

BY EMAIL

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Our ref: RYP/075667.00002

24 April 2026

Dear PCU

**Proposed redevelopment of The Glassmill, 1 Battersea Bridge Road, London, SW11 3BZ
Planning Inspectorate Reference 6002127**

We write to request that this appeal is recovered for determination by the Secretary of State for Housing, Communities and Local Government (**SSHCLG**) under section 79(1) Town and Country Planning Act 1990.

In view of the Government's emergency announcement made on 25 March 2026 to kickstart London housebuilding, this appeal - which will be one of the first major housing schemes determined in the light of this announcement – should be considered by the Secretary of State. We explain the reasons for this in detail further below, but in summary:

- The Appeal Scheme is of more than local significance, involving redevelopment of a prominent Thames-side gateway site in London (and delivery of 110 homes, including 54 affordable homes at social rent / 50% affordable housing by habitable room, in a context of acute London-wide housing need);
- The cases made at Inquiry raise important issues of development management and legal/policy application extending beyond the Appeal Site, namely the proper treatment of tall building proposals outside a designated tall building zone, in the context of the Government's strengthened post-2024 policy support for the development of suitable brownfield land and urban housing delivery;
- In any event, the combination of those legal, policy, design, heritage and housing-delivery features makes the case one that merits recovery in the particular circumstances.

Post-Inquiry Position

- 1 SSHCLG published a policy note on the London housing emergency following the conclusion of the Inquiry sessions¹. The Inspector rightly gave the Appellant and other parties the opportunity to review and make submissions on the Policy Note.
- 2 We enclose the Appellant's submissions, made on 14 April 2026 (**Policy Note Submissions**), and do not add anything to them here. In summary, though:

¹ 'Homes For London: A Time-Limited Package Of Support For Housebuilding In The Capital' (SSHCLG and Mayor of London, 25 March 2026) (**Policy Note**)

- (a) The publication of the emergency measures to support housebuilding in London is unprecedented. It reflects the acute housing crisis in London that is prevalent at this time and the urgent need to take action to achieve a step change in delivery of housing in London;
- (b) The Policy Note reinforces:
- (1) The critical importance of the issues dealt with in the Appellant's evidence on housing delivery - now establishing both the acute need referred to above and the urgency of addressing it,
 - (2) The exceptional opportunity provided by the Appeal Scheme to address the need for immediate action, and in doing so deliver 110 homes, of which 50% are affordable homes,
 - (3) The fact that it is even more critical to do so in the context of an accepted acute need for housing in London at national and regional levels.

Reasons for SSHCLG Determination

- 3 In that light, the Appellant considers that it is now both appropriate and important for SSHCLG to ultimately consider the merits of the Appeal Scheme. As you are aware, recovery can occur at any stage of the appeal, even after the site visit, a hearing or an inquiry has taken place².
- 4 The Appellant's evidence to the Inquiry (summarised in the enclosed Closing Submissions) and its Policy Note Submissions are relevant when considering this request against the criteria for recovery³.

Ground 1 - Major Importance, More Than Local Significance

- 5 The Appeal Scheme is of major importance having more than local significance:
- (a) As noted in the Closing Submissions, the Appeal Site is a gateway location on the Thames, at an important focal point of activity, and would provide 110 homes with 54 affordable homes at social rent (being 50% affordable by habitable room). In the context of established London-wide housing need, the worsening delivery position, and now-established emergency urgency to address it, the housing delivery it proposes is relevant to the wider London Housing Market area and the recognised emergency affecting delivery within it. The Policy Note confirms that this is an issue of more than local significance;
 - (b) Wider than local townscape and heritage views are relied on by those objecting to the delivery of the Appeal Scheme homes. The Closing Submissions note that the decision on whether to provide these homes in this location through the Appeal Scheme involve issues of crossing Borough boundaries and involving an essential planning judgment on the way that the juxtaposition of the best of the old with the best of the new operates as a townscape benefit of life in the World City. It follows that the issues and the planning balance are of more than local significance.

Ground 2 - Important issues of development control

- 6 In resisting the delivery of the Appeal Scheme, the local planning authority relies among other things on the exclusion of the Appeal Site from a designated tall buildings zone on heritage grounds and the historic evidence base for doing so. This gives rise to issues in relation to the way that such policies

² PPG Paragraph: 005 Reference ID: 16-005-20160713

³ Parliamentary Statement (30 June 2008)

should be approached both in isolation and having regard to the lawful application of London Plan Policy D9.

- 7 Both are issues justifying SSHCLG scrutiny, not least (but not exclusively) because the approach taken has potential wider and significant implications for recovery from the current housing emergency:
- (a) The Closing Submissions explain the relevance of the current (December 2024) version of the NPPF, which post-dates the relevant plan policies and evidence base, and the local authority's own position (that there is in fact no unacceptable heritage harm from the Appeal Scheme)⁴. In light of the housing emergency in London, the consideration of these issues by the policy-holder for the NPPF is of considerable importance;
 - (b) The same applies to the proper approach to – and application on the facts of – London Plan Policy D9 (the merits of which are dealt with at paragraphs 122-142 of the Closing Submissions).

Ground 3 - Particular circumstances

- 8 The published criteria for consideration recognise that there may on occasion be other cases which merit recovery because of the particular circumstances. The Appeal Scheme concerns:
- (a) delivery of a substantial affordable housing package in inner London, contested against townscape impacts;
 - (b) redevelopment of a prominent brownfield river site;
 - (c) policy issues relating to out-of-zone tall buildings with implications for London-wide housing and brownfield policy.
- 9 This combination of legal, policy, heritage, design, and housing-delivery issues in the context of the Policy Note, makes the Appeal Scheme suitable for recovery in the particular circumstances. We note that none of the Grounds above (taken from the 2008 Ministerial Statement) rely on a particular number of homes, floorspace or site size.
- 10 As you are aware, there are instances of both Recovered appeals and Called-In schemes⁵ of fewer than 150 homes where the issues have been judged sufficiently significant to require Secretary of State oversight of the decision. Those cases also pre-date the advent of the London housing delivery emergency confirmed in the Secretary of State's Policy Note.

The Planning Inspectorate has been provided with a copy of this letter.

Yours sincerely



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⁴ Paragraphs 107-121 – summarised at paragraph 120

⁵ E.g. Edith Summerskill House, Fulham (ref 3277137 - 133 homes/ 0.1 ha); 43/45 and 39/41 Notting Hill Gate and 161-237 (odd), Kensington Church Street, London (ref: 3225884 — 55 residential units/ 0.5 ha)