

s.78 Town & Country Planning Act 1990

Planning Appeal Against Refusal of Planning Permission for the
Development of a 29-storey tower ('The Glassmill'), 1 Battersea Bridge
Road, London SW11 3BZ

Local Planning Authority Reference – 2024/1322

Planning Inspectorate Reference - 6002127

William Walton MRTPI

Advocate

Opening Statement

On behalf of the Battersea Society, the Chelsea Society, the Cheyne Walk
Trust, Friends of Battersea Park, the Putney Society and the Wandsworth
Society

March 2026

INTRODUCTION

1. This Opening Statement is presented by William Walton MRTPI on behalf of a consortium of local interest groups comprising the Battersea Society, the Chelsea Society, the Cheyne Walk Trust, Friends of Battersea Park, Putney Society and the Wandsworth Society. These local groups have been accorded Rule 6 status at this planning appeal inquiry into the refusal of permission for the development of a 29-storey tall building at 1 Battersea Bridge Road, London SW11 3BZ. They speak with one voice and with one intention; to present their collective case to the Inspector in the belief that the appeal for the proposed Glassmill tower should be dismissed.
2. Each of the 6 separate groups in the consortium has been involved in making representations to Wandsworth Council (hereafter 'the Council') in respect of the Glassmill development proposal from the very earliest stages in the planning process. They attended various public consultation meetings and made written objections to the original and the later revised planning application.
3. Moreover, at an even earlier stage, most were involved in making representations to the Council during the formulation of its currently adopted local plan. In short, these civically minded groups have engaged in the planning process at every relevant stage. Links to the web sites for each of the groups are contained in Appendix A of Dr Jubb's Witness Statement.
4. It is instructive to note that 763 objections were received by the Council to the original planning application and 660 objections to the later revised version. This underscores the widespread concerns and depth of anger prompted by what many people consider to be an inappropriately tall building located within an area designated in a very recently adopted local plan for much more modest scale projects. It is acknowledged that many representations were received in support of the scheme, and this will be dealt with in the Consortium's evidence.
5. These 6 separate groups supported the decision of the Council to refuse planning permission for the proposed development. Nevertheless, to ensure that their collective voice is heard and to ensure that all the relevant issues are properly put to the Inspector, the consortium decided to apply for Rule 6 status for this appeal inquiry in January 2026. The consortium duly submitted its Statement of Case timeously in January 2026.
6. To this effect, I will be calling one witness on behalf of the Consortium. Dr Michael Jubb MBE, a long-term resident of Battersea and current Chairman of the London Forum of Amenity & Civic Societies, will present evidence on planning policy, design, heritage impact and other issues relevant to the appeal proposal. As you will see from his witness statement, Dr Jubb has a long-standing interest in urban history and has served on the Battersea Society's planning committee for nearly 10 years. During that time, he has appeared at the Examination-in-Public for the Council's local plan in 2022 and at its partial review in 2025. To add to his credentials as a witness at this inquiry, he also serves as the Chair of the Council's Conservation & Heritage Advisory Committee.

THE CONSORTIUM'S CASE

7. At section C of his evidence, Dr Michael Jubb will consider whether the appeal proposal is an appropriate form of development for the Glassmill site. His evidence will demonstrate that the appeal proposal fails to accord with the statutory requirement set out at s.38(6) Planning & Compulsory Purchase Act 2004 (and restated at paragraph 48 of the National Planning Policy Framework (2024)). As he will explain, this is because the proposal fundamentally conflicts with the development plan (being the London Plan (2021) and the Wandsworth Local Plan (2023)), and that there are no material considerations that should suggest that this conflict should be set aside.
8. First, he will demonstrate that the appeal proposal breaches London Plan (hereafter the 'LP') Policy D9B in that the scheme is located within an area designated in the Wandsworth Local Plan (hereafter the 'WLP') at Appendix 2 (TB-B2-04) for buildings restricted to a maximum of 6-storeys in height (being 'mid-rise'), and that due to its significant effect on the townscape and important heritage assets, it fails to meet the various requirements laid down in D9C.
9. Second, he will show that the proposal fails to comply with the recently adopted WLP policy PM9 (as well as and LP4B as already alluded to). The appeal site is not located within a tall-building zone on the Wandsworth Thames Riverside stretch.
10. Dr Jubb will also demonstrate that the tall buildings policies in the WLP are themselves the product of a methodical, robust and considered analysis of the scope for such structures across the borough. These policies reflect the findings and recommendations contained within the 'Urban Design Study', being a detailed investigation commissioned by the Council and conducted by Arup (2020), which Dr Jubb will refer to in his evidence.
11. This Urban Design Study concluded that the Wandsworth riverside area was not an appropriate location for the height and size of building subject to this appeal. Instead, it proposed that the height of buildings be limited to 7-12 storeys (21-36m) for the 'inner' section of the block between the Albert Bridge and Battersea Bridge. Furthermore, it concluded that the outer part of the block, including the appeal site, be restricted to 'mid-rise' buildings to be no taller than 6-storeys. Those conclusions were largely accepted by the Planning Inspectors at the examination to the WLP and, as stated, incorporated into the policies which formed the reasons for refusal of the current Glassmill scheme.
12. As Dr Jubb will remind this inquiry, the Inspector to the WLP examination concluded that any tall buildings outside of designated tall building zones should be 'extraordinary rather than ordinary' (paragraph 117, Inspector's Report). It is the Consortium's view that this test must therefore apply for tall buildings within the mid-rise zone where the appeal scheme is located. Dr Jubb does not accept that the appeal tower is 'extraordinary' in design and appearance.
13. Moving on, at section D of his evidence, Dr Jubb examines the claims made by the Appellant about the effect that the scheme would have on the wider townscape and spatial character of the area. As Dr Jubb will note, the Guidelines for Landscape and

Visual Impact Assessment (Third Edition) acknowledge that assessments of visual impact inevitably contain an element of subjectivity and that the evaluation task is an art rather than a high science.

14. Proceeding from this premise, Dr Jubb will take issue with the conclusions, reached in the appellant's Built Heritage Townscape Visual Impact Assessment (BHTVIA), that the scheme would only have a low to modest impact on views from such places as the Chelsea Embankment, Beaufort Street, Battersea Par, Battersea Bridge, Albert Bridge, Chelsea Bridge, Battersea Bridge Road, Cheyne Walk and many others. Instead, he will argue that the scheme will be an incongruent structure and will jar with the surrounding area. He will also argue that the structure is not of exceptional (or 'extraordinary') architectural quality.
15. This lack of congruity with the surrounding area stems, as Dr Jubb will argue, from a combination of the height and isolation of the Glassmill site relative to other tall buildings within this immediate area of London. It will be much higher than most other tall buildings within the BHTVIA area. Further, it will not be part of a cluster. Instead, it will be some distance from other tall buildings located at Vauxhall, Battersea Power Station, World's End, Chelsea Waterfront and Montevetro.
16. As is evident from the documents submitted by the Appellant in support of the planning application and in its Statement of Case, it is apparent that it considers that a critical argument in favour of the scheme is that the 29-storey building will act as a 'marker' signifying an entrance to the borough. But as Dr Jubb will contend, there is little policy support for this 'marker' argument. Moreover, he will show that many of the other 'markers' cited by the Appellant, such as the Shard, do not correspond historically or geographically to the various claimed partner bridges along the Thames.
17. In Section E of his evidence, Dr Jubb will argue that that the methodological approach used by the Appellant to assess the impact of the proposed scheme on nearby designated heritage assets fails to comply with the approach recommended by the GLA. Instead of preparing a separate Heritage Impact Assessment, it has prepared a BHTVIA document to assess the impact of the proposed scheme on the townscape and the setting on designated heritage assets. Dr Jubb will argue that this fails to give proper consideration to heritage issues with the result that the impacts are materially understated and the conclusions flawed.
18. He will also state that the Appellant's BHTVIA fails to give proper consideration to the issue of cumulative impact, that is to say the impact that the proposed tall building would have in combination with existing and permitted tall buildings on the setting of designated heritage assets. The submitted BHTVIA is thus at odds with London Plan policies HC1C and D9C, and with guidance prepared by Historic England and the GLA.
19. Dr Jubb will then argue that because Historic England and the Council were largely reliant on the contents of the Appellant's BHTVIA document to formulate their assessment, in some instances they also understated the harm that would flow from the scheme on the setting of designated heritage assets. From paragraph 59 onward in his statement, Dr Jubb will identify those heritage assets where his assessment of the

likely impact is at variance with that given by one or more of the Appellant, Historic England and the Council.

20. These instances of understatement within the Appellant's BHTVIA include, for example, the Westbridge Road Conservation Area, Cheyne Walk, Battersea Bridge, St Mary's Church and Albert Bridge.
21. In Section F, Dr Jubb will argue that the proposed scheme will be too large, too great in mass and too high for the site's footprint. As he notes, the scheme would maximise the development capacity as opposed to 'optimising' it, as advised under Policy D9 LP. Maximising and optimising are not to be treated as being synonymous or interchangeable terms but are instead quite different.
22. After that, he will examine the impact of the appeal proposal on the public realm (section G). As he will note, the scheme will not lead to any material improvements to the adjacent Thames Path. It will therefore represent a missed opportunity for what is an important public asset.
23. Under Other Matters (section H) Dr Jubb will consider the issues of transport, office space, daylight, sunlight and overlooking, play space and public consultation. He will explain that the use of the River Thames for the removal of demolition spoil and the delivery of materials has been dismissed without any conclusive evidence or investigative reports. He will also argue that the scheme will contribute to short term congestion, result in the loss of valuable office space and underprovide for children's play space, with no access for the occupants of the open market housing units.
24. He will argue that the level of public support claimed by the Appellant for the scheme is based in large part upon the results of surveys / leaflets – conducted and distributed by the Appellant - that contained a series of leading questions designed to direct respondents to give what amounted to predetermined answers. These surveys were supplemented by what is understood to be a pre-drafted letter of support for respondents to sign.
25. Finally, Dr Jubb will perform the Planning Balance (Section I). He acknowledges that the scheme will provide several potential benefits in the form of high quality, affordable workspace, affordable housing, community space at a peppercorn rent, a restaurant, improvements to the Thames Path, space for public artwork, funds to promote public transport improvements and short to medium term employment benefits. However, for reasons that will be set out, he concludes that jointly and severally, these do not outweigh the appeal proposal's clear conflicts with policy.

CONCLUSION

26. For the reasons set out above, I respectfully request the Inspector to dismiss the appeal and refuse planning permission for the proposed Glassmill development.

William Walton MRTPI

Advocate, 16 March 2026