

The Planning Inspectorate

c/o Quadient
69 Buckingham Avenue
Slough
SL1 4PN

Appeal reference: APP/H5960/W/25/6002127

Site: The Glassmill, 1 Battersea Bridge Road, Battersea, London SW11 3BZ

Application reference: 2024/1322

For the attention of: Ms Joanna Gilbert

26 January 2026

Dear Ms Gilbert,

I write in my capacity as the Chairperson of the Thames Walk Residents Association (TWRA) Limited, the resident's company that represents the interests of all the shareholders and residents of Thameswalk Apartments which shares a 'party wall' with the Glassmill building and which owns the river frontage, the river wall, the access road adjacent to the east of the Glassmill, and the land to south of The Glassmill. Rather than you wade through 14 letters I have summarised below the thoughts of the owners of TWRA from Shareholder meetings, three detailed letters from other Directors, as well as studies paid and undertaken for TWRA in the initial objection.

We would like to register **our unanimous objection** to the proposed development of The Glassmill building by the developer Rockwell Properties Ltd. in conjunction with Promontoria Battersea and the finance house Cerberus Capital Management LP of New York in the USA and, in particular, to object to the appeal by Rockwell against the planning application refusal by the London Borough of Wandsworth.

As you know, this appeal comes after Wandsworth Council's Planning Applications Committee unanimously refused planning permission. The decision followed officers' recommendations and was in line with the views of all political parties, thousands of local people, as well as civic societies from across this part of London. All were all deeply concerned about its significant impact on both the locality and environment.

TWRA occupies a uniquely affected position. Thames Walk is physically attached to the Glassmill building and directly adjoins the application site. TWRA owns and is responsible for the private access road, the riverside walkway and the Thames River Wall. Any demolition, excavation and construction on the site would therefore have direct and unavoidable implications for TWRA's buildings, infrastructure, and assets. Despite repeated representations since 2024, the applicant has not engaged meaningfully with TWRA on party wall matters, river wall protection, access arrangements or the risks to adjoining structures and privately owned land.

These unresolved matters go to the heart of the scheme's deliverability. The proposal depends on works affecting third-party land and structures, yet fundamental issues of interface, risk and long-term liability remain unaddressed. Such impacts on residential amenity, structural integrity and environmental assets cannot be assumed away, mitigated through financial contribution, or deferred to condition. Their continued uncertainty weighs materially against the proposal in the planning balance.

Our following objections are grounded in planning policy and evidence. The arguments below are presented in an order that reflects TWRA's long-standing priorities, drawing on earlier representations to the local authority.

1. Scale, Height and Massing: A Fundamentally Inappropriate Tower

The proposed development is a hideously tall building. At 29 storeys (not including the double height podium taking it closer to 34) it is wholly out of scale with its surroundings, where prevailing building heights range from two to nine storeys. This represents a clear and serious conflict with Wandsworth Local Plan Policy LP4 and London Plan Policy D9.

The excessive height and bulk would dominate the local skyline, cause significant townscape harm and fundamentally alter the character of this stretch of the Thames. Allowing a tower of this scale would also set a damaging precedent, undermining the integrity of Wandsworth's recently adopted Local Plan.

2. Daylight, Sunlight, Overshadowing and Privacy

The scale of the proposed building would result in permanent and severe losses of daylight and sunlight to neighbouring properties, including Thames Walk Apartments, Albion Riverside and the assisted housing at 6 Hester Road. In several instances, these losses exceed accepted standards by a substantial margin, resulting in irreversible harm to residential amenity. These impacts are examined in detail in the independent daylight and sunlight assessment prepared by Anstey Horne, commissioned by TWRA and appended to this letter, which provides the technical evidence underpinning this objection.

The proposal would also cause significant overlooking and loss of privacy, including from elevated terraces. These impacts conflict with Local Plan Policies LP2, LP15 and LP27 and have not been properly addressed in the application or the officer's report. The failure to consider the implications of the Supreme Court judgment in *Fearn v Tate Gallery* is particularly notable and a clear oversight.

3. Construction Impacts, Vibration and Structural Risk

TWRA has consistently identified construction impacts as a primary concern. Demolition, deep excavation, extensive piling and prolonged construction activity would generate significant noise and vibration over several years.

Given the site's constraints and proximity to sensitive structures, these works pose serious risks to the foundations and structural integrity of Thames Walk Apartments, the River Wall, Albion Riverside's underground car park, 6 Hester Road (affordable housing units of 84 units) which is less than 10m from the site, Battersea Bridge Road and Battersea Bridge itself. No credible construction methodology has been provided to demonstrate how these risks would be managed or mitigated.

The scale, duration and intensity of construction activity associated with a 29-storey tower on this constrained riverside site would be exceptional in local terms, materially increasing the risk profile compared with typical development in the area.

In addition, the tightly drawn red line boundary has had the effect of excluding essential construction activities from full assessment. Earlier representations set out why a properly defined application site would be likely to trigger Environmental Impact Assessment under the 2017 Regulations. These cumulative construction impacts have never been comprehensively examined.

The appendix to this letter includes independent material commissioned by TWRA that unpacks construction intensity, demolition and foundation impacts in greater depth.

4. Traffic, Access and Network Impacts

The development would generate substantial construction and operational traffic in an area already subject to congestion and physical constraints, including weight limits on Battersea Bridge.

There is no credible construction traffic management plan, and unresolved questions remain about access via private roads owned by TWRA. The cumulative impact of demolition traffic, servicing, refuse collection, deliveries, cycling provision and general residential traffic would be severe, contrary to the NPPF and Local Plan transport policies.

Whilst in the original meeting of Council for the Planning Application of Rockwell, TFL, to the surprise of everyone present suggested that there would be no impact on the traffic during construction. However, since this meeting in mid-2025, there has been a dramatic change in the layout of the road onto and after Battersea Bridge with additional lights, limitation on lanes with added bus lanes. It is also clearly evident that the traffic and changes to the roads joining the bridge are causing huge concern to Emergency vehicles who are now often stuck on Battersea Bridge with no way of hastening a pathway.

5. Heritage, Townscape and Strategic Views

The proposal would cause material harm to the setting of heritage assets, most notably the Grade II listed Battersea Bridge, as well as conservation areas and registered parks and gardens on both banks of the Thames. There have been several developments in the last year on Battersea Bridge Road in 2025 that have adhered to the building height of 9 floors whilst providing adequate accommodation fitting to council targets.

Historic England has advised that the building height would need to be significantly reduced to avoid harm. That advice has not been meaningfully addressed. The scheme therefore conflicts with Local Plan Policy LP3, London Plan Policies D9 and HC1, and the statutory duty to preserve heritage settings.

Again, the suggestion that any impact on the Historical Site can be offset by a monetary payment is insensitive and irresponsible.

6. Environmental and Climate Considerations

TWRA has commissioned independent specialist advice demonstrating that the existing Glassmill building could be retained and retrofitted. The applicant has not properly examined this option and has instead relied on a superficial and incomplete carbon assessment to justify demolition.

The detailed evidence supporting this position is set out in the Whole Life Carbon Review prepared by Targeting Zero, appended to this letter. That review assesses retrofit feasibility, embodied carbon impacts and compliance with national policy, the London Plan and the Wandsworth Local Plan.

Demolition and rebuild would result in substantially higher embodied carbon emissions than refurbishment, in clear conflict with Local Plan Policy LP10 and London Plan policies on whole-life carbon and circular economy principles. Such impacts cannot be neutralised through offsetting or financial contributions and must be addressed through design choices at application stage. The proposal therefore fails to demonstrate an acceptable carbon outcome in planning terms.

7. Flood Risk and Riverside Constraints

The site lies within Flood Zone 3 and in close proximity to the Thames flood defences. The Environment Agency has objected due to inadequate assessment of flood risk and impacts on the flood defence structure.

TWRA is aware that the Inspector will already have the Environment Agency's objection before them as a statutory consultee response. It is nevertheless relied upon here and appended for completeness, given its direct relevance to assets owned and maintained by TWRA, including the River Wall.

These issues have been deferred to conditions rather than resolved at application stage, contrary to the precautionary approach required by national and local policy.

8. Wind Microclimate, Infrastructure and Employment Impacts

The wind microclimate effects of a tower of this height on a constrained riverside site have not been adequately assessed. The applicant’s own studies identify uncomfortable conditions at pedestrian level, with no convincing mitigation. Potential implications for Battersea Heliport flight paths remain unexamined.

The applicant has also failed to demonstrate that utilities infrastructure, including water, electricity and wastewater capacity, can support the full development. This raises further doubts about deliverability.

Finally, the proposal would result in a net loss of employment floorspace within Wandsworth’s Riverside area, contrary to Local Plan Policies PM9 and LP33.

Conclusion

Taken individually, the harms arising from excessive height and massing, loss of residential amenity, construction impacts, flood risk and whole-life carbon emissions are each significant and materially harmful. Each was sufficient to justify refusal of the application, and none has been adequately resolved through the appeal.

TWRA goes further in submitting that these harms should also be considered cumulatively. When assessed together, rather than in isolation, their combined effect is greater than the sum of their parts, compounding the impact on a constrained riverside site and reinforcing the conclusion that the proposal represents overdevelopment in planning terms.

For these reasons, the Thames Walk Residents Association respectfully requests that the appeal be dismissed and the Council’s decision upheld.

Yours faithfully,

Amanda Gulliver
 Chair, Thames Walk Residents Association Limited (Flat 5)

Signed on behalf of the following residents and shareholders of Thames Walk Apartments:

Flat	Resident(s)
1	James Steele
2	Maz Marrer
3	Robert Godber
4	Sir Chris & Lady Sally Edwards
5	Amanda & Stuart Gulliver
6	Julia Barton
7	Hugh McCahey
8	Habe Crocker
9	Linde Muller
10	Eleanor Sunley

11	Michael Folb
12	Claire & Lionel Kevis
13–15	Andrew Cazalet Family
17	Julia Holls Allen & Robin Gollace

Contents of this Appendix

Appendix A

Letter from Hugh McCahey

Director, Thames Walk Residents Association (Flat 7)

Dated 15 January 2026

A supplementary representation addressing construction impacts, traffic disruption and safety risks associated with demolition, excavation and construction phases of the proposed development.

Appendix B

Letter from Habe Crocker

Director, Thames Walk Residents Association (8)

Dated 13 January 2026

A supplementary representation focusing on whole-life carbon, retrofit feasibility and compliance with environmental policy, submitted in support of the appended Targeting Zero report.

Appendix C

Whole Life Carbon Review – Glassmill, Battersea

Prepared by **Targeting Zero**

Dated 19 June 2024

(Commissioned by Thames Walk Residents Association Limited)

This report assesses the feasibility of retention and retrofit of the existing Glassmill building, compares whole-life carbon impacts of demolition and rebuild versus refurbishment, and evaluates compliance with national policy, the London Plan and the Wandsworth Local Plan.

Appendix D

Independent Daylight and Sunlight Assessment

Prepared by **Anstey Horne**

(Commissioned by Thames Walk Residents Association Limited)

This report provides technical analysis of daylight and sunlight impacts arising from the proposed development and underpins TWRA's objections in relation to residential amenity. The report is relied upon insofar as it relates to daylight and sunlight impacts, which are material planning considerations.

Appendix E

Environment Agency Objection

Dated 17 June 2024

The Environment Agency's formal objection to the proposal, addressing flood risk, riverside constraints and impacts on flood defence infrastructure. This document is already before the Inspector but is included here for completeness and ease of reference.

Appendix A: Letter on Demolition and Construction Build Impact

15 January 2026

The Planning Inspectorate

The **Planning Inspectorate**
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

Dear Planning Inspector,

Re: Objection to Appeal on Planning Application Ref: 2024/1322 — Proposed Demolition and Redevelopment of The Glassmill, 1 Battersea Bridge Road, London SW11, by Rockwell

Project Management Limited and Promontoria Battersea Ltd

I am writing as a Director of Thames Walk Residents Association and owner of Flat 7 to formally object to the appeal by Rockwell Project Management Limited and Promontoria Battersea Ltd against the London Borough of Wandsworth's refusal of planning permission in April 2025 for the demolition of The Glassmill and its replacement with a 29-storey residential-led tower. My objection focuses on the severe disruption, traffic congestion, and safety risks posed by the demolition, foundation works, and overall construction phases, as evidenced by detailed estimates of waste removal, excavation, and material deliveries. These impacts would be unacceptable in this sensitive location adjacent to Battersea Bridge, a major arterial road, and residential properties like Thameswalk Apartments.

The site's proximity to Battersea Bridge Road (A3220), a busy commuter route carrying thousands of vehicles daily, including buses, cyclists, and pedestrians, exacerbates these concerns. Any increase in heavy goods vehicle (HGV) traffic would lead to gridlock, heightened accident risks, air pollution, and noise/vibration disturbances for nearby residents and bridge users. The proposal fails to adequately mitigate these issues, and a retrofit of the existing 40-year-old, functional building—as recommended in the attached Whole Life Carbon Review by Targeting Zero (dated 19 June 2024)—would avoid them entirely. Below, I outline the key disruptions based on industry-standard calculations derived from the application's details (e.g., site dimensions of approximately 75m x 16m, sub-basement excavation to 5m depth, and 400 bored piles at 35m deep x 1m diameter).

Disruption from Demolition Works

The existing Glassmill, a 6-storey office building with a gross internal area of about 4,877 m², would generate an estimated 9,754 tonnes of demolition waste (concrete, steel, glass, etc.), based on UK benchmarks from sources like WRAP and BRE (approximately 2 tonnes per m²). Removing this waste would require:

- 488 loads using 20-tonne lorries (or 244 with 40-tonne lorries, though urban restrictions may limit larger vehicles).
- An estimated 41 working days (8-10 weeks) for 20-tonne lorries, assuming 3 lorries operating in an 8-hour day with 2-hour cycles (loading, travel to disposal sites 10-20 km away, and unloading). This equates to about 328 hours of active site operations, overlapping with demolition itself (adding 2-4 weeks).

In practice, this means 12-15 lorry movements per day, causing repeated road closures or lane restrictions on Battersea Bridge Road. The constant HGV traffic would disrupt local bus routes (e.g., 44, 49, 319), endanger cyclists on this designated cycle lane, and create bottlenecks at the bridge, a key Thames crossing. Noise from breaking structures and dust from waste handling would affect residents for months, with no clear mitigation in the submission.

Disruption from Foundation Excavation and Construction

The proposed sub-basement (75m x 16m x 5m pit) and foundations for the 29-storey and 12-storey elements would involve excavating approximately 16,996 m³ of London clay (density -1.8 tonnes/m³), totalling 30,593 tonnes of spoil. This requires:

- 1,530 loads using 20-tonne lorries (with 10-20% more for bulking factors).
- An estimated 4-8 weeks (20-40 working days) for excavation alone, using 3-4 machines in clay conditions limited by shoring and dewatering.

Piling (400 x 35m-deep bored piles) and a 1.5m-thick concrete raft would then require 12,796 m³ of concrete, delivered by 1,600 trucks (8 m³ capacity each). Piling and concreting could take 8-12 weeks, with the full foundation phase spanning 3-6 months. Daily rates might include 100-200 m³ of concrete pours, meaning 12-25 truck deliveries per day, plus ongoing spoil removal.

This phase would generate intense vibrations from pile boring (potentially damaging nearby structures like Thameswalk Apartments or the river wall) and constant HGV influx, worsening congestion on Battersea Bridge Road. With up to 20-30 vehicle movements daily, the site—constrained by the river and adjacent residences—offers no off-road staging area, forcing lorries to queue on public roads. This could lead to hours-long delays for commuters, increased emissions, and safety hazards near the bridge's pedestrian crossings.

Overall Construction Disruption and Traffic Issues

Beyond demolition and foundations (totalling 5-9 months of intensive works), the full build —erecting a 29-storey tower—could extend 2-3 years, per similar London projects. This includes ongoing deliveries of steel, cladding, and fit-out materials, potentially adding thousands more HGV trips. The site's location amplifies risks:

- **Traffic Congestion:** Battersea Bridge is already a pinch point, with peak-hour queues extending to Chelsea and Clapham. Hundreds of additional lorries would exacerbate this, potentially violating Wandsworth 's transport policies (e.g., Local Plan LPIO on minimizing disruption).
- **Safety and Amenity:** Vibrations and noise could affect bridge stability, river wall integrity (TWRA liability), and resident health. Dust and pollution would impact air quality in this residential zone.
- **Lack of Mitigation:** The submission provides no detailed traffic management plan addressing these volumes, ignoring GLA Policy T7 on freight and servicing.

In contrast, retrofitting the existing building—as argued in the Targeting Zero review— would involve minimal waste (no full demolition), no deep excavation, and far fewer vehicle movements, aligning with NPPF (2023) sustainability goals and reducing carbon emissions. I urge you to dismiss this appeal and uphold the refusal, prioritizing community well-being over unnecessary disruption. Please confirm receipt and keep me informed of proceedings.

Yours sincerely,

Hugh McCahey

Director Thames Walk Residents Association (Flat 7)

Attachment: Whole Life Carbon Review by Targeting Zero (19 June 2024); Combined
Estimates of Demolition and Foundation Waste (January 2026)

Appendix B: Letter on Targeting Zero

January 13, 2026

The **Planning Inspectorate**
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

Formal Objection to Appeal: The Glassmill, 1 Battersea Bridge Road, London SW11 3BZ

Re Appeal Reference Number: 6002127

Site Address: The Glassmill, 1 Battersea Bridge Road, Battersea, London SW11 3BZ
Re: Appeal against refusal of planning permission for The Glassmill (Ref: 2024/1322)

For the kind attention of Ms Joanna Gilbert.

Dear Ms Gilbert,

Re: Objection to Appeal on Planning Application Ref: 2024/1322 — Proposed Demolition and Rebuilding of The Glassmill, 1 Battersea Bridge Road, London, by Rockwell Project Management Limited.

I am writing as a local resident as well as Director of Thames Walk Residents Association to formally object to the proposed demolition and rebuilding of The Glassmill building at 1 Battersea Bridge Road, Battersea, London.

This proposal, led by Rockwell Project Management Limited on behalf of Promontoria Battersea Ltd, was refused planning permission by the London Borough of Wandsworth in April 2025.

I understand that an appeal is underway, and I urge you to uphold the refusal based on significant environmental, policy, and sustainability concerns outlined in the attached Whole Life Carbon Review prepared by Targeting Zero commissioned on behalf of the Thameswalk Residents Association Limited (dated 19 June 2024).

My-and our collective resident's objection is grounded in the review's detailed analysis, which highlights how the proposal fails to prioritize retrofit and reuse of the existing building, contravenes key UK, Greater London Authority (GLA), and Wandsworth policies, and includes misleading or inaccurate assessments in its Whole Life Carbon (WLC) and Circular Economy reports.

Demolishing a functional 40-year-old building for a new 29-storey tower is unnecessary, wasteful, and contrary to the UK's net zero commitments in the midst of a climate crisis.

Below, I summarize the key issues drawn from the review.

Failure to Properly Consider Retrofit of the Existing Building.

The existing Glassmill building, completed in 1984, remains occupied and operational. While its glazed facade may need replacement, a comprehensive retrofit could upgrade its environmental performance, energy efficiency, and architectural appearance without demolition. The applicants claim the building is of "poor quality" and unsuitable for refurbishment but provide no evidence to support this. Issues cited in their Design and Access Statement (DAS, Section 2, p14), such as ground-level permeability, can be addressed through creative retrofit solutions.

The submission dedicates only one page (DAS p29) to exploring retrofit, which is cursory and arguably designed to fail. This ignores viable options and results in unnecessary waste of resources, carbon emissions, and materials.

A retrofit would provide a new, attractive, efficient facade while preserving embodied carbon—far more preferable to new build.

Non-Compliance with Planning Policies Prioritizing Reuse and Retrofit

The proposal disregards extensive policies at international, national, GLA, and local levels that mandate exploring retention and retrofit before demolition:

International: The Buildings and Climate Global Forum Declaration de Chaillot (March 2024), signed by the UK, prioritizes reuse, repurposing, and renovation to minimize non-renewable resource use (Clauses 5.2.2—5.2.4).

UK National: The Industrial Decarbonisation Strategy (2021) emphasizes keeping products in circulation through reuse and repair (Action 5.5, p64).

The Net Zero Strategy (2021) promotes resource efficiency via circular approaches (Items 47, 53, p130—180).

The National Planning Policy Framework (NPPF, 2023) requires shaping places to reduce emissions and encourage reuse of existing buildings (Para 157).

The Environmental Audit Committee's report (2023) recommends prioritizing retrofit over new build to conserve resources and minimize emissions (Paras 38, 187, 189).

GLA: Policy S12 requires confirming that retention options have been fully explored before substantial demolition (London Plan Guidance, Principle 1, p4; Item 3.1.2, Box 3, p24). The decision tree in Policy S17 (Figure 4) and London Plan Policy D3 (Figure 3.2) prioritize "Retain, Refit, and Refurbish." Policy S17 emphasizes designing for circular economy outcomes, including reuse (Item 2.4.1—2.4.2).

Wandsworth Local Plan (2023—2038): Policy LPIO requires incorporating circular economy principles from the start, retaining existing buildings where viable, and reusing demolished materials (Items 1, 5, 6).

These have not been achieved.

The submission fails the GLA decision tree and does not demonstrate that demolition benefits outweigh retention. This non-compliance undermines the UK's trajectory to net zero and is unacceptable.

Misleading and Inaccurate Whole Life Carbon Assessment

The applicants' WLC Report claims to follow the RICS Whole Life Carbon Assessment for the Built Environment (2023) but misquotes it and excludes required elements:

Demolition emissions (Module A5.1) are omitted, underreporting impacts (Para 3.3.6, p16).

Incorrect figures are used, e.g., 1.4 tonnes CO₂e per E 100,000 project value (Para 3.3.7, p16—not in 2023 guidance).

Tables 3, 4, and 5 contain errors: Upfront emissions (A1—A5) are suspiciously low (396 kgCO₂e/m² vs. GLA benchmark 850 kgCO₂e/m²), in-use emissions are a quarter of benchmarks (74 kgCO₂e/m² vs. 350 kgCO₂e/m²), and arithmetic inconsistencies suggest miscalculations.

Carbon sequestration (-104 kgCO₂e/m²) is improperly included without full lifecycle accounting.

Module D benefits are wrongly added to totals.

Appendix A spreadsheets are unreadable and incomplete, preventing verification.

All figures require re-evaluation and independent peer review as per RICS standards.

Inadequate Circular Economy Statement

The most circular action—retaining the existing building—has been dismissed without evidence. The report claims retention is "not technically feasible" due to age and performance, but this is unsubstantiated. Vague commitments to minimize materials lack detail and enforceability.

This contradicts policies favouring reuse (e.g., GLA S17, Wandsworth LPIO).

Overall, demolishing and rebuilding will generate significantly greater carbon emissions than retrofit, harming the environment and community without justification.

I strongly urge you to dismiss this appeal and require the applicants to pursue a retrofit-led approach that complies with policies and minimizes environmental impact.

Please confirm receipt of this objection and keep me informed of the appeal's progress.

My thanks for your time in taking to read this.

Yours sincerely,

Habe Crocker

Director – Thames Walk Residents Association Flat 13, 14, 15

Attachment: Whole Life Carbon Review by Targeting Zero (19 June 2024)

Appendix C: Whole Life Carbon Review- Glassmill Battersea

Prepared by **Targeting Zero**

Dated 19 June 2024

(Commissioned by Thames Walk Residents Association Limited)

See attachment to email

Appendix D: Independent Daylight and Sunlight Assessment

Prepared by **Anstey Horne**

(Commissioned by Thames Walk Residents Association Limited)

See attachment to email

Appendix E: Environment Agency Objection

Dated 17 June 2024

See attachment to email