

**REBUTTAL PLANNING PROOF OF EVIDENCE OF JONATHAN MARGINSON MA HONS
(MRTPI)**

THE GLASSMILL, 1 BATTERSEA BRIDGE, LONDON, SW11 3BZ

LPA REF: 2024/1322

APPEAL REF: APP/6002127

6 March 2026

CONTENTS

1.0 Introduction 2
2.0 Rebuttal..... 3

Appendices

Appendix A: Response to DPDS comments on agreed Statement of Common Ground between Appellant and LBW

1.0 Introduction

- 1.1 This rebuttal evidence has been prepared in response to the Proof of Evidence of Joanna Chambers (CD 9.03). It also provides a response to the DPDS comments (February 2026) on the Statement of Common Ground between LBW and the Appellant (CD 7.01). The response is included at Appendix A.

- 1.2 This rebuttal evidence should be read in conjunction with my main Proof of Evidence (CD 8.04), and the evidence of the Appellant's other witnesses, including further rebuttal evidence. Where I make no comment on other matters raised in the evidence of the London Borough of Wandsworth ("LBW") or the Battersea Society, this does not in any way confer agreement on these matters.

2.0 Rebuttal

- 2.1 Ms Chambers raises the matter of deliverability of the Proposed Development and the corresponding weight to be attached to the delivery of affordable housing. The matter of deliverability was addressed in Appendix G (letter from DS2) and in paragraphs 5.50 and 5.51 of my Proof of Evidence.
- 2.2 The matter of deliverability and the weight to be attached to affordable housing is contained at paragraph 5.34 (page 40) of Ms Chambers Proof of Evidence, where Ms Chambers affords the delivery of the affordable housing significant weight but states that she would need to be assured of the practical delivery of the proposal before attaching the highest weight of 'substantial' to the affordable housing benefit. It follows therefore that if Ms Chambers can be satisfied on deliverability, then there would be no obstacle to Ms Chambers concluding that substantial weight should be given to the delivery of 50% affordable housing. As I note in my Proof of Evidence, the Officer Report gives significant weight to the delivery of affordable housing and raises no concerns in relation to delivery (paragraph 20.29, CD 3.01). Paragraph 59 of the NPPF (CD 4.01) states that *"Where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable"*. Like the Development Plan, there is no viability test in the NPPF for proposals that comply with up-to-date policies. The draft NPPF (CD 4.02) (DM5) similarly states that where development proposals accord with relevant up-to-date plan policies and national decision-making policies, they should be assumed to be viable. I consider there is no policy basis for reducing the weight to be attached to affordable housing due to any perceived concerns over deliverability.
- 2.3 The Appellant is fully committed to the delivery of the Proposed Development subject to planning permission being granted. The Appellant has been in discussions with Registered Providers regarding the delivery of the affordable housing component as there would be an obligation for the homes to be transferred upon completion on a long leasehold to a Registered Provider. The Appellant has been in discussions with the GLA under the Accelerated Funding Route in relation to securing affordable housing grant for which the Appeal Scheme would qualify.
- 2.4 In relation to the market residential element of the Proposed Development, I would note that this is comprised of high-quality residential accommodation located in a 29-storey tower above commercial uses. The Appeal Site is located in what is a predominantly residential

neighbourhood and a unique high value riverside location. The Appeal Site is located on the eastern side of Battersea Bridge and with views north across to the Royal Borough of Kensington & Chelsea and Cheyne Walk and is a 10-minute walk west of Battersea Park. The proposals would result in the activation of the Thames Path and Battersea Bridge Road frontages with extensive landscaping and public realm improvements that would benefit the locality.

- 2.5 I note that the market homes will benefit from high levels of amenity including a range of internal and external amenity spaces, a podium garden, play space, a gym and internal community space as well as stunning 360-degree views of the capital and along the River Thames. The market homes are configured so that they benefit from these prime River Thames views and in particular, the northwest facing two bedroom homes on the 16th and 17th floors and the three bedroom homes on the 18th, I am advised by the Appellant, will generate very high values given their aspect looking across the river north into Chelsea, east across Chelsea Harbour and northeast across Battersea Park towards Westminster and towards the City of London. The market units on the south side benefit from views looking beyond Clapham Common but also have similar spectacular vistas of the River Thames, the parks and the capital generally.
- 2.6 It is well known that the macro-economic and geopolitical environment remains extremely challenging with the potential for external factors to suppress residential pricing and sales volumes in the capital. The current perfect storm of regulatory, economic and political influences has resulted in the Government and GLA proposing to introduce a range of short-term measures to stimulate supply in the capital as set out in the draft LPG (CD 5.31). However, whilst there is a recognition that there remain significant risks that is impacting on the prospects for the residential new homes market, I am advised by DS2 that the chronic undersupply of new homes does present an opportunity for those developments that can be delivered in the short to medium term. The Appeal Site represents a unique prime residential opportunity, one of few remaining along this stretch of the river in southwest London.
- 2.7 In terms of the leading residential agents views on prime residential in London, Savills are anticipating growth of 12% (Savills prime outer central London forecast – fourth quarter, 2025) over the next 5 years. Savills consider that short term recovery is sensitive to interest rate movements but the medium-term outlook is considered to be positive driven by undersupply. Knight Frank are quoting circa 14.8% growth for Greater London and 10.1% growth over the 5-year period from 2025 (UK housing market forecast, September 2025) with buyer confidence to improve gradually. JLL in their 2026-2030 forecast, are predicting 17.6%

growth in Greater London pricing over the five-year period. CBRE's UK Residential Forecasts, published in November 2025, states that compounded, values in Inner London will grow by 24.1% over the time period 2025 to 2029 with undersupply being cited as a significant factor. Whilst there are economic and geopolitical risks at the current time, and agents forecast are a guide only based on a range of external factors that can change rapidly, the predicted outlook for growth over the next four to five years remains positive.

- 2.8 The Appellant is fully committed to the delivery of this unique waterside development located in an established residential location in a prime part of the capital. Whilst there are well publicised viability challenges for development across the country, and London in particular, the limited supply of new housing in the prime markets and generally positive outlook for pricing over the short to medium term mean that the Appellant is committed to the delivery of the project subject to securing a planning permission.

Appendix A: Response to DPDS comments on agreed Statement of Common Ground between Appellant and LBW

DPDS On behalf of Mr Stuart Gulliver (Albion Riverside) and Ms Amanda Henricks (Chair, Thameswalk Residents Association) Comment	Appellant Response
A number of concerns/impacts of the proposal which the appellant claims can be addressed by planning conditions and obligations should actually be addressed upfront, prior to determination of the application, given the scale of proposed development and heavily constrained nature of the site.	The reliance on planning conditions to secure detailed construction methodology is entirely consistent with national policy and established practice for major urban developments. It is not typical nor beneficial to explore very specific levels of operational detail at this stage given that subject to when commencement might take place the context could be different.
We reserve the right to comment on the complete set of conditions once we have had the opportunity to review them	Noted
a) Living conditions, with particular regard to daylight, sunlight, outlook and privacy	Matters on Daylight and Sunlight previously raised by DPDS have been addressed within Appendix C of the Planning Proof of Evidence (Letter from GIA dated 17 February 2026 in relation to daylight and sunlight)
We disagree that the daylight and sunlight, overshadowing, noise, microclimate, air quality and flood risk assessments indicate that the Proposed Development does not create any unacceptable environmental impacts. (Para 4.22 of SoCG) We disagree particularly in relation to daylight and sunlight/ overshadowing. Our position is informed by independent analysis undertaken by Anstey Horne and submitted with our objections to the planning application and representations to the appeal.	Please refer to GIA letter within Appendix C of the Mr Marginson's Proof of Evidence CD 8.04).
No specific discussions concerning daylight, sunlight, outlook and privacy have been explicitly documented in this section therefore it is justifiably assumed that these impacts were not considered during the course of pre-application consultation.	As confirmed within the GIA letter within Appendix C of the Mr Marginson's Proof of Evidence CD 8.04), GIA were instructed in 2021 by the Appellant to advise on daylight and sunlight matters from the outset of the scheme and prior to the start of pre-application discussions. Daylight, sunlight, outlook and privacy matters were discussed during the pre-application process, as is typical of a scheme of this nature. Detailed discussions of the pre-application meetings are not included within the SoCG.
We are of the view that this list should also include the BRE daylight and sunlight guidance titled "Site layout planning for daylight and sunlight: a guide to good practice 2022 (BR 209)". It is noted that this guidance is loosely referenced at 10.48 and 10.51 of the SoCG which refers to 'Daylight, Outlook and Privacy for Future Occupants', however it is not referenced in the context of 'Amenity Impact' for residents of surrounding buildings which is discussed at paragraph 10.40-10.43 of the SoCG. This guidance should be complied with in both contexts.	The BRE guidance explains that their advice is not mandatory and that their guidelines should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer (para 1.6 of the BRE guidance).
The element of London Plan Policy D9 referred to here states that "wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building. We do not consider that the appeal proposal fully accords with this part of Policy DP9, particularly in relation to daylight and sunlight impacts to surrounding residential buildings. Our position is informed by independent analysis undertaken by Anstey Horne and submitted with our objections to the planning application and representations to the appeal. This analysis is discussed further later in this section.	Please refer to GIA letter within Appendix C of the Mr Marginson's Proof of Evidence CD 8.04).
The part of Local Plan Policy LP4 mentioned here states that "Tall buildings should not result in the creation of development which would impede the outlook and/or amenity of occupiers of existing buildings or users of public spaces having regard to their relationship with the river frontage". Therefore, this element of the policy which is claimed to be complied with only relates to outlook in respect of the river frontage. Outlook in all other respects, however, is significantly impeded for residents of the adjoining Thameswalk Apartments as well as 6 Hester Road and Albion Riverside as discussed further below.	Matters in relation to outlook and privacy are dealt with comprehensively in the Officer Report (paragraphs 5.1-6.8, CD 3.01). The Appellant agrees with the Officer's analysis that the Proposed Development would not result in unacceptable levels of overlooking, in accordance with Policy LP2 of the Local Plan. Mr Marginson's Proof of Evidence (CD 8.04) deals with outlook and privacy at paragraph 5.48.
Policy LP2, referred to in this statement, notes that proposals will be supported where the development "Avoids unacceptable impacts on levels of daylight and sunlight for the host building or adjoining properties (including their gardens or outdoor spaces)". Based on independent daylight and sunlight analysis commissioned by our clients and undertaken by Anstey Horne, we disagree with the claims set out in paragraph 10.40 of the SoCG, particularly in terms of impact on the affordable homes at 6 Hester Road.	Please refer to GIA letter within Appendix C of the Mr Marginson's Proof of Evidence CD 8.04).

<p>The independent analysis suggests that the proposal would result in reductions to absolute Vertical Sky Component (VSC) values for properties at 6 Hester Road that exceed levels typically considered acceptable under BRE guidance. Only 42% of assessed windows comply with the BRE VSC criteria, with some windows losing over 50% of their current light levels. Fewer than half of assessed rooms meet the BRE recommended Daylight Distribution levels, with some experiencing very substantial losses of daylight.</p> <p>The independent analysis indicates that the average retained VSC for windows at 6 Hester is 8.78%, which is substantially below the BRE guideline of 27%. It is also significantly lower than retained VSC levels recorded for neighbouring affordable housing affected by comparable proposed developments approved by the London Borough of Wandsworth. Independent research conducted by Anstey Horne found that six mid-rise to tall building schemes granted permission between 2018 and 2023 resulted in impacts to neighbouring properties that averaged retained VSC values ranging from the mid-teens to 32%, meeting or broadly aligning with the 27% BRE guidelines.</p> <p>The independent analysis has also found that the overshadowing impact of the proposal on the outdoor terrace at 6 Hester Road results in a significant reduction in sunlight to this area well in excess of that accepted by BRE guidelines, with the proportion of the terrace meeting BRE recommended sunlight levels reducing from 43.03% to 23.13%.</p>	
<p>We strongly disagree with the SoCG's claim that the proposed development complies with Policy LP2 in this respect. Whilst Thameswalk Apartments, which adjoins the existing Glassmill building on its western, does not have any west facing windows, it does have south facing windows. These windows would experience an impeded outlook and sense of oppression given the scale of the proposed development of the entire appeal site which extends south-west of the apartment building.</p> <p>Significant outlook impediment and sense of oppression would also be felt by residents of 6 Hester Road, which is an affordable housing development with a large number of habitable living space windows and outdoor amenity space facing out west towards the application site. The outlook from these windows would be eradicated by a building of the scale and height proposed. The SoCG is silent on reference to outlook impact on 6 Hester Road. The SoCG is also silent regarding harmful impact on outlook experience by Albion Riverside, which also has habitable living space windows addressing the application site to the west.</p> <p>Given the proximity of the large-scale proposed development to three existing residential buildings (Thameswalk Apartments, 6 Hester Road and Albion Riverside), we do not believe that the appellant has addressed the legal nuisance and constant visual intrusion that would result from the development, interfering with the ordinary use and enjoyment of these adjacent residential properties. In our view the appellant has not given sufficient consideration to this impact in the context of the recent Supreme Court ruling 'Fearn and others v Board of Trustees of the Tate Gallery'. This judgement was enclosed at Appendix F of the previously submitted DPDS representations to the appeal dated January 2026.</p> <p>The appellant should clearly demonstrate how the impact of the proposal on outlook, privacy and sense of enclosure for neighbouring residents at Thameswalk Apartments, 6 Hester Road and Albion Riverside is policy compliant, if they claim this to be the case.</p>	<p>Matters in relation to outlook and privacy are dealt with comprehensively in the Officer Report (paragraphs 5.1-6.8, CD 3.01). The Appellant agrees with the Officer's analysis that the Proposed Development would not result in unacceptable levels of overlooking, in accordance with Policy LP2 of the Local Plan. Mr Marginson's Proof of Evidence (CD 8.04) deals with outlook and privacy at paragraph 5.48.</p>
<p>b) Construction, with particular regard to vibration and structural stability</p>	<p>Matters on Construction previously raised by DPDS and other IP representations to the appeal have been addressed within Appendix D of the Planning Proof of Evidence (Letter from Velocity dated 19 February 2026 in relation to transport</p>
<p>We have 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. However, there continues to be a lack of submitted assessment or proposed mitigation measures to demonstrate that the proposed development (including demolition of the existing Glassmill building and construction of the proposed new tall building) will not lead to</p>	<p>Please refer to the letter from Velocity within Appendix D of the Mr Marginson's Proof of Evidence (CD 8.04) which has been prepared in response to the concerns and issued raised.</p>

<p>detrimental impacts on the adjoining Thameswalk Apartments in respect of vibration and the structural stability of the existing apartment building.</p> <p>This also applies to detrimental impacts to health, safety and amenity of existing residents of Thameswalk Apartments, 6 Hester Road and Albion Riverside resulting from noise, dust and pollution during the construction period.</p>	
<p>Although noise and disturbance is explicitly mentioned in this statement, it should be highlighted that Policy LP2 is far more comprehensive and only supports development where they “Would not lead to detrimental effects on the health, safety and the amenity of existing and new occupiers, and the amenity of occupiers/users of nearby properties through unacceptable noise, vibration, traffic congestion, air pollution, light pollution, odours, land contamination, disturbances during construction and demolition, in accordance with Policy LP14”</p> <p>The SoCG makes no reference to vibration or structural stability of neighbouring buildings, including the adjoining Thameswalk Apartments, therefore it can be reasonably concluded that the appellant has not met the requirements of Policy LP2 in respect of vibration disturbances during construction and demolition.</p> <p>The appellant should clearly demonstrate how the full requirements of Policy LP2, particularly in respect of vibrational disturbance and associated structural stability, are met prior to the application being determined.</p>	<p>The associated vibration and structural safeguards, and safety are matters that are routinely and appropriately controlled through a full, detailed Construction Logistics or Construction Management Plan, secured by planning condition. The presence of a pre-commencement Planning Condition means that there is a mechanism in place to allow a further review and approval process when the exact details can be determined and understood in their context, and should sufficient mitigation of construction impacts not be demonstrated it is within the Local Authorities power to refuse the discharge of the Planning Condition (and therefore commencement of the construction) until such time as these matters have been resolved. The absence of objection from TfL or other statutory consultees demonstrates that, with a robust and enforceable construction document in place, the proposed development would not give rise to unacceptable construction or highway impacts.</p>
<p>c) Highway safety, with regards to demolition, construction and operational phases of the proposal</p>	<p>Matters on Transport previously raised by DPDS and other IP representations to the appeal have been addressed within Appendix D of the Planning Proof of Evidence (Letter from Velocity dated 19 February 2026 in relation to transport</p>
<p>It is noted that the application ‘red line’ as shown on the Site Location Plan does not extend to the river wall, therefore it is not clear how the landscaping, public realm and streetscape enhancements will be secured. Given this uncertainty, the weight afforded to these claimed ‘benefits’ should be reduced.</p>	<p>The public realm improvements outside the redline boundary, which are located within the highway boundary will be secured under a Section 278 agreement. These include level changes, the addition of steps and planting. The Proposed Development also includes financial contributions to be secured under a S106 Agreement to Healthy Street Corridor Improvements.</p> <p>Overall, the proposed public realm would result in a significant upgrade to the public realm in terms of layout, accessibility, paving, lighting, planting, biodiversity and public art provision.</p>
<p>Paragraph 4.16 makes reference to “a car lift which would have its own access on the western side of the service road north of Hester Road” however, as noted in previous objections made to the planning application, the appellant does not have a right of access over the service road which belongs to Thameswalk Apartments. The proposed car parking strategy is therefore unachievable.</p>	<p>The Appellant is confident that it has the necessary legal rights to access the development.</p>
<p>We also do not agree with the statement set out at paragraph 4.20 of the SoCG: “It is agreed that the Proposed Development would have an acceptable impact upon highway safety and capacity and would provide acceptable car and cycle parking provision”. This is discussed in further detail later in this section.</p>	<p>As set out in the letter from Velocity in Appendix D of Mr Marginson’s Proof of Evidence (CD 8.04), the submitted Transport Assessment (which followed significant pre-application engagement with LB Wandsworth and TfL) assessed the change in nature of the extant office permission and proposed residential-led development. As part of the proposals the number of on-site parking bays has reduced from 33 spaces to a total of 18 parking spaces (reduction of 15 spaces) of which five are for disabled residents. Not unsurprisingly given the nature of the current and future uses the Transport Assessment identified that a reduction in vehicle trips associated with site users could be expected in the network peaks. Further detailed trip generation assessment has also been provided within the submitted materials and has not given rise to any concerns from LB Wandsworth or TfL who raised no objections.</p>
<p>It is noted that the evacuation strategy for the proposal involves evacuation points on the service road located north of Hester Road. However, as previously noted, the appellant does not have a right of access over the service road which belongs to Thameswalk Apartments. The proposed evacuation strategy is therefore unachievable and does not comply with London Plan Policy D9.</p>	<p>The Appellant is confident that it has the necessary legal rights to access the development.</p>
<p>We strongly disagree with these statements, together with the statement at paragraph 4.20 of the SoCG, regarding the impact of the proposal on highways safety and capacity being ‘acceptable’. Our client continues to have particular concerns regarding the impacts of the proposal on the local highway network, in particular traffic crossing Battersea Bridge both during the construction and operational periods of the development. The client is not convinced that this has been adequately assessed nor have concerns been mitigated through the application submission.</p>	<p>Please refer to the detailed letter, prepared by Velocity in Appendix D of Mr Marginson’s Proof of Evidence (CD 8.04), which responds to these matters. In summary, Velocity conclude that they see no reasonable grounds for which the proposals should not be considered acceptable insofar as they relate to highway and transport matters. Further, that the more recent changes to the surrounding highway network have no material impact to the Proposed Development, and do not require any change of strategy with regards to construction logistics.</p>

<p>It should be highlighted that there have been recent changes to the traffic light layout at Battersea Bridge. Local residents have reported that this has already impeded the fire service's ability to cross to the south due to lane width restrictions. This disruption to emergency services will be further exacerbated as a result of the development, particularly during the construction phase which will involve large scale construction and delivery vehicles frequenting the site over a number of years. Given the constrained nature of the site, it is inevitable that all construction vehicles will have to wait or unload on the highways itself at Battersea Bridge Road. The resulting impact on highways safety cannot just be accepted and needs to be given sufficient weight against the proposal in the planning balance, as the health and safety of hundreds of existing residents is potentially in jeopardy particularly in the event of a large-scale incident if emergency vehicles are unable to access the south side of the river.</p> <p>It is acknowledged from the Committee Report that there was no objection to the application from TfL (subject to conditions/legal agreement), however it is not clear if their review accounted for the changes to the traffic light layout at Battersea Bridge and therefore strongly urge that confirmation is sought that relevant highway modelling and assessment was undertaken based on the current layout. TfL should also be consulted again on this basis.</p>	<p>Please refer to the detailed letter, prepared by Velocity in Appendix D of Mr Marginson's Proof of Evidence (CD 8.04), which responds to these matters. In summary, Velocity state that with regards to the recent changes to the road traffic layout, the physical lane widths do not appear to have changed demonstrably from the previous arrangements which included a central island at the crossing point. Moreover, the design and implementation of these changes have been implemented on an active bus route for the benefit of buses who in themselves are not restricted by any of the lane widths. Although Velocity cannot confirm they have evidenced a fire tender using Battersea Bridge Road in its current arrangements without issue; they consider that there appears to be sufficient lane width such that they do not see any practical issue for them doing so.</p> <p>It should also be noted that the absence of objection from TfL or other statutory consultees demonstrates that, with a robust and enforceable construction document in place, the proposed development would not give rise to unacceptable construction or highway impacts.</p>
<p>We are of the view that this is a completely inappropriate position to take on construction matters, given the scale of the development and heavily constrained nature of the site.</p> <p>The construction timetable implied in the submission documents appears overly ambitious and it is necessary for the appellant to provide a much more detailed and realistic overview of the construction process, the specific equipment to be utilised during the construction and where such will be sited within or on land adjacent to the site, especially where this will be outside the red line area of the application site. This is not a matter that should be left to be addressed as a pre-commencement condition requiring a Construction Management Plan to be submitted and approved by the Local Planning Authority; rather, it should have been addressed at the point of submission of the application, particularly as the proposal has not been the subject of a rigorous Environmental Impact Assessment. The client would expect to see far more information in respect of the type and manner of the construction, sourcing of materials, haul routes from source to site and arrangements for building material preparation and interim storage both within the site and, if necessary, off-site, and how the developer/contractor will mitigate impacts on the local highway network, adjacent residential and commercial properties as well as on other nearby properties. For a complex, high-rise development of this type this is not information that can be left to be dealt with in due course by way of pre-commencement condition(s) attached to a grant of planning permission because the information is required now, prior to determination, to enable full assessment of the environmental impacts of the development. Had this scheme been treated as EIA development, this work would have been an integral and inescapable element of the EIA process. Whether the scheme is scoped as being EIA development or not; it is quite clear that the scheme will give rise to significant environmental impacts that need to be thoroughly and overtly assessed as an integral part of the planning application consideration process. In the view of the client, this has not been done.</p>	<p>The reliance on planning conditions to secure detailed construction methodology is entirely consistent with national policy and established practice for major urban developments. It is not typical nor beneficial to explore very specific levels of operational detail at this stage given that subject to when commencement might take place the context could be different. This is already clearly evidenced by changes to the network since the application was submitted and as raised in comments.</p> <p>With regards to the EIA process, please see paragraphs 5.149 and 5.150 of Mr Marginson's Proof of Evidence (CD 8.04).</p>
<p>d) Environment and climate, with particular regard to whole life carbon and wind microclimate</p>	<p>Matters on Whole Life Carbon previously raised by DPDS to the appeal have been addressed within Appendix F of the Planning Proof of Evidence (Letter from Ramboll dated 18 February 2026 in relation to Whole Life Carbon and Circular Economy) and matters on Wind have been addressed within Appendix E (Letter from GIA dated February 2026 in relation to wind impact)</p>
<p>In our view, the appellant's submission does not adequately justify why retention of the existing building has not been considered and therefore conflicts with Policy LP10 (Responding to the Climate Crisis).</p>	<p>The letter from Ramboll in Appendix F of Mr Marginson's Proof of Evidence (CD 8.04) affirms that the updated WLCA and CES reports are fully approved and supported by the GLA, London Borough of Wandsworth's Sustainability Consultants and the Appellant's design team, confirming the Proposed Development achieves outcomes consistent with the established policy and guidance.</p> <p>In addition, please refer to the GLA memo included at Appendix 1 of the WLCA (dated 14.02.25) and the Circular Economy Statement which confirms that it is not technically feasible to retain the building currently in situ. Given the age of the office building currently sitting on the site, the existing fabric/ building systems do not meet modern</p>

	<p>standards in terms of energy efficiency or performance and will therefore be removed from site prior to possession of the site for this development. However, part of the existing building's elements will be reused on other sites (e.g. reclaimed bricks, glass panels, lighting). Where materials cannot be deconstructed and reused, they will be demolished, recycled, and reused to minimise the amount of waste produced.</p> <p>DS2 has also undertaken an assessment to determine the viability of continuing the existing use and/ or refurbishing the existing building for offices (Appendix G of Mr Marginson's Proof of Evidence Cd 8.04). DS2 conclude that »it.is. highly.improbable.that.any.reasonable.investor.or.developer.would.commit.significant.financial.resource.and.time.to.the.Site.with.an.expectation.that.this.would.yield.the.economic.value.that.derives.a.reasonable.return.for.riskj.There.is.no.reasonable.prospect.that.a.continuation.of.the.existing.use?either.with.or.without.refurbishment?is.a.feasible.or.viable proposition». (paragraph.170).</p>
<p>The appellant should address the queries and concerns raised in the report titled 'Whole Life Carbon Review' prepared by Targeting Zero and submitted as Appendix C to the letter of representation dated 26th January 2026 submitted by Ms Amanda Gulliver, Chair of Thameswalk Residents Association.</p>	<p>The letter from Ramboll in Appendix F of Mr Marginson's Proof of Evidence (CD 8.04) affirms that the updated WLCA and CES reports are fully approved and supported by the GLA, London Borough of Wandsworth's Sustainability Consultants and the Appellant's design team, confirming the Proposed Development achieves outcomes consistent with the established policy and guidance.</p> <p>Further, it should be noted that the Targeting Zero report (dated June 2024) was issued based on the review of the March 2024 WLCA, originally issued as part of the TWRA objection to the scheme.</p> <p>When the application was revised in October 2024, a revised WLCA was submitted which also addressed concerns raised from the GLA at Stage 1 of their consultation. This revised WLCA has been reviewed in detail by the GLA's sustainability team, which after further clarifications concluded the WLC of the Proposed Development complies with London Plan Policy SI2 and the GLA's Whole Life Carbon Guidance (2022).</p>
<p>In our view, the wind microclimate effects of a tower of this height on a constrained riverside site have not been adequately assessed. The appellant's own studies identify uncomfortable conditions at both public realm and balcony levels, with no convincing mitigation proposed. This needs to be addressed by the appellant.</p>	<p>Please refer to Appendix E of the Mr Marginson's Proof of Evidence (CD 8.04), prepared by GIA which has been prepared to address the representations by DPDS to the appeal on wind microclimate matters. Direct responses to each of the DPDS comments are set out and addressed within this letter. GIA conclude that the wind impacts of the Proposed Development are acceptable.</p>
<p>In our client's view, potential implications for Battersea Heliport flight paths as a result of the proposed development also remain unexamined. This needs to be addressed by the appellant.</p>	<p>Battersea Heliport were consulted at Application stage and provided no objection to the Proposed Development.</p>