

## **Appendix 3 – Design Quality Table**

**‘The tall building meets an opportunity for a landmark marker’.**

The Appellant in their supporting material make reference to the Appeal Scheme being a ‘visual marker’ at a ‘key entrance into Wandsworth and Chelsea’ (BHTVI, para 9.10). It is deemed this indicates a destination in of itself and would aid wayfinding in the wider townscape. It states the tall building would ‘reorganise the public realm along the river’ (BHTVIA, 3.42). On a macro level, the Appellant refers to a ‘London-wide precedent for tall, landmark buildings at the bridgehead of major river crossings, such as at Battersea Railway Bridge (Lombard Wharf), Blackfriars Bridge (One Blackfriars) and Vauxhall Bridge (Vauxhall / Nine Elms cluster).

**Views of the Wandsworth Design Review Panel (WDRP)**

**Views of the Greater London Authority (GLA)**

After two rounds of WDRP (letters at CD12.01 & CD12.02), the Panel ‘remained unconvinced that marking the bridge is an argument for a tall building in this location’. It went further: ‘the constrained site for the tower and the amenities offered do not mark a broader opportunity for placemaking for the wider community, which might be supported’. It left off that: ‘were the height of the tower and podium to be reduced, the argument still stands’.

Whilst not against height per se, the Panel ‘were not convinced on the need for height in this location and do not think the narrative presented is clear and robust enough’.

Whilst it considered the idea of a tall building could be plausible, it found the reasoning to mark Battersea Bridge very limited and noted that others cited along the river were not always ‘tall’. It noted there are plenty of examples in London that demonstrate legibility can be achieved in a number of ways, ‘through a building of exemplar design quality not necessarily just through height, for example’.

Officers found the proposal contrary to D9 Part B, though recognised this must be assessed against the remainder of D9. In their Stage 1 Letter, GLA Officers considered: ‘that a ‘landmark’ for the river bridge could be an appropriate design principle to apply when re-developing this site. However, as outlined at pre-application stage, this does not mean that a building of significant height is considered appropriate on this basis’ (Stage 1 letter, paragraph 37, CD11.08).

GLA Officers, representing the strategic authority for Greater London, did not state that a ‘metropolitan marker’ was either necessary or desirable in this location.

### View of the LPA

Having regard for the views of the WDRP and the GLA I give weight to their findings. That conclusion is, on the main, there is no stated ‘need’ for a tall landmark, and, in any case, any future landmark need not be tall to perform a landmark function.

Firstly, it is worth restating an important fact. If the Council (or GLA, Historic England), or even the local community, considered - via the democratic Local Plan process - that a tall ‘marker’ was either desirable or necessary – then it was in their gift to say so, and the Council’s to designate, the site for a tall or very tall building as part of a site allocation and/or in a tall building zone. In fact, this is not the case. On the contrary, the Appeal Site is not an allocation and is in mid-rise zone for no more than 6 storeys. Either side, tall building zones of between 7-12 storeys, considerably lower than Appeal Scheme, were designated. The main Proof addresses the sound and good placemaking reasons underpinning this design-led, Plan-led approach – one which meets the UDS (CD5.16) aim to ‘restore’ and ‘improve’ Character Area B2’s character, which has been fragmented. That less coherent character stems from the harmful influence of incremental towers and non-contextual development. This growth context in the UDS does not explicitly seek to ‘mark’ the bridgehead – in fact, it seeks a respectful height and scale. It is a matter of common ground that the UDS forms the basis of the Council’s design-led approach to growth under London Plan Policy D1. The Appellant’s claim of a design benefit here is considered speculative, unsubstantiated and in any case peripheral to any design quality case.

We shall start at the macro, London-wide level – suitable to a claimed ‘metropolitan marker’. The Appellant’s case is un-evidenced – there is no visual representation of the proposal on the wider London skyline. It is a matter of common ground that the Appeal Scheme would not affect any strategic view identified by the Mayor under London Plan (CD5.01) Policy HC3 / in the London View Management Framework (LVMF). It would affect, potentially, views from London’s southern ridges rising above the Thames valley. From the west (Richmond Park) to east (Telegraph Hill) there is potential visibility, at least, for the focused observer (Figures 101-105). Even if *marginally* visible, and discernible to only the very engaged observer – it could even cause a negligible dilution when reading London’s skyline topography. I’m not aware of anywhere in the north London hills from where the site might be visible. Nevertheless, any impact would likely be residual and peripheral to the macro level skyline views.

Along the Thames valley, the Appellant suggests that marking river crossings is part of some deliberate, or incidental, skyline curation or pattern. It is worth stating, this specific claim has no place in the LVMF LPG (2012), the London Plan (CD5.01) or the Local Plan (CD5.02). In fact, the LVMF (and London Plan HC4) approach to the river prospects is to preserve their view compositions, historic skylines, landmarks and key elements of character. Of direct relevance, the LVMF LPG states: ‘bridges help frame River Prospects, create a setting for particular landmarks, demarcate the extent of the middle ground and/or add to the sense of movement and activity. They can also be landmarks in their own right’ (my emphasis). Indeed, many are identified as such. It is further fact that no visual management guidance identifies the contribution of an identified landmark as marking a river crossing – nor does it seek such a landmark – and a number of the central London bridges are identified landmarks or

features in their own right. This is the document, more than anything, which has curated London's skyline – and the Appellant's marker claim has no basis in it.

The Appellant's examples in their D&AS (CD 1.07, page 37) of other landmarks 'marking bridges' is spurious. The Royal Festival Hall makes my case advanced below – that a landmark need not be tall, but respectful of the open River edge. Albert Bridge/Battersea Park also makes this point – whilst reinforcing our central claim that the bridges form the central landmark on the River. Others are not straightforward – the Shard may be associated with London Bridge (Station, at least) – but its heritage impacts / harms were much contested – and it is set well back from the riverside. Westminster Towers at Lambeth Bridge, I contend, is a particularly poor-quality example – one with established claims to harm its sensitive setting and macro-level LVMF views. The only bridge I'd suggest has an integral landmark element is Cannon Street Rail Bridge – whose integral Grade II listed 'Wren-esque' towers form an ensemble – self-evidently not relevant here. But what unites most of them is that there is no common thread in terms of marking bridges - or a wider placemaking agenda stemming from that - and they act to emphasise that each case should be considered on merit, relative to its spatial character.

I accept, as I do in evidence, that the River allows a reading of London's wider topographical setting, for example from Chelsea Waterside or Chelsea Bridge – but that in all instances in this case, the Appeal Scheme would harm that reading, not enhance it.

At a neighbourhood level, the Appeal Scheme might have residual visibility from local high points – for example from the local rises of St John's Hill, or Lavender Hill – where in glimpsed views above the tumbling chimney plots, for example, Albion Wharf is visible, alongside Albert Bridge, Battersea Park and the Kensington museum quarter beyond. However, in particular by mid-20<sup>th</sup> Century developments, Battersea's distinctive lower-rise skyline context has been undermined, and the proposal could just add to that. In the views from Clapham Junction Station down track to central London, any proposed visibility would be residual and likely insignificant.

However, it is at a more local / mid-distance level in the river corridor that seems to be the focus of the Appellant's case. I tackle this now.

The Council's UDS (CD5.16) seeks 'new development should have a distinctive character that creates remarkable landmarks' (pg 63). We support this principle, including at the Appeal Site. However, height is just one component of a landmark. This is a long-established principle in policy, guidance and practice. This is not just our view, the GLA's and the WDRP's stated views – but that also espoused by 'Historic England Advice Note 4: Tall Buildings' (CD4.14). Under consideration of 'architectural quality', it considers the case for landmarks: 'it is important to note that not all tall buildings can be landmarks, and not all landmarks need to be tall buildings' (our emphasis). This is the commonly accepted case. In fact, the National Design Guide (para 70) qualifies the fact landmarks can emphasise important places, with that these need to be well-designed and make a positive contribution to the skyline, in fact, requiring special attention (para 71). RBKC opposite have addressed this matter directly in its Building Height in the Royal Borough SPD (CD5.25). At para 3.2 it identifies that landmarks can be distinguished by other features than height –

such as distinctive form, materials, colour or use – without the need to rise above predominant building heights. It states that its river’s municipal borders, which is the Appellant is explicit in seeking to ‘mark, are of, I quote, ‘no real significance’ and ‘there is no overriding case for landmark buildings to define administrative districts or local boundaries’ (5.42). It goes on to state that marking bridges is a matter of local legibility often accomplished by lower-order visual cues, such as signage (5.43). In this day and age, wayfinding orientation relative to physical landmarks is, self-evidently, less important.

It is our position, as set out in main evidence, that the Appeal Scheme compounds the local spatial hierarchy and the landmark status of Albert and Battersea Bridges which self-evidently mark out these river crossings. It would diminish the openness and pre-eminence of the River and its landmark bridges. If realised, the Appeal Scheme could, over time, become associated with the bridge in some views amongst discerning local observers, namely from up close – when orientation or ‘wayfinding’ is not a significant matter. But I contend that this association would be negative – the result of the harmful impact on the River, not affectionately on some loose association with the bridge it would subjugate.

My view is that there is no instructive or determinative case for a ‘metropolitan marker’ that is tall. In fact, the height and scale drive the significant harm to local spatial hierarchy.

**‘The Proposed Development is not near an existing group of tall buildings, but would establish a successful relationship with the taller elements nearby, particularly at Lots Road, Chelsea Waterfront, and Lombard Wharf. Together, these tall buildings would make a positive – and varied – contribution to London’s skyline’.**

The Appellant makes the case, at BHTVIA paragraph 9.12, that the Appeal Scheme would lead to a ‘balanced skyline composition with the buildings at Chelsea Waterfront / Lombard Wharf, supporting orientation and legibility’. It finds that the ‘perception of height in the area is evolving as more tall building schemes are completed, including those in the Vauxhall Nine Elms Battersea Opportunity Area’.

Views of WDRP	Views of the GLA
The Panel highlighted a fundamental issue with the height of the proposal and level of mitigation offered. The Panel considered it	GLA Officers stated the proposal represented a ‘stark new urban typology in its immediate setting’ (Stage 1 Letter, para 38, CD11.08). It

<p>undeniable that the building will have a substantial impact on the surrounding areas.</p> <p>There was no suggestion of a positive relationship with taller elements nearby or that it would make a positive - or varied - contribution to London's skyline.</p>	<p>found it would be of a 'dominant scale' (para 38). There was no suggestion that the scheme would form a successful relationship with taller elements nearby or that it would make a positive or varied contribution to London's skyline. It acknowledged that the extensive heritage harms identified were inclusive of cumulative harms.</p>
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**View of the LPA**

I note the silence of the WDRP and GLA on this topic, read in against their wider observations on inappropriate height and substantial impacts. Contrary to the Appellant's stated claim, the Appeal Scheme is near - in fact opposite - a clustering of tall buildings forming part of the Ransome's Dock Focal Area of Activity; namely Albion Riverside (11 storeys), Waterside Point (c.7/8 storeys), Riverside One (8 storeys), parts of the RCA – and others are in the pipeline. Though, the Appeal Scheme would dwarf these.

I appreciate the Appellant's acknowledgement that the Appeal Scheme would evidently not form part of this local clustering. However, I refute claims it will form a positive relationship with a wider skyline, including Lots Road / Chelsea Waterfront – or for that matter any claimed relationship with Lombard Wharf other than to state the obvious - both would be opposite bridges, albeit with limited meaningful intervisibility or relationship.

The Appellant's claims ignore the adopted and up-to-date Development Plan context either side of the river corridor. The Chelsea Waterfront towers were acknowledged to harm the River Thames by the Inspector who recommended them for refusal – and that harm, I contend, has been realised. The RBKC Character Study (CD5.24), underpinning its 2024 Local Plan (CD5.41) growth strategy, explicitly recognises their impact – and does not seek to replicate it. The Wandsworth UDS is clear in its approach not to 'transform' Character Area B2, but to 'restore' and 'improve' it – recognising the fragmentation caused by poor quality towers – and that between Albert and Battersea Bridges heights have broadly reached their limit and that the Montevetro Tower should not be used as a future height precedent. The Surrey Lane / Sommerset Estate, and especially the World's End Estate, whilst more conventional clusters – add further undermining fragmentation – which have compounded harm to spatial character and together form just a scattering of taller buildings. This Appeal Scheme, in this instance in a much more conspicuous and sensitive location, would compound this effect, but to a much greater degree.

My evidence is that, rather than forming a positive grouping – these undermine the river corridor in particular, at this transition from the Central Activities Zone (CAZ) at Chelsea Bridge, into a lower-scale, lush and more open historic finer-grain character. In addition, as we set out in main evidence, in particular between Chelsea Bridge and the Chelsea Embankment (north side), the Appeal Scheme would form a poor relationship with Chelsea Waterfront, and actually undermine those aspects of more distant siting, slender form and architectural symbiosis which actually mitigate their unduly prominent, intrusive skyline impact, thus compounding spatial character (and heritage) harms. There is no apparent or evidenced relationship with the much more distant Vauxhall Nine Elms Battersea cluster – which does actually mark a major regeneration Opportunity Area and transport hub – and which, as set out in evidence, is read as ‘there’ and not of this River corridor, but beyond in the Zone 1 Central Activities Zone. In fact, it is my case, that the Appeal Scheme would detract from a reading of the emerging London skyline, in particular on approach from the west from as far back as Chelsea Harbour.

The landmark symbolism of Lots Road Power Station – once the primary and pioneering power source for the London Underground – has been much diminished by the Chelsea Waterfront towers. This is evident in the local river corridor views set out in Appendix 2 – but also on the wider London skyline (such as in Figures 101-102 from Richmond Park). From Richmond Park, the World’s End Estate towers even blot out the Palace of Westminster. From on high to the near south, we have no evidence of a positive skyline contribution – but are left to consider if it would simply act to further fragment and undermine the lower-rise and verdant Battersea skyline of period terraces, Battersea Park and the inner west end beyond.

Any claim that the impact is ‘varied’ - is just that - a simple, blunt suggestion that the Appeal Scheme would add more variation – something which could, and should, be achieved at a much lesser height and scale, in accordance with the Plan-led approach.

Our case is that the Appeal Scheme would undermine the existing and emerging spatial character and its skyline, far from enhance it. Its height, relative to its depth, would be of an unprecedented, and harmful, scale.

**‘The form of the Proposed Development has been carefully considered and developed, responding to both strategic and local views as well as the setting of designated heritage assets in the study area’.**

**Views of WDRP**

**Views of the GLA**

<p>Nowhere is it suggested that the Appeal Scheme has been carefully considered with regard views or heritage assets – in fact – to the contrary, significant harms were found.</p> <p>The Panel reminded unconvinced by the journey presented to justify the height. It remained of the position that the benefits were not sufficient to justify the harm, or that they were sufficient to justify the height. The Panel shared Historic England’s concern that the tall building would have ‘extensive and wide-ranging impacts on the historic environment, including heritage designations of very high significance’. The Panel remained unconvinced that the heritage and visual impacts had been properly considered and that insufficient information had been provided. It found the reduction to 33 storeys had no clear narrative and appeared arbitrary.</p> <p>The Panel noted that the Council has been through a ‘very thorough process’ in the UDS which had deemed this location as not suitable for a tall building and would risk adversely affecting the character of the River Thames, including the north bank and the surrounding area.</p> <p>It remained of the view that ‘less than substantial harm can be identified yet the package of benefits to mitigate the harm seem meagre’. The Panel did not identify any heritage benefits.</p>	<p>The GLA’s assessment of heritage harms stated these were inclusive of cumulative harms. It found that the Appeal Scheme did not affect London strategic views (ie those in the LVMF).</p> <p>Nowhere is it suggested that the Appeal Scheme has been carefully considered with regard views or heritage assets – in fact – to the contrary, significant harms were found. The GLA did not identify any heritage benefits.</p>
<p><b>View of the LPA</b></p>	
<p>No independent expert stakeholder has considered the Appeal Scheme carefully considered with respect views and the setting of heritage assets. In fact, it is our case, in addition to the views of the WDRP, GLA and Historic England, in addition to other amenity societies – that the Appeal Scheme would demonstrably harm views and heritage assets. This is set out in detail in my Proof and at Appendix 1.</p>	

Insofar as heritage is an important, but not exhaustive, aspect of local character – we contend that this harm must, at least, diminish any claim to high quality, never mind, ‘exemplary’ design.

**The proposal is of ‘exemplar architectural quality’.**

**‘Design excellence is achieved: the building is successfully sculpted and split into a clearly legible base, middle and top zone, using high quality, durable materials’.**

**‘The material palette has been thoughtfully selected and has been led by the aspiration to have a graceful and visually interesting building which will change in response to various weather and lighting conditions’.**

**Views of WDRP**

**Views of the GLA**

At no point did the Panel state that the building represented an exemplar of architecture. In fact, the Panel, whilst acknowledging some refinements, overall, it remained ‘unimpressed by the architectural approach which we think is neither strong nor convincing enough to outweigh the harm’.

The Panel noted 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.

It considered the link with Thameswalk Apartments remained unresolved, remained unconvinced by the architectural reference to Battersea Bridge and that the visual permeability wasn’t enough to make Hester Road a more welcoming environment. As discussed above, it remained unconvinced by the crown of the tower which it felt ‘too

Overall, GLA Officers considered the architectural quality of materials proposed is good. It found the tower slender, assisted by the legible approach to massing and the curved profile of the tower. It stated the tower had a legible base, middle and crown in line with Policy D9. Officers thought the crown could be better articulated.

<p>flimsy’, and its technical screening requirements remained unjustified. It raised concern at the number of single aspect flats.</p> <p>It found the materials, including the terracotta, could be successful.</p>	
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**View of the LPA**

The Appellant design case can be summated as taking cues from the riparian location and adjacent buildings, not least Battersea Bridge (BHTVIA, paras 9.15-917, CD 1.02), following traditional ordering principles (bottom, middle, top) and an attractive materiality, relief and modelling, which will create variety and texture which will change throughout the day.

A conventional ordering of base-middle-top is just that – a sound established principle for most tall buildings – and in fact general compliance with policy LP4 Part B4 (noting also the justification of Policy D9). This doesn’t change our position that the Appeal Scheme would substantially harm local spatial character.

The Council’s case does not rely on the ancillary design details of the scheme which, in of themselves, are unobjectionable – and indeed, the aspiration (subject to conditions) could be attractive in isolation. The adoption of a streamline moderne style, whilst unremarkable in of itself, has potential, and has a waterside synergy. For a proposal of such height and depth, of such a massive scale – the architect has resisted the pitfall of contrived variety and overwrought complexity. It’s main axis vertical relief gaps, layering in two-tone terracotta and subtler textural contrasts and shadow gaps would create a legible, uncluttered expression which would have integrity. However, in our view, this just acts not to compound the harms of height and scale on context – it doesn’t eradicate them. Consideration of the detailed architectural expression formed part of the Council’s assessment as to the harms to spatial character.

Attention to detail is, of course, broad policy compliance - not least Policy D9 Part Cc or D3 Part D12. This requires *all* (never mind very tall) development pay attention to detail, and be of attractive, robust materials which weather and mature well. It is a matter of common ground that the detail aspired to will need to be secured via condition, in accordance with Policy D4 Part F; ensuring design quality be maintained.

The Appellant places some emphasis on a ‘nod’ to the arches of Battersea Bridge, namely in the form of its large colonnade, in part at least, forming the ‘base’. We note our independent expert WDRP were not convinced by this aspect – finding it jarring. For us, it is just part and parcel of an overall height and scale equation which would dominate Battersea Bridge, diminishing and detracting from its setting. To the extent the average

observer might notice an architectural ‘nod’ – which I contend most would not – this in no way materially alters the incongruity of the relationship fundamental: that there is a harmful height and scale relationship. In any case, I’d suggest the staggered, suspended metal panels of the arch wouldn’t have the qualities of Bazalgette’s ribbed coving on the inside edge of the bridge (Image 1 and Image 2, in contrast).

The Applicant’s claim to sculptural form should not be overstated – its riverfront ‘bullnose’, over a more limited viewing area, assists a slender verticality. But, on the whole, the Appeal Scheme would be viewed on edge – where its sheer rise, without set-back profiling, or entasis – will be unduly dominant and visually intrusive. The Appellant points to a relationship with Lombard Wharf – alongside other examples of the streamline modern – and I would encourage the Inspector to appreciate the difference in scale and context in her riverside walk site visit. The Appeal Scheme, at greater height and scale, would have little of the slender, dynamically contoured plectrum form of Lombard Wharf. For the Appeal Scheme, the central ‘seam’ of the taller aspect, its banding, two-tone terracotta, relief and shadow, changes in texture above level 11, and a stepped crown playing on the base – for all a coherence and integrity – have been accounted for, but do not nullify the harms identified.

Detailed design is a matter which would otherwise be reserved for condition. The Appellant’s visualisations and aspirations display positive intent – but judicious oversight of detailed matters will be important if the inappropriateness of the height and scale is not to be compounded. This can be affected by technical requirements, including construction and/or any value engineering exercise. The sinuous curves and clean lines of the streamline moderne – essential to claims of quality or slenderness – will, for example, be particularly affected by how the panellised system is put together. This will include how consideration of primary movement joints, secondary joints of the terracotta modules, the potential for faceted (rather than curved) glazing, the thickness of frames, the incorporation of mechanical ventilation, the treatment of soffits and rebates, namely. The Appeal Scheme draws some parallels with the Metrobank on Putney High Street (Image 3), where the detailed design was essential to its overall success – including, at 5 storeys, its contextual response. Nothing I can see in terms of facades/expression is innovative or pioneering, and I can’t see this evidenced in the Appellant’s submission – for example innovation on passive system incorporation, or embedded carbon reduction, for example. It seeks to do what all good detailed architectural design should. There was no claim to exceptionalism on before of the WDRP or the GLA, in fact, to the contrary, these found harm.

I recognise other objective design expert were less convinced by the ‘crown’. I understand and appreciate its synergy with the architectural approach and recognise the need to subdue to overbearing height and scale in context, and not to further draw away from a sensitive setting.

The Appellant makes much of design development and testing at pre-application stage. Changes were made, but, despite Officer advice on the appropriateness of the tall building, no option was tested which was not a tall building, which, of course, could also be well-detailed.

**Image 1:** the proposed 'nod' to Battersea Bridge in the cambered metal panels of the base.



**Image 2:** the more dynamic coved, ribbed edge of the bridges elegant span.



**Image 3:** The Appeal scheme (right) has some similarities with the c.2015 Putney Metrobank (89-93 Putney High St) (left) which adopts a streamline modern style and where its execution; jointing, curved sleek glass frames, were important to the overall effect.



**‘The Proposed Development provides high-quality public realm.’**

<p><b>‘The Proposed Development presents active frontages onto the surrounding streets that contribute to an animated streetscape along Battersea Bridge Road and the interface with the Thames Path, Hester Road and the Royal College of Art. An improved access point would be established from the Site to the Thames Path, providing improved connectivity for pedestrians and cyclists, as well as new planting, trees and a terrace for the public to enjoy views across the river.’</b></p>	
<p><b>Views of WDRP</b></p>	<p><b>Views of the GLA</b></p>
<p>The Panel acknowledged that a reduction in the floorplan on the riverfront, allowing for a more generous space, was positive. However, it found the amended layout felt more pressured and were ‘not convinced this is working’. It found the restaurant too small, that access remained problematic with no clear drop off point and noted pedestrian access at ground floor was not inclusive. It found permeability of the ground floor could be improved for the affordable lobby.</p> <p>Whilst it recognised the positive on the riverfront, it thought the design could be simplified and felt it slightly overworked and that the relationship between the building and the landscape needed to work harder.</p> <p>The Panel noted the location on a busy main road with high levels of vehicular traffic. It raised wind as a concern and strongly advised that planting such as trees should be used as wind mitigation so this can be resolved with the architecture.</p> <p>It found that the stepped access on Battersea Bridge Road was less inclusive. In addition, it found the stone-faced planters created a physical and visual barrier compromising the sense of arrival, undermining the active frontage.</p>	<p>GLA Officers stated, at Stage 1 (para 45, CD11.08) that ‘the quantum of public realm being delivered by the proposed development is considered insufficient to contribute to place making for the wider community and provide the public benefit that a building of this scale with this impact on the context would be expected to contribute’. The Stage 2 letter found this unchanged (para 39, CD11.09).</p> <p>In addition, it questioned ‘the practicality and likely success of the trees indicated for Battersea Bridge Road public realm as they sit beneath the overhang of the building façade above’ (Stage 1, para 46).</p> <p>GLA Officers noted generally good ground level activation and asked that an optimal situation be reached to address the changes in level on the Battersea Bridge Road frontage in terms of visual permeability and connectivity. It found that ground floor uses and entry points are logical.</p> <p>It noted the proposal included good improvements to the riverside and accessibility to the Thames Path, whilst noting a majority of these are beyond the red line. It noted the separation of the residential lobbies could be more equitable and that this could offer frontage enhancements. However, it noted that ‘only limited riverside improvements are proposed within the red line’ (para 45, Stage 1). Officers strongly encouraged a greater Thames Path width of 5m. It raised some general</p>

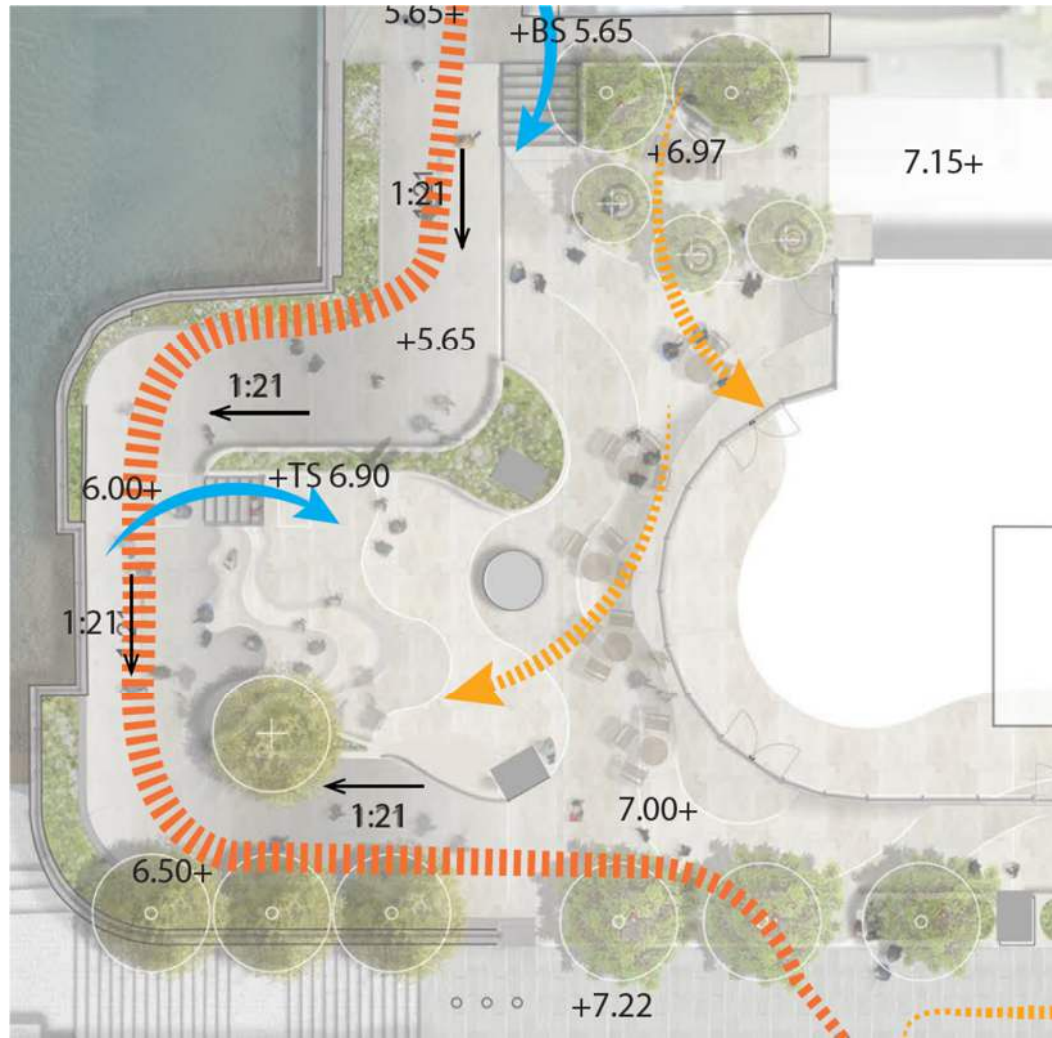
	<p>concerns about the stepped and ramped access to the riverside being complex and should be simplified to free up more space.</p> <p>It noted that wind conditions even in the summer could limit the versatility of the public space and therefore detract from the value of this potential benefit.</p> <p>Overall, Officers welcomed the enhancements, but had outstanding concerns, and reiterated that the public realm enhancements are not what one would expect of a scheme of this scale. The measure of success was clearly a mixed picture.</p>
<b>View of the LPA</b>	
<p>That the public realm enhancements are an urban design benefit is a statement of common ground. However, these should not be overplayed. In proper context, the existing site interfaces and public realm is a low bar – and so enhancement should be seen in that context. In addition, active frontages, enhanced greening and new public realm is not an ‘added additional’ – something which goes above and beyond – but the expectation of D3, D8, LP1 and the NPPF which, at para 131, sees good design simply as fundamental to planning. It is recognised that much of the riverfront enhancement is dependent on a s.278.</p> <p>In the bigger picture, the enhancements at the riverside would be relatively small. Whilst it is a threshold to the Thames Path from the bridge, the area of riverfront public realm is relatively small. This was the settled position of the GLA – and Officers encouraged the Appellant to try and further set back the building from the Thames Path.</p> <p>Officer’s (and the WDRP) encouraged the Appellant to try and acquire the small open space to the south at the junction of Hester Road – a natural enhancement opportunity one might expect of a scheme of this scale, on a prominent flank approach, would address. Unfortunately, this would remain a poor-quality space and abutment – which would pinch the main aspect of the proposed community space.</p>	

The difficult site levels on Battersea Bridge Road make optimising the frontage difficult, including genuine parity of inclusive access, even if we recognise the Appellant has worked hard to optimise it. There is little transformation of the back-of-house character of the private service road to the east.

Whilst clearly the proposals could only be a significant improvement on baseline – they are just that – and are not exemplar or of wider civic importance scale compared, for example, with the generous public realm which was rightly lauded at Albion Riverside, or even that opposite at Morgan’s Wharf. The riverfront space is, in essence, a passive space, a momentary passage onward to the remainder of the (often more generous) wider embankment riverfront beyond. To deal with the change in level, much of it is circulation space, whilst the spill out space outside the café/restaurant would be either very pinched or, if it erected al-fresco barriers, could actively block the natural desire line from the bridgehead, placing further pressure on the Thames Path dog-leg (Image 4). We note the GLA sought a greater Thames Path and we note the c.3m depth is about the same width the TfL ‘Pedestrian Comfort Guidance for London’ document expects as standard for low flow pedestrian environments (2.9m). In addition, further wind mitigation is required to ensure appropriate microclimatic comfort levels which could place further pressure still on the public realm. In wider microclimatic terms, part of the elevated sitting spaces would be in shadow for much of the year, given its north-facing aspect.

Overall, the Council do not raise objection on public realm grounds, specifically, which are obviously a step-up from a low bar. However, neither in of itself, or considered as a whole design, does it result in exemplary design, and certainly does not outweigh the far-reaching spatial character harms identified. Whilst we recognise the concerns of the WDRP and GLA, on the whole, we are content with the proposals in public realm terms.

**Image 4:** a clear upper terrace desire line could be quite ‘pinched’, given the columns, planters and indicative al-fresco spill out space, potentially, subject to management, with limited unobstructed movement corridor.



<b>‘The proposal is of exemplar sustainability, incorporating a range of net zero carbon measures in construction and operation’.</b>	
<b>Views of WDRP</b>	<b>Views of the GLA</b>
<p>The Panel emphasised the importance of the scheme being exemplar in terms of sustainability but did not state it is exemplar. It welcomed a commitment to zero carbon in operation and construction but noted that questions remained around potential overheating and how adaptable the facades were to future climate change.</p> <p>Nowhere is the development referred to for particular or exemplar sustainability.</p>	<p>The London Plan requires all major development meet a net-zero target. Its Stage 1 (CD11.08) letter found the proposal not in accordance with the London Plan in this regard. GLA Officers considered the urban greening improvement ‘appropriate’ when assessed against the London Plan.</p> <p>Nowhere is the development referred to for particular or exemplar sustainability.</p>
<b>View of the LPA</b>	
<p>We would simply point out that high levels of sustainable design is a standard policy requirement, not least of D3 and LP1, for example. No independent party has claimed the scheme is, or has the potential to be, an ‘exemplar’ of sustainability – and indeed the WDRP raised concerns, for example, about the extent of single-aspect units.</p> <p>The Officer Report notes that, in the round, the sustainable credentials of the site are acceptable and in accordance with policy through carbon offset (subject to a final review secured by s.106).</p> <p>Overall, there is no apparent case that the sustainability of the Appeal Scheme is somehow exemplar.</p>	