

22 March 2016

Planning applications committee

Councillor Jeremy Ambache
Councillor Tony Belton (Opposition Speaker)
Councillor Annamarie Critchard
Councillor Jane Dodd
Councillor Maurice Heaster
Councillor Guy Humphries (Deputy Chairman)

Councillor Piers McCausland
Councillor Mrs. Sarah McDermott
(Chairman)
Councillor Michael Ryder
Councillor Will Sweet
and ward councillor
Councillor Stuart Thom

Response to the report to the PAC : 23 March 2016

Application number 2015 / 6608 : Homebase, Swandon Way SW18

We objected strongly to this application in our letter of 18 January 2016. We have now read the officers' report to next Wednesday's PAC meeting and are writing to you urgently for two reasons -

- we believe the report fails to answer many of the points raised in our objection
- the sparse 7-line summary of our letter on page 295 does not fairly represent the reasons for our concern.

We objected to the scheme on several grounds, our main issues being the height of the tower, massing and design, the low provision of affordable housing, and the cumulative effect on local services.

1. The tall building : planning policy

- 1.1. The 17-storey building was the principal concern of our January letter of objection. Concern about the negative effect of the tall building also features prominently in the responses to the public consultation.
- 1.2. **We are not persuaded that the case for the tall building in the officers' report comes close to a justification for the 17-storey building.** The recommendation to accept this tall building is based on an assessment of the fifteen criteria of Policy DMS 4 of the Development Management Policies Document of the Local Plan.
- 1.3. The underlying planning policies used to determine the height at which buildings are considered to be tall and whether or not tall buildings are likely to be inappropriate as set out in the SSAD can only have been the same as those used to frame the criteria in Policy DMS 4.
- 1.4. **We fail to understand the process by which the clear guidance in the SSAD (3.6 Homebase, Swandon Way, SW18) can be so comprehensively set aside** and the criteria of Policy DMS4 be used to justify what is clearly considered to be 'inappropriate' in the SSAD.
- 1.5. The SSAD for this site states
***Tall buildings:** In accordance with Core Strategy Policy IS3d, tall buildings in this location are likely to be inappropriate. In accordance with DMPD Policy DMS4, the height at which a development in this location will be considered to be tall is 9 storeys.*
- 1.6. Paragraphs 3.12 - 3.56 of the report seek to demonstrate that the proposals comply with the criteria in Tall buildings Policy DMS 4b. The conclusion of the assessment of the fifteen criteria is that a tall building can be **allowed** (paragraph 3.56) in this location because it *delivers on several public benefits which include high quality public realm; improved permeability; new station entrance; much needed provision of housing, including a*

necessary quantum of affordable housing, a good mix of uses and a contribution towards job creation.

- 1.7. **We submit that the ‘several public benefits’ are not exceptional** because
- under the heading Infrastructure, the SSAD states ‘*Improved access to Wandsworth Town Station from the north side of the railway will be required.*’
 - provision of housing is a requirement of the SSAD
 - providing affordable housing is a requirement of the Local Plan and the London Plan
 - (from Table 3 page 288 of the report) 94% of the floorspace is residential or ancillary to the residential use and 6% is retail or studio / office space
 - (from paragraphs 1.10 and 1.11) the proposed development could create two-and-a-half times the number of jobs that Homebase and the carwash currently provide.
- 1.8. **Apart from providing the benefits that have to be provided, and failing to achieve much in the way of a good mix of uses or new jobs, allowing this tall building seems to be based on the development providing ‘high quality public realm’ – that is a public square, ‘improved permeability’ – a new pedestrian access at the west of the site.**
- 1.9. **We do not consider the public benefits amount to a great deal: they fail to justify the inclusion of the 17-storey building.**

2. Tall buildings : local impact

- 2.1. This site is not a town centre location where approved tall buildings have been located in commercial or mixed-use locations where their overbearing character has been held not to affect significant numbers of local residents. Here the tower will directly dominate the close-knit, small-scale houses, flats and cottages in the Tonsleys.
- 2.2. The officers’ report dismisses concerns about the overbearing and dominant scale. However,
- the top 15 storeys of the Station building, and indeed the top 7 storeys of the other two blocks will be above the station and thus highly visible from the Tonsleys.
 - the tower will dominate the Tonsleys to the extent that the top of the steep slope of Alma Road, 15m above Swandon Way, is only at the level of the fifth floor of the tower.
 - we believe the officers have been misled, as so often in the past, by the photographic montages produced by the developers. For example, in the view taken from the corner of Alma Road and Dighton Road the development is only 160m away but is rendered insignificant. In our experience so close a view of such a tall building would be filled and dominated by the tower.
 - Battersea Reach is by common consent overbearing, over dense and an eyesore. It is, however, the only scheme to the northeast of the town centre similar in height to this tower. The prevailing height for nearby schemes, e.g. the Schoolyard or Riverside West is 7-9 storeys. We suggest that would be a reasonable maximum height for this scheme and in keeping with the location.
 - we consider the proposed scheme breaches NPPF guidelines on respecting local character, history and identity with its surroundings (paragraph 3.6). It is also in conflict with the local plan as being likely to be inappropriate.
- 2.3. In the process of seeking to justify the tall building by demonstrating compliance with the criteria of Policy DMS4 the report also seeks to justify the tall building by virtue of its architectural merit. At 3.55 it states ‘*The detailed analysis above has shown the architectural quality of the tall buildings to be high and the proposed development as a whole would have an acceptable visual impact;*’ **We submit that there is no detailed analysis of the architectural quality of the tall building and no demonstration that the visual impact of the building is acceptable.**

- 2.4. We submit that arguments put forward to support the proposition that the tall building has a purpose and either makes a positive contribution or does no harm are little more than unsupported, subjective statements. Consider, for example, paragraph 3.41 of the report *The Station Building (17-storeys) would provide a focal building as a wayfinding marker at the heart of the scheme, which identifies the new square and new station entrance [and] which ... terminates a vista at the end of the open space of Bramford Gardens and the Wandsworth roundabout.*
- 2.5. A wayfinding marker? How are the square and new station entrance 'identified'? A building some 60m tall does not 'terminates a vista' of an open space some 150m long; it looms over it.
- 2.6. And, somewhat strangely, the report seeks to demonstrate that the tall building sits successfully within the townscape (at paragraph 3.43) in this statement to describe the relationship of the tall building with the Tonsleys
*The significance of this area derives mainly [from] its interrelationship and internal character, and as such, **the proposed building would have a noticeable but less than substantial impact** on the setting of this area. The scale of the proposal would be clearly taller than the existing Victorian foreground and **therefore act as a stark contrast.** Despite making a major change to the composition of the view, the character of this area would remain clearly defined and not threatened by the tall building.*

2.7. So, a 'less than substantial impact', but at the same time a 'stark contrast'?

3. Other strong objections

- 3.1. We think the application should be refused on height grounds alone, but there are other factors which are also unacceptable
- 3.2. **Massing and the design** - We have already suggested that the scheme resembles nothing so much as a 1970s office development. We note also that the density of the scheme is well above the maximum density range for this location of 200-700 hr / ha set out in the London Plan. There is no justification for this being wilfully exceeded
- 3.3. **Housing** - Again the developers have designed the scheme they want, and then provided only 23.6% of affordable housing. The scheme should have been designed so that the required amount of affordable housing could have been provided in the first place. We are not convinced either that a scheme of high-priced predominately one and two-bedroom flats, will contribute in any way to the real housing needs of the area.
- 3.4. **Transport** - Wandsworth town station is overwhelmed despite Network Rail providing longer trains and platforms. There is no suggestion in the report how this can be dealt with.

Our conclusion is that the application should be rejected. A scheme for the site should be designed in keeping with its location, at a maximum height of 9 storeys similar to other nearby developments. There are no special merits to this scheme which justify a departure from the proposals set out in 3.6 of the SSAD