

# The Glassmill, 1 Battersea Bridge Road, London

Local Planning Authority: Wandsworth

Local Planning Authority reference: 2024/1322

## Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

## The proposal

Comprehensive redevelopment of the site to include demolition of existing building and erection of a part 10 storey, part 34 storey building 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.

## The applicant

The applicant is **Promontoria Battersea Limited** and the architect is **Farrells**

## Strategic issues summary

**Land use principles:** Subject to demonstrating that the existing office space is not viable, the proposed residential-led redevelopment is supported in principle.

**Housing:** The proposed new homes would contribute to housing targets. The proposal includes a 35% affordable housing offer that meets with Fast Track Thresholds.

**Urban Design and heritage:** The site has not been identified as suitable for a tall building and visual and environmental impacts need to be robustly addressed. The proposal would result in harm to heritage assets. This harm must be outweighed by public benefits in order to be acceptable.

**Transport:** Active Travel Zone Assessment should be amended. Contribution towards TfL's Battersea Bridge Road scheme are requested. General parking removed. Proposed servicing and cycle arrangements need to be reviewed. Management Plans need to be secured.

Other issues on **environment** and **sustainability** also require resolution prior to the Mayor's decision making stage.

## Recommendation

That Wandsworth Council be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 121. Possible remedies set out in this report could address these deficiencies.

## Context

1. On 28 May 2024 the Mayor of London received documents from Wandsworth Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The application is referable under the following categories of the Schedule to the Order 2008:
  - *Category 1B 1. Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats; and*
  - *Category 1C(a): "Development which comprises the erection of a building that is more than 25 metres in height and is adjacent to the River Thames.*
3. Once Wandsworth Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.
4. The Mayor of London's statement on this case will be made available on the GLA's public register: <https://planning.london.gov.uk/pr/s/>

## Site description

5. The 0.11 hectare site is bound by Battersea Bridge Road to the west, the River Thames to the north, a building associated with the Royal College of Art to the east, and Hester Road to the south which is a private access road and pedestrian and cycle zone. The site contains a 6-storey 1980s office building (Use Class E) which is largely vacant. To the east of the site lies the 11-storey Albion Wharf and a 5-storey residential building. To the west of the site lies a residential estate separated by Battersea Bridge Road and public realm.
6. The site is not statutorily or locally listed and is not located within a conservation area. The site is located just east of the Westbridge Road Conservation Area and west of the Battersea Park Conservation Area. The site is also opposite the Cheyne Conservation Area (its boundary within the Royal Borough of Kensington and Chelsea (RBKC) and the Thames Conservation Area (also in RBKC). The Grade II Listed Battersea Bridge lies adjacent to the site to the north.
7. The (A3320) Battersea Bridge Road forms part of the Transport for London Road Network (TLRN). The site is served by a number of bus services along Battersea Bridge Road. The site has a public transport accessibility level (PTAL) of 3, on a scale of 0 to 6b where 6b is the highest.

## **Details of this proposal**

8. Demolition of existing six storey office building with 4877 sq.m of floorspace and erection of a part 10 storey, part 34 storey building (plus basement level) 142 comprising residential use (Class C3), 534 sq.m of office use (Class E), 274 sq.m community use (Class F2), and a 189 sq.m restaurant (Class E), with associated car parking, cycle parking, public realm, landscaping and other associated works.

## **Case history**

9. On 11 April 2023, GLA officers issued a pre-application advice note for the proposed development. In summary, the note advised the applicant that the proposed redevelopment of the site to deliver a mixed-use retail, office and residential development is accepted in line with Policies SD4, E1 and H1 of the London Plan, subject to the applicant providing full justification for the loss of the existing office uses and demonstrating that the retention of the building has been fully explored and providing a robust rationale for any demolition in line with circular economy principles. Further justification on the principle of a tall building on this site should be provided as part of any future submission.

## **Strategic planning issues and relevant policies and guidance**

10. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Wandsworth Local Plan 2023 and the London Plan 2021.
11. The following are also relevant material considerations:
  - The National Planning Policy Framework and National Planning Practice Guidance;
12. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:
  - Good Growth - London Plan;
  - Housing - London Plan; Housing SPG; the Mayor's Housing Strategy; Play and Informal Recreation SPG; Character and Context SPG; Housing Design Standards draft LPG;
  - Affordable housing - London Plan; Housing SPG; Affordable Housing and Viability SPG; the Mayor's Housing Strategy;
  - Retail / Office - London Plan;
  - Urban design - London Plan; Character and Context SPG; Public London Charter LPG; Characterisation and Growth Strategy draft LPG; Optimising Site Capacity: A Design-Led Approach draft LPG; Housing SPG; Play and Informal Recreation SPG; Housing Design Standards draft LPG [if a residential scheme];
  - Fire Safety – London Plan; Fire Safety draft LPG;

- Strategic views - London Plan, London View Management Framework SPG;
- Heritage - London Plan; World Heritage Sites SPG;
- Inclusive access - London Plan; Accessible London: achieving an inclusive environment SPG; Public London Charter LPG
- Sustainable development - London Plan; Circular Economy Statements LPG; Whole-life Carbon Assessments LPG; 'Be Seen' Energy Monitoring Guidance LPG; Energy Planning Guidance; Mayor's Environment Strategy;
- Air quality - London Plan; the Mayor's Environment Strategy; Control of dust and emissions during construction and demolition SPG; Air quality positive draft LPG; Air quality neutral draft LPG;
- Transport and parking - London Plan; the Mayor's Transport Strategy;
- On 24 May 2021 a Written Ministerial Statement (WMS) was published in relation to First Homes. To the extent that it is relevant to this particular application, the WMS has been taken into account by the Mayor as a material consideration when considering this report and the officer's recommendation. Further information on the WMS and guidance in relation to how the GLA expect local planning authorities to take the WMS into account in decision making can be found [here](#). (Link to practice note)

## Land use principles

13. The existing building contains approximately 4,877 sq.m. of office floor space (Class E).
14. The proposed development would provide 534 sq.m of new office floorspace along with 189 sq.m of retail (restaurant) floorspace (Class E) and 274 sq.m community use (Class F2). The applicant should provide further details on the existing and proposed uses and which will be re-provided and provide full justification for the loss of any office floor space. The applicant is encouraged to engage with Wandsworth Council regarding the provision of affordable workspace in response to local need. Such provision should be secured in the S106 agreement.

### Employment floorspace

15. The site currently contains a six storey commercial office building comprised of 4,877 sq.m of employment (Use Class E(g)) floorspace. Policy E1 of the London Plan relates to employment floorspace and promotes the enhancement of office floorspace within London. The policy states that where such space is viable, it should be protected by Councils, however if such floor space is not viable, the Council should permit its release to be used for other purposes.
16. In terms of employment floorspace, the proposed development would provide 534 sq.m of new office floorspace along with 189 sq.m of retail (restaurant) floorspace (Class E) and 274 sq.m community use (Class F2).
17. Based on this, in order for the net loss of employment floorspace on the site to be accepted, the applicant would need to demonstrate that this floorspace is surplus to requirement.

18. As part of the submission, the applicant provided a marketing assessment of the existing building. This assessment indicates that commercial floorspace is not viable. Subject to the Council agreeing with the findings of the applicant's assessment and considering the floorspace to be surplus to requirements, then the loss of the majority of commercial floorspace on the site would not be of strategic concern. An update will be provided at Stage 2.
19. The applicant has stated that the 534 sq.m of new employment floorspace will be delivered as affordable workspace. The proposed floorspace will be flexible and adaptable to ensure it would be used by a wide range of future tenants. London Plan Policy E3 supports the development of affordable workspace in areas where cost pressures could lead to the loss of affordable or low-cost workspace for micro, small and medium-sized enterprises. The quantum of affordable workspace is supported subject to being provided at a suitable discounted rate. The affordable workspace should be secured by way of a legal agreement.

### Residential

20. Policy H1 of the London Plan sets 10-year housing targets for each borough including a target of 19,500 for Wandsworth. The proposed 142 residential units would contribute towards meeting that housing target and would be strongly supported from a strategic planning perspective where other land use considerations are appropriately addressed.

### Community use

21. The proposal includes 274 sq.m of community floorspace. Policy S1 of the London Plan states that the introduction of social infrastructure that addresses a local or strategic need should be supported in easily accessible locations. Subject to the space meeting the community need and Council requirements, the size, location and intended use is likely to meet with the objectives of Policy S1 of the London Plan. The Council should ensure that the space has been designed for flexibility and adaptation in order for it to be fully utilised for purposes that are both needed and also benefit the community. The floorspace and its operation/management should be secured by legal obligation.

## **Housing**

22. The proposed development would provide 142 residential units. In addition to market units, the unit mix includes 35% affordable housing (by habitable rooms) as outlined by Table 1 below.

	<b>1 Bed</b>	<b>2 Bed</b>	<b>3 Bed</b>	<b>4 Bed</b>	<b>TOTAL</b>
<b>Market</b>	18	64	14	1	<b>97</b>
<b>intermediate</b>	4	7	4	0	<b>15</b>

<b>Social Rent</b>	5	9	12	4	<b>30</b>
<b>TOTAL</b>	<b>27</b>	<b>80</b>	<b>30</b>	<b>5</b>	<b>142</b>

**Table 1: housing mix and tenure**

Housing mix

23. London Plan Policy H10 encourages a choice of housing based on local needs with regard given to robust local evidence of need, the requirement to deliver mixed and inclusive neighbourhoods and the need to deliver a range of unit types at different price points across London. The proposal includes a mix of one to four bedroom units with 16 of the 30 social rent units being family sized which is welcome.
24. Subject to the Council confirming the proposed mix meets the local need of the Borough, given the number of affordable family size units, GLA officers are supportive of the housing mix from a strategic perspective.

Affordable housing

25. London Plan Policy H4 seeks to maximise affordable housing delivery, with the Mayor setting a strategic target for 50% of all new homes to be genuinely affordable. London Plan Policy H5 and the Mayor's Affordable Housing and Viability SPF set out the 'threshold approach' to planning applications and identify a minimum threshold for the Fast Track Route of 35% affordable housing (without public subsidy), unless the development is on public land or is on industrial land and comprises a net loss of industrial capacity, in which case the threshold is 50%. The proposal is not located on industrial land and as such the Fast Track threshold for the site is 35%.
26. In order for a scheme to follow the Fast Track Route, the tenure split must also accord with the preferred mix outlined in Policy H5 of the London Plan, i.e.+- at least 30% low cost rent (social rent or affordable rent), at least 30% intermediate (London Living Rent or shared ownership) and the remaining 40% to be determined by the local planning authority, with an expectation that the remaining 40% will be weighted towards low-cost rental products.
27. The proposed affordable housing offer is 45 units which equates to 35% of habitable rooms. 30 units will be social rent with 16 of the units being family units of three and four bedrooms. The scheme includes 15 intermediate units which will be split between one, two and three bedrooms. Based on the above, the proposal will deliver an affordable housing offer with a 70:30 split in favour of social rent. It is noted that Council's affordable housing policy (LP23) stipulates a 50% social rented requirement. Subject to confirmation that the mix and rent levels is deemed acceptable to the Council, the quantum and unit mix proposed would be able to follow the Fast Track Route and would not need to be viability tested.

## Playspace

28. London Plan Policy S4 seeks to ensure that development proposals include suitable provision for play and recreation, and incorporate good-quality, accessible play provision for all ages, of at least 10 sq.m. per child that is not segregated by tenure.
29. The proposal includes 232 sq.m of playspace at podium level which falls short of the 712 sq.m which is required by the GLA population yield calculator. The applicant has stated that this playspace will serve the affordable housing element of the scheme and will meet the playspace for children under 5 years. The applicant is advised that this is not in line with London Plan policies regarding equitable provision, social inclusion and accessibility (Policies D5, D6 and S4). The applicant acknowledges the short fall in playspace for other residents and for older ages groups and has offered to pay a financial contribution for the shortfall. The Council should by way of condition ensure that the proposed playspace is suitable for the intended group and accords with the requirements of Policy S4 of the London Plan and is retained on the site for the benefit of residents. For the remaining shortfall, a financial contribution towards off-site provision should be secured by way of legal obligation. The quality and design of the on-site play provision should be secured by condition.

## **Urban design and heritage**

30. Chapter 3 of the London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture, sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment.
31. Policy D4 sets out that development proposals referable to the Mayor must have undergone at least one design review early on in their preparation before a planning application is made or demonstrate that they have undergone a local borough process of design scrutiny. It is understood that in addition to pre-application discussions with GLA officers, consultation of the design also included pre-application meetings with Council including its Design Review Panel as required by Policy D4 of the London Plan.

## Development layout

32. The proposal comprises a broadly north-south linear footprint of river-fronting development, between neighbouring development to the east and Battersea Bridge Road to the west. The level of ground floor activation is generally good (and a marked improvement over the existing situation). The Battersea Bridge Road frontage is complicated by rising street levels towards the bridge, and the applicant and Council should carefully consider the best approach to landscaping elements (i.e. raised planters v planting at grade) to ensure the optimal level of visual permeability and connectivity between ground floor uses and the street.

33. GLA officers are supportive of pulling the north end of the proposed building back from the river-facing site boundary. The proposal includes good improvements to the riverside and accessibility to the Thames path. It is noted that the majority of the improvements are beyond the red line boundary and will need to be delivered in liaison with Council.
34. The design proposes two separate residential lobbies, separating the tenures. As highlighted at GLA pre-application advice a combined lobby would provide a more equitable and integrated approach, in line with LP policies D5 B 2 'facilitating spatial interaction and inclusion' and D6 3.6.7 'maximising tenure integration'. This may also give a more space efficient layout, allowing more street level space for public access /community activities within the building.

#### Scale and massing (Tall buildings)

35. The proposed building is 34 storeys in height and is defined as a tall building by Council's local plan Policy LP4 which considers any building greater than seven storeys (21 metres) to be a tall building. Policy D9 of the London Plan states that tall buildings should only be developed in locations identified as potentially suitable in development plans. In this regard, GLA officers have reviewed the Council's tall building zone information and are of the view that the site falls just outside a tall building zone. Notwithstanding this, the site is wedged between two tall building zones which Council considered an appropriate building height to be between seven and 12 storeys. As such, the proposal is contrary to Part B of Policy D9 of the London Plan.
36. Although not compliant with Part B of Policy D9 of the London Plan, the acceptability of a tall building on the site must also be determined by its visual, functional, environmental and cumulative impact upon the surrounding environment as outlined by Part C of Policy D9.
37. At pre-application stage GLA officers considered that a 'landmark' for the river bridge could be an appropriate design principle to apply when re-developing this site. However as outlined at pre-application stage, this does not mean that a building of significant height is considered appropriate on that basis.
38. In terms of visual and cumulative impact, GLA officers note that the tall building proposal, whilst slender and architecturally elegant, would represent a stark new urban typology in its immediate setting. The submitted HTVIA also demonstrates that the proposal would have quite a high degree of wider townscape visibility, often in juxtaposition with the height of development in its context. This is apparent in many HTVIA views, but particularly in view 15 from Battersea Park where it is the only building obviously visible above the tree line, and in views 10 and 11 where its dominant scale is clearly indicated. Whilst this doesn't raise any particular concerns with respect to strategic views, associated heritage considerations are set out below.
39. In terms of functional impact and as outlined in the land use section of this report, the use of the site for both residential, commercial/retail and community uses are not expected to raise strategic concerns. Subject to some minor suggested refinements to layout, the ground floor uses and entry points are

logical and expected to ensure that the tall building and uses would generally integrate well with its surrounds. The functional impacts of the scheme are not expected to raise any strategic concerns.

40. In terms of environmental impacts, the wind assessment indicates that even in the best conditions (summer comfort) and with mitigation, much of the public realm including the river frontage is appropriate for standing only not occasional or frequent sitting. Unless improved mitigation can be found this could limit the versatility of this public space and therefore detract from the value of this potential public benefit. It is noted that the residential terrace experiences similar conditions.
41. With regards to the environmental impacts resulting from the tall building, prior to making any recommendation to approve the scheme, the Council should ensure appropriate mitigation has been secured in order for the amenity of these spaces to be high quality and fulfil their function.

#### Architectural quality

42. The reduction in the proposed shoulder height since pre-application stage is positive and beneficial to the building's proportions, and relates better to the immediate context than earlier iterations.
43. Overall, the architectural quality of materials proposed is good. The tower is slender in long-range and mid-range views, in part helped by the simple and legible approach to massing and the curved profile of the tower. The tower has a legible base, middle and crown in line with Policy D9 of the London Plan. The base is particularly successful at creating an animated and lively pedestrian experience. Whilst GLA officers are of the view that the crown could be better articulated, overall the proposed materials and the architectural language is considered appropriate.
44. Notwithstanding the position on overall building height in terms of the issue of non-compliance with London Plan Policy D9 part B (as well as other issues identified under D9 part C), the refinements made to the massing since the GLA pre-application meeting are welcomed as positive steps.

#### Public realm and landscaping

45. The aspirations to improve access to the riverside and improve the pedestrian experience along Battersea Bridge Road are positive. However, only limited riverside improvements are proposed within the red line boundary. It is understood that beyond the boundary, the public realm indicated is illustrative only. Given this, the quantum of public realm being delivered by the proposed development is considered insufficient to contribute to place making for the wider community and provide the public benefit that a building of this scale with this impact on the context would be expected to contribute.
46. GLA officers question the practicality and likely success of the trees indicated to the Battersea Bridge Road public realm as they sit beneath the overhang of the building facade above.

47. The combination of stepped and ramped access to the riverside is complex and collectively means that a significant amount of the available space is taken up by movement between levels. This should be simplified to allow more public realm riverside space to be available for gathering or relaxation rather than movement.

### Internal Quality

48. It is noted that 78% dual aspect units in the market tenure of the development and 50% dual aspect units in the affordable tenure. GLA officers would welcome improved dual aspect in affordable tenure. Separate lobbies for market tenure and affordable tenure are proposed. GLA officers recognise registered providers typically prefer separate cores for service charge and maintenance purposes, however GLA officers remind the applicant that Policies D5 and D6 of the London Plan promote spatial interaction, inclusion and integration. The private studio units in typical lower storeys of block have compromised layouts (i.e. shallow depth in one with multiple SW facing windows, deep plan in another with just two windows).

### Heritage

49. London Plan Policy HC1 states that proposals affecting heritage assets, and their settings should conserve their significance, avoid harm, and identify enhancement opportunities. The NPPF states that when considering the impact of the proposal on the significance of a heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. The NPPF states that in weighing applications that affect non-designated heritage assets, a balanced judgement is required having regard to the scale of any harm or loss and the significance of the heritage asset.
50. The site is not located within a conservation area and does not contain a nationally or locally listed building. The site is in the setting of the designated heritage assets as outlined below.
51. GLA officers have reviewed the submitted Heritage and Visual Impact Assessment (HVIA) and have formed the view that the proposed height causes widespread levels of harm to the setting of various heritage assets. It is the view of GLA officers that much of this harm could be removed/reduced if the proposed building were reduced in height to bring the building below tree lines in parks and below the established datum of development in longer views. GLA officers consider that the following levels of indirect harm are caused by the proposed development (in all cases the assessment is based on the cumulative scenario); the scale used for less than substantial harm is very low, low, low to middle, middle, middle to high, high and very high.

<b>Table of indirect (setting) impacts</b>			
<b>Heritage asset</b>	<b>Category of harm</b>	<b>Extent of harm</b>	<b>View reference</b>
Westminster World Heritage Site	No harm	No harm	HTVIA Figures 11.2, 11.13
Hyde Park, Registered Park and Garden, Grade I and the Royal Parks Conservation Area	Less than substantial harm	Very low	HTVIA Figures 11.8, 11.10, 11.11, 11.12
Church of St Mary and churchyard wall and gates, listed Grade I	Less than substantial	Low to middle	View 18, 19
Royal Hospital Chelsea and associated buildings, listed Grade I and the Chelsea Royal Hospital Conservation Area (RBKC) and the associated Chelsea Physic Garden, a Registered Park and Garden, Grade I	Less than substantial	Low to middle	Views 1, 2, 3, 12 and 23
Albert Bridge, listed Grade II*	Less than substantial	Low to middle	View 4
Numbers 4, 5, 6 and 15 Cheyne Walk, Queens House, listed Grade II and Swan House and Garden Corner, listed Grade II*			Views 3, 4 and 11
Battersea Bridge, listed Grade II	Less than substantial	Low to middle	Views 7 and 11
Battersea Park, Grade II* Registered Park and Garden and the associated Battersea Park Conservation Area and the listed buildings within the area	Less than substantial	Low to middle	Views 12, 13, 14, 15, 22 and 24
Westbridge Road Conservation Area (LBW) and the Grade II listed buildings within the area	Less than substantial	Low	View 20 and 26
Battersea Square Conservation Area (LBW)	No harm	No harm	Views 17, 18 and 25
Cheyne Conservation Areas (RBKC) and the multiple listed buildings within the area including Chelsea Old Church, Grade I; Crosby Hall, Grade II*; Lindsey House, Grade II* and Grade II listed houses in Cheyne Walk, Danvers Street, Paultons Square and Ropers Garden	Less than substantial	Low to middle	Views 4, 6 and 7
The Boltons Conservation Area (RBKC)	Less than substantial	Low	View 8
Chelsea Park/Carlyle Conservation Area (RBKC)	Less than substantial	Low	Views 5, 7

Brompton Cemetery Conservation Area (RBKC) and the associated Brompton Cemetery, a Registered Park and Garden, Grade I and associated cemetery buildings, listed Grade II*	No harm	No harm	View 9
Three Sisters Conservation Area (LBW)	No assessment possible	No assessment possible	No view provided
Thames Conservation Area (RBKC)	Less than substantial	Low to middle	View 4, 10 and 11

**Table 2: Impacts upon heritage**

52. Views 1, 2, 3, 12 and 23 within the HVIA show the proposed development in the context of the Royal Hospital Chelsea. Although the building does not appear in the principal axial view, it is clearly visible in transverse views in the garden setting of the assets, rising well above the treeline and existing development. In Views 2 and 23 parts of the historic building are backdropped by the proposal. This occurs in the apparently intact setting of a highly graded asset and is a concern.
53. In View 4 the proposed development backdrops the structure of the Albert Bridge. It is important that the spidery elegance of this beautiful bridge be appreciated against open sky and the intrusion into the backdrop is a concern.
54. The intrusion of the proposed development into views within the Cheyne Conservation Area, particularly Paulton's Square in View 6 is a concern, since this area is of historically low scale and has a well-preserved skyline. The distinct scale of the proposals in the streetscape are very apparent in View 7.
55. In Views 10 and 11 the distinct scale of the building can be seen to dominate the local street scene, appearing as an overly dominant element in the context of the Thames Conservation Area in View 10 and distracting from the primacy of Battersea Bridge in the view in View 11.
56. The Zone of Theoretical Visibility shows very wide visibility across Battersea Park. In some areas this will be partially screened by trees, but Views 12, 13, 14, 15, 22 and 24 show that the building will rise well above the treeline. This is particularly clear in View 15 and this is harmful since it urbanises the periphery of the park, detracting from its peaceful and *rus in urbe* character.
57. In View 18 and 19 the proposed development is seen in the context of the Church of St Mary nearby. View 18 is of particular concern, since it is noted that the existing nearby development was stepped down in an attempt to partly conserve views of the spire against clear sky. The proposals run counter to this approach and introduce a competing element in the skyline.
58. The proposed development is contrary to The London Plan Policy HC1 Heritage conservation and growth Part C: "Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their

surroundings. In accordance with paragraph 196 of the NPPF, where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. In carrying out this balance, in accordance with the statutory requirements, great weight and importance should be attached to harm to designated assets.

59. In principle, GLA officers consider that the proposal could deliver a number of public benefits. As outlined above, the proposal would provide new residential accommodation (including a significant number of affordable homes), affordable employment space and new community floorspace. Following the conclusion of matters and discussions related to issues raised in this consultation stage report, an assessment of whether the public benefits resulting from the scheme would outweigh heritage harm will be undertaken at the Mayor's decision making stage.

### Fire safety

60. Policy D12 of the London Plan states that major applications should be accompanied by a fire statement, prepared by a suitably qualified third party assessor, demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel. Further to the above, Policy D5 (B5) of the London Plan seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users, with fire evacuation lifts suitable to be used to evacuate people who require level access from the buildings.
61. The submitted fire safety strategy and Gateway 1 Fire Statement has been drafted and reviewed by Ashton Fire, and information has been provided regarding the qualifications of the assessor and reviewer. The submitted fire statement has been prepared to address Policy D5 and D12 of the London Plan, however, it does not appear to include a declaration of compliance in relation to both policies D12 and D5(B5). As set out in the Fire Safety draft LPG such a declaration should be included within the fire statement. Prior to determination the Council must confirm that appropriate Fire Safety considerations have been agreed and that compliance is secured by way of condition or legal agreement
62. It is noted that the residential levels are served by a central core consisting of two common stairs and central lifts consisting of a firefighting and evacuation lifts in line with Policy D5 and D12 of the London Plan. This provision should be secured by condition by the Council in accordance with London Plan Policy D5 and D12

### Inclusive access

63. Policy D7 of the London Plan seeks to ensure that new development achieves the highest standards of accessible and inclusive design- not just the minimum. Developments should ensure that the development can be entered and used

safely, easily, and with dignity by all, is convenient and welcoming, and provides independent access without additional undue effort, separation, or special treatment.

64. All the residential units have been designed to be wheelchair adaptable, with 14 (10%) provided as wheelchair user dwellings consistent with Part M4(3) of the Building Regulations and Policy D7 of the London Plan.

#### Digital connectivity

65. Policy SI6 of the London Plan states that development proposals should ensure that sufficient ducting space for full fibre connectivity infrastructure is provided to all end users within new developments, unless an affordable alternative 1GB/s capable connection is made available to all end users. This should be secured by Council.

## **Transport**

#### Healthy Streets

66. The proposal for active frontage along Battersea Bridge Road is welcomed and supported. The inclusion of street trees and well-integrated short-stay cycle parking within the sites redline boundary is supported. Reducing the building footprint to increase footway widths on Battersea Bridge Road is also supported in line with Policy T2 of the London Plan.
67. The redevelopment of the site includes improvements to the public realm on the Thames Path. The improvements proposed are supported in principle, however opportunities to straighten the route for cyclists passing in front of the site on the Thames Path to improve cycling visibility and permeability should be explored.
68. The development proposal should seek to address the lack of width on the Thames Path and ensure a high quality pedestrian and cyclist crossing facility on Battersea Bridge is provided. The application proposes a 3-metre shared use path, however GLA officers would strongly support the width of the shared path being increased to five metres. A plan with proposed and current widths of the footway between the Thames and amphitheatre / building lines should be provided. Widening the Thames Path would improve the public amenity offer.
69. It is also unclear if the proposed public realm along the Thames Path will be cyclable or whether cyclists must dismount from a certain point. In line with Policies T2 and T5 of the London Plan any walking and cycling infrastructure should be safe, comfortable, attractive, coherent and direct.
70. An Active Travel Zone (ATZ) Assessment has been submitted in line with Transport for London (TfL) guidance. Further work is required on the contents of the ATZ Assessment prior to the application being determined.

## Battersea Bridge Road

71. TfL is delivering pedestrian and cyclist improvements along Battersea Bridge Road to enhance the public realm and address collision hotspots. The scheme aims to improve cyclist and pedestrian facilities on the public highway. It is considered that the proposed development will benefit from the scheme as it will better accommodate the additional pedestrian and cycling trips generated by the development and further promote safe and active travel. A proportionate contribution towards the delivery of the scheme is requested to be secured through the S106 Agreement in line with policies T2, T4 and T5 of the London Plan.

## Car parking

72. A total of 18 parking spaces are proposed, including 5 disabled bays at lower ground level with a further 13 general parking spaces proposed at basement level, accessed via a car lift. Policy T6 of the London Plan Policy T6 sets out that car free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car lite'). GLA officers are of the view that a car free development is entirely appropriate in a central PTAL 3 location and would therefore strongly support the application being amended, with all general car parking removed, and only 3% of blue badge bays provided from the outset.
73. Residents should be excluded from obtaining permits to park in local controlled parking zones (CPZ's).
74. A Parking Design and Management Plan (PDMP) should be secured appropriately.

## Cycle parking

75. 268 long stay and five short stay cycle parking spaces are proposed, exceeding Policy T5 of the London Plan minimum standards. However, further adjustment is required on the mix and location of the cycle parking proposed to ensure compliance with London Cycling Design Standards (LCDS) guidance.
76. Access to the cycle store is proposed to the rear of the building, via Hester Road. As set in section 8.1.2 (Cycle parking principles) of TfL's LCDS guidance, long stay cycle parking should be well located, convenient, and accessible as close as possible to the destination. The proposed location of the cycle parking store access may increase conflicts between cyclists, servicing vehicles and any vehicles using the proposed car parking store, threatening Vision Zero and conflicting with policies T2 and T4f of the London Plan. The access arrangement for the cycle parking should be reassessed and consideration should be given to cyclists being able to access the cycle stores from the residential cores.
77. One cycle lift is proposed to each of the cycle stores proposed. If this breaks and needs maintenance, cyclists will find it difficult to access their bikes. An

additional lift, and/or ramped access to the cycle store should be provided to ensure continuous access in line with policies T1 and T5 of the London Plan.

#### Trip generation

78. Further work is required on the trip generation assessment prior to it being considered acceptable in line with Policy T4 of the London Plan.

#### Deliveries and servicing

79. Servicing is proposed on street on Hester Road, close to where the cyclist and vehicle entrances to the site are proposed. GLA officers would strongly support the car parking proposed in the lower ground floor being removed to introduce a servicing yard within the building, reducing potential conflicts between cyclists and servicing vehicles in line with policies T2, T4f and T7 of the London Plan.
80. A Delivery and Servicing Plan (DSP) should be secured by condition in line with Policy T7 of the London Plan.

#### Battersea Bridge

81. The proposed basement outline clashes with the staircase banister and construction could damage the banister. Battersea Bridge is a Grade II listed structure and the banister would need to be protected. The basement work will require an impact assessment on the bridge south abutment and wing walls and parapets walls. Furthermore, as the bridge is a TfL Surface Structures asset any work in proximity of the structure will require Technical Approval from TfL Surface Structures.

#### Construction

82. An outline Construction Logistics Plan (CLP) has been submitted with the application. Further discussion and work on the proposed construction arrangement is required prior to the application being determined.
83. A Construction Logistics Plan (CLP) should be secured by condition should the application be granted approval in line with Policy T7 of the London Plan.

#### Travel Plan

84. An outline Travel Plan has been provided as part of the application submission. Funding for the implementation and monitoring of the Travel Plan should be secured in the Section 106 Agreement.

### **Sustainable development**

#### Energy strategy

85. The London Plan requires all major developments to meet a net-zero carbon target. Reductions in carbon emissions beyond Part L of the 2021 Building Regulations should be met on-site. Only where it is clearly demonstrated that

the zero-carbon target cannot be fully achieved on-site a contribution to a carbon offset fund or reductions provided off site can be considered.

### *Energy strategy compliance*

86. An energy statement has been submitted with the application. The energy statement does not yet comply with Policies SI2, SI3 and SI4 of the London Plan Policies. The applicant is required to further refine the energy strategy and submit further information to fully comply with London Plan requirements. Full details have been provided to the Council and applicant in a technical memo that should be responded to in full; however outstanding policy requirements include:
- Be Lean – further evidencing of measures for domestic and non-domestic including reporting of figures separately, evidencing of thermal bridging and submission of full modelling outputs;
  - Be Clean – demonstration that the number of energy centres has been minimised;
  - Be Green – demonstration that renewable energy has been maximised, including roof layouts showing the extent of PV provision and details of the proposed air source heat pumps;
  - Be Seen – confirmation of compliance with this element of policy, with compliance to be secured within the S106 agreement;
  - Energy infrastructure – further details on the design of district heating network connection is required, and the future connection to this network must be secured by condition or obligation;
  - Managing heat risk – further details to demonstrate the cooling hierarchy has been followed.
87. The development is estimated to achieve a 64% reduction in CO2 emissions compared to 2021 Building Regulations. The domestic and non-domestic savings have been reported only as site-wide savings at this stage of the review. This should be updated by the applicant.
88. The development falls short of the net zero-carbon target in Policy SI2, although it meets the minimum 35% reduction on site required by policy. As such, a carbon offset payment is required to be secured. This should be calculated based on a net-zero carbon target using the GLA's recommended carbon offset price (£95/tonne) or, where a local price has been set, the borough's carbon offset price. The draft s106 agreement should be submitted when available to evidence the agreement with the borough.

### Whole Life-cycle Carbon

89. In accordance with London Plan Policy SI2 the applicant is required to calculate and reduce whole life-cycle carbon (WLC) emissions to fully capture the development's carbon footprint.
90. The applicant has submitted a whole life-cycle carbon assessment. The WLC assessment does not yet comply with London Plan Policy SI2. Further information is required on:

- Evidence to confirm that 95% of the cost per building element category has been modelled;
  - Details of the third-party verification mechanisms;
  - The applicant should confirm whether the WLC Assessment has been submitted to the Built Environment Carbon Database by the applicant or whether the applicant has given permission for the GLA to submit the assessment to the Built Environment Carbon Database;
  - The applicant has provided results that fall within the WLC benchmarks and has not reasonably explained the reasons for any divergences from the WLC benchmark. The applicant should provide details of the innovative design that has enabled the aspirational benchmarks to be achieved;
  - Confirm that options for retaining the existing building and structures were considered before considering substantial demolition;
  - Further opportunities to reduce whole life-cycle carbon emissions;
  - Further information on materials quantity, assumptions and end of life scenarios;
  - GWP potential for all life-cycle modules.
91. A condition should be secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions. The template and suggested condition wording are available on the GLA [website](#)<sup>1</sup>.

### Circular Economy

92. London Plan Policy D3 requires development proposals to integrate circular economy principles as part of the design process. London Plan Policy SI7 requires development applications that are referable to the Mayor of London to submit a Circular Economy Statement, following the Circular Economy Statements LPG.
93. Whilst it is welcomed that the applicant has provided a Circular Economy Statement, this is with reference to the previous guidance. The applicant should submit a revised Circular Economy Statement in line with the adopted London Plan Guidance: Circular Economy Statements (March 2022), including the completed CE template and/or an accompanying written report.
94. The submission does not yet demonstrate compliance with London Plan Policy SI 7, in particular the applicant has not yet demonstrated:
- how all materials arising from demolition and remediation works will be re-used and/or recycled
  - how the proposal's design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life
  - how much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy
  - how performance will be monitored and reported.

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<sup>1</sup> <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance>

95. Based on the information provided, it is understood that demolition is proposed where the existing building does not suit the brief for the site. The applicant should further consider whether it would be technically feasible to retain the existing building in any alternative or continued use. The applicant should provide additional information to clearly illustrate that the constraints identified could not feasibly be addressed via a retention scheme. The applicant references that a retrofit study was undertaken by the project architect, the applicant is strongly encouraged to provide this as supporting evidence.
96. The applicant should ensure that the measures / commitments provided are project specific, including detail of how this is to be achieved within the Proposed Development.
97. The applicant should consider key circular economy commitments that go beyond standard practice.
98. The applicant should complete the Bill of Materials in the GLA CE template, in line with the WLCA.
99. The applicant should ensure that estimates of all waste streams are provided, including a breakdown of waste management routes and relevant cross references.
100. The applicant should provide specific commitments to the GLA policy targets.

## **Environmental issues**

### Urban greening

101. Policy G1 of the London Plan encourages development proposals to incorporate elements of green infrastructure, which should be planned, designed, and managed in an integrated way to achieve multiple benefits. The proposal includes the provision of new trees, grasses, lawn, woodland planting, permeable paving, and green roofs.
102. Policy G5 of the London Plan recommends a UGF target of 0.4 for residential and 0.3 of predominantly commercial developments. The applicant has stated that the UGF for the proposed development is 0.4 which meets with the London Plan policy requirements.
103. GLA officers are of the view that proposed urban greening improvement is considered appropriate when assessed against the requirements of Policies G1 and G5 of the London Plan.

### Sustainable drainage and flood risk

104. The site is located in Flood Zone 3, in an area benefitting from the Thames Tidal Defences. A Flood Risk Assessment (FRA) has been submitted.

#### *Flooding*

105. There is the potential for elevated groundwater beneath the site. Groundwater monitoring should be undertaken ideally during winter months to inform the exact mitigation measures required, to be secured by condition.
106. The FRA adequately assesses the risk of flooding from pluvial, sewer and reservoir flooding, which is considered to be low. At present, the FRA provided for the proposed development does not comply with Policy SI.12 of the London Plan.

#### *Sustainable drainage*

107. The drainage strategy proposes to discharge at an unrestricted rate to the tidal River Thames.
108. Pumping is not a sustainable solution to surface water discharge and should be avoided. The drainage strategy should be re-visited to incorporate the attenuation volume above ground where possible, or robust justification should be provided as to why it is included.
109. In terms of SuDS, the drainage strategy proposes green roofs, podium gardens, blue roofs, tree pits, rain gardens and a tank, which is welcomed.
110. The applicant should ensure that the London Borough of Wandsworth's version of the London Sustainable Drainage Proforma is completed and accompanies the planning application. The proformas for all Local Authorities can be found here: <https://www.london.gov.uk/what-we-do/environment/climate-change/surface-water/london-sustainable-drainage-proforma>.
111. The surface water drainage strategy for the proposed development does not comply with Policy SI 13 of the London Plan.

#### *Water efficiency*

112. The Sustainability Statement identifies a water consumption target for the residential component of the development as 110 l/person/day. This is higher than the maximum of 105 l/person/day set by Policy SI.5 of The London Plan.
113. The Sustainability Statement notes that 2 Wat 01 credits are targeted for the non-residential uses on site, with water consumption reduced by 25%, in line with Policy SI 5 of the London Plan.
114. Water efficient fittings are proposed, which is welcomed.
115. The proposed development does not currently meet the requirements of Policy SI 5 of the London Plan.

#### Air quality

116. An air quality assessment has been submitted as part of the submission. The assessment has been reviewed by GLA officers who have formed the view that the proposed development will likely not lead to adverse impacts on local air

quality and conditions for future residents. Therefore the development is considered to be compliant with London Plan Policy. Notwithstanding this, GLA officers recommend the following conditions be included in any decision notice:

- All Non-Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the course of the demolition, site preparation and construction phases shall comply with the emission standards set out in chapter 7 of the GLA's supplementary planning guidance "Control of Dust and Emissions During Construction and Demolition" dated July 2014 (SPG), or subsequent guidance. Unless it complies with the standards set out in the SPG, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority. The developer shall keep an up to date list of all NRMM used during the demolition, site preparation and construction phases of the development on the online register.
- Measures to control emissions during the demolition and construction phase relevant to a Medium risk site should be written into an Air Quality and Dust Management Plan (AQDMP), or form part of a Construction Environmental Management Plan, in line with the requirements of the Control of Dust and Emissions during Construction and Demolition SPG. The AQDMP should be approved by the LPA and the measures and monitoring protocols implemented throughout the construction phase (London Plan Policy SI 1 (D)).
- Use of the backup generator(s) is restricted to emergency use and operational testing (less than 50 hours per year).

117. A copy of the air quality memo has been provided under separate cover.

### **Local planning authority's position**

118. Wandsworth Council planning officers are currently assessing the application. In due course the Council will formally consider the application at a planning committee meeting.

### **Legal considerations**

119. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order to refuse the application; or, issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application (and any connected application). There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

## Financial considerations

120. There are no financial considerations at this stage.

## Conclusion

121. London Plan policies on employment floorspace housing, affordable housing, urban design, heritage, inclusive design, sustainable development, green infrastructure, and transport are relevant to this application. Whilst the proposed land uses are supported in principle, the scale of the proposal raises some concern and the application does not currently fully comply with some of these policies, as summarised below:

- **Land use principle:** Subject to demonstrating that the existing office space is not viable, the proposed residential-led redevelopment is supported in principle.
- **Housing:** The proposed new homes would contribute to housing targets. The proposal includes a 35% affordable housing offer that meets with Fast Track Thresholds.
- **Urban Design and heritage:** The site has not been identified as suitable for a tall building and visual and environmental impacts need to be robustly addressed. The proposal would result in harm to heritage assets. This harm must be outweighed by public benefits in order to be acceptable.
- **Transport:** Active Travel Zone Assessment should be amended. Contribution towards TfL's Battersea Bridge Road scheme are requested. General parking removed. Proposed servicing and cycle arrangements need to be reviewed. Management Plans need to be secured.
- Other issues on **environment** and **sustainability** also require resolution prior to the Mayor's decision making stage.

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