

MAYOR OF LONDON

Nick Calder
Wandsworth Council
Housing and Community Services Department
Wandsworth High Street
London
SW18 2PU

Our ref: D&P/3377/02
Your ref: 2014/5149
Date: 21 January 2015

Dear Mr Calder

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008
South Thames College tower, Welbeck House, Wandsworth High Street & 17-27 Garratt Lane

I refer to your letter of 8 January 2015, informing me that Wandsworth Council is minded grant planning permission for the above application, subject to conditions and completion of a section 106 agreement. I refer you also to the notice that was issued on 13 January 2015 under the provisions of article 5(1)(b)(i) of the above Order.

Having now considered a report on this case, I am content to allow Wandsworth Council to determine the case itself, subject to any action that the Secretary of State may take, and do not therefore wish to direct refusal or to take over the application for my own determination.

Yours sincerely



Boris Johnson
Mayor of London

cc Richard Tracey, London Assembly Constituency Member
Nicky Gavron, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Alex Williams, TfL
Andrew Williams, Boyer Planning, UK House, 82 Heath Road, Twickenham TW1 4BW

21 January 2015

South Thames College tower, Welbeck House, Wandsworth High Street, & 17-27 Garratt Lane

in the London Borough of Wandsworth

planning application no. 2014/5149

Strategic planning application stage II referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Demolition of existing buildings and erection of four new buildings ranging in height from 4 to 26 storeys to provide 201 residential units, 2,389 sq.m. of commercial floor space (Class A1, A2, A3, A4 and A5, B1(a)) and D1 (relocation of Wandsworth Library) and associated parking, access routes, amenity space, and public realm works.

The applicant

The applicant is the **London Borough of Wandsworth** and **South Thames College**, the architect is **Feilden Clegg Bradley Studios** and the agent is **Boyer Planning**.

Strategic issues

Issues with respect to **retail and town centre uses; housing; affordable housing; urban design, tall buildings and historic environment; inclusive design; transport; and climate change** have been satisfactorily addressed since Stage One and the proposed residential-led development is supported in strategic planning terms.

The Council's decision

In this instance, Wandsworth Council has resolved to grant planning permission, subject to conditions and completion of a section 106 agreement.

Recommendation

That Wandsworth Council be advised that the Mayor is content for it to determine the case itself, subject to any action that the Secretary of State may take, and does not therefore wish to direct refusal or direct that he is to be the local planning authority.

Context

1 On 9 October 2014, the Mayor of London received documents from Wandsworth Council notifying him of a planning application of potential strategic importance to develop the above

site for the above uses. This was referred to the Mayor under Categories 1A and 1C of the Mayor of London Order 2008:

- *1A “Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.”*
- *1C “Development which comprises or includes the erection of a building of (c) more than 30 metres high and is outside the City of London.”*

2 On 18 November 2014, the Mayor considered planning report D&P/3377/01, and subsequently advised Wandsworth Council that the application did not yet comply with the London Plan, for the reasons set out in paragraph 90 of that report; but that the possible remedies set out in that paragraph could address those deficiencies.

3 A copy of the above-mentioned report is attached. The essentials of the case with regard to the proposal, the site, case history, strategic planning issues and relevant policies and guidance are as set out therein, unless otherwise stated in this report. Since then, the application has been revised and further information provided in response to the Mayor’s concerns (see below). On 16 December 2014, Wandsworth Council decided that it was minded to grant planning permission subject to conditions and completion of a section 106 agreement, and on 8 January 2015 it advised the Mayor of this decision. Under the provisions of Article 5 of the Town & Country Planning (Mayor of London) Order 2008, the Mayor may allow the draft decision to proceed unchanged, direct Wandsworth Council under Article 6 to refuse the application or issue a direction to the Council under Article 7 that he is to act as the Local Planning Authority for the purposes of determining the application and any connected application. The Mayor has until 21 January 2015 to notify the Council of his decision and to issue any direction.

4 The decision on this case, and the reasons will be made available on the GLA’s website www.london.gov.uk.

Update

5 At the consultation stage, Wandsworth Council was advised that the application did not yet comply with the London Plan, for the reasons set out in paragraph 90 of planning report D&P/3377/01; but that the possible remedies set out in that paragraph could address these deficiencies:

- **Retail and town centre use:** In line with London Plan Policy 4.7, the applicant should provide further justification on the need for the proposed commercial space and investigate other potential users.
- **Social infrastructure:** The relocation of the Library to block B is strongly supported in line with London Plan Policy 3.16; however the applicant should provide further detail on the likelihood of this.
- **Affordable housing:** The applicant’s viability assessment, together with the results of an independent review commissioned by the Council, should be shared with the GLA before it can be determined if the proposal meets the requirements of London Plan Policy 3.12.
- **Housing:** Further information is required before it can be confirmed that the density of the proposal is acceptable as required by London Plan Policy 3.4. The proposals are generally of a high residential quality, in line with London Plan Policy 3.5. The applicant should provide further detail, including drawings, showing the layout of the public square play space and the Council should confirm if contributions are required to other facilities near the site.

- **Urban design, tall buildings and historic environment:** The layout of the scheme is generally well considered; however further detail is required on the proposed layout of the southern end of College Walk, and the likely timescale and delivery of the suggested improvements to the Old Burial Ground. The architecture and approach to materials are acceptable. The proposals will not cause substantial harm to any heritage assets, and any harm is outweighed by the considerable public benefits provided.
- **Inclusive design:** The applicant should consider the options to incorporate more one and three bed wheelchair adaptable units, and clarify its statement that all wheelchair accessible units will be served by two lifts.
- **Transport:** Further information is required, including confirmation of the direction of the proposed one way route through the site; detailed drawings of the proposed vehicular access points; highway improvements and stopping up orders should be secured through a section 278 agreement; further information on how the development could contribute to improving provision for local cyclists; a contribution and safeguarded land for one Cycle Hire docking station is requested; cycle parking should be secured by condition; electric vehicle charging points should be provided and secured by condition; the provision of a car club space should be considered and secured through the section 106 agreement; the final travel plan should be secured through the section 106 agreement; a delivery and servicing plan and a construction logistics plan should be secured by condition or through the section 106 agreement.
- **Climate change:** Further information should be provided on how the demand for cooling and the risk of overheating will be minimised; whether the buildings will be provided with active cooling; sample DER and TER sheets should be provided; a commitment should be provided to ensure that the development is designed to allow future connection to a district heating network and information on how this would be achieved in practice; the applicant should confirm that all apartments and non-domestic building uses will be connected to the site heat network and a drawing showing its route should be provided; further detail should be provided on the sizing, feasibility and management arrangements of the CHP system. The proposed savings exceed the target set within London Plan Policy 5.2; however the comments above should be addressed before compliance with London Plan energy policy can be verified.

6 Since then, the applicant has responded to the matters raised in the Stage One report as set out below.

Retail and town centre use, and social infrastructure

7 The application proposes that most of the ground floor of blocks A, C and D will be Use Classes A and B1(a), and approximately half of the first floor of block A (1,201 sq.m.). The ground floor and mezzanine of block B is proposed for the relocated library (1,188 sq.m.).

8 As identified at Stage One, the site is within Wandsworth Town Centre, identified in London Plan Table A2.1 as a Major Centre with medium growth potential, having moderate levels of demand for retail, leisure or office floorspace and with physical and public transport capacity to accommodate it. It is also identified as in need of regeneration. Furthermore, Policy 4.7 'Retail and town centres' states that new retail uses should be located in town centres and that its scale should be related to the size, role and function of the town centre. Wandsworth Council's Site Specific Allocations Document (2012) also identifies the site for a mixed use development.

9 At Stage One, concerns were raised about the need for the proposed retail space, in light of the Wandsworth Retail and Town Centre Needs Assessment (2012), which found that there was little need for both comparison and convenience floorspace up to 2019. This took into account the current expansion of the Southside Shopping Centre; however it excluded other expansion in the town centre, such as that at the Ram Brewery.

10 In response, the applicant has provided evidence that Wandsworth Council has ratified the relocation of the library into block B, taking up a significant part of the commercial space. This will also encourage footfall, which would be beneficial to the other commercial units. Furthermore, South Thames College has confirmed that it is interested in taking space in blocks C or D. The application also seeks permission for a range of uses other than retail, including B1(a) Offices and D1 Non-residential institutions in order to appeal to as wide a market as possible. As recognised at Stage One, block A fronting onto Garrett Lane, and block D fronting onto Wandsworth High Street, are likely to be attractive to potential tenants due to existing footfall, and this would be strengthened by the planned changes to the Wandsworth one-way system, which would improve the town centre’s retail environment. Furthermore, the under-construction extension to the Southside Shopping Centre, with new units including a department store facing onto Garrett Lane, will significantly strengthen the retail offer immediately opposite the site. These points, together with the inclusion of high quality public spaces within the site, provide sufficient reassurance that the commercial units will not remain empty and the proposed commercial space is accepted in line with London Plan policies.

Affordable housing

11 The applicant has provided a revised schedule of the 201 residential units, as follows:

	Affordable Rent		Intermediate		Market		Total	
	Stage 1	Current	Stage 1	Current	Stage 1	Current	Stage 1	Current
1 bed	9	8	6	10	19	15	34 (17%)	33 (17%)
2 bed	13	13	6	11	134	129	153 (76%)	153 (76%)
3 bed	8	8	0	0	7	7	15 (7%)	15 (7%)
Total	30 (15%)	29 (15%)	12 (6%)	21 (10%)	160 (79%)	151 (75%)	202	201

12 London Plan Policy 3.9 ‘Mixed and Balanced Communities’ seeks to promote mixed and balanced communities by tenure and household income. Policy 3.12 ‘Negotiating Affordable Housing’ seeks to secure the maximum reasonable amount of affordable housing. At Stage One, the affordable housing offer equated to approximately 21% of both units and habitable rooms. The applicant submitted a financial viability assessment to Wandsworth Council, which was reviewed by the Council’s independent assessor. Subsequent discussions resulted in a revised viability assessment, confirming that 25% affordable housing could be provided in the form of 29 affordable rent units and 21 intermediate units. The affordable rent units are proposed in block D and the intermediate units in block A, with blocks B and C as market units. Additional affordable units could be located amongst the market housing in blocks B or C; however this would not be attractive to housing providers and would impact service charges. Consequently, a commuted sum of £76,440 has been proposed, which is acceptable in these circumstances. The Council’s independent assessor confirms that this is the maximum reasonable amount of affordable housing, and this is acceptable in line with London Plan policy.

13 London Plan Policy 3.11 ‘Affordable Housing Targets’ requires that 60% of the affordable housing provision should be for social and affordable rent and 40% for intermediate

rent or sale. The revised proposal represents a 58%/42% split, an improvement on the previous 75%/25% split and is supported.

Housing

14 At Stage One, it was noted that the density of the proposed scheme is 1,060 habitable rooms per hectare, taking account of the commercial floorspace, which is towards the top of the London Plan density range. As detailed in the Housing SPG, in order for a high density to be acceptable, the application should be exemplary in all other respects and provide a high quality living environment for occupiers, including adequate provision of amenity and play space, an appropriate level of affordable housing, a good mix of unit sizes, high quality design and resolution of all transport and climate change issues. This report, the Stage One report, and the Council's Committee Report, confirm that the proposal is considered to be of a high quality and the density is therefore acceptable.

15 At Stage One, GLA officers calculated that the child yield for the scheme would be 48, requiring 480 sq.m. of play space, with 260 sq.m. for under-fives. The application materials show that 276 sq.m. of play space is proposed on site. This includes two private courtyard spaces, and it was recognised that these have the potential to provide high quality play space. However, concerns were expressed about the practicality of locating play space within the public square. In response, the applicant has provided further information on the type of play space within the proposed public square. The Council's Committee Report also discusses concerns about the location of play space within the public square and states that more preferable play equipment could be installed within the neighbouring Old Burial Ground. Consequently, the section 106 agreement will secure that play space should be provided within the Old Burial Ground, and if this is not possible, the public square will be utilised. This possibility was also recognised in the Stage One report and is supported.

16 With regard to the lack of playspace provision for children over the age of five, the Council proposes that King George's Park, approximately 200 metres from the site, and Wandle Recreation Centre, approximately 350 metres from the site, provide playspace for children of any age. Financial contributions towards the improvement of facilities within the Recreation Centre, estimated to be approximately £50-75,000 are to be secured within the section 106 agreement. This approach is supported, in line with London Plan policies.

Urban design, tall buildings and historic environment

17 At Stage One, it was acknowledged that landscaping details are to be conditioned; however further detail was requested on the proposed layout of the southern end of College Walk, in order to ensure that the residential entrance to block C does not appear isolated. In response, a visualisation has been provided showing a wide, landscaped area adjacent to block C, leading to the Old Burial Ground. Even if the walls to the Old Burial Ground were not removed, the walkway outside the entrance to block C would be approximately 10 metres wide and details of lighting and closed circuit television will be secured through the section 106 agreement, ensuring that the area is safe and secure. The design of the southern end of college Walk is therefore considered acceptable.

18 At Stage One, it was noted that the success of both College Walk and Library Square will be maximised by their integration with the Old Burial Ground, and more detail was requested on the likely timescale and delivery of the suggested improvements to the Old Burial Ground, in order to ensure that the scheme will be fully integrated with its surroundings. The Diocesan Advisory Board, which owns the Old Burial Ground, considered the proposals in December 2014

and confirmed that the works, including the removal of the boundary wall are acceptable. These works will also be secured within the section 106 agreement, which is welcomed.

19 In summary, the proposals now meet the urban design requirements of the London Plan.

Inclusive design

20 As requested at Stage One, detailed drawings of the proposed vehicular access points have been provided, which confirm that these have been carefully designed to provide as much pedestrian priority as possible.

21 The Council's Committee Report confirms that 25 of the units will be wheelchair accessible or easily adaptable, which goes beyond the 10% requirement in the London Plan and is welcomed. Although these are spread across tenures, at Stage One it was noted that all but one of the units are two bed units and the applicant was requested to consider more variation in unit size in order to give disabled and older people similar choices to non-disabled people. In response, the scheme has been revised and two additional three-bed units have now been provided, which is supported.

22 Furthermore, in response to Housing SPG standard 3.2.7, requiring all wheelchair accessible units to be served by two lifts, the units previously located above ground floor level in block D have now been removed and located elsewhere, which is welcomed.

23 In summary, the proposals now meet the requirements of London Plan policy in terms of inclusive design.

Transport

24 As requested at Stage One, additional information has been provided, including swept path drawings and visibility splays. These demonstrate the proposed layout is acceptable, and has been designed so as to avoid vehicles queuing back onto Wandsworth High Street.

25 The access route has been designed to operate in either direction in order to accommodate potential future changes to the Wandsworth Town Centre highway network currently being developed by TfL and the Council. The Stage One report stated a preference for the access route to operate one-way from Wandsworth High Street to Garratt Lane; however, following further discussions with the Council, TfL is now satisfied that the route could operate satisfactorily in either direction. The direction of operation should be reviewed in the event that the town centre scheme is implemented, in order to ensure that it provides the optimal solution.

26 At Stage One, a contribution of £100,000 was requested, together with safeguarded land, for a Cycle Hire docking station. Following discussions with the Council and the applicant, it is clear that there is insufficient space within the site for a new docking station. Consequently, a contribution of £90,000 has been secured in the section 106 agreement towards the operational cost of redistributing Cycle Hire bikes at the existing docking stations, therefore increasing availability and providing additional capacity to cater for the increased demand from the development. The contribution should be paid prior to occupation of the scheme.

27 As requested, electric vehicle charging points have been secured through the section 106 agreement in line with London Plan standards, along with a commitment that all future residents will be excluded from applying for permits in the surrounding CPZs. The provision of a car club space and one year's free membership has now been included in the Travel Plan and will also be secured through the section 106.

28 The Travel Plan, including £100 Oyster Card for new residents and one year's car club membership, has been secured through the section 106 agreement. A delivery and servicing management plan has been secured by condition, along with a construction management plan, which will include details of vehicle routings and pedestrian and cycle safety measures. This will need to ensure coordination with any future works to the gyratory.

29 Given the level of cycle activity in the area and proximity to Cycle Superhighway 8, it is important that cycle safety measures are enforced during construction. In particular, construction vehicles should be fitted with cycle specific safety equipment, including side-bars, blind spot mirrors and detection equipment, in order to reduce the risk of collision.

30 The application is now in accordance with the transport policies of the London Plan.

Climate change

31 At Stage One, further information was requested on how the demand for cooling and the risk of overheating will be minimised. In response, the applicant has provided outputs from SAP modelling suggesting a slight to medium risk of high temperatures in summer. Given that the building designs include passive features to reduce risk of overheating, such as relatively low glazing ratios and recessed balconies, this is accepted in this instance as confirmation that Policy 5.9 'Overheating and Cooling' has been addressed. The SAP modelling also suggests that active cooling is not specified. It is recommended that the design is progressed giving due consideration to the risk of overheating both now and in the future, and how this can be avoided through passive design.

32 Sample DER and TER sheets have also been provided, including efficiency measures alone, to support the savings claimed under the first step of the energy hierarchy (Be Lean').

33 As requested, further information has been provided confirming that space has been safeguarded for heat exchangers for future connection to a district heating network and that the basement is accessible for connection.

34 The applicant has confirmed that all domestic building uses will be connected to the site heat network and that non-domestic building uses will be provided with capped connection so that tenants can connect if justified by their heat demands.

35 Concerns were expressed at Stage One about the sizing and feasibility of the combined heat and power (CHP) system, as the installed capacity appeared oversized relative to the carbon savings claimed. In response, the applicant states that the sizing of the CHP is an initial estimate and will be refined as the design progresses. This is acceptable in this instance.

36 The electricity generated by the CHP will be used for the landlord supply and any excess sold to the grid. The applicant states that the CHP is likely to be operated by a building management company. The management of the system should be considered further as the system design progresses, as the approach taken will significantly affect long term financial viability of running the system.

37 In summary, the proposed energy strategy now meets the requirements of London Plan policy.

Response to statutory consultation

38 English Heritage made no objection, recognising that the proposed buildings on Garratt Lane and Wandsworth High Street allow an improved relationship with the Old Courthouse and Friends Meeting House; however expressed some reservations that the proposed new tall building may appear over-dominant, particularly in views from the Old Burial Ground, while recognising the context of tall buildings including the permitted 36-storey development at the Ram Brewery. It concluded that while there are concerns that the scale of the development, particularly height, would have an impact on the character of the Conservation Area and the setting of some heritage assets, it did not consider that this impact would be significant and on balance, these impacts would be outweighed by other benefits, including replacement of the existing buildings. A condition was recommended regarding details of archaeological investigation.

39 The Environment Agency made no objection to the application subject to appropriate conditions.

40 Thames Water suggested conditions and informatives in relation to waste water, surface water drainage, piling, public sewers and water supply infrastructure.

41 The London Borough of Hammersmith and Fulham made no objection.

42 The Royal Borough of Kensington and Chelsea made no objection.

Response to public consultation

43 Wandsworth Council publicised the application by sending letters of consultation to 5,100 neighbouring properties, as well as advertising it by way of site notices and press adverts. The Council received 42 objections and 4 responses in support. The grounds for objection included:

- Scale/massing – overwhelming and out of context with listed and sensitive buildings, Old Burial Ground and Wandsworth Town Conservation Area.
- Design – out of context; unattractive; lack of colour.
- Layout – too dense; lack of play, public and private space; wind effects.
- Loss of employment space.
- Transport – impact on the over-burdened rail service; local buses already under pressure; increased traffic will add to congestion; insufficient parking spaces; objection to the proposed one-way system within the site.
- Social infrastructure – schools already oversubscribed; GPs are full.
- Relocation of public library - only recently relocated to the current building; unnecessary to move it to an inferior environment; waste of money to relocate; public access to the Grade II listed building would be lost.
- Retail units – excessive space considering other retail developments underway.
- Impact on Quaker Friends Meeting House - overlooking from balconies; noise caused by the residents in the development; harm to tranquillity of the Friends Meeting House garden; insufficient mitigation; reduction in daylight/sunlight; spiritual activities will be disrupted; impact of new access road to rear.
- Impact on surrounding properties - loss of direct sunlight.
- Public Realm - insensitive to the Old Burial Ground; lack of landscaping and play-space.
- Construction – disruption to traffic along the High Street.
- Listed Buildings - development should complement rather than overshadow and dominate them; distorts the setting of listed buildings.

- Affordable housing - not enough affordable housing; shared ownership unaffordable to most people.

44 The Wandsworth Society objected on grounds including inadequate justification for the tall building, which is against Wandsworth's planning policies; impact on the character, appearance and setting of the conservation area, listed buildings, Old Burial Ground and the grounds of the Friends Meeting House; loss of employment and education floorspace; lack of evidence showing no demand for office and education space; negative impact on the already crowded public transport system; affordable housing below the requirements of Wandsworth's local plan.

45 Wandsworth Quakers objected on grounds including reduction in light to the Meeting House and burial ground; noise and privacy impact from balconies/living areas looking over the burial ground, which is still used by Quakers for the scattering of ashes, quiet reflection and contemplative activities; however open balconies facing onto the burial ground will restrict this; negative impact on access; poor provision of trees in the new public square; inadequate playspace; 21% affordable housing inadequate; the route through the scheme could become a short-cut.

46 The Tonsley Residents' Association objected to the height of the tower.

47 Wandsworth Historical Society requested that due attention be paid to the archaeological potential of the site.

48 Issues raised by objectors have been considered in this report, the Stage One report, the Council's committee report and Late Items of Correspondence paper.

49 Comments in support included demolition of ugly buildings; well thought out and well designed; adds to Wandsworth Town shopping area; provides much needed housing; active ground floor; works well with neighbouring buildings; new public realm and thoroughfares; encourages spending in local area and on infrastructure.

Representations to the Mayor of London

50 In addition to those representations received by the local authority, the Wandsworth Society has provided written representations directly to the Mayor objecting to the scheme and requesting the Mayor to direct refusal or take over the application.

51 As identified in the Stage One report, the site is within Wandsworth Town Conservation Area and within the setting of a number of listed buildings, including the Friends Meeting House, Spread Eagle public house, Wandsworth Library, South Thames College, Wandsworth Town Hall, The Civic Suite, the former Ram Brewery, and the Brewery Tap public house. The Mayor is aware that section 66(1) and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (the desirability of preserving a listed building etc. or preserving or enhancing the character etc. of a conservation area) means that where, on consideration, harm is likely to flow, the Mayor must give that harm considerable importance and weight.

52 The Society argues that the decision to recommend the application for approval was based on a report to Wandsworth's Planning 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. In particular, the Society objects to the assessment that the harm caused to heritage assets by the tower element of the scheme is less than substantial "*in terms of the tests set by the NPPF*", stating that there are no tests set out in the NPPF to determine the level of harm or to distinguish between substantial and less than substantial harm. It is accepted that there are no

strict 'tests' in the NPPF; however paragraphs 131-132 do provide guidance in order to come to a conclusion and further information is provided in National Planning Practice Guidance (NPPG) (Reference ID: 18a-017-20140306 onwards). Both Wandsworth's Committee Report, and the Mayor's Stage One Report, concluded that the harm caused is less than substantial. As discussed above, English Heritage also considered that the impact on heritage assets would not be significant.

53 At stated in the Stage One report, paragraph 7.31A of the London Plan and paragraph 134 of the NPPF states that *"where a development proposal will lead to less than substantial harm to the significance of a designated asset, this harm should be weighed against the public benefits of the proposal, including securing its optimal viable use."* The Society states that the public benefits, namely *"the improved public realm, permeability through the site, replacement of the existing buildings ... and the provision of a new modern public library"*, which are assessed in the Committee report as outweighing the harm, do not accrue as a consequence of the inclusion of a tall building in the proposals, but are inevitable outcomes of any development of the site that accords with the objectives of Wandsworth's Site Specific Allocations Document. However, these benefits are not necessarily inevitable, since a different proposal could result in a reduced level of benefits, which would need to be weighed against any harm caused. Furthermore, the Local Planning Authority and the Mayor are required to take a decision on the application put forward to them. GLA officers and English Heritage consider that in the proposed scheme the benefits outweigh the less than substantial harm caused.

54 The Society also argues that the assessment provided in Wandsworth's Committee Report against Core Strategy Policy IS3d on tall buildings is misleading and inadequate, and fails to explain or justify the tall building, which it states is contrary to the Site Specific Allocations Document. GLA officers consider that the Committee report includes extensive discussion and analysis of the taller building proposals, not only in the section on tall buildings, but throughout the report. Furthermore, the Committee report, as well as the Mayor's Stage One report, discusses the proposals in relation to the Site Specific Allocations Document, which it should be noted, states the site is *"sensitive to tall buildings"* and seeks *"some reduction of existing storey heights"* but only *"in part"*. The proposals do achieve a reduction in height on both Garrett Lane and Wandsworth High Street, which are considered to be the most sensitive locations, being adjacent to listed buildings. GLA officers also consider that the Committee Report assessment of the submitted visualisations, heritage impact, mix of uses, massing and scale, and townscape impact is appropriate.

55 To conclude, as further detailed below, GLA officers do not consider that there are any grounds for the Mayor to direct refusal or take over the application.

Section 106 Heads of Terms

56 The section 106 Heads of Terms includes the following contributions:

- 50 affordable housing units (29 affordable rent units in block D and 21 intermediate rent units in block A (rented at 80% of market value), together with a commuted sum of £76,440, plus a review mechanism within 18 months;
- Cycle Docking Station contribution of £90,000;
- A play space contribution of £50,000 - £75,000 towards Wandle Recreation Centre;
- Details of Old Burial Ground alterations to be provided, including new routes, public art, landscaping; seating areas and lighting;
- Relocation of existing library into the commercial unit of block B to shell and core.

Article 7: Direction that the Mayor is to be the local planning authority

57 Under Article 7 of the Order, the Mayor could take over this application provided all the tests set out in that Article are met. In this instance the Council has resolved to grant permission with conditions and a planning obligation, which satisfactorily addresses the matters raised at Stage One, therefore there are no sound planning reasons for the Mayor to take over this application.

Legal considerations

58 Under the arrangements set out in Article 5 of the Town and Country Planning (Mayor of London) Order 2008, the Mayor has the power under Article 6 to direct the local planning authority to refuse permission for a planning application referred to him under Article 4 of the Order. The Mayor may also leave the decision to the local authority. In directing refusal the Mayor must have regard to the matters set out in Article 6(2) of the Order, including the principal purposes of the Greater London Authority, the effect on health and sustainable development, national policies and international obligations, regional planning guidance, and the use of the River Thames. The Mayor may direct refusal if he considers that to grant permission would be contrary to good strategic planning in Greater London. If he decides to direct refusal, the Mayor must set out his reasons, and the local planning authority must issue these with the refusal notice. Having had regard to Article 6, the Mayor does not consider that there are reasons to direct refusal of the application.

Financial considerations

59 Should the Mayor direct refusal, he would be the principal party at any subsequent appeal hearing or public inquiry. Government Planning Practice Guidance emphasises that parties usually pay their own expenses arising from an appeal.

60 Following an inquiry caused by a direction to refuse, costs may be awarded against the Mayor if he has either directed refusal unreasonably; handled a referral from a planning unreasonably during the appeal. A major factor in deciding whether the Mayor has acted unreasonably will be the extent to which he has taken account of established planning policy.

61 Should the Mayor take over the application he would be responsible for holding a representation hearing and negotiating any planning obligation. He would also be responsible for determining any reserved matters applications (unless he directs the council to do so) and determining any approval of details (unless the council agrees to do so).

Conclusion

62 The matters raised at consultation stage, namely those relating to retail and town centre uses; housing; affordable housing; urban design, tall buildings and historic environment; inclusive design; transport; and climate change have been satisfactorily addressed. The proposed residential-led development is supported in strategic planning terms.

for further information, contact GLA Planning Unit (Development & Projects Team):

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18 November 2014

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The applicant

The applicant is the **London Borough of Wandsworth** and **South Thames College**, the architect is **Feilden Clegg Bradley Studios** and the agent is **Boyer Planning**.

Strategic issues

The proposed residential-led redevelopment is supported in strategic planning terms, however issues with respect to **retail and town centre uses; housing; affordable housing; urban design, tall buildings and historic environment; inclusive design; transport; and climate change** should be addressed before the application is referred back to the Mayor at his decision making stage. Policies in respect of **office use and employment; social infrastructure; and education** are also relevant to the application.

Recommendation

That Wandsworth Council be advised that the application does not yet comply with the London Plan, for the reasons set out in paragraph 90 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.

Context

1 On 9 October 2014, the Mayor of London received documents from Wandsworth Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor has until 19 November 2014 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Categories 1A and 1C of the Mayor of London Order 2008:

- 1A *"Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats."*
- 1C *"Development which comprises or includes the erection of a building of (c) more than 30 metres high and is outside the City of London."*

3 Once Wandsworth Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The 0.61 hectare L-shaped site in Wandsworth Town Centre currently comprises three buildings:

- 17-27 Garratt Lane is a six storey 1960s office building, currently occupied by Wandsworth Council's Housing Department.
- Welbeck House is a five storey 1960s office building fronting onto Wandsworth High Street, currently occupied by Wandsworth Council's Children's Services Department.
- A nine storey 1960s block overlooking the former burial ground, currently occupied by South Thames College.

6 The site fronts onto Wandsworth High Street (the A3 South Circular) to the north, with two vehicle access routes to the site; Garratt Lane to the west, with one vehicle access route; the Old Burial Ground, now public open space designated as Metropolitan Open Land, to the south; and the Grade II listed buildings of South Thames College to the east. The site is within Wandsworth Town Conservation Area and a number of other listed buildings lie adjacent to the site to the north-west (Friends Meeting House, Spread Eagle public house and Wandsworth Library). Further to the north-west are a number of listed buildings on the former Ram Brewery site, currently under development with a residential scheme including a 36 storey building. On the opposite side of Wandsworth High Street lies the Grade II listed Civic Centre. Southside Shopping Centre lies on the opposite side of Garratt Lane, which is currently undergoing refurbishment and extension, with new retail units and a department store fronting onto Garratt Lane. Sudbury House, of 25 storeys, rises above the Shopping Centre just to the west of the site. On the west side of the Shopping Centre are three residential towers of 21 storeys, together with a recently constructed 23 storey residential tower.

7 Wandsworth High Street forms part of the Transport for London Road Network (TLRN) and Garratt Lane forms part of the Strategic Road Network (SRN). Eleven bus services are available within walking distance of the site. National Rail services are available 575 metres from the site at Wandsworth Town station. London Underground services are available 1.5 kilometres from the site at East Putney. Although this is beyond what TfL would consider a reasonable walking distance, the site still has a public transport accessibility level (PTAL) of 6a (on a scale of 1 to 6 where 6b is the most accessible). This indicates that the site has excellent accessibility to public transport.

Details of the proposal

8 The proposal is to demolish the existing buildings on the site and erect four new buildings with stepped heights of up to 6, 7, 9 and 26 storeys, providing 202 residential units, 2,389 sq.m. of commercial floor space (Class A1, A2, A3, A4 and A5, B1(a)) and the relocated Wandsworth Library (D1).

9 The proposals include two new public streets, a new public square, private courtyards, 26 basement parking spaces at basement level and four at surface level, with 382 cycle parking spaces.

10 Indicative sketches have been provided to show how enhancements to the Old Burial Ground could come forward with the proposed development. The Old Burial Ground is outside the control of the applicant and as such discussions are continuing to agree any potential works to enhance the space, which would be secured via a section 106 agreement.

Case history

11 On 1 April 2014, a pre-application meeting was held at City Hall for the demolition of the existing buildings and the erection of four buildings providing 1,822 sq.m. of commercial floorspace, 205 apartments on the upper floors, associated access, parking, landscaping and public open space. The GLA's Pre-application Advice Report of 11 April 2014 concluded that the principle of residential-led development was broadly supported in strategic planning terms, but that issues in relation to retail, education, housing, affordable housing, urban design, historic environment, tall buildings, inclusive access, transport and climate change should be addressed prior to the submission of any future planning application.

Strategic planning issues and relevant policies and guidance

12 The relevant issues and corresponding policies are as follows:

- Employment *London Plan*
- Retail/town centre uses *London Plan; Town Centres SPG*
- Social infrastructure *London Plan; draft Social Infrastructure SPG; Town Centres SPG*
- Education *London Plan*
- Housing *London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG*
- Affordable housing *London Plan; Housing SPG; Housing Strategy*
- Density *London Plan; Housing SPG*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context, SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG*

- Tall buildings/views *London Plan, London View Management Framework SPG*
- Historic environment *London Plan; World Heritage Sites SPG*
- Inclusive design *London Plan; Accessible London: Achieving an Inclusive Environment SPG*
- Transport *London Plan; the Mayor's Transport Strategy; Land for Industry and Transport SPG*
- Crossrail *London Plan; Mayoral Community Infrastructure Levy; Crossrail SPG*
- Parking *London Plan; the Mayor's Transport Strategy*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*

13 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Wandsworth Core Strategy, the Development Management Policies Document, the Site Specific Allocations Document and the 2011 London Plan (with 2013 alterations).

14 The following are also relevant material considerations:

- The National Planning Policy Framework and accompanying Planning Practice Guidance.
- The draft Further Alterations to the London Plan (2014).

Principle of development

Residential-led development

15 London Plan Policy 3.3 'Increasing Housing Supply' recognises the pressing need for new homes in London and Table 3.1 of the draft Further Alterations to the London Plan (FALP) gives an annual monitoring target of 1,812 new homes per year in Wandsworth between 2015 and 2025. The site is located within Wandsworth Town Centre, and Policy 2.15 'Town Centres' supports housing growth through intensification and selective expansion in appropriate locations. In summary, the proposal for a residential-led development is consistent with London Plan policies and is supported in strategic planning terms.

Office use and employment

16 Welbeck House and 17-27 Garratt Lane currently contain 7,217 sq.m. (GEA) of B1 office space, which will primarily be replaced by residential use, with some commercial and D1 uses. The applicant states that the buildings will become vacant in 2015 as the Council rationalises its needs and the space will be surplus to requirements. London Plan Policy 2.15 'Town Centres' and Table A2.1 identifies Wandsworth as a Major Centre with medium growth potential, experiencing moderate levels of demand for retail, leisure, and office space. The draft FALP removes Office Guideline B, which seeks some office provision as part of wider mixed use development, based on evidence from the London Office Policy Review (2012). London Plan Policy 4.2 'Offices' offers strategic support for mixed use redevelopment and supports the change of surplus office space to other uses. The loss of office space does not therefore raise any strategic concerns.

Retail and town centre uses

17 London Plan Policies 2.15 'Town Centres', 4.7 'Retail and town centres', 4.8 'Supporting a successful and diverse retail sector', and 2.11 'Central Activities Zone – Strategic Functions

provide the strategic policy context in which the proposals are considered. Further guidance is provided in the London Plan supplementary planning guidance 'Town Centres'.

18 The application proposes that most of the ground floor of blocks A, C and D will be Use Classes A and B1(a), and approximately half of the first floor of block A (1,201 sq.m.). The ground floor and mezzanine of block B is proposed for the relocated library (1,188 sq.m.).

Retail – need and scale

19 The site is within Wandsworth Town Centre, identified in London Plan Table A2.1 as a Major Centre with medium growth potential, having moderate levels of demand for retail, leisure or office floorspace and with physical and public transport capacity to accommodate it. It is also identified as in need of regeneration. Furthermore, Policy 4.7 states that new retail uses should be located in town centres and that its scale should be related to the size, role and function of the town centre. Wandsworth Council's Site Specific Allocations Document (2012) also identifies the site for a mixed use development.

20 At pre-application stage, the applicant's attention was drawn to the 2013 London Town Centre Healthcheck, which indicates that Wandsworth Town Centre experiences a relatively high level of vacant retail space (12,000 sq.m. out of 36,000 sq.m. of retail space), representing a 7% increase in vacant retail floorspace since 2007. This raised concerns that the level of new Class 'A' space may be excessive, leading to vacant ground floor units, which would negatively impact the success of the scheme. However, the applicant indicated that this was likely to be due to the redevelopment and extension of the Southside Shopping Centre, which necessitated the vacation of retail floorspace prior to redevelopment, and indeed this is confirmed by Wandsworth's Core Strategy (2010) and the Wandsworth Retail and Town Centre Needs Assessment (2012) and is therefore accepted.

21 In support of its proposals, the applicant has provided a Retail Report, which examines the retail market in Wandsworth town centre. The centre is dominated by the refurbished Southside Shopping Centre, and part of the Centre's Garrett Lane frontage has been redeveloped to provide a more outlooking retail frontage. The Centre currently has minimal vacancy rates. Opposite the site on Garrett Lane, the Centre is currently constructing a retail and leisure extension, including a Debenhams department store and eight smaller retail and restaurant units. Although the Centre's leasing agents have not yet marketed the smaller units, they are said to have had a number of registrations of interest. To the north of the site, the Ram Brewery site, which has recently commenced site clearance, will include approximately 9,500 sq.m. of retail and leisure space. Under construction on the opposite side of the Southside Centre is the Filaments development, which will contain approximately 1,000 sq.m. of retail space along Buckhold Road. The Report also draws attention to the planned changes to the Wandsworth one-way system, which are expected to be beneficial to the town centre's retail environment.

22 The Wandsworth Retail and Town Centre Needs Assessment (2012) found that there was no additional comparison goods floorspace requirement and only 227 sq.m. of convenience floorspace needed in the town centre up to 2019. This took into account existing commitments at the Southside Shopping Centre; however it excluded space coming forward at the Ram Brewery. The Assessment concludes that *"the implementation of commitments (i.e. Southside, the Sainsbury's extension and if permitted the Ram Brewery development) should meet the need for retail (Class A1 to A5) for the foreseeable future (up to 2024), and potentially up to 2029."* This raises concerns about the need for the commercial space and consequently concerns that it will remain vacant, which would be detrimental to the success of the scheme.

23 Although concerns were raised at pre-application stage that *“the level of new ‘A’ class space may be excessive, leading to vacant ground floor units”*, the applicant has provided little justification to demonstrate the need for the space. Although the applicant’s Retail Report concludes that the proposals are *“well placed to attract good quality tenants”*, the justification for this conclusion is limited and the report also raises concerns about the practical use of the proposed retail spaces, such as the positioning of internal columns and walls, and limited depth, which it states may limit letting options. This raises further concerns that the units will remain vacant. The inclusion of the library in block B would take up a significant part of the commercial space and also encourage footfall, which would be beneficial to the other commercial units. However, as discussed below, the application does not make clear the likelihood of the library’s relocation into the scheme, and the applicant should provide further information on this as indicated below.

24 Notwithstanding this, the commercial space in block A, fronting onto Garratt Lane, is likely to benefit from its location opposite the under-construction department store, and the units in block D, fronting onto Wandsworth High Street will also benefit from the existing footfall. However, there are concerns about the ability of the commercial space in block C and to the rear of block D, since footfall in these locations is likely to be limited, although the applicant states that South Thames College may be interested in this space for student related services. The applicant should provide further justification for the proposed commercial space and investigate other potential use for the space, including community use.

25 The site is within 300 metres of the primary shopping area and a sequential test and impact assessment are not therefore required.

Social infrastructure

26 London Plan Policies 3.16 ‘Protection and Enhancement of Social Infrastructure’ supports the provision of high quality social infrastructure based on local and strategic needs assessments. Further guidance is provided in the draft Social Infrastructure SPG and the Town Centres SPG. The application proposes that the ground and mezzanine level of building B (1,188 sq.m.), in the centre of the site, will comprise the relocated Wandsworth Library, although this appears to be aspirational at this stage. The library is currently housed in the neighbouring Old Courthouse, which as a listed building, is constrained in its opportunities to make alterations. As suggested by the Town Centres SPG, mixing and stacking libraries with other uses helps to optimise use of the site, helping to draw customers to the surrounding retail units and activating the site. The applicant’s Retail Demand Study also states that the vacated Old Courthouse is likely to attract retail and restaurant operators. The relocation of the library to building B is strongly supported; however the applicant should provide further detail on the likelihood of this proposal.

Education

27 The South Thames College block currently contains 7,014 sq.m. (GEA) of D1 space, which will largely be replaced by residential use, with some commercial uses. London Plan Policy 3.18 ‘Education Facilities’ states that proposals resulting in a net loss of education facilities should be resisted, unless it can be demonstrated that there is no ongoing or future demand. The applicant states that approximately 2,000 sq.m. of the building is currently used for teaching, with the upper floors only used for storage, being in a poor condition. Construction is due to commence on more than 2,000 sq.m. of educational facilities at the College’s Merton campus in October 2014 and on the neighbouring Wandsworth campus in Easter 2015. The loss of educational facilities on the site does not therefore raise any strategic concerns as there will

be no net loss since improved facilities will be provided in Merton. This is acceptable in line with London Plan policy.

Housing

28 The applicant has provided a detailed schedule of the 202 residential units, which are made up as follows:

	Affordable Rent	Intermediate	Market	Total
1 bed	9	6	19	34 (17%)
2 bed	13	6	134	153 (76%)
3 bed	8	0	7	15 (7%)
Total	30 (15%)	12 (6%)	160 (79%)	202

Affordable housing

29 London Plan Policy 3.9 'Mixed and Balanced Communities' seeks to promote mixed and balanced communities by tenure and household income. Policy 3.12 'Negotiating Affordable Housing' seeks to secure the maximum reasonable amount of affordable housing. The current proposals include 42 affordable units out of a total of 202, which equates to approximately 21% of both units and habitable rooms. The applicant has submitted a financial viability assessment to Wandsworth Council. The viability assessment, together with the results of an independent review commissioned by the Council, should be shared with the GLA before the application is referred back to the Mayor. GLA officers will update the Mayor on the findings of the review, and of any further negotiations, at the Stage Two decision making stage.

30 London Plan Policy 3.11 'Affordable Housing Targets' requires that 60% of the affordable housing provision should be for social and affordable rent and 40% for intermediate rent or sale. Of the 42 affordable units proposed, 30 are affordable rent and 12 are intermediate, which represents a 75%/25% split by habitable room and is a departure from London Plan policy. The applicant states that Wandsworth Housing Officers have confirmed that this ratio is supported and is based on local need, which is accepted in this instance.

Housing choice

31 London Plan Policy 3.8 'Housing Choice' encourages a choice of housing based on local needs, while affordable family housing is stated as a strategic priority. The current unit sizes are stated as 17% one-bed, 76% two-bed, and 7% three-bed. Of the 42 affordable units, only eight are family sized, and across all tenures the proportion of one- and two-bed units is large; however the applicant states that Wandsworth Housing Officers have confirmed that this ratio is supported and is based on local need, which is accepted in this instance.

Density

32 London Plan Policy 3.4 'Optimising Housing Potential' states that taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output for different types of location within the relevant density range shown in Table 3.2. The site is within a central location where the density matrix sets a guideline of 650-1100 habitable rooms or 140-405 units per hectare with a PTAL of 4-6.

33 The applicant states that the density of the proposed scheme is 1,060 habitable rooms per hectare, taking account of the commercial floorspace. This is towards the top of the density range and the proposal would be therefore be classified as a high density development. As

detailed in the Housing SPG, in order for a high density to be acceptable, the application needs to be exemplary in all other respects and provide a high quality living environment for occupiers, including adequate provision of amenity and play space, an appropriate level of affordable housing, a good mix of unit sizes, high quality design and resolution of all transport and climate change issues. As detailed elsewhere in this report, some of these areas require further information before such a density can be deemed acceptable.

Residential quality

34 London Plan Policy 3.5 'Quality and Design of Housing Developments' promotes quality in new housing provision, including space standards, with further guidance provided by the Mayor's Housing SPG. At pre-application stage, the applicant was requested to demonstrate that the scheme has been designed to positively respond to the requirements within the Mayor's Housing SPG, with reference to the baseline standards *and* good practice standards (due to its high density) contained there-in. As stated above, quality issues are particularly important in a high density development.

35 The applicant has provided an analysis of the scheme against the Housing SPG standards, showing that the proposals are largely compliant, with a small number of relatively minor areas of only partial compliance. The depth and proportions of building footprints provide good core to unit ratios, a high proportion of dual aspect units and no north facing single aspect units, which is welcomed. This demonstrates that the proposals are of a generally high residential quality.

Children's play space

36 London Plan Policy 3.6 'Children and Young People's Play and Informal Recreation Facilities' seeks to ensure that development proposals include suitable provision for play and recreation. Further detail is provided in the Mayor's Supplementary Planning Guidance 'Shaping Neighbourhoods: Play and Informal Recreation', which sets a benchmark of 10 sq.m. of useable child play space to be provided per child, with under-five child play space provided on-site as a minimum.

37 GLA officers calculate that the child yield for the scheme would be 48, requiring 480 sq.m. of play space, with 260 sq.m. for under-fives. The application materials show that 276 sq.m. of play space is proposed on site, located in the two private courtyards (165 sq.m. and 42 sq.m.) and the new public square (69 sq.m). The courtyard spaces, especially that between blocks B and C (165 sq.m.), have the potential to provide high quality play space, as illustrated in the applicant's CGI views. However, as stated at pre-application stage there are concerns about the practicality of locating play space within the public square, which are reinforced by the applicant's own CGI views. The applicant should provide further detail, including drawings, showing the layout of play space within the proposed public square. It is however recognised that the Old Burial Ground is located immediately next to the site, which provides opportunities for informal play for under-fives and older children.

38 The applicant states that play space for over-fives can be accommodated in King George's Park, which is within the required 400 metres walking distance and has a range of play provision. The applicant has offered section 106 contributions towards these play facilities and the Local Planning Authority should confirm if contributions are required.

Urban design, tall buildings and historic environment

Layout

39 The proposal is generally well thought out, arranged around two new axial routes providing improved permeability north-south (College Walk) between Wandsworth High Street and the Old Burial Ground, linking to an east-west route to Garratt Lane via a new public square (Library Square). These routes are in line with the aspirations for improved connections and permeability through the town centre as set out in the Council's Site Specific Allocations Document, and are welcomed. Blocks A and D are positioned to allow strong building lines to the edges of the development, while providing consistency in scale to the existing streetscape.

40 Concerns were raised at pre-application stage in relation to the location and visibility of the entrances to the residential cores, and the applicant has now revised the proposal to address this. The removal of the commercial element linking blocks B and C enables residents to access the cores to these blocks from the east-west link, as well as from the south. Similarly, the entrance core to block A has been relocated to a more prominent location directly off Library Square.

41 The proposal demonstrates a simple and well-defined delineation between public and private spaces, with communal residential courtyards orientated on a north-south axis to maximise sunlight penetration. While it is acknowledged that landscaping details are to be conditioned as part of any future consent, the applicant should provide further detail on the proposed layout of the southern end of College Walk, in order to ensure that the residential entrance to block C does not appear isolated. The success of both College Walk and Library Square are reliant on their integration with the Old Burial Ground, and more detail should be provided on the likely timescale and delivery of the suggested improvements to the Old Burial Ground, in order to ensure that the scheme is fully integrated with its surroundings.

42 Refuse storage for both the commercial and the residential units is contained at basement level which is welcomed as this allows active frontages to be maximised and minimises the impact of collection requirements on the public realm. Notwithstanding this, Courthouse Way is conceived as a shared space providing access for delivery vehicles and as such, the landscaping strategy should include details of how pedestrian paths are clearly delineated from vehicular routes to promote safety and inclusivity.

43 At pre-application stage, the applicant was advised to give further consideration to the alignment and geometry of ground floor commercial frontages. While the only amendment is the removal of the two storey link between blocks B and C, it is considered that the geometry of building footprints generally provides good levels of enclosure to the public realm, while also responding to pedestrian movement patterns through the site. The northern edge of block D is 'folded' incorporating set-backs from the building line, which provides an increase in pavement width along the High Street, while also providing visual delineation to the residential entrance.

Architecture and materials

44 The simple and clean-lined design approach to each block is welcomed, with shifts in building lines introducing visual interest and subtle articulation. The modular layout of elevations enables individual residential units to be articulated from each other, promoting a sense of ownership for future residents.

45 The elevations along Wandsworth High Street and Garratt Lane respond to the scale, varying roofline, rhythm, and red brick of the of the neighbouring existing development, which

is supported. The applicant describes this as a 'crust', with the 'core' of the scheme having a more homogenous architectural style with elevations of grey brick. As stated at pre-application stage, it is disappointing that the improved connectivity through the site has not been accompanied by a more responsive architectural approach that draws on the rhythm and proportions of the wider context and pulls this into the heart of the scheme. However, the applicant states that the selection of grey brick seeks to establish an equality of importance between the red brick and grey brick elements, and avoid a 'lower value' material, and it is accepted that this rationale is valid.

Form/massing

46 Wandsworth's Site Specific Allocations Document (2012) indicates that the site is sensitive to tall buildings, defined as five storeys and above. The document refers to the existing site buildings on Garratt Lane and Welbeck House as "*less successful*" and suggests some reduction of height, in part, to ensure a better relationship to adjoining listed buildings and to enhance the appearance of the Wandsworth Town Conservation Area.

47 It is noted that other tall buildings are already in existence in close proximity of the site, in particular the 25 storey Sudbury House. The Ram Brewery site to the north-west includes a proposed 36 storey tower. The remaining nearby townscape is low- to mid-rise, whilst the existing buildings on site are five to eight storeys, with setbacks on the uppermost storeys. As stated above, the site is within the Wandsworth Town Conservation Area and four Grade II Listed buildings lie in the immediate vicinity of the site.

48 As noted above, the proposal includes stepped buildings of up to six, seven, nine and 26 storeys. The applicant emphasises the desire to reflect the diversity of the local roofline in the design approach, as well as introducing variation in building heights in order to avoid the coalescence of the lower blocks into a large, medium height mass. Along the High Street and Garratt Lane, blocks A and D are proposed to have three storey elevations fronting onto the streets, designed to be in proportion with the scale of the adjoining historic buildings, which then rise to four and five storeys behind the street elevations. The height of these blocks has been reduced since pre-application discussions, which now relate better to their context of historic buildings. This approach is supported.

49 The buildings step up in scale towards block B at the centre of the site. This approach is supported in principle as it mediates the proposed massing impact on the wider context, and positions the tower alongside the open space of the Old Burial Ground, away from the predominantly low rise and historic buildings along Wandsworth High Street. The height of the tower has increased from 20 storeys at pre-application stage, to 26 storeys as now proposed, in response to the lowering of the other blocks.

50 The applicant has submitted a full analysis of the impact of the proposal, in the form of a Heritage Statement, and 23 fully rendered CGI views and 8 verified views from within and around the site within the design and access statement. It is accepted that the proposals will not have any impact on strategic views.

51 The views provided illustrate that the lower rise buildings (blocks A, C and D) will have a limited impact on both near and far views; however block B will have an impact on its surroundings and in particular on the Conservation Area and neighbouring listed buildings, due to its height and massing, as well as its architecture and materials, as discussed above. London Plan Policy 7.8 states that development affecting heritage assets and their settings should be sympathetic to their form, scale, materials and architectural detail. Particular attention should be given to the setting of listed buildings. GLA officers do not consider that block B will cause

substantial harm to any heritage assets, including the settings of neighbouring listed buildings; however paragraph 7.31A of the London Plan states that “*where a development proposal will lead to less than substantial harm to the significance of a designated asset, this harm should be weighed against the public benefits of the proposal, including securing its optimal viable use.*” The scheme will provide considerable public benefits, including improved permeability and improved public realm, as well as heritage benefits, such as the removal of the present unsympathetic buildings. On these grounds, the proposal is considered acceptable in principle.

Inclusive design

52 The aim of London Plan Policy 7.2 ‘An Inclusive Environment’ is to ensure that proposals achieve the highest standards of accessibility and inclusion (not just the minimum). Inclusive design principles, if embedded into the development and design process from the outset, help to ensure that everyone, including older people, disabled and Deaf people, children and young people, can use the places and spaces proposed comfortably, safely and with dignity.

53 The potential conflict between pedestrians and vehicles at the access points and within the site will need to be carefully designed and managed to provide as much pedestrian priority as possible. Shared surfaces are proposed and as requested at pre-application stage, the applicant has stated that tactile surfaces will be incorporated to ensure that the areas are safe and usable for disabled people. However, detailed drawings of the proposed vehicular access points should be provided before the application is referred back to the Mayor.

54 Extensive areas of public seating are proposed, particularly within the public square, which is welcomed. As requested at pre-application stage, the applicant has investigated the need to incorporate public toilets in the scheme and the Council has confirmed that these are not required as they are available in the Southside Shopping Centre.

55 The proposals include twenty accessible parking bays in the basement for the wheelchair accessible units, which will allow all of the wheelchair accessible to have use of a space. Four accessible spaces are provided at ground level for visitors to the scheme. This meets the requirements of London Plan Policy 6.13 ‘Parking’ and Table 6.2.

56 Given the significant number of residential units proposed, the applicant has provided storage space and charging points for mobility scooters in the basement, in accordance with the Housing SPG, which is welcomed.

57 The applicant has confirmed that all residential units will be designed to the Lifetime Homes standard and that 10% (21 units) will be easily adaptable for wheelchair use. These are spread across tenures and the design and access statement includes typical flat layouts. This is welcomed in line with London Plan Policy 3.8 ‘Housing Choice’; however all but one of the units are two bed units. The applicant should consider the options to incorporate more one and three bed units, in order to give disabled and older people similar choices to non-disabled people, unless the Council through their Accessible Housing Register work can advise on the need in this part of the Borough for a particular size of wheelchair accessible home. In response to Housing SPG standard 3.2.7, the applicant states that all wheelchair accessible units will be served by two lifts; however this does not appear to be the case for units on the third and fourth floor of block D and the applicant should clarify this before the proposal is referred back to the Mayor.

Transport

Wandsworth Town Centre gyratory

58 TfL is working closely with Wandsworth Council to develop a scheme to remove the Wandsworth town centre gyratory. The key objective is to improve the look and feel of the town centre by removing through-traffic from the High Street. This would be achieved by re-routing the A3 and A205 South Circular to the north along Armoury Way and Swandon Way, and would free the main shopping areas from high traffic levels and allow better access for pedestrians, cyclists and buses. As part of the proposals, Wandsworth High Street would become two-way for general traffic between Fairfield Street and the vehicular access to the site. Between the site access and Ram Street, Wandsworth High Street would be one-way eastbound for general traffic, with only buses and cycles allowed in the westbound direction. Garratt Lane would remain two-way.

Access arrangements

59 The existing vehicular access serving South Thames College from Wandsworth High Street will be retained to provide access to a one-way vehicle route linking to Garratt Lane. The existing access serving 17-27 Garratt Lane will also be retained. The access to Welbeck House from Wandsworth High Street will be closed, which is welcomed.

60 The vehicle route has been designed to operate one-way in either direction between Wandsworth High Street and Garratt Lane, in order to accommodate the potential highway changes described above. This is welcomed, and TfL's current preference is for the route to be one-way from Wandsworth High Street to Garratt Lane. Vehicles accessing the site would then be able to turn left into the site from Wandsworth High Street in the existing situation, and both left and right into the site in the proposed layout. This should be reviewed prior to commencement of construction of the development in order to ensure that this is still the preferred position, and the Council should secure this as appropriate.

61 A number of new pedestrian accesses will provide links through the site between Wandsworth High Street, Garratt Lane and the Old Burial Ground to the south. The potential conflict between pedestrians and vehicles at the access points and within the site will need to be carefully designed and managed to provide as much pedestrian priority as possible and to discourage rat running. The access and the route should be designed so as to avoid parked or manoeuvring vehicles causing queues back onto Wandsworth High Street. Detailed drawings of the proposed vehicular access points, including visibility splays, should be provided for review before the application is referred back to the Mayor.

62 Any highway improvements to Wandsworth High Street, including the stopping up of the Welbeck House access, should be secured through a section 278 agreement with TfL, either by condition or through the section 106 agreement.

63 In addition, cycling infrastructure along Garratt Lane is particularly poor and the applicant should provide further information on how the development could contribute to improving provision for local cyclists, in line with the Mayor's Vision for Cycling in London.

Trip generation

64 The Transport Statement indicates that the proposed development would result in an overall decrease in trip generation when compared to the existing land uses. TfL agrees with

this conclusion and is therefore satisfied that there are unlikely to be any significant impacts on the wider road network or public transport services.

Cycle Hire

65 There is a high demand for cycle hire in this area of Wandsworth, with the closest docking station (Ram Street) ranked fifth out of 57 in the borough for redistribution due to very high usage. The development will place greater stress on the network as it will add to the existing tidal flow of cyclists to and from the area and a minimum of thirty additional docking points is required to reflect the change in demand and minimise any detrimental impact on the network from an operational perspective. A contribution of £100,000 is therefore requested, together with safeguarded land for one Cycle Hire docking station. As a rule, 27 uninterrupted metres are required per 30 docking point station; however, there are options to split sites and locate docking points back to back where space allows. Further discussions with TfL on the location of the docking station are necessary, and this should be agreed before the application is referred back to the Mayor.

Cycle parking

66 A total of 348 cycle parking spaces are proposed for the residential use. This is in excess of the current London Plan standards and is welcomed. In addition, 15 to 19 spaces (depending on the final use) for the commercial space will be provided, plus 5 spaces for visitors. The proposed level of cycle parking should be secured by condition.

Car parking

67 Residential car parking is proposed at 0.13 spaces per unit, providing a total of 26 spaces, of which 20 will be accessible. No specific car parking is proposed for the commercial elements, but 4 accessible spaces will be provided within the development on the new access road through the site. This is welcomed and considered to be in accordance with London Plan Policy 6.13 'Parking'.

68 The Transport Statement also acknowledges that future residents will be prevented from applying for parking permits in the surrounding CPZ. In addition, electric vehicle charging points (EVCPs) should be provided in line with London Plan standards (20% active and 20% passive for residential). These requirements should both be secured by condition.

69 The provision of a car club space within the site should also be considered, based on discussions with local operators, and secured through the section 106 agreement if deemed necessary.

Travel Plan

70 The draft Interim Travel Plan has passed the ATTrBuTE assessment and the measures and objectives contained within it are considered to be appropriate. TfL expects the final travel plan to be secured, monitored, reviewed, and enforced through the section 106 agreement, including funding for specific measures such as cycle vouchers and car club membership.

Deliveries and servicing

71 Servicing and refuse collection for the development will take place along the new access route within the site, which is welcomed. A Delivery and Servicing Plan should be produced and submitted in accordance with TfL's guidance (available at <http://tfl.gov.uk/info->

[for/freight/planning/delivery-and-servicing-plans?intcmp=7833](http://www.tfl.gov.uk/info-for/freight/planning/delivery-and-servicing-plans?intcmp=7833)) and secured by condition or through the section 106 agreement. This should include measures to minimise the impact of servicing trips on the surrounding road network, including delivery booking systems, avoiding peak traffic periods and minimising failed deliveries to the residential units.

Construction

72 A 'construction logistics plan' in line with London Plan Policy 6.3 should be produced in accordance with TfL guidance (available at <http://www.tfl.gov.uk/info-for/freight/planning/construction-logistics-plans>) and secured by condition or through the section 106 agreement. This is to ensure minimum disruption, including to bus operations, cyclists and pedestrians during construction.

73 Given the level of cycle activity in the area and proximity to Cycle Superhighway 8, it is important that cycle safety measures are enforced during construction. In particular, TfL wishes to ensure that construction vehicles are fitted with cycle specific safety equipment, including side-bars, blind spot mirrors and detection equipment to reduce the risk of collisions on the capital's roads.

74 The construction logistics plan should also include details of construction phasing, trips generated, site access arrangements, construction routes, co-ordination with other sites (e.g. Ram Brewery and the highway works for the town centre scheme) and cumulative impacts of construction traffic. Any security issues should also be identified at this stage. TfL also strongly encourages the use of construction contractors who are registered on the 'fleet operator recognition scheme'.

Community Infrastructure Levy

75 The Mayor has introduced a London-wide Community Infrastructure Levy (CIL) to help implement the London Plan, particularly Policies 6.5 and 8.3 towards the funding of Crossrail. The rate for Wandsworth is £50 per square metre. The required CIL should be confirmed by the applicant and Council once the components of the development or phase have been finalised.

76 The Council's CIL charging schedule has also now been adopted, and the rate in this area is £250 per square metre of residential development. The Council's priority for CIL funding is the town centre improvements and an agreement is in place with TfL for contributions towards the scheme. CIL contributions from this development will therefore be directed towards those proposals.

Climate Change

Energy

77 A range of passive design features and demand reduction measures are proposed. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include reduced thermal bridging and low energy lighting. Further information should be provided on how the demand for cooling and the risk of overheating will be minimised. The applicant should also confirm whether the buildings (domestic and non-domestic uses) will be provided with active cooling, in line with Policy 5.9 'Overheating and Cooling'.

78 The development is estimated to achieve a reduction of 30 tonnes per annum (8%) in regulated CO2 emissions through the first stage of the energy hierarchy ('Be Lean') compared to

a 2013 Building Regulations compliant development. Sample DER and TER sheets should be provided, including efficiency measures alone, to support the statements made in the report.

79 The applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development. The applicant has provided evidence of correspondence with a nearby development demonstrating that opportunities for sharing plant are being investigated. This is welcomed and should continue to be prioritised.

80 The applicant should provide a commitment to ensure that the development is designed to allow future connection to a district heating network should one become available. Information should be provided on how this would be achieved in practice, for example by capped pipes, space allocated for heat exchangers, etc.

81 The applicant should confirm that all apartments and non-domestic building uses will be connected to the site heat network and a drawing showing the route of the heat network linking all buildings on the site should be provided. The site heat network will be supplied from a single energy centre located in the basement of block B. A plan showing the location of the plant room has been provided.

82 The applicant is proposing to install a 70 kWe 105kWth gas fired CHP unit as the lead heat source for the site heat network. The CHP is sized to provide the domestic hot water load, as well as a proportion of the space heating (50% of the total load). It is estimated that the system will run for approximately 5,200 hours. Further detail should be provided on the sizing and feasibility of the CHP system as the installed capacity appears oversized relative to the carbon savings claimed. A reduction in regulated CO₂ emissions of 70 tonnes per annum (21%) will be achieved through this second part of the energy hierarchy ('Be Clean').

83 The applicant states that the electricity generated by the CHP will be used for the landlord supply and any excess sold to the grid. The potential for sale to the nearby college is being investigated. The applicant should provide further information on the management arrangements for the system as it is unlikely that an ESCO will be interested to take over the management of a system of this size.

84 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 70kWp of solar PV. A roof plan has been provided showing that sufficient roof space can be allocated for the proposed installation. A reduction in regulated CO₂ emissions of 32 tonnes per annum (12%) will be achieved through this third element of the energy hierarchy ('Be Green').

85 Based on the energy assessment submitted, a reduction of 132 tonnes of CO₂ per year in regulated emissions, compared to a 2013 Building Regulations compliant development, is expected, equivalent to an overall saving of 36%. The savings exceed the target set within London Plan Policy 5.2 'Minimising Carbon Dioxide Emissions'; however the comments above should be addressed before compliance with London Plan energy policy can be verified.

Climate change adaptation

86 A Flood Risk Assessment has been prepared in accordance with London Plan Policy 5.12 'Flood Risk Management'. This proposes a strategy for the discharge of surface water that will not increase the risk of flooding. In line with London Plan Policy 5.13 'Sustainable Drainage', the applicant is proposing to achieve greenfield run-off rates. Given the site's constraints and limited space available, it is recognised that it is difficult to incorporate SuDS features.

Infiltration is limited due to the presence of London clay, although underground storage tanks, water features, and green roofs are proposed. These proposals are acceptable in line with London Plan policy requirements.

Local planning authority's position

87 The Local Planning Authority's position is not yet known.

Legal considerations

88 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008, the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

89 There are no financial considerations at this stage.

Conclusion

90 London Plan policies on office use and employment; retail and town centre uses; social infrastructure; education; affordable housing; housing; urban design, tall buildings and historic environment; inclusive design; transport and climate change are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Office use and employment:** London Plan Policy 4.2 offers strategic support for mixed use redevelopment and supports the change of surplus office space to other uses. The loss of office space does not therefore raise any strategic concerns.
- **Retail and town centre use:** In line with London Plan Policy 4.7, the applicant should provide further justification on the need for the proposed commercial space and investigate other potential users.
- **Social infrastructure:** The relocation of the Library to block B is strongly supported in line with London Plan Policy 3.16; however the applicant should provide further detail on the likelihood of this.
- **Education:** The loss of educational facilities on the site does not raise any strategic concerns as facilities are being provided elsewhere in line with London Plan Policy 3.18.
- **Affordable housing:** The applicant's viability assessment, together with the results of an independent review commissioned by the Council, should be shared with the GLA before it can be determined if the proposal meets the requirements of London Plan Policy 3.12.

- **Housing:** Further information is required before it can be confirmed that the density of the proposal is acceptable as required by London Plan Policy 3.4. The proposals are generally of a high residential quality, in line with London Plan Policy 3.5. The applicant should provide further detail, including drawings, showing the layout of the public square play space and the Council should confirm if contributions are required to other facilities near the site.
- **Urban design, tall buildings and historic environment:** The layout of the scheme is generally well considered; however further detail is required on the proposed layout of the southern end of College Walk, and the likely timescale and delivery of the suggested improvements to the Old Burial Ground. The architecture and approach to materials are acceptable. The proposals will not cause substantial harm to any heritage assets, and any harm is outweighed by the considerable public benefits provided.
- **Inclusive design:** The applicant should consider the options to incorporate more one and three bed wheelchair adaptable units, and clarify its statement that all wheelchair accessible units will be served by two lifts.
- **Transport:** Further information is required, including confirmation of the direction of the proposed one way route through the site; detailed drawings of the proposed vehicular access points; highway improvements and stopping up orders should be secured through a section 278 agreement; further information on how the development could contribute to improving provision for local cyclists; a contribution and safeguarded land for one Cycle Hire docking station is requested; cycle parking should be secured by condition; electric vehicle charging points should be provided and secured by condition; the provision of a car club space should be considered and secured through the section 106 agreement; the final travel plan should be secured through the section 106 agreement; a delivery and servicing plan and a construction logistics plan should be secured by condition or through the section 106 agreement.
- **Climate change:** Further information should be provided on how the demand for cooling and the risk of overheating will be minimised; whether the buildings will be provided with active cooling; sample DER and TER sheets should be provided; a commitment should be provided to ensure that the development is designed to allow future connection to a district heating network and information on how this would be achieved in practice; the applicant should confirm that all apartments and non-domestic building uses will be connected to the site heat network and a drawing showing its route should be provided; further detail should be provided on the sizing, feasibility and management arrangements of the CHP system. The proposed savings exceed the target set within London Plan Policy 5.2; however the comments above should be addressed before compliance with London Plan energy policy can be verified.

91 On balance, the application does not yet comply with the London Plan.

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