

**Wandsworth
Design Review Panel
C/o Wandsworth Council**

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Our ref: ECS/
Your ref:
Date: 6 March 2024

David Shiels
DP9 Ltd
100 Pall Mall
London
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Dear David,

Wandsworth Design Review Panel – DRP 2: 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 follow-up design review of proposals for The Glassmill at One Battersea Bridge Road on 16 February 2024. The Panel was able to visit the site at the first DRP in December 2023 and therefore the meeting was held online on this occasion. We thank 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.

To recap, 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 policy context has been described in detail in the first DRP letter. Briefly, the application site is located within the wider Riverside Area Strategy within the Adopted Local Plan. 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.

In terms of heritage assets, there are ten listed buildings and structures within a 300m radius of the site. On the wider context, there are multiple designated heritage assets in the adjoining Royal Borough of Kensington and Chelsea, 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.

The amended proposal seeks the demolition of the existing buildings and the erection of a mixed-use development plus basement comprised of a podium to the south of ground floor plus 10 storeys, and a tower to the north of ground plus 33 storeys with ground level at 7m AOD. The building would be comprising of up to 142 residential units (Class C3) with onsite delivery of 35.2% affordable housing, community use (approximately 268sqm GIA floorspace Class F2), restaurant (approximately 174sqm GIA floorspace Class E) and office use (approximately 520sqm GIA floorspace Class E). As part of the landscape scheme 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 is pleased to see the scheme for a second design review focussing on some of the issues raised at the first DRP. We welcomed the presentation of the proposal and compliment the design team for their openness and collaborative approach in engaging on a follow-up review, but we are concerned about the tight timescale and lack of definition on some aspects of the proposal which we understand, a month from submission, are still work in progress.

- **Benefits/harm:** We are pleased to see further refinement; however, we find the scheme has not progressed as much as we would have wished at this stage. We are conscious of the tight timescale the team is working to and are aware of the complexities of a development of such scale and impact in this context as well as the difficulties of meeting the economic challenges with the Council's expectations for the site, but we feel many of the fundamental issues we raised in the first review have not been addressed, specifically around the height. We would expect a building of this scale to achieve a level of mitigation which is proportionate to its impact on the context and areas around. Unfortunately, we are not convinced the public benefits offered as mitigation are sufficient, and we still feel it seems overdevelopment on this tight and constrained plot.

As for the community space, we welcome the engagement with charities but think this could be a space used by many to ensure it is open and accessible to the public. We would also invite the team to look at other opportunities within the building to free up space for the public and so even non-residents can have the benefit of the long views out. The importance of understanding who will inhabit this building and who the wider users are is still relevant, but yet to inform the design.

- **Marker:** As before, the Panel remains unconvinced that marking the bridge is an argument for a tall building in this location. The constrained site for the tower and the amenities offered do not mark a broader opportunity of placemaking for the wider community, which might be supported. Were the height of the tower and the podium to

be reduced, the argument still stands. In architectural terms, the reduction might be seen as compromising the slenderness of the building.

The detailed comments of the Panel have been collated as follows under the main headings of the review, following the first DRP letter for easiness:

Heritage and Views

In the first DRP, the Panel expressed concerns that the height of the building had not been properly considered in terms of its visual impact on heritage assets. This proposal is a significant departure from the recently Adopted Local Plan. Both the tower and podium trigger consideration as tall buildings and both are non-compliant with the mid-rise zoning of the Plan. At this second review, the Panel reaffirms the same opinion.

- **Height:** Whilst reducing the height of the tower is positive, the justification for the 33 storeys proposed, contrary to the zoning, is still not convincing. We acknowledge how the height is now reduced by 15.5m bringing the building to ground floor plus 33 storeys, but we remain unclear as to the narrative and reasoning behind the 5 storeys reduction. The reduction appears to be arbitrary and not backed by a clear rationale or justified by its relationship to other nearby buildings.
- **Views:** We thank the team for providing the additional views demonstrating the impact of the revised height in relationship to key heritage sites. The scale of the tower is still very dominant from a number of views presented and while we agree the impact causes less than substantial harm, it does nevertheless cause harm, and statutory weight needs to be given to the public benefits it is offering in exchange.

Design Response and Architecture

In the first review we touched on the strong architectural reference to the adjacent Battersea Bridge and how the Panel was not convinced by it. We see some refinements but overall, we remain unimpressed by the architectural approach which we think is neither strong nor convincing enough to outweigh the harm.

- **Ground floor:** Reducing the floorplan on the riverfront side to allow for a more generous public space appeared positive, but we feel there was greater clarity in the previous ground floor arrangement. The amended layout feels more pressured, and we are not convinced this is working. The restaurant is too small, akin to a café space. The relationship of the workspace with the community centre on first floor is not tested enough. Accessing the building is problematic as there is no clear drop off point, whilst pedestrian access at ground floor is not inclusive. Whilst we welcome the inclusion of the restaurant in principle, we encourage the team to explore a better integration of the affordable workspace and the community space. A better distribution of these spaces should be presented in terms of location, layout and viability, for example, locating the restaurant partly on first floor could help its viability. Further, the permeability of the ground floor could be improved for the affordable lobby.
- **Structural:** The link with the remaining residential block was unresolved and described as work in progress, but a technical and aesthetic solution to this junction is fundamental to the success of tying the smaller mass of the retained housing to the larger new element.
- **Cores:** In terms of the cores, the level of enquiry around the fire strategy is important and should be resolved, especially around locating the fire exit through an enclosed car park.
- **Base articulation:** Ground floor river-fronting floorspace has been reduced, but the cantilevered ground floor requires structural support as a result. The added forked columns introduce a new architectural expression which jars with the rest of the building.

On the south and east side, we think the elevational improvements are more successful. The structural linear stepping of the bands over the glazed ground floor are more elegant and the relationship between columns and bands appears better resolved.

On the eastern façade however, the openings onto the service road are for access to refuse storage, cycle parking and substation only, giving it a more utilitarian appearance. We note the stronger visual permeability but are not convinced this is enough to create a welcoming environment.

- Crown of the tower: Some evolution has been made on the articulation of the crown and whilst we welcome the improvements the Panel is still not convinced this is making a strong visual statement, it feels too flimsy. The purpose of the frame is unclear, as well as how the variety of technical requirements located on the roof such as plant, building maintenance unit and solar panel array, are going to be arranged or accommodated within the stated height.
- Materiality: The selection and quality of the materiality presented, notably the terracotta cladding seems successful, but the proposed screen at podium level needs further consideration in terms of glare, transparency, materials and safety, as well as the requirements and technicalities of cleaning.

Landscape and Public Realm

The Panel notes and welcomes the additional work on the landscape strategy.

- Accessibility: The long steady slope along Battersea Bridge Road has currently been resolved with stepped access. This results in a long detour for less ambulant users. This needs to be resolved to allow inclusive access for all.
- Public realm: Re-modelling the public realm along the river frontage making it more accessible for wheelchair users and buggies and including sitting spaces is positive, but the design could be simplified, as it feels slightly overworked. The relationship of the building to the landscape needs to work harder, the columns (as mentioned above) should have a convincing narrative and meaningful appearance within the landscape as they become external landscape features. We strongly advise against using planting such as trees in the landscape for wind mitigation as this needs to be shown to be resolved fully in the architecture.
- West elevation: The large stone-faced planters stepping down Battersea Bridge Road do provide soil for significant plants, but at the same time create a visual and physical barrier for pedestrians; the views along the ground floor are segmented and there is no visual permeability due to the height of the planters and additional vegetation. Additionally, we feel this creates an issue for when people who would need drop on/off to step more directly into the building, and thus the sense of arrival is compromised. We would urge the team to improve the visual permeability and enhance the interface to this otherwise active frontage, as well as providing a robust transport strategy showing how the building will be accessed on a busy road frontage with adjacent bus-stops.
- Play space: The design of the landscaped playarea on top of the podium, the Thames Garden, seems to have moved forward well, but we feel that the single storey undercroft has an inherent meanness and shadiness to it. We therefore encourage the team to explore lifting the overhang by a full storey, allowing more light into the interior. We also have concerns about the 3m high balustrade around the perimeter of the playspace as regards to the security measures in place for the children playing there, as well as the materiality of the screen.

As for the societal aspect of the Thames Garden, we think it is unfortunate that a solution that demonstrates equity in accessibility cannot be found whereby both market and affordable residents can use the space together. Likewise, the inability of the

scheme to accommodate the child yield of the market rent units within the building, (as under the current proposals it is envisaged that they will be required to use the public park) is not acceptable and a solution should be found to overcome this.

Sustainability

Considering the Council’s green agenda, we emphasise the importance of achieving an exemplar scheme in terms of sustainability. We note the sustainability strategy has progressed, for example we welcome the commitment to zero carbon operation and construction, but note many aspects are still being scrutinised.

- Overheating: We understand a full assessment is underway and the opportunity for openable windows still being reviewed which raises some questions in terms of the service charge for future residents in the affordable units.
- Climate Change: Are the façades adaptable for future climate change? It would be good to have more clarity about this and to know what future weather files have been used for the design.

Moving Forward

The Panel welcomes the many refinements to the scheme and particularly the reduction in height of the tower though this has concomitant implications on its design. However, we feel the proposals for a tower in this location have still not been justified and a far stronger narrative about height and the impact that has on the significance of the many and varied heritage assets is required. We agree that less than substantial harm to these heritage assets can be identified yet the package of benefits to mitigate the harm seem meagre and much more work needs to be undertaken to understand how this building can contribute to the wider placemaking agenda to facilitate buy in from the local community in terms of meeting their needs and aspirations.

We acknowledge the tight timescale for submission, but despite progress on many details, more work is still required on finessing the architectural design of the tower, particularly the crown and ground floor layout. This latter will need to work for all the proposed uses in a way that the internal and external spaces are working together in a harmonious and inclusive way that instils a high-quality environment. We would recommend that you also revisit previous comments and address issues in the design of apartments, including single aspect units which are undesirable. Other outstanding matters from the first review include BNG and UGF commitments.

In light of our comments and the need to address the outstanding issues, we suggest that the team be given further time to fully address all matters raised in order to produce the high-quality development that the Council and this site demands.

Yours sincerely



Deborah Nagan
Landscape Architect, Mayor's Design Advocate
Interim Chair, Wandsworth Design Review Panel

Panel Members

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Xenia Kaldy	Ridge
Chris Harley	GIA (wind)
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Observer

Cllr Tony Belton