

**Wandsworth  
Design Review Panel  
C/o Wandsworth Council**  
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Our ref: ECS/  
Your ref:  
Date: 11 January 2024

David Shiels  
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Dear David,

**Wandsworth Design Review Panel: The Glassmill, One Battersea Bridge Road, SW11**

The Panel is grateful to you and your development team for submitting your proposal to the Wandsworth Design Review Panel (WDRP) for a design review of proposals for The Glassmill at One Battersea Bridge Road on 13 December 2023. The Panel was able to visit the site and thanks the team and in particular the architects, Farrells, for a comprehensive and clear presentation of the proposals. We provided feedback in an open session with the applicant present to hear the comments. This letter will remain confidential until a formal planning application has been submitted, whereupon it will be uploaded to the Council’s website.

The application site hosts an existing part five and part six-storey office building located on the eastern side of Battersea Bridge Road. The building, known as The Glassmill, designed by Michael Lyell Associates and built in the 1980’s, has a glazed curtain wall façade typical of that era. The main access to the building is provided from a stepped entrance on Battersea Bridge Road and there is a basement level car park that is accessed from a private road to the rear that connects with Hester Road. The existing public realm suffers from a myriad of level changes with steps and ramps, which are narrow in places, and given the existing footfall this presents problems for pedestrians and cyclists.

The site is bound to the north by the River Thames and to the south by Hester Road and the Royal College of Art. A five-storey residential block, originally built together with the building, is situated to the immediate east, with the nine-storey Albion Riverside Building situated beyond.

## Policy Context and Proposal

The application site is located within the wider Riverside Area Strategy within the Adopted Local Plan. The Area Strategy sets out the overall vision for how Wandsworth's Riverside can realise those improvements over the next 10-15 years to become a high-quality destination with better connected, new and enhanced public space benefitting the borough and its Thames setting and supporting future growth. The Council has sought to leverage and encourage this investment, designating particular stretches of the riverside as Focal Points of Activity. In these areas residential-led developments are promoted, alongside a mixture of uses to increase activity and vibrancy along the river.

The Adopted Local Plan (2023) identifies the application site to be appropriate for a mid-rise building (MB-B2-02) which is defined as: Buildings of 5-6 storeys or 15-18m from the ground level to the top of the building, whichever is lower. A thorough Urban Design Study was carried out and provides the evidence base for the Adopted Local Plan upfront to identify these.

In terms of heritage assets, we note how there are ten listed buildings and structures within a 300m radius of the site, the closest being Battersea Bridge (Grade II) approximately 20m to the north/west, and 2 and 4 Westbridge Road (Grade II) approximately 165m to the south. The site is not located within a conservation area, but several exist in the wider study area. The closest in the London Borough of Wandsworth are the Westbridge Road Conservation Area, Battersea Park Conservation Area, Battersea Square Conservation Area and Three Sisters Conservation Area.

On the wider context, there are multiple designated heritage assets in the adjoining Royal Borough of Kensington and Chelsea, including the Thames Conservation Area, Chelsea Park/Carlyle Conservation Area, Cheyne Conservation Area (including direct views from Beaufort Street) and Lots Village Conservation Area. There would also be views of the development from within the settings of various listed buildings, notably including the Grade I Listed Chelsea Old Church (All Saints) and the Royal Hospital buildings also Grade I within the Royal Hospital Conservation Area.

Within this framework, the proposal presented seeks the demolition of the existing buildings and the erection of a mixed-use development up to 38 storeys plus basement comprised of a podium to the south of up to 40.4m AOD, and a tower to the north of up to 134m AOD with ground level at 7m AOD. The building would be comprising of up to 160 residential units (Class C3) with onsite delivery of 35% affordable housing, community use (approximately 73sqm GIA floorspace Class F2), and commercial use (approximately 861sqm GIA floorspace Class E). As part of the landscaping and associated works, it is proposed to remodel the existing public realm forming part of the Riverside Walk to provide a more generous and accessible walkway.

## Key Observations

The Panel welcomed the presentation of the proposal and compliments the design team for their openness and collaborative approach. We acknowledge the challenges of the site determined by the location, context and landownership boundaries, as well as the economic pressure to deliver a viable scheme that meets the brief in line with the Council's requirements and ambitions for this area. In the review the Panel highlighted a fundamental issue with the height proposed and the level of mitigation offered, and whilst we think the DRP provided a varied and hopefully constructive discussion, three key points emerged from the review:

- Narrative: The rationale presented by the design team for a tall building in this location appears to be based on two ideas:

- from a portrait of a mill close to the first Battersea Bridge, albeit that its precise location and height is unknown by the applicant team. Mills were common in Battersea in the 18th and 19th centuries,
- and in part to the idea that, in the same way as other bridges, it is a gateway into the borough and therefore should be marked by a taller element to aid legibility.

Whilst we are not against height per se, we are not convinced on the need for height in this location and do not think the narrative presented is clear and robust enough. Whilst it was good to have a range of views illustrating the impact on heritage assets, we would have wished to see a more convincing journey about the development of the height in this location and to justify the quantum of development.

- **Benefits/harm:** Mindful that the scheme presented is not compliant with the Council's policy recommendation on tall buildings for the site, and that undeniably the building will have a substantial impact on the surrounding areas, there is the expectation for any marker building that exceeds the height parameters set out in the Adopted Local Plan to be fully justified. As part of any mitigation the range of benefits provided would need to outweigh the harm caused. We are however not convinced that the benefits offered by the scheme are currently sufficient to justify a building of this height in this location. The replacement employment floorspace is not sufficient and not policy compliant. The scheme needs to work much harder to realise a package of benefits it can offer to the community in terms of uses and quality of amenity space, and quality of the architecture.
- **Climate Change:** We note the commitment to achieve a high level of sustainability and support the targets set, but a much more forward-thinking position on climate change is needed for a building of this scale that in our view should be exemplary. The carbon impacts of the production of a tall building should be verifiably calculated and a clear mitigation strategy set out.

The detailed comments of the Panel have been collated as follows under the main headings of the review:

### **Heritage and Views**

We note Historic England's response on the scheme and thank the design team for sharing this in advance of the meeting. The Panel shares Historic England's concerns about the proposed introduction of a tall building along this stretch of the Battersea riverfront which would have 'extensive and wide-ranging impacts on the historic environment, including heritage designations of very high significance'.

The Panel is concerned that the height of the building has not been properly considered in its heritage and visual impacts. This proposal would be a significant departure from the Adopted Local Plan which has only recently been adopted and further testing is required to demonstrate that there are no alternative solutions to the site which would cause less harm.

- **Marker:** The idea of a tall building in this location could be plausible, however we find the reasoning for the need to mark Battersea Bridge with a tall building very limited as the other examples cited along the river are not always 'tall'. There are plenty of examples in London that demonstrate that achieving legibility can be done in a number of ways, through a building of exemplar design quality not necessarily just through height, for example, and therefore a stronger justification is required.
- **Policy:** The Council has gone through a very thorough process, commissioning the preparation of the Urban Design Study as the evidence base for the Adopted Local Plan, to identify areas where tall buildings are appropriate and deemed this location as not suitable as any increases in height would risk adversely affecting the character of the River Thames including the north bank which is designated as a conservation area by

the Royal Borough of Kensington and Chelsea as well as heritage assets in Wandsworth. There is insufficient information included within the submitted material to demonstrate that the wider impacts have been considered. The Heritage, Townscape and Visual Impact Assessment (HTVIA) is extremely limited. We note how both the podium building, but most significantly the tower, depart from the tall buildings policies set out in Wandsworth Council's recently Adopted Local Plan and cannot see a justification for it. We understand you are at the early stages of public engagement and suggest contact with Royal Borough of Chelsea and Kensington is therefore essential.

- Views: Whilst we appreciate the views provided, the study is extremely limited, and we would have expected a much wider study area to have been considered to give a proper understanding of the impact of a building of this height. The proposals would have a far-reaching impact from a number of views, but the HTVIA study is only limited to 1km from the site. Of the views included, they clearly show the level of harm caused in terms of the impact on the significance of the settings of designated heritage assets through visibility. We are slightly underwhelmed by the HTVIA produced and would have expected the Zone of Theoretical Visibility (ZTV) to be at least 2km long so as to include the sensitive assets in a wider area. Night-time views should also have been considered as the illuminated tower will have an impact on the night-time scene. Furthermore, the choice of some viewpoints is also slightly puzzling, for example, from Battersea Park, the static view provided from the pagoda should have stepped back along the riverbank to show the full extent of the impact. We question therefore the validity of the views as they do not show the full extent of the impact the building would have. At this stage we feel there is no need to cause this level of harm and fail to understand why the number of storeys proposed for both blocks are required. We feel the views analysis should be exploring the different heights and massing from the position whereby the building is not visible through to the impact from a range of heights to assess the harm.

**Design Response and Architecture**

We acknowledge how the site constraints imposes great pressure on the building articulation and arrangement of uses. The footprint relative to the height and the location of the building offering only the western side to play with makes the activation quite challenging. The overall architectural approach, however, is not strong enough to outweigh the harm and we would have wished to see more of the design development to better understand the rationale of what works within this context, which heights have been tested and how the building relates to the neighbours. A long-term collaborative engagement with the College of Art and the Albion Riverside Building to design something that works well together and create something exciting in terms of place-making for this part of the borough is missing.

- Structural: There was not much discussion about taking down the existing building and the impact in terms of structure, materiality etc. this would have to the conjoined block of flats. How the two buildings will be separated, and the retained block made good should be demonstrated.
- Base articulation: We acknowledge how the base articulation has a strong reference to the adjacent Battersea Bridge, however, transferring the bridge typology out of the water and onto the building is not convincing. We feel there is something jarring in the repetition of the bridge arches above ground level and think the relationship between the base and the bridge needs more careful understanding to inform the development of the base architecture. Perhaps a more linear and simpler approach would work better and sit more comfortably with the bridge? Furthermore, the arches are not uniformly wrapping around the base, resulting in a less interesting rear elevation which in our view should be more celebrated in equal manner as the front façade.

- Crown of the tower: The crown of the tower will be an important element within the townscape, but the elegance of a tall and slim tower is missing here, and the set back is not convincing. This should be revisited and better celebrated.
- Ground floor: We acknowledge the amount of uses the ground floor is trying to accommodate but we are not convinced this is yet well resolved. Particularly the size of the lobby to the market flats compared to the restaurant space facing the river was highlighted as a concern as this leaves little opportunity to celebrate the riverfront and create an attraction for the wider area. We feel a more generous restaurant area opening up river views could be explored. Also, permeability through the ground floor is important, as it helps creating a more welcoming environment on both sides of the building.
- Societal aspects: We feel there is huge disparity between the market and affordable housing offer and in consultation with Registered Providers more consideration should be given to testing the tenure blindness, from the lobby articulation to the design of the amenity area on the terrace at level 10, where the two worlds inhabit the same space. Equally the consultation process should be a long-term engagement that goes beyond rhetorical meetings but true collaborations where all design aspects are interrogated and addressed. Being neighbourly is part of the responsibility of architects and developers and will help embed the scheme into this place.
- Quality of accommodation: We are aware of the difficulties of achieving dual aspect flats in a long building and note how these are not compliant with the GLA guidance on Housing Design Standards. We are concerned that the affordable element of the proposal, in the shoulder block, may have a lower proportion of dual aspect units than the stated average, but this information was not available in the meeting. We urge a review of this, and that equity is sought in the provision. Additionally, the balconies seem deep and whilst offering shade in the south and west facing flats, also overshadow the internal spaces. We would have wished for more transparency on what can be achieved and how this is measured in order to have a clearer understanding of the implications of design decisions.
- Materiality: We acknowledge how the materials and colours proposed will have a different effect, but we feel the materiality and the impact these have on the views have not been fully explored yet. Views should show the building rendered in different materials, at different times of day and night in different weather conditions.

## Landscape and Public Realm

The struggle with tall buildings is that they often come across as greedy because of the amount of space they occupy versus the lack of generosity in terms of landscape and public realm they provide around them. We feel the same applies for this building for which the public realm is limited by the red line; we note how the ownership of the public realm on the north interfaces with the adopted highway part of the riverside walk managed by Wandsworth Council, while the public realm to the south of the site adjoining the community space is outside the red line. The landscape offer is therefore pushed off site rather than provided on the ground thus heavily compromising the amount of mitigation to balance out the height and the opportunity to create something of high quality, where the community can spill onto and that truly enhances the life of families living in and around the building.

- Public realm: We experienced on the site visit the compromised and disjointed public realm around the building and along the riverfront, so we welcome improving the status quo but we feel this must and could do more. Pushing back the ground floor and allowing for a more generous space along the river frontage as well as engaging with the neighbouring property owners to agree on a more coherent and joined up public realm should be considered. This would also improve the spatial generosity for pedestrians

and cyclists negotiating the tight spaces. We also noted the impoverished condition of the public realm adjoining the proposed community facility to the south, and understand it is outside the red line, thus we would strongly urge the team to have further conversations with the owners to find ways for improving the space.

- East elevation: We mentioned the less interesting elevation on the east façade, equally the public realm should be rethought as a service space and become a welcoming and attractive space of equal care in its treatment as the Battersea Bridge Road side.
- Play space: Achieving good quality play space which is not on the ground floor is extremely difficult. More clarity is needed on the play areas at podium level as we feel this needs to be better articulated based on a more rigorous in-depth understanding of the needs of the families that will inhabit the building. From details of the parapet to integration of shading structures, the proposal should go beyond the standard offer and be as inclusive and accessible as possible.
- Urban Greening Factor (UGF) and Biodiversity Net Gain (BNG): Targeting 0.4 UGF and 10% BNG is positive, but these should be investigated further to address the quantum proposed and help mitigate the impact. The scheme should aim to go beyond legislation with an aspiration to provide biodiversity gains per resident to compensate for the height/footprint ratio.

**Sustainability**

In light of Wandsworth Council’s agenda to become zero carbon by 2030, we expect all schemes subject of planning applications to adhere to this vision and introduce an environmental strategy at an early stage in the process as this will influence the design of the building. With this in mind, we note the work in progress, but we feel underwhelmed by the sustainability strategy presented as we feel the aspirations could and should be higher and that the team needs to take full responsibility in leading the way on every aspect of the scheme. The design should be robust enough for worst case scenarios thus a stronger and more convincing environmental strategy is needed, one that clearly demonstrates how the building would adapt to climate changes over time. Given the need to mitigate the impact of the tall building in this location there is an expectation that the building will need to be exemplary in its sustainable design.

- Whole Life Carbon: We feel encouraged you have considered the form factor into your environmental calculations, but the design considerations on the carbon impact of the proposal need to go much further. We are unclear on the whole life carbon implications of the design and how you propose to achieve the targets set. We strongly encourage the team to consider the whole life carbon implications and indicate how these are impacting on material choices for the whole building and demonstrate these at this stage.
- Photovoltaics (PV): Locating PVs on the roof area of the building will be challenging and more details are needed to demonstrate how this can be achieved.
- Microclimate: We note the location of the building along the river and on a busy road with high levels of vehicular traffic. Issues such as acoustic and air quality for residents need careful consideration and suggest building in solutions early on into the design of the building. Wind microclimate caused by a tall building is a concern, and the importance of undertaking a thorough wind analysis at a conceptual level should be not undervalued as this will have an implication on the comfort of people using the public realm and of roof amenity and balconies for residents and visitors. We strongly recommend not relying on trees for wind mitigation but rather find design solutions to overcome this. We advise following the City of London’s guidelines on wind microclimate.

- Overheating: We note and appreciate the acknowledgement for building façades to adapt for overheating, especially on the south and west facing façades, but we are concerned the design response is not yet enough. There are still a great number of single aspect flats and large areas of glazing on the western façade, where we think a solution for external shading is needed. The need for mechanical cooling should be avoided, especially on the affordable units, where it also unnecessarily puts weight on the service charge.
- Transport: We are concerned the public transport links around the site are not conducive for a scheme of such density.

## Moving Forward

We thank the design team for the opportunity to provide comments on the proposals for this site. The impact of height on a building, and indeed the civic responsibility of a marker building as proposed by the design team has wide implications and the appropriateness needs to be demonstrated across various aspects from heritage to public realm, transport, architecture, biodiversity and so on. The Panel questions whether such robust analysis has been undertaken to support the current proposals.

At this stage, we strongly question whether a building of such scale, height and mass is appropriate in this location as we fail to see an adequate justification for it. While much more work is required on mitigating the impact of the building through identifying a more substantial package of public benefits, the scheme should seek to reduce its harm by a more careful study of the visual impact of different height buildings, from not being visible to being visible, to understand more fully the impact on the significance of the setting of sensitive heritage locations like the Royal Hospital Chelsea for example.

Moreover, the scheme should demonstrate how the life of families who will reside within the building will be enhanced but also the wider community. The building will sit within the Focal Point of Activity as set out in the Riverside Strategy in the Adopted Local Plan and its neighbours include the Royal College of Art and a range of employment activities and conversations with these providers are important to understand how this building will function as part of the wider place-making agenda.

We note the tight timescale for submission, but in light of our comments above and the need to address the issues raised the team should be given sufficient time to develop and finesse the proposals. We would wish to have the opportunity to comment of this proposal again.

Yours sincerely



**Gillian Horn**  
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