Juliana (Cllr); Mcleod, Maurice (Cllr)  
**Subject:** Re: Objection to The Glassmill, 1 Battersea Bridge Road, SW11 3BZ (Ref: 2024/1322)

Official

Thank you for your very comprehensive email, which I have read with interest. You can be assured that I will take your concerns into account when considering the application. However, as the Chair of the Planning Applications Committee, I cannot declare a view on this, or any other application, until I have seen the official report and the officers' recommendations AND/OR heard the debate that may or may not happen in the committee. To do so would mean that I had "pre-determined" my view on the application and would, therefore, be subject to challenge in any subsequent appeal. In these circumstances you will understand that I can do no more than assure you that your comments will get due care and consideration.

Yours sincerely  
Cllr Tony Belton,

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**From:** Bedria Bedri [REDACTED]  
**Sent:** 11 October 2024 16:16  
**To:** Planning Applications <Wandsworthplanningapplications@richmondandwandsworth.gov.uk>  
**Cc:** Hogg, Simon (Cllr) <Cllr.S.Hogg@wandsworth.gov.uk>; marsha.decordova@parliament.uk <marsha.decordova@parliament.uk>; Annan, Juliana (Cllr) <Cllr.J.Annan@wandsworth.gov.uk>; Belton, Tony (Cllr) <Cllr.T.Belton@wandsworth.gov.uk>; Mcleod, Maurice (Cllr) <Cllr.M.McLeod@wandsworth.gov.uk>  
**Subject:** Objection to The Glassmill, 1 Battersea Bridge Road, SW11 3BZ (Ref: 2024/1322)

[REDACTED]

Dear Sir/Madam,

I am writing to object to Rockwell Property's planning application for the redevelopment of The Glassmill site at 1 Battersea Bridge Road SW11 3BZ, with planning reference 2024/1322.

I live at C26 Albion Riverside, 8 Hester Road, SW11 4AR, and I am deeply concerned about the proposals and how they will affect me and the local area. I am copying my

local elected representatives for their reference.

There are a number of reasons for my concerns and objection. However, I will keep it succinct and to a minimum to avoid bombarding you with lengthy emails.

### **Scale, Height, and Massing**

- Inappropriate Scale and Height: The proposed 34-storey building is significantly taller than the surrounding buildings, creating a dominating visual impact on the local area and landmarks such as Battersea Bridge.
- Contrary to Local Plan: The proposal does not align with the Wandsworth Local Plan 2023-2038, which sets an appropriate building height for the area at 7-12 storeys.

### **Impact on Heritage and Visual Amenity**

- Heritage Sites: The development will negatively impact ten historic buildings within a 400m radius, including the Grade II listed Battersea Bridge and Albert Bridge.
- Visual and Townscape: The proposed height of the building will significantly alter the visual character of the area, conflicting with local policies aimed at preserving the townscape and heritage.
- Lack of Justification for a "Metropolitan Marker": The developers claim that the site serves as an opportunity for a "Metropolitan Marker" building but provide no evidence or rationale for the necessity or value of such a marker in this local town.

### **Daylight, Sunlight, and Overshadowing**

- Loss of Light: The development will severely impact daylight and sunlight for neighbouring properties. Full impact assessment data is missing, making it difficult to evaluate the true extent of the impact. We believe that there will be significant impacts on 6 Hester Road in particular.

### **Environmental Impact**

- Air Quality: The site is within the Wandsworth Air Quality Management Area. There are concerns about managing nitrogen dioxide and particulate matter emissions during construction and we do not have a clear picture of how the applicant plans to mitigate this due to the absence of a detailed Construction Management Plan.
- Carbon Emissions: Incomplete and poorly presented carbon emission data undermine the claimed environmental benefits. We question the applicant's "Whole Life Carbon Assessment" figures are questioned for being overly optimistic.

### **Construction Impact**

- Noise and Vibration: We have significant concerns about noise and vibration during demolition, excavation and construction phases, especially from pile driving, which could affect nearby structures including the Grade II listed Battersea Bridge.
- Traffic and Transport: Increased construction traffic, including hundreds of heavy goods vehicles, will exacerbate traffic congestion and pollution. This poses safety risks for cyclists, pedestrians and other vulnerable people as well as having unknown impacts on local transport network.
- Emergency Services Disruption: Our expectation is that construction will likely block or narrow Battersea Bridge Road, a critical route for emergency services and causing knock-on problems with congestion elsewhere in the transport network.

## **Community and Social Impact**

- Community Disruption: The construction phase, estimated to last 35 months, will cause significant noise, vibration, dust, and general disruption, affecting residents' quality of life. The lack of a detailed Construction Management Plan as part of the application process means we do not know if or how the applicant plans to deal with these problems.

- Lack of Local Investment: Whilst the application promotes some proposed improvements to the area immediately around the building, our view is that these are really for the residents rather than the wider community. Our view is that the development plans lack meaningful investment in the local area, which might realistically include wider improvements to the Thames Path or local landscape, so there is minimal benefit to the existing community.

## **Wind Microclimate**

- Wind Conditions: The proposal could lead to uncomfortable wind conditions for pedestrians around the site, particularly during the winter.

## **Amenity and Privacy**

- Overlooking and Privacy: The height and design of the proposed building, including the roof terrace, will lead to significant overlooking issues, impacting the privacy and quiet enjoyment of nearby residential properties.

## **Financial Viability and Precedent**

- Limited Development Capacity: The site is acknowledged by the developers as having "limited development capacity", yet the high acquisition cost of £45m drives the need for an over-scaled development to justify the investment, highlighting a fundamental mismatch between the site's capacity and the proposed scale.

- Financial Un-sustainability: The developer has overpaid for the site and aims to recoup costs by building a high-density, high-rise development. We believe that the underlying financial un-sustainability of the plans means that it is more likely that any planning consent will be sold on or watered-down rather than built out as proposed. Basically, we believe the applicant will bank the precedent for height that the plans create and then do something even less attractive with the site.

- Precedent for Future Development: Approving this project would set a negative precedent, encouraging further inappropriate high-rise developments along the South Bank of the Thames in Battersea, contrary to Wandsworth Council's planning rules for the area and community interests.

## **Consultation**

- Manipulative Community Engagement: We do not believe that consultation with the community has been substantive, meaningful or genuine. Questionnaires have been biased, illustrations of the development have been misleading, and promotional materials that obscure the project's true impact in an attempt to manufacture support.

## **Other**

- Battersea Heliport: The impact on Battersea Heliport's flight paths has not been adequately addressed.

I am deeply concerned about this application and its impact, and I would therefore ask/plead that the council refuses this application.

Please can you acknowledge receipt of my email and keep me updated about when a decision will be taken on the plans.

Your sincerely,

Bedria Bedri  
C26 Albion Riverside, 8 Hester Road, London SW11 4AR

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### Comments Made By

**Name:** Ms. Caroline coates

**Address:** 19 SHUTTLEWORTH ROAD LONDON SW11 3DH

### Comments

**Type of comment:** Make a general observation

**Comment:** i agree with all the points on your flyer particularly re the views over the Thames, character of building and disruptions to travel and walking on the Thames Path / cycle routes access which I imagine will be disrupted The building is unimaginative in design, ugly even

Materials are standard and startling not in a good way ...

And whilst I agree re social housing mix of 50/50 think it should be a max of 6 storeys Also wildlife impact There is a murmuration of starlings each evening in spring summer which is diminishing This disruption will surely affect their display Think again on this one

We have enough buildings like this already in Wandsworth

This is a focal point which deserves better

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### Comments Made By

**Name:** Mr. Henry Watts

**Address:** 64 ORBEL STREET LONDON SW11 3NZ

### Comments

**Type of comment:** Make a general observation

**Comment:** My concern, which it appears is trying to be dealt with, is the overall height.

1 - It will dominate the immediate skyline with, and I appreciate different people have different tastes, not a particularly attractive tower.

2 - The transport links are already relatively poor with traffic being awful over the bridge. The travel plan appears to focus on local conveniences, walking and cycling. However residents will need to connect to tube and rail networks which necessitates a bus or private car for most.

Nonetheless, will be pleased to see this ugly old site developed.

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### Comments Made By

**Name:** Ms. Jane Barry

**Address:** 13 GRANFIELD STREET LONDON SW11 3JG

### Comments

**Type of comment:** Make a general observation

**Comment:** The list of objections frequently feature the same comments (they also mention Rockwell.) All of the comments from 12 - 30 Sept are identical. All the comments from 4 Nov except one are identical. All the comments from 13 Nov are identical and all so are all but one of the 18 Nov comments. A spot sample check of comments from July reveals the identical comment frequently recurring. Perhaps these are genuine supporters of the proposal, but it looks suspiciously like a campaign.

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### Comments Made By

**Name:** Mrs. Susanna Heinemann

**Address:** 175 HARBUT ROAD LONDON SW11 2RH

### Comments

**Type of comment:** Make a general observation

**Comment:** Far too tall

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### Comments Made By

**Name:** Ms. Susan Ekins

**Address:** 33 HERON HOUSE SEARLES CLOSE LONDON SW11 4RJ

### Comments

**Type of comment:** Make a general observation

**Comment:** just to point out that the comment from Granfield Street - 8th comment I think - refers to similar objections. I think she must mean supporters - these are the one swchich have dozens and dozens of identical Template letters mentioning Rockwell.

**The Glassmill, 1 Battersea Bridge Road (application ref. 2024/1322)  
Director of Housing (Strategy, Compliance and Enabling) comments**

**DRAFT**

The application proposes construction of a part 10 part 28 storey building providing 110 residential units.

It is currently proposed that 50% (by habitable room) will be affordable housing, all provided as social rent. This compares to the originally submitted version that proposed 35% affordable housing with a tenure split of 70% social rent to 30% intermediate.

At 50% affordable housing, it exceeds the threshold (35%) at which the application becomes eligible for the GLA's 'Fast Track' assessment route meaning an application stage viability appraisal and late-stage review mechanism are not required.

The proposed unit mix is set out in the table below:

Unit size	Social Rent	Market	Total
Studio	-	4	<b>4</b>
1-bed	9	-	<b>9</b>
2-bed	18	26	<b>44</b>
3-bed	19	24	<b>43</b>
4-bed	8	2	<b>10</b>
<b>Total units</b>	<b>54</b>	<b>56</b>	<b>110</b>
<b>Total hab. rooms</b>	<b>188</b>	<b>188</b>	<b>376</b>
<b>% by hab. room</b>	<b>50%</b>	<b>50%</b>	<b>100%</b>

The Director of Housing (Strategy, Compliance and Enabling) (DHSCE) welcomes the fact that 50% of the homes will be for social rent, including 3 and 4-bedroom family homes which will help meet the needs of applicants registered on the Council's housing access queues.

The DHSCE recommends that an early-stage viability review is undertaken, in line with the GLA's affordable housing and viability SPG, if an agreed level of progress on implementing the permission has not been made within 24 months of granting permission. The terms of the review should be set out in the Section 106 agreement.

10% (14 no.) of the homes will be designed as 'Wheelchair User Dwellings' meeting the requirements of Building Regulations Part M4(3). Of these six homes (1 x 2b3p, 1 x 3b5p and 4 x 4b5p) will be social rent and should be built to Building Regulations M4(3)2b standards to fully meet the needs of wheelchair users upon completion.

The Council's specialist housing occupational therapist (OT) has reviewed the floor plans and size mix of the proposed accessible homes. They advise that the provision of large accessible homes is rare, and whilst some internal layouts are slightly constrained by the building design, the benefit of including 4 x 4-bed accessible homes within the proposals outweighs this.

Five accessible parking spaces will be provided for residents who hold a 'Blue Badge'.

The OT has requested that if practicable, an additional 1 x 3b5p home is provided in place of the current 1 x 2b3p home. The applicant should continue to consult the OT on the design and layout details of the affordable wheelchair user dwellings to ensure they meet the Council's requirements.

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### Comments Made By

**Name:** Ms. Zhongmizi Liu

**Address:** APARTMENT 30 DUVAL HOUSE 10 GRANT ROAD LONDON SW11 2FR

### Comments

**Type of comment:** Make a general observation

**Comment:** Impact on crime rate.  
Making criteria for applicants, who is eligible to apply, publicly available?

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### Comments Made By

**Name:** Mr. Rob McGibbon

**Address:** 52 LOTS ROAD LONDON SW10 0QD

### Comments

**Type of comment:** Make a general observation

**Comment:** Dear Planning Committee Councillors and Officers

It is plain to see that there has been some unusual and highly suspect submissions in recent days "In support" of this planning application.

In fact, 242 letters have suddenly been submitted since 6th March - most of which, by some miracle, arrived on the exact same date (10th March). You will see from the "supporting" documents attached to them that the supporters are using either the exact same wording, or minor variants of the same text.

Rockwell property has admitted to me directly that it proactively solicits favourable comments as a matter of working policy for its developments. They have already used this tactic for the One Battersea Bridge project in the recent past (pre-December), so it is fair to suggest that the company is behind this new flood of positivity for a development that has been roundly rejected locally and beyond. For it to be suddenly loved by so many would be laughable, if the machinations behind it were not so serious.

It is clear that these latest letters are part of a new "binge" operation by Rockwell to pad out the Comments section in their favour. The only motivation for this would be to sway the committee by somehow "proving" that there is actually some "support" for One Battersea Bridge. Some might say that this is a cynical, and brazen attempt to "rig" any potential decision - but I could not comment.

I urge the committee to look at this new batch of Support letters closely and dismiss them all in their entirety. They are, quite simply, meaningless submissions in the names of people who were either misinformed or did not understand what they were actually being told when they were approached by representatives from Rockwell.

This practice use by the building industry shames the profession and should be called out by the committee for what it is: a crass attempt to abuse the democratic system.

Yours sincerely

Rob McGibbon

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### Comments Made By

**Name:** Mr. Paul Chapman

**Address:** 33 NANTES CLOSE LONDON SW18 1JL

### Comments

**Type of comment:** Make a general observation

**Comment:** Affordable housing (genuinely affordable) is valuable, craft workshops close to RCA

Necessary - but the right kind, there is already too much  
We need to address the problem of homelessness in London

The need to replace the building is understandable, but looks poor quality design (surprise, it's Farrell's) and very over scaled in it's context -  
better scaling CF Palestra building

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### Comments Made By

**Name:** Miss Helena Moore

**Address:** 73 INKSTER HOUSE 1 INGRAVE STREET LONDON SW11 2SD

### Comments

**Type of comment:** Make a general observation

**Comment:** 20 Years of neglect in social housing - Labour you can do better than 50% - affordable for whom?

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### Comments Made By

**Name:** Ms. Susan Ekins

**Address:** 33 HERON HOUSE SEARLES CLOSE LONDON SW11 4RJ

### Comments

**Type of comment:** Make a general observation

**Comment:** It seems that the people with the clipboards are still telling people that it is 50% social housing. It isn't. It is affordable housing - quite a different thing. People who sign those templates are under the impression that it is social housing. All comments that say that should be ignored.

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### Comments Made By

**Name:** Mrs. Jodie Stoye

**Address:** 35 ELSPETH ROAD LONDON SW11 1DW

### Comments

**Type of comment:** Make a general observation

**Comment:** It's good but traffic is extremely bad here - concerns over additional cars/traffic

Supportive of housing that is affordable but suggest a different area

Build away from this busy area

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### Comments Made By

**Name:** Mrs. caroline kenilworth

**Address:** 31 HENNING STREET LONDON SW11 3DR

### Comments

**Type of comment:** Make a general observation

**Comment:** some of the people in favour don't live in Battersea and they all say the same thing in their support. Why is that? its very odd. Also they seem to think it will be for young people who can't afford homes which I am certain its not!

FAO Nigel Granger  
Planning Officer – East Area Team Manager  
London Borough of Wandsworth

**By email only**

Our Ref  
WJD/GRP/10276685

Your Ref  
2024/1322

Date  
23 April 2025

Dear Sirs

**Proposed development of The Glassmill, 1 Battersea Bridge Road, London SW11 3BZ (the Glassmill)  
Planning application 2024/1322 (the Application)**

This firm acts for Promontoria Battersea Ltd and its project managers Rockwell Project Management Limited (Rockwell). Rockwell has, through its agents DP9, submitted the Application which is due to be heard at committee on 24 April 2025.

A copy of a letter dated 18 March 2025 from Farrer & Co LLP (who act for Thames Walk Residents Association (**TWRA**)) to our clients (the **Letter**) has been passed to us and a copy of the Letter is attached for ease of reference. Inevitably our client has had to address issues raised in the Letter and a copy of our response is attached..

Our client wishes to put on record that the Letter does not, in its view, contain any material considerations that would be relevant to a planning authority when making a public law decision. It relates wholly to private law matters. There is a body of case law that establishes that private law matters are not a material consideration for planning authorities other than in unusual cases. No property developer or land owner would be able to submit a planning application if it first had to resolve all private law rights.

As such our client's view is that the matters raised in the Letter do not constitute material considerations for Wandsworth as planning authority, but, while irrelevant, are potentially prejudicial to the Application. If the Letter comes before the planning committee then we respectfully request that our detailed letter of response is also brought to the committee's attention.

Specifically we want to correct some of the points raised in the Letter and, using the numbered paragraphs in the Letter, our comments are:

4. There has been a long period of dialogue between our client and TWRA. Paragraph 25 of our letter of reply sets out the chronology of that engagement.
  
8. In the statement on page 127 of the submitted Design and Access statement dated October 2024 our client **"acknowledges that further discussions and consultation will need to take place post planning permission"**. This statement is not disingenuous as it makes clear that our client

will have to engage with interested parties following the grant of any planning consent for the Proposed Redevelopment and nor, as suggested by TWRA, does it imply any consent from TWRA to the Application..

- 9 TWRA again state that our client is not in consultation with them nor made any effort to substantively communicate with them. The two statements of community involvement lodged in support of the Application give details of the historic and recent consultation. Again we refer you to paragraph 25 of our letter of reply. TWRA's statements in paragraph 9 of the Letter are not correct.
- 13 Our client has no intention to use any property of TWRA over which it does not have rights.
- 16 The proposed development will contain only eighteen parking spaces, five of which have to be permanently reserved for disabled use. The planning obligations which will bind the development will prevent occupiers from applying for local on street parking permits. The transport statement submitted with the Application forecasts that the overall number of trips to be generated by the Property will fall from the present office use levels. As such TWRA's suggestions are unfounded.
- 17 The use of the service road is not going to increase significantly, if at all. While the number of servicing trips will increase, the number of trips made by occupiers will decrease. The overall net effect is neutral.
18. TWRA allege that it is "patently clear" that the increased use will impede emergency services. The London Fire Brigade's published response to the Application (in its capacity as a statutory consultee) is that it has no comments on the development. It is unconcerned that it will create any difficulties for the emergency services.
- 21 The proposed works to improve the Thames Path will take place either on our client's land or existing public highway. Regardless of TWRA's ownership of the underlying freehold to any part of the public highway, Wandsworth as highway authority can authorise work to the existing public highway under section 278 of the Highways Act 1980 without reference to TWRA. Our client is not aware of any need to enter any land which it does not own or which is not public highway.
- 22 The development does not overhang or extend beyond the red line legal boundary of the Glassmill and the plan in our letter of response clearly shows that TWRA's statement is incorrect.
- 23 The surface water drain which will serve the development, runs from Battersea Bridge Road under the Glassmill and also under Thames Walk, is owned by Thames Water. It is open to our client to connect to and use that drain.
- 25 Our clients have been in dialogue with TWRA since December 2021 up to October 2024 immediately before the last revisions to the submitted Application were made. TWRA has appointed a professional property agent, Colliers, to represent them and protect their property interests. There has been dialogue between our client and Colliers as well as directly with TWRA. To state that our client has "failed in every respect to engage with" TWRA is incorrect.

Please confirm receipt of this letter and that it will, if the Letter is placed on public record, also be placed on public record alongside it.

Yours faithfully

  
**Clyde & Co LLP**

FAO Siobhan Jones  
Farrer & Co LLP  
66 Lincon's Inn Fields  
London  
WC2A 3LH

**By email only**

Our Ref  
WJD/GRP/10276685

Your Ref  
SCJ/107311.1/PAS

Date  
23 April 2025

Dear Farrer & Co LLP

**Proposed development of The Glassmill, 1 Battersea Bridge Road, London SW11 3BZ (the Glassmill)**

This firm acts for Promontoria Battersea Ltd and its project managers Rockwell Project Management Limited (company number 13448610). A copy of your letter to our clients dated 18 March 2025 has been passed to us. We have used defined terms from your letter in this letter other than where specified otherwise. Our comments on the numbered paragraphs in your letter, where we think comment is needed, are set out below.

More generally it is not clear why you have copied your letter to Wandsworth LBC, presumably in its capacity as local planning authority for the Application and as an objection of record? Your letter does not, in our view, contain any material considerations that would be relevant to a planning authority when making a public law decision. There is a body of case law that establishes that private law matters are not a material consideration for planning authorities other than in extreme cases. No property developer or land owner would be able to submit a planning application if it first had to resolve all private law rights. Our view is that none of the private law matters raised in your letter constitute material considerations for a planning authority.

Dealing with your numbered paragraphs our comments are:

- 4 Our client is aware that some elements of the Proposed Redevelopment may be better implemented with the co-operation of TWRA and for that reason there has been a long period of dialogue between the parties. Paragraph 25, below, sets out the chronology of that engagement more fully.
- 5 We have sent a copy of this letter to the case officer at Wandsworth LBC and also attach a copy of our separate letter to the case officer explaining where your letter of 18 March 2025 requires clarification.
- 6 HM Land Registry records will show that Promontoria Battersea Ltd has registered, or is registering, UN1 notices against the freehold and leasehold titles to the Glassmill protecting its interest under a contract to buy the Glassmill from Lockguard Limited.

7 As stated above, Rockwell Project Management Limited will be the project manager for Promontoria Battersea Ltd.

8 For clarity we have set out below an extract from page 127 of the revised Design and Access statement dated October 2024 to which you refer. It states that the present proposals have been designed to reflect the existing access arrangements but our client ***“acknowledges that further discussions and consultation will need to take place post planning permission”***.

The Applicant has a legal right of access to enter and egress the building and this has been discussed with planning officers and the Thameswalk residents (the freeholds of the private road). The proposals have been designed to reflect the existing access arrangements on site, however the applicant acknowledges that further discussions and consultation will need to take place post planning permission.

This statement is not disingenuous as it makes clear that our client will have to engage with interested parties following the grant of any planning consent for the Proposed Redevelopment.

Nor does that statement seek to give any impression that your client agrees to the Application, as if your client agreed to it then further discussions would not be needed. Your client, and the individual occupiers of Thames Walk, are fully aware of the Application having been served with statutory notice of it as neighbours following its registration with Wandsworth LBC. TWRA were also made aware of the detail of the Proposed Redevelopment through the consultation events and other correspondence as detailed at paragraph 25.

As stated in the above extract, the position remains that the Proposed Redevelopment could be implemented at lower ground floor level using the Access Road and the two lawful entry points to the Glassmill.

9 You state that our client is not in consultation with your client nor made any effort to substantively communicate or consult with your client. There are two statements of community involvement lodged in support of the Application the latter of which details recent consultation specifically with your client. Again we refer you to paragraph 25 of this letter. Your statements in paragraph 9 of your letter are not correct.

12 You omit to state that the rights enjoyed by the Glassmill over the Access Road are “at all times and for all purposes connected with the use and enjoyment of [the Glassmill]”. There are no express limitations as to time or the nature of the use by the users of the Glassmill.

13 Can you detail which property of TWRA that our client intends to use? Your comments concerning intensification of the use of the Access Road are addressed below.

14 As stated above the Proposed Redevelopment can be implemented using the two existing entrances into the Glassmill from the Access Road. The fact that one of the access points is currently not used is irrelevant. There is a body of settled case law which makes it clear that periods of disuse of easements do not affect the validity or future use of such easements. The right to use both access points remains legally in effect.

15 Our client’s prescriptive rights concerning other entry points from the Access Road to the Glassmill are reserved.

16 The Proposed Redevelopment will contain only eighteen parking spaces, five of which have to be permanently reserved for disabled use. The planning obligations which will bind the Proposed Redevelopment will prevent occupiers from applying for local on street parking permits. The transport statement submitted with the Application forecasts that the overall number of trips to be generated by the Property will fall from the present office use levels.

17 Your statement that the use of the Access Road is going to intensify significantly is not correct, While the number of servicing trips will increase the number of trips made by occupiers will decrease. In absolute terms the number of servicing trips will increase from 16 movements to 46 daily and so remains low in absolute terms. That is 23 service vehicles using the road in total which, over a 12 hour working period, from say 7am to 7pm, is just under two vehicles per hour.

Your letter does not address non-servicing vehicular use of the road, either currently or as projected. That projected use, in the view of our client's transport consultants, will fall relative to current levels and the net result is to offset any increase in servicing traffic.

The legal test for actionable intensification is that the use would need to be so intensive as to amount to an unreasonable interference of the servient owner's rights to exercise the same easement. In the context of the above usage levels, the physical characteristics of the Access Road and the nature of Glassmill's legal rights to use it, then there would be no such legal interference.

18. Our comments above concerning intensification of use apply equally and the servicing management and car parking management plans which will bind the Proposed Redevelopment, will take into account existing users of the Access Road. You allege that it is "patently clear" that the increased use will impede emergency services. We have set out below the London Fire Brigade's published response to the Application, in its capacity as a statutory consultee. They have no comments on the Proposed Redevelopment and are unconcerned that it will create any difficulties for the emergency services.

**RECORD OF CONSULTATION/ADVICE GIVEN**

**TOWN AND COUNTRY PLANNING ACT 1990**

**SCOPE OF WORKS:** COMPREHENSIVE REDEVELOPMENT OF THE SITE TO INCLUDE DEMOLITION OF EXISTING BUILDING AND ERECTION OF A PART 9 STOREY, PART 33 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.

**PREMISES ADDRESS:** THE GLASSMILL 1 BATTERSEA BRIDGE ROAD SW11 3BZ

**PLAN NUMBERS:** AS PER APPLICATION 2024/1322

**DOCUMENTS REVIEWED:** FIRE SAFETY STRATEGY, FIRE STATEMENTS, COVER LETTER

The London Fire Commissioner (the Commissioner) is the fire and rescue authority for London. The Commissioner is responsible for enforcing the Regulatory Reform (Fire Safety) Order 2005 (as amended) in London.

**The London Fire Brigade (LFB) has been consulted with regard to the above-mentioned premises and have no further observations to make. It should be ensured that if any material amendments to this consultation is proposed, a further consultation may be required.**

21 The extent of the public highway constituting Thames Path is shown shaded yellow on the plan below. Regardless of TWRA's ownership of the underlying freehold to any part of it, Wandsworth LBC can lawfully authorise work to the existing public highway under section 278 of the Highways Act 1980 without reference to TWRA. Our client is not aware of any need to enter any land which it does not own or which is not public highway.



- 22 The Proposed Redevelopment does not extend beyond the red line legal boundary of the Glassmill and we have set out a plan below which overlays that red line legal ownership onto the Proposed Redevelopment at ground floor level. Given that there is no overhang into the freehold title to Thames Walk please withdraw this suggestion and ensure that both your client and Wandsworth LBC are aware of the correct position.



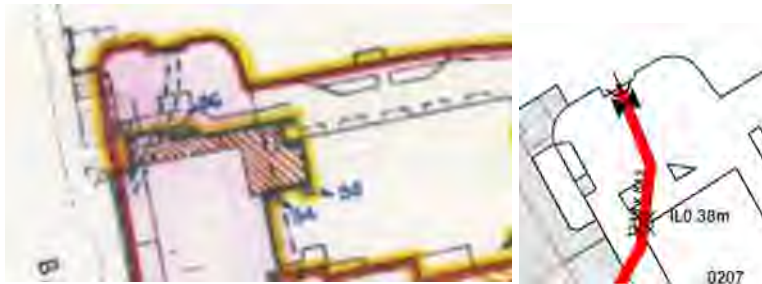
- 23 The surface water drain that runs from Battersea Bridge Road, under the Glassmill and also under Thames Walk (as shown by the red line on the Thames Water drawing below) is excepted from your client's registered title. We attach an extract from the property register of that title and an extract from the filed plan showing the route of the drain, shaded light blue, that matches the publicly available record.

## A: Property Register

This register describes the land and estate comprised in the title.

WANDSWORTH

- 1 (21.09.1973) The Freehold land shown edged with red on the plan of the above Title filed at the Registry and being Thames Walk, London (SW11 3BG).
- 2 The boundary of the land where it abuts on the River Thames is the mean high water mark from time to time.
- 3 The Sewer under the land tinted blue on the filed plan is excepted.



As such that drain is owned by the statutory utility provider, Thames Water Utilities Limited. If that company does not enjoy private or prescriptive rights to carry out work to that drain then it has those rights under statute. Any work to the existing outfall in the Thames Walk will not need the approval of your client as that outfall is not its property.

The Glassmill also enjoys a right at paragraph (3) (d) of Schedule III to the Transfer to enter Thames Walk with workmen, all necessary tools, appliances, scaffolding and materials to connect, to maintain, repair and rebuild any sewers drains, pipes, wires or gutters belonging to [Thames Walk] and to maintain, repair, decorate and rebuild the [the Glassmill]. As such our client is satisfied that it enjoys sufficient rights to implement its drainage strategy as and when it is finalised.

- 24 Please refer to our comments in our separate letter of the same date as this letter.
- 25 The table below sets out the history of communication between our clients. All of the residents of Thames Walk were invited to the public consultation events. To state that our clients have “failed in every respect to engage with” your client is incorrect and that allegation must be withdrawn.

Date	Contact
10 December 2021	Thames Walk Residents
10 May 2022	Anthony Shapland, Colliers (TWRA Representative)
23 September 2022	Thames Walk Residents
21 November 2023	Thames Walk Residents
22 November 2023	Public Exhibition
25 November 2023	Public Exhibition
27 November 2023	Public Webinar
25 June 2024	Anthony Shapland, Colliers (TWRA Representative)
14 August 2024	Thames Walk Residents
10 October 2024	Thames Walk Residents
12 October 2024	Public Exhibition
14 October 2024	Public Webinar

While we have written to Wandsworth LBC, as attached, our client invites your client to contact Wandsworth LBC as soon as possible to correct or clarify the inaccuracies in your letter (as identified in this letter) and bring those to its attention.

Yours faithfully

A solid black rectangular box used to redact the signature of the sender.

**Clyde & Co LLP**

# FARRER & Co

---

DP9 Limited  
100 Pall Mall  
London  
SW1Y 5NQ

Your Ref: DS/FC/DP6524

Our Ref: SCJ/107311.1/pas

18 March 2025

**For the attention of David Shiels**

Dear DP9 Limited

**Proposed redevelopment of The Glassmill, 1 Battersea Bridge Road, London SW11 3BZ  
("The Glassmill")**

We are instructed by Thames Walk Residents Association Ltd.

We enclose our letter of today's date which has been sent to Promontoria Battersea Limited and Rockwell Properties Limited.

Yours faithfully

**Farrer & Co LLP** 66 Lincoln's Inn Fields London WC2A 3LH

Farrer & Co LLP is a limited liability partnership registered in England and Wales, registered number OC323570, and is authorised and regulated by the Solicitors Regulation Authority (ID 447822). A list of the members of the LLP is displayed at the above address, together with a list of those non-members who are designated as partners.

107311/1/4126-7991-6634.1

Promontoria Battersea Limited  
10th Floor  
5 Churchill Place  
London  
E14 5HU

Our Ref: SJ/AT/107311.1

Rockwell Properties Limited  
2nd Floor  
140 Wardour Street  
London  
W1F 8ZT

18 March 2025

By Post  
By Special Delivery

Dear Promontoria Battersea Limited

**Proposed redevelopment of The Glassmill, 1 Battersea Bridge Road, London SW11 3BZ  
("The Glassmill")**

1. We act for Thames Walk Residents' Association ("**TWRA**").
2. Our client is the proprietor of the freehold estate in Thames Walk, London SW11 3BG ("**Thames Walk**") which neighbours The Glassmill. The former is registered at HM Land Registry under title number SGL270066, and the latter under title number TGL159114.
3. By an application dated 21 May 2024, you made an application for planning permission (ref.: 2024/1322) in respect of The Glassmill which was materially revised in October 2024 (the "**Application**"). In its present form, the proposed redevelopment will comprise a "*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)...*" (the "**Proposed Redevelopment**").
4. The purpose of this letter is to put you on notice that the Proposed Redevelopment, as proposed in the Application, will infringe TWRA's property rights and our client will not

Farrer & Co LLP 66 Lincoln's Inn Fields London WC2A 3LH

18 March 2025

hesitate to take action to vindicate those rights if permission is granted and the Proposed Redevelopment proceeds.

5. We have sent a copy of this letter to the Case Officer at Wandsworth London Borough Council, the relevant planning authority for the Application (“**Wandsworth LBC**”).

## **Preliminary matters**

6. The Glassmill is not presently vested in you, but Lockguard Limited. However, we understand that the latter has granted an option to you and/or your parent company, pursuant to which you would purchase The Glassmill and carry out the Proposed Redevelopment.
7. In your original application for planning permission, you listed Rockwell Property Limited (CRN: 05403060) as the lead developer in the application form dated 11 April 2024. This company has now been dissolved. Notwithstanding, we understand that the Rockwell Group remains the developer, and so we have addressed this letter to Rockwell Properties Limited (CRN: 09701759).
8. Our client wishes to make clear that pages 127 and 138 of the revised Design and Access Statement dated October 2024 submitted by you are disingenuous. It states: “*The Applicant has a legal right of access to enter and egress the building and this has been discussed with the planning officers and the Thameswalk residents (the freeholds [sic] of the private road).*” To be clear, this seeks to give the impression that our client is aware and/or accedes to your plans. It does not. The residents of Thames Walk vehemently oppose the Application. There has been insufficient consultation, nor have you or Rockwell sought to engage meaningfully with any of the concerns raised.
9. Further, we refer to a letter dated 26 February 2025 from Temple Group Ltd (on your behalf) to the Council in response to the Environment Agency’s second letter of objection dated 13 February 2025. In that letter Temple Group (on your behalf) states; “*It should be noted that the Applicant is not in control of the river wall or the land immediately adjacent to it, however they are in consultation with the landowner on various matters ...*” [emphasis added]. This statement is false. You are not in consultation with our client, nor have you made any effort substantively to communicate or consult with our client.

18 March 2025

## The original conveyance

10. Thames Walk and The Glassmill originally formed one parcel of land. By a conveyance dated 29 September 1987 and made between (1) Sunley Holdings PLC and (2) Beckmills Limited, the former transferred part of the land to the latter (the “**Transfer**”). The “*Retained Land*” as defined in the Transfer became Thames Walk, and the “*Property*” (to be conveyed) became The Glassmill. We enclose the plan appended to the Transfer. This aligns with each property’s title plan at HM Land Registry.

## Issues

11. There are three key areas over which our client has grave concerns. As defined below, these are:
  - (a) the Access Road;
  - (b) the Thames Path; and
  - (c) the Thames Wall.

We shall deal with each in turn.

## Private Road

12. By virtue of clause 3 of the Transfer, together with paragraph 3 of Schedule III, the owners of The Glassmill have the right to: “*to pass and repass with or without motor vehicles to or from the Property from or to the public highway known as Hester Road over and along the private roadway hatched brown on the plan between the points marked ‘A-B’ and ‘C-D’...*” (the “**Access Road**”). This is clearly delineated on the plan. There are two issues.
13. First, the Application proposes to use property outside of The Glassmill or its rights in respect of the Access Road. Second, the scale of the Proposed Redevelopment will intensify use of the Access Road to an unreasonable and excessive degree.
14. As to the extent of use, the Application documents include a plan showing the current lower ground floor of The Glassmill (which remains as depicted on the above plan). However, as

18 March 2025

part of the Application, you are proposing to construct various entrances along the Access Road from The Glassmill. Should you purchase The Glassmill, your right of access and egress pertains to the Access Road only. The Access Road presently leads into The Glassmill at two points (one of which we understand is disused).

15. Accordingly, you would have no right to open up entry points, whether they be vehicular or pedestrian, at any other point along the footpath between the Access Road and The Glassmill. Any use or occupation thereof would amount to a trespass and our client would be entitled to restrain your use of the same.
16. Further, the scale of the Proposed Redevelopment is immense. You seek to demolish a part five-storey, part-six storey office building (with 33 parking spaces in a basement level car park) into a building comprising 30 storey (part 28, part 10, plus ground and basement storeys) mixed-use development including 110 residential units.
17. Naturally, use of the Access Road is going to intensify significantly, causing a disproportionate and unreasonable impact upon the residents of Thames Walk. On your own figures the number of serving trips via the Access Road will treble.
18. This is particularly important when considered in the context of its use by the residents of Thames Walk, with whom the right is made expressly subject to use in tandem. This is not a parcel of land seldom used by the owners of the servient land. It is the main access route from Thames Walk to Hester Road. It is patently clear that the increased use by those occupying residential units and commercial space will significantly impede use by the residents of Thames Walk and emergency services.

## **Thames Path and Wall**

19. Within the boundary of Thames Walk sits the riverside walkway (the “**Thames Path**”). This is identifiable as the path sitting between Thames Walk/The Glassmill and the River Thames.
20. By an agreement dated 27 November 1981 and made between (1) Sunley Holdings Limited and (2) the Mayor and Burgesses of the London Borough of Wandsworth, the Thames Path was to be constructed and dedicated permanently, following which it would be adopted by

18 March 2025

Wandsworth LBC as a public highway with a right of way on foot alone (Unique Street Ref. No. 22906734) (the “**1981 Agreement**”).

21. It would appear from the documents filed in support of the Application that large parts of the Thames Path sit outside The Glassmill’s boundaries. You would have no right to alter these spaces without a licence from the owner(s). To do so without consent would amount to a trespass. Further, any attempts by Wandsworth LBC to grant such a licence to you would be a breach of the 1981 Agreement and therefore challengeable.
22. Further, it appears that the structure of the new building on The Glassmill may overhang the site boundary. For the avoidance of doubt, Wandsworth LBC’s adoption of the Thames Path includes so much of the airspace above it as may reasonably be required for its control, protection and maintenance as a highway for use by the public. Subject to those reservations, the airspace above those parts of the Thames Path within the freehold title to Thames Walk remains vested in TWRA. Our client does not, nor will it, give you permission to project any part of the Proposed Redevelopment into its airspace.
23. Finally, it appears that the Drainage Strategy you have submitted assumes that The Glassmill’s surface water current discharges into the River Thames via a private drain beneath the Thames Path or a combined trunk sewer. It is unclear exactly where you plan to install the multi-level outfall. However, the wall between the Thames Path and the River Thames (the “**Thames Wall**”) was not adopted. It remains the responsibility of the owners of Thames Walk (now, TWRA). Thus, any works to the Thames Wall will need a licence from our client, which it is unwilling to provide. Further, as already noted, any pipes or other conduits which you should wish to lay beneath the Thames Path, and so within our client’s property, will require our client’s consent. Proceeding on either front without consent will amount to a trespass.

## **Conclusion**

24. For the reasons given in this letter, it would be impossible at present for you to carry out crucial aspects of the Proposed Redevelopment, even if planning permission were granted.

# FARRER&Co

18 March 2025

25. You have failed in every respect to engage with our client or properly to take account of the residents of Thames Walk.

Yours faithfully



cc DP9 Limited, 100 Pall Mall, London SW1Y 5NQ  
Wandsworth LBC, The Town Hall, Wandsworth High Street, London SW18 2PU



FAO Nigel Granger  
Planning Officer – East Area Team Manager  
London Borough of Wandsworth

greg.purnell@clydeco.com

Dir Line: +44 (0) 20 7876 4257

## By email only

Our Ref  
WJD/GRP/10276685

Your Ref  
2024/1322

Date  
23 April 2025

Dear Sirs

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Please confirm receipt of this letter and that it will, if the Letter is placed on public record, also be placed on public record alongside it.

Yours faithfully

*Clyde & Co LLP*

**Clyde & Co LLP**

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The St Botolph Building  
138 Houndsditch  
London  
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Farrer & Co LLP  
66 Lincon's Inn Fields  
London  
WC2A 3LH

## By email only

Our Ref  
WJD/GRP/10276685

Your Ref  
SCJ/107311.1/PAS

Date  
23 April 2025

Dear Farrer & Co LLP

### **Proposed development of The Glassmill, 1 Battersea Bridge Road, London SW11 3BZ (the Glassmill)**

This firm acts for Promontoria Battersea Ltd and its project managers Rockwell Project Management Limited (company number 13448610). A copy of your letter to our clients dated 18 March 2025 has been passed to us. We have used defined terms from your letter in this letter other than where specified otherwise. Our comments on the numbered paragraphs in your letter, where we think comment is needed, are set out below.

More generally it is not clear why you have copied your letter to Wandsworth LBC, presumably in its capacity as local planning authority for the Application and as an objection of record? Your letter does not, in our view, contain any material considerations that would be relevant to a planning authority when making a public law decision. There is a body of case law that establishes that private law matters are not a material consideration for planning authorities other than in extreme cases. No property developer or land owner would be able to submit a planning application if it first had to resolve all private law rights. Our view is that none of the private law matters raised in your letter constitute material considerations for a planning authority.

Dealing with your numbered paragraphs our comments are:

- 4 Our client is aware that some elements of the Proposed Redevelopment may be better implemented with the co-operation of TWRA and for that reason there has been a long period of dialogue between the parties. Paragraph 25, below, sets out the chronology of that engagement more fully.
- 5 We have sent a copy of this letter to the case officer at Wandsworth LBC and also attach a copy of our separate letter to the case officer explaining where your letter of 18 March 2025 requires clarification.
- 6 HM Land Registry records will show that Promontoria Battersea Ltd has registered, or is registering, UN1 notices against the freehold and leasehold titles to the Glassmill protecting its interest under a contract to buy the Glassmill from Lockguard Limited.

7 As stated above, Rockwell Project Management Limited will be the project manager for Promontoria Battersea Ltd.

8 For clarity we have set out below an extract from page 127 of the revised Design and Access statement dated October 2024 to which you refer. It states that the present proposals have been designed to reflect the existing access arrangements but our client ***“acknowledges that further discussions and consultation will need to take place post planning permission”***.

The Applicant has a legal right of access to enter and egress the building and this has been discussed with planning officers and the Thameswalk residents (the freeholds of the private road). The proposals have been designed to reflect the existing access arrangements on site, however the applicant acknowledges that further discussions and consultation will need to take place post planning permission.

This statement is not disingenuous as it makes clear that our client will have to engage with interested parties following the grant of any planning consent for the Proposed Redevelopment.

Nor does that statement seek to give any impression that your client agrees to the Application, as if your client agreed to it then further discussions would not be needed. Your client, and the individual occupiers of Thames Walk, are fully aware of the Application having been served with statutory notice of it as neighbours following its registration with Wandsworth LBC. TWRA were also made aware of the detail of the Proposed Redevelopment through the consultation events and other correspondence as detailed at paragraph 25.

As stated in the above extract, the position remains that the Proposed Redevelopment could be implemented at lower ground floor level using the Access Road and the two lawful entry points to the Glassmill.

9 You state that our client is not in consultation with your client nor made any effort to substantively communicate or consult with your client. There are two statements of community involvement lodged in support of the Application the latter of which details recent consultation specifically with your client. Again we refer you to paragraph 25 of this letter. Your statements in paragraph 9 of your letter are not correct.

12 You omit to state that the rights enjoyed by the Glassmill over the Access Road are “at all times and for all purposes connected with the use and enjoyment of [the Glassmill]”. There are no express limitations as to time or the nature of the use by the users of the Glassmill.

13 Can you detail which property of TWRA that our client intends to use? Your comments concerning intensification of the use of the Access Road are addressed below.

14 As stated above the Proposed Redevelopment can be implemented using the two existing entrances into the Glassmill from the Access Road. The fact that one of the access points is currently not used is irrelevant. There is a body of settled case law which makes it clear that periods of disuse of easements do not affect the validity or future use of such easements. The right to use both access points remains legally in effect.

15 Our client’s prescriptive rights concerning other entry points from the Access Road to the Glassmill are reserved.

16 The Proposed Redevelopment will contain only eighteen parking spaces, five of which have to be permanently reserved for disabled use. The planning obligations which will bind the Proposed Redevelopment will prevent occupiers from applying for local on street parking permits. The transport statement submitted with the Application forecasts that the overall number of trips to be generated by the Property will fall from the present office use levels.

17 Your statement that the use of the Access Road is going to intensify significantly is not correct, While the number of servicing trips will increase the number of trips made by occupiers will decrease. In absolute terms the number of servicing trips will increase from 16 movements to 46 daily and so remains low in absolute terms. That is 23 service vehicles using the road in total which, over a 12 hour working period, from say 7am to 7pm, is just under two vehicles per hour.

Your letter does not address non-servicing vehicular use of the road, either currently or as projected. That projected use, in the view of our client's transport consultants, will fall relative to current levels and the net result is to offset any increase in servicing traffic.

The legal test for actionable intensification is that the use would need to be so intensive as to amount to an unreasonable interference of the servient owner's rights to exercise the same easement. In the context of the above usage levels, the physical characteristics of the Access Road and the nature of Glassmill's legal rights to use it, then there would be no such legal interference.

18. Our comments above concerning intensification of use apply equally and the servicing management and car parking management plans which will bind the Proposed Redevelopment, will take into account existing users of the Access Road. You allege that it is "patently clear" that the increased use will impede emergency services. We have set out below the London Fire Brigade's published response to the Application, in its capacity as a statutory consultee. They have no comments on the Proposed Redevelopment and are unconcerned that it will create any difficulties for the emergency services.

**RECORD OF CONSULTATION/ADVICE GIVEN**

**TOWN AND COUNTRY PLANNING ACT 1990**

**SCOPE OF WORKS:** COMPREHENSIVE REDEVELOPMENT OF THE SITE TO INCLUDE DEMOLITION OF EXISTING BUILDING AND ERECTION OF A PART 9 STOREY, PART 33 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.

**PREMISES ADDRESS:** THE GLASSMILL 1 BATTERSEA BRIDGE ROAD SW11 3BZ

**PLAN NUMBERS:** AS PER APPLICATION 2024/1322

**DOCUMENTS REVIEWED:** FIRE SAFETY STRATEGY, FIRE STATEMENTS, COVER LETTER

The London Fire Commissioner (the Commissioner) is the fire and rescue authority for London. The Commissioner is responsible for enforcing the Regulatory Reform (Fire Safety) Order 2005 (as amended) in London.

**The London Fire Brigade (LFB) has been consulted with regard to the above-mentioned premises and have no further observations to make. It should be ensured that if any material amendments to this consultation is proposed, a further consultation may be required.**

21 The extent of the public highway constituting Thames Path is shown shaded yellow on the plan below. Regardless of TWRA's ownership of the underlying freehold to any part of it, Wandsworth LBC can lawfully authorise work to the existing public highway under section 278 of the Highways Act 1980 without reference to TWRA. Our client is not aware of any need to enter any land which it does not own or which is not public highway.



- 22 The Proposed Redevelopment does not extend beyond the red line legal boundary of the Glassmill and we have set out a plan below which overlays that red line legal ownership onto the Proposed Redevelopment at ground floor level. Given that there is no overhang into the freehold title to Thames Walk please withdraw this suggestion and ensure that both your client and Wandsworth LBC are aware of the correct position.



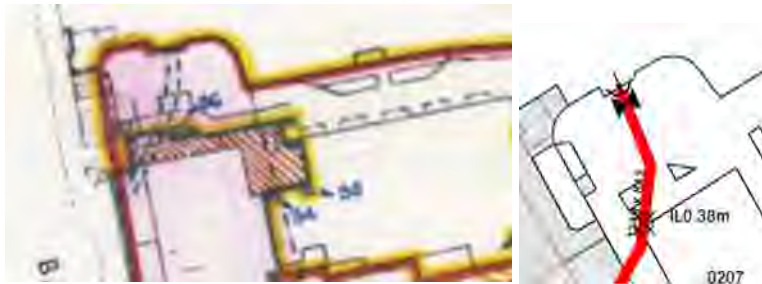
- 23 The surface water drain that runs from Battersea Bridge Road, under the Glassmill and also under Thames Walk (as shown by the red line on the Thames Water drawing below) is excepted from your client's registered title. We attach an extract from the property register of that title and an extract from the filed plan showing the route of the drain, shaded light blue, that matches the publicly available record.

## A: Property Register

This register describes the land and estate comprised in the title.

WANDSWORTH

- 1 (21.09.1973) The Freehold land shown edged with red on the plan of the above Title filed at the Registry and being Thames Walk, London (SW11 3BG).
- 2 The boundary of the land where it abuts on the River Thames is the mean high water mark from time to time.
- 3 The Sewer under the land tinted blue on the filed plan is excepted.



As such that drain is owned by the statutory utility provider, Thames Water Utilities Limited. If that company does not enjoy private or prescriptive rights to carry out work to that drain then it has those rights under statute. Any work to the existing outfall in the Thames Walk will not need the approval of your client as that outfall is not its property.

The Glassmill also enjoys a right at paragraph (3) (d) of Schedule III to the Transfer to enter Thames Walk with workmen, all necessary tools, appliances, scaffolding and materials to connect, to maintain, repair and rebuild any sewers drains, pipes, wires or gutters belonging to [Thames Walk] and to maintain, repair, decorate and rebuild the [the Glassmill]. As such our client is satisfied that it enjoys sufficient rights to implement its drainage strategy as and when it is finalised.

- 24 Please refer to our comments in our separate letter of the same date as this letter.
- 25 The table below sets out the history of communication between our clients. All of the residents of Thames Walk were invited to the public consultation events. To state that our clients have “failed in every respect to engage with” your client is incorrect and that allegation must be withdrawn.

Date	Contact
10 December 2021	Thames Walk Residents
10 May 2022	Anthony Shapland, Colliers (TWRA Representative)
23 September 2022	Thames Walk Residents
21 November 2023	Thames Walk Residents
22 November 2023	Public Exhibition
25 November 2023	Public Exhibition
27 November 2023	Public Webinar
25 June 2024	Anthony Shapland, Colliers (TWRA Representative)
14 August 2024	Thames Walk Residents
10 October 2024	Thames Walk Residents
12 October 2024	Public Exhibition
14 October 2024	Public Webinar

While we have written to Wandsworth LBC, as attached, our client invites your client to contact Wandsworth LBC as soon as possible to correct or clarify the inaccuracies in your letter (as identified in this letter) and bring those to its attention.

Yours faithfully

Clyde & Co LLP

**Clyde & Co LLP**

# FARRER & Co

DP9 Limited  
100 Pall Mall  
London  
SW1Y 5NQ

Your Ref: DS/FC/DP6524  
Our Ref: SCJ/107311.1/pas  
Tel: 020 3375 7000  
Fax: 020 3375 7001  
Email: siobhan.jones@farrer.co.uk

18 March 2025

By Email: david.shiels@dp9.co.uk

## **For the attention of David Shiels**

Dear DP9 Limited

### **Proposed redevelopment of The Glassmill, 1 Battersea Bridge Road, London SW11 3BZ ("The Glassmill")**

We are instructed by Thames Walk Residents Association Ltd.

We enclose our letter of today's date which has been sent to Promontoria Battersea Limited and Rockwell Properties Limited.

Yours faithfully

*Farrer & Co*

**Farrer & Co LLP** 66 Lincoln's Inn Fields London WC2A 3LH **Telephone** +44 (0)20 3375 7000 **Facsimile** +44 (0)20 3375 7001

**DX** 32 Chancery Lane **Website** [www.farrer.co.uk](http://www.farrer.co.uk)

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107311/1/4126-7991-6634.1

Promontoria Battersea Limited  
10th Floor  
5 Churchill Place  
London  
E14 5HU

Our Ref: SJ/AT/107311.1  
Tel: 020 3375 7000  
Fax:  
Email: Siobhan.Jones@farrer.co.uk

Rockwell Properties Limited  
2nd Floor  
140 Wardour Street  
London  
W1F 8ZT

18 March 2025

By Post  
By Special Delivery

Dear Promontoria Battersea Limited

**Proposed redevelopment of The Glassmill, 1 Battersea Bridge Road, London SW11 3BZ  
("The Glassmill")**

1. We act for Thames Walk Residents' Association ("**TWRA**").
2. Our client is the proprietor of the freehold estate in Thames Walk, London SW11 3BG ("**Thames Walk**") which neighbours The Glassmill. The former is registered at HM Land Registry under title number SGL270066, and the latter under title number TGL159114.
3. By an application dated 21 May 2024, you made an application for planning permission (ref.: 2024/1322) in respect of The Glassmill which was materially revised in October 2024 (the "**Application**"). In its present form, the proposed redevelopment will comprise a "*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)...*" (the "**Proposed Redevelopment**").
4. The purpose of this letter is to put you on notice that the Proposed Redevelopment, as proposed in the Application, will infringe TWRA's property rights and our client will not

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hesitate to take action to vindicate those rights if permission is granted and the Proposed Redevelopment proceeds.

5. We have sent a copy of this letter to the Case Officer at Wandsworth London Borough Council, the relevant planning authority for the Application (“**Wandsworth LBC**”).

## **Preliminary matters**

6. The Glassmill is not presently vested in you, but Lockguard Limited. However, we understand that the latter has granted an option to you and/or your parent company, pursuant to which you would purchase The Glassmill and carry out the Proposed Redevelopment.
7. In your original application for planning permission, you listed Rockwell Property Limited (CRN: 05403060) as the lead developer in the application form dated 11 April 2024. This company has now been dissolved. Notwithstanding, we understand that the Rockwell Group remains the developer, and so we have addressed this letter to Rockwell Properties Limited (CRN: 09701759).
8. Our client wishes to make clear that pages 127 and 138 of the revised Design and Access Statement dated October 2024 submitted by you are disingenuous. It states: “*The Applicant has a legal right of access to enter and egress the building and this has been discussed with the planning officers and the Thameswalk residents (the freeholds [sic] of the private road).*” To be clear, this seeks to give the impression that our client is aware and/or accedes to your plans. It does not. The residents of Thames Walk vehemently oppose the Application. There has been insufficient consultation, nor have you or Rockwell sought to engage meaningfully with any of the concerns raised.
9. Further, we refer to a letter dated 26 February 2025 from Temple Group Ltd (on your behalf) to the Council in response to the Environment Agency’s second letter of objection dated 13 February 2025. In that letter Temple Group (on your behalf) states; “*It should be noted that the Applicant is not in control of the river wall or the land immediately adjacent to it, however they are in consultation with the landowner on various matters ...*” [emphasis added]. This statement is false. You are not in consultation with our client, nor have you made any effort substantively to communicate or consult with our client.

18 March 2025

## The original conveyance

10. Thames Walk and The Glassmill originally formed one parcel of land. By a conveyance dated 29 September 1987 and made between (1) Sunley Holdings PLC and (2) Beckmills Limited, the former transferred part of the land to the latter (the “**Transfer**”). The “*Retained Land*” as defined in the Transfer became Thames Walk, and the “*Property*” (to be conveyed) became The Glassmill. We enclose the plan appended to the Transfer. This aligns with each property’s title plan at HM Land Registry.

## Issues

11. There are three key areas over which our client has grave concerns. As defined below, these are:
  - (a) the Access Road;
  - (b) the Thames Path; and
  - (c) the Thames Wall.

We shall deal with each in turn.

## Private Road

12. By virtue of clause 3 of the Transfer, together with paragraph 3 of Schedule III, the owners of The Glassmill have the right to: “*to pass and repass with or without motor vehicles to or from the Property from or to the public highway known as Hester Road over and along the private roadway hatched brown on the plan between the points marked ‘A-B’ and ‘C-D’...*” (the “**Access Road**”). This is clearly delineated on the plan. There are two issues.
13. First, the Application proposes to use property outside of The Glassmill or its rights in respect of the Access Road. Second, the scale of the Proposed Redevelopment will intensify use of the Access Road to an unreasonable and excessive degree.
14. As to the extent of use, the Application documents include a plan showing the current lower ground floor of The Glassmill (which remains as depicted on the above plan). However, as

18 March 2025

part of the Application, you are proposing to construct various entrances along the Access Road from The Glassmill. Should you purchase The Glassmill, your right of access and egress pertains to the Access Road only. The Access Road presently leads into The Glassmill at two points (one of which we understand is disused).

15. Accordingly, you would have no right to open up entry points, whether they be vehicular or pedestrian, at any other point along the footpath between the Access Road and The Glassmill. Any use or occupation thereof would amount to a trespass and our client would be entitled to restrain your use of the same.
16. Further, the scale of the Proposed Redevelopment is immense. You seek to demolish a part five-storey, part-six storey office building (with 33 parking spaces in a basement level car park) into a building comprising 30 storey (part 28, part 10, plus ground and basement storeys) mixed-use development including 110 residential units.
17. Naturally, use of the Access Road is going to intensify significantly, causing a disproportionate and unreasonable impact upon the residents of Thames Walk. On your own figures the number of serving trips via the Access Road will treble.
18. This is particularly important when considered in the context of its use by the residents of Thames Walk, with whom the right is made expressly subject to use in tandem. This is not a parcel of land seldom used by the owners of the servient land. It is the main access route from Thames Walk to Hester Road. It is patently clear that the increased use by those occupying residential units and commercial space will significantly impede use by the residents of Thames Walk and emergency services.

## **Thames Path and Wall**

19. Within the boundary of Thames Walk sits the riverside walkway (the “**Thames Path**”). This is identifiable as the path sitting between Thames Walk/The Glassmill and the River Thames.
20. By an agreement dated 27 November 1981 and made between (1) Sunley Holdings Limited and (2) the Mayor and Burgesses of the London Borough of Wandsworth, the Thames Path was to be constructed and dedicated permanently, following which it would be adopted by

18 March 2025

Wandsworth LBC as a public highway with a right of way on foot alone (Unique Street Ref. No. 22906734) (the “**1981 Agreement**”).

21. It would appear from the documents filed in support of the Application that large parts of the Thames Path sit outside The Glassmill’s boundaries. You would have no right to alter these spaces without a licence from the owner(s). To do so without consent would amount to a trespass. Further, any attempts by Wandsworth LBC to grant such a licence to you would be a breach of the 1981 Agreement and therefore challengeable.
22. Further, it appears that the structure of the new building on The Glassmill may overhang the site boundary. For the avoidance of doubt, Wandsworth LBC’s adoption of the Thames Path includes so much of the airspace above it as may reasonably be required for its control, protection and maintenance as a highway for use by the public. Subject to those reservations, the airspace above those parts of the Thames Path within the freehold title to Thames Walk remains vested in TWRA. Our client does not, nor will it, give you permission to project any part of the Proposed Redevelopment into its airspace.
23. Finally, it appears that the Drainage Strategy you have submitted assumes that The Glassmill’s surface water current discharges into the River Thames via a private drain beneath the Thames Path or a combined trunk sewer. It is unclear exactly where you plan to install the multi-level outfall. However, the wall between the Thames Path and the River Thames (the “**Thames Wall**”) was not adopted. It remains the responsibility of the owners of Thames Walk (now, TWRA). Thus, any works to the Thames Wall will need a licence from our client, which it is unwilling to provide. Further, as already noted, any pipes or other conduits which you should wish to lay beneath the Thames Path, and so within our client’s property, will require our client’s consent. Proceeding on either front without consent will amount to a trespass.

## **Conclusion**

24. For the reasons given in this letter, it would be impossible at present for you to carry out crucial aspects of the Proposed Redevelopment, even if planning permission were granted.

# FARRER & Co

18 March 2025

25. You have failed in every respect to engage with our client or properly to take account of the residents of Thames Walk.

Yours faithfully

A handwritten signature in blue ink that reads "Farrer & Co". The signature is written in a cursive, slightly slanted style.

cc DP9 Limited, 100 Pall Mall, London SW1Y 5NQ  
Wandsworth LBC, The Town Hall, Wandsworth High Street, London SW18 2PU

# FARRER & Co

