

# Wandsworth Society

---

5 Windmill Road LONDON SW18 2EU  
020 8874 3274

wandsworth.society@mac.com

Martin Jones  
Strategic Planner  
Development & Projects  
Planning Department  
GREATER LONDON AUTHORITY  
City Hall The Queen's Walk London SE1 2AA

sent by e-mail

13 January 2015

**2014 5149 South Thames College Tower and Welbeck House, Wandsworth High Street and  
17-27 Garratt Lane,**

We are writing to request the Mayor to direct refusal of this application, or to take over the application for his own determination.

We consider the Mayor should act as we believe the decision to recommend the application for approval is contrary to the spatial development strategy of the Local Plan and that there are sound planning reasons either to direct refusal or issue a direction that the Mayor is to be the local planning authority.

Our argument is that the decision to recommend the application for approval was based on a report to the Planning Applications Committee that failed to give proper weight to significant parts of the Local Plan and did not properly assess the justification for the tall building and the harm it caused.

The grounds for our request are described in the accompanying statement

Peter Farrow  
for  
**The Wandsworth Society's planning sub-committee**

## 2014 5149 Garratt Lane - Wandsworth Town Centre

The report to the committee acknowledges that harm will be caused by the tall building and seeks to justify a recommendation to approve by claiming that the harm is less than substantial 'in terms of the tests set by the NPF' and that public benefits outweigh the harm (p35 - 5.17). We submit that this is misleading as there are no tests set out in the NPF to determine the level of harm or to distinguish between substantial and less than substantial harm. The degree of harm is a subjective judgement, it is misleading to imply that the assertion that the harm caused is less than substantial has been arrived at by the application of tests that do not exist.

As to the public benefits, these are '... the improved public realm, permeability through the site, replacement of the existing buildings ... and the provision of a new modern public library'. (p39 - 5.36)

With the exception of the relocation of the library these gains do not accrue as a consequence of the inclusion of a tall building in the proposals, they are inevitable outcomes of any development of the site that accords with the objectives of the Design Principles of 3.1.6 of the SSAD.

### **DMS4 Core Strategy Policy IS3d**

In section 6 Tall buildings, the report seeks to justify the tall building by assessing it against the criteria in DMS4 of the DMPD to demonstrate compliance with Core Strategy Policy IS3d, that is -

Applications for tall buildings will need to justify themselves in terms of the benefits they may bring for regeneration, townscape and public realm and be of high architectural quality, respect local context and the historic environment.

We submit the justifications provided in the report to committee to demonstrate compliance with Core Strategy Policy IS3d are misleading and inadequate; in particular to items

- iv. show, through a detailed design analysis, that the proposal will have an acceptable visual impact on surrounding areas. The visual impact should be illustrated through computer visualisations and photo montages that cover the built and natural environment, strategic views, and the settings of conservation areas and listed buildings. ...

At 6.13 the gist of the argument to justify the tall building is that there are existing and proposed tall buildings nearby, that the CGI images 'show the development would be acceptable' and that the design is 'considered sympathetic to the surrounding buildings'.

- v. assess the impact on the existing historic environment through a conservation impact assessment identifying how the surrounding area's character or appearance or the setting of a listed building will be preserved or enhanced. ...

At 6.16 there is no evidence that the surrounding area's character or appearance or the setting of a listed building will be preserved or enhanced by the tall building other than that, albeit the tall building will cause some harm, the proposed buildings are 'considered' an improvement and that the choice of brick as the cladding material is 'a link with the historic surrounding buildings'.

- vi. describe how the proposed land use mix supports and complements the surrounding land use pattern and local community;

At 6.19 the development is said to be mixed use, although approximately 90% of the floor area is residential.

- vii. describe how the massing and scale of the proposal creates a form that is well integrated into surrounding development;

At 6.21 it is argued that the step from 4 to 6/7/9 and 26 storeys 'fully integrates with the existing streetscape' and the location of the tall building in the centre of the site adjacent to the Old Burial Ground 'will help 'to balance the height'.

- viii. demonstrate how the proposal successfully sits within the existing townscape and landform by way of a townscape/landscape impact assessment;

## 2014 5149 Garratt Lane - Wandsworth Town Centre

At 6.23 the gist of the argument to justify the tall building is that there are existing and proposed tall buildings nearby, there is a difference between the cladding of the street frontages and other buildings, and that the routes through the site required to be included by the SSAD have been provided.

There is no substance or evidence in any of the justifications put forward above that the tall building will comply with Core Strategy Policy IS3d.

### SSAD 3.1.6

As well as the overarching provisions of national and local planning policies the SSAD sets out where the Council has particular objectives. This site is described in section 3.1.6 of Site Specific Allocations Document (Proposed Submission Version) May 2013, which remains substantially unaltered in the October 2014 proposed version, both versions referring to the S2UDS December 2009 document. These objectives are longstanding and remain current. The relevant objectives are -

**Design Principles:** All the existing buildings on all three sites do not make a positive contribution to the appearance of the Conservation Area and therefore redevelopment is regarded as an opportunity for enhancement. The existing buildings are considered to be unattractive and incongruous and the potential for enhancement in each case should be seriously addressed and noticeable benefits to the townscape must be secured. Development will be expected to preserve or enhance the character and appearance of the Conservation Area and should not cause harm to the setting of any listed building.

**Tall buildings:** In accordance with the Stage 2 Urban Design Study – Tall Buildings (S2UDS), the site is sensitive to tall buildings, and the height at which a development in this location will be considered to be tall is 5 storeys. Applications for tall buildings will be subject to the assessment set out in DMPD Policy DMS4.

Paragraph 2.8 of the S2UDS refers to both the offices in Garratt Lane and Welbeck House as “less successful” and some reduction of existing storey heights will be sought, in part, on both sites. This is to ensure a better relationship to adjoining listed buildings and to enhance the appearance of the Wandsworth Town Conservation Area. In addition, the 8 storey annexe to South Thames College is an intrusive element in the townscape and already has a poor relationship to surrounding listed buildings. All new buildings will require very sensitive massing to ensure that they do not harm the setting of listed buildings and enhance the Conservation Area. It will also be necessary to consider the visual impact that any tall buildings might have on views from the Conservation Area and of adjacent listed buildings.

p101-2 Local Plan - Site Specific Allocations Document (Proposed Submission Version) May 2013

The Design Principles and paragraphs on tall buildings of 3.1.6 of the SSAD are clear statements that redevelopment of this site should not include tall buildings.

The report to committee merely mentions inter alia that a reduction of existing storey heights will be sought and that the existing 8 storey building is considered intrusive. There is no attempt to explain or justify significantly taller buildings clearly contrary to the objectives of the SSAD.

Ω