

26th February 2021

Planning Policy
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Dear Sir/Madam

**WANDSWORTH DRAFT LOCAL PLAN
PRE-PUBLICATION REGULATION 18 CONSULTATION VERSION (NOVEMBER 2018)
SUBMISSION OF WRITTEN REPRESENTATIONS**

On behalf of our client, Lockguard Ltd, we submit the following written representations in respect of the Wandsworth Draft Local Plan Pre-Publication Regulation 18 Consultation Version, published November 2018 ('Draft Local Plan').

Our client is the freeholder of The Glassmill, 1 Battersea Bridge Road, London, SW11 3BZ ('the Site'), and therefore has a keen interest in the direction of emerging Local Plan policy and site allocations, as well as the Council's objectives for residential and employment land within the borough.

Draft Site Allocation

The Draft Local Plan includes a number of site allocations which are proposed to replace the current site allocations within the adopted Site-Specific Allocations Document (March 2016). At present, the Site is not allocated for redevelopment in the Draft Local Plan.

The Site is located within the designated Area Strategy for Wandsworth's Riverside, as detailed in Draft Policy PM9. The Draft Policy notes that whilst much of the riverside between Wandsworth and Battersea Parks has been redeveloped, a number of sites in the area present opportunities for targeted growth. It is considered that the Site presents an excellent opportunity for growth through wholesale redevelopment, which should be recognised through a site allocation in the Draft Local Plan. The site allocation would assist in bringing forward the residential-led redevelopment of an underutilised brownfield site in a highly prominent location adjacent to the river. Owing to its position at a key gateway into the borough, it is considered that the Site would be a suitable location for delivery of a tall building, in line with Draft Policy LP4.

In terms of site capacity, it is considered that the Site could support approximately 150 residential units, alongside the provision of commercial uses, providing a significant contribution towards the Council's housing and employment targets. The allocation of the Site for residential use would be consistent with a number of wider the Draft Local Plan objectives, including Draft Policy LP24, which states that the Council will provide for the delivery of minimum of 1,950 new homes per year

by 2028/2029, with these new homes delivered by, *inter alia*, the development of sites as allocated through the Draft Local Plan. Additionally, Part A of Draft Policy PM9 acknowledges that new residential accommodation in Wandsworth's Riverside will help meet the borough's housing target, with development in this area expected to provide at least 3,210 homes over the entire plan period to by 2037/38.

The Site is also located within a designated Focal Point, where Part C of Draft Policy PM9 seeks to promote residential-led development, alongside a mixture of uses to increase activity and vibrancy along the riverside and new development which creates a positive front to the water, with active ground floor uses and continuation of the public riverside walk.

It is therefore considered that the Site should be allocated in the Draft Local Plan for residential-led development to provide circa 150 residential units, with potential for commercial uses at ground floor level and improved pedestrian links, in line with the above draft policies. The site allocation should also recognise that the Site is suitable for the delivery of a tall building, in accordance with Draft Policy LP4, as addressed below.

Draft Policy LP4 – Tall Buildings

Draft Policy LP4 outlines areas where proposals for tall buildings may be appropriate in the borough. These locations are identified in the Tall Buildings Map included in Appendix 2 of the Draft Local Plan. It is noted that the Site is located in an area where there is 'Opportunities for tall building clusters and/or landmarks.' This is strongly supported by our client.

Draft Policy LP4 continues, states that tall buildings near the River Thames frontage should strike a careful balance between achieving optimal riverfront views without creating a dense wall of development that blocks visibility from buildings and public spaces behind it. The Draft Policy seeks that, where appropriate, the massing of tall buildings consider their landward facing orientation and step down appropriately to provide a transition towards smaller building types, and that tall buildings are appropriately set back to ensure the Thames Path continues to act like a welcoming public route without heavy overlooking from adjacent riverside residences.

Although the key principles of Draft Policy LP4 are strongly encouraged by our client, it is suggested that the policy wording relating to tall buildings near the river frontage is revised to take account of existing site conditions and wider townscape considerations. The Draft Policy should make clear that there are instances where the taller elements of tall building proposals should be located adjacent to the river frontage, particularly where there is a strong townscape rationale for doing so. Additionally, the Draft Policy should recognise that there are instances where tall buildings which are not significantly set back from the Thames Path are acceptable, particularly when taking into account the location and spatial constraints of specific sites.

Draft Policy LP38 – Mixed Use Development on Economic Land

Draft Policy LP38 supports proposals for mixed use development, including residential, where it meets the criteria for the relevant economic land designation within which it is located, as set out within the Draft Policy.

Within Focal Points of Activity (where the Site is located), Draft Policy LP38 states that proposals which would result in the existing quantum of office floorspace being fully replaced will be supported. Proposals in the Ransomes Dock Focal Point that would result in a net increase in office floorspace will normally be resisted, unless it can be demonstrated that this is required in order to

support the intensification of industrial uses on the site, or where it provides for a limited amount of co-working space and/or managed workspace which meets the needs of local residents.

Whilst the Council's position regarding any net increase of office floorspace in Focal Points of Activity is supported, it is considered that any requirement for development to reprovide the existing quantum of office floorspace within Focal Points of Activity is not fully consistent with Part C of Draft Policy PM9, which states that the Council will promote residential-led development on sites located within a Focal Point. In some instances, particularly where an existing site solely in office use is being brought forward for residential-led redevelopment in line with Draft Policy PM9, the ability to reprovide the entirety of the existing quantum of office accommodation, alongside a substantial quantum of residential floorspace (whilst having regard to the policy requirement to provide onsite affordable housing) is not feasible. Draft Policy LP38 should therefore be revised to state that a reduction in existing office floorspace may be acceptable where it can be demonstrated that the existing quantum of office floorspace cannot be reprovided in full onsite as part of a mixed-use development.

Draft Policy LP26 - Housing Mix

Draft Policy LP26 requires development proposals creating 10 or more units to have regard to the borough-level indicative proportions for housing mix. The Draft Policy acknowledges that housing mix will be considered on a site by site basis, and in applying the preferred mix, the Council will have regard to a number of factors, including current evidence in relation to housing need, the surrounding context and character, the overall level of affordable housing proposed, and the financial viability of the scheme.

Whilst the principles of Draft Policy LP26 are broadly supported by our client, it is considered that the policy wording is further expanded to take account of additional considerations which may restrict or limit the potential to deliver a housing mix which fully accords with the housing mix requirements set out in Draft Policy LP26. It is our view that the Draft Policy should also consider the scale and nature of any proposed development, and the spatial constraints of the application site, both of which can significantly impact the ability to provide a wider range of residential unit types and sizes.

Draft Policy LP47 - Local Shops and Services

Draft Policy LP47 addresses the Council's position on local shops and services within the borough. The Draft Policy states that there are limited areas in the borough which are 'not within reasonable walking distance (400 metres) of an existing centre or an Important Local Parade'. Within such areas, there may be a deficiency of essential goods and services to meet local needs. As defined in Map 19.2 in the Draft Local Plan, the Site is partially located within an area 'not within reasonable walking distance (400 metres) of an existing centre or an Important Local Parade'.

Draft Policy LP47 states that, in order to promote the sustainable distribution of local shops and services, uses providing essential goods and services will be promoted in these locations through the provision of new shopping and services, including as part of new residential or residential-led development, where the scale of the provision is justified and appropriate to meet a local need, and it would not harm the vitality and viability of any of the borough's centres or Parades.

This policy is strongly supported by our client, which would enable the provision of new shops or services as part of any future redevelopment of the Site, serving both the Site and the surrounding area.

Summary

We trust our comments will be acknowledged in progressing the Draft Local Plan, and we would welcome the opportunity to further engage in the planmaking process in the future. Should you have any queries please contact David Shiels or David Morris of this office.

Yours faithfully

A handwritten signature in black ink, appearing to be 'DP' followed by a stylized flourish and a horizontal line extending to the right.

DP9 Ltd.