

# Wandsworth Society

Application number 2017/0580

22<sup>nd</sup> December 2017

**B&Q: Swandon Way : SW18**

**The Society objects to this application.**

We do so principally because we consider the proposed development is excessive and contrary to the current London and Local Plans -

- the buildings are too tall
- the density of development is too great
- local infrastructure will be overstretched
- the loss of trees is unjustified. We comment further as Addendum 1 in this respect.

## **Tall buildings**

All the buildings in this development are tall buildings as defined in the SSAD for the site. The tallest buildings are twice the height at which buildings in this location are 'likely to be inappropriate'. The benefits the applicant puts forward to justify these tall buildings are inadequate. Benefits that do arise from the development are either unrelated to the heights of the buildings or are necessary outcomes of Local Plan requirements.

## **Density**

The development is at the high end of the London Plan density matrix. This site is not a central location with the best transport connections. Development at this density is inappropriate for this area.

## **Affordable housing**

We are pleased to note that the standards required by the Mayor have been met by the revised allocation of affordable housing for the site; nevertheless our comments on density prevail.

## **Trees**

We are extremely disappointed that the townscape benefits of the existing trees, which have been recognised in the applicants' landscape assessment, have again been disregarded. Moreover, since the earlier version of the proposals was submitted, trees on the site now benefit from Tree Preservation Orders. We comment in detail in Addendum1 in this respect.

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**Our detailed comments are as follows:-**

## **Tall buildings**

Site Specific Allocations Document

The description for this site in the SSAD states that buildings over nine storeys are "likely to be inappropriate"

**"Tall buildings:** In accordance with Core Policy IS3d, tall buildings in this location are likely to be inappropriate. In accordance with DMPD Policy DMS4, the height at which a development in this location will be considered tall is nine(9) storeys"

The buildings in the proposed development are described as ranging from **eight to fifteen** storeys. However, on the application drawings, the two floors of commercial use are variously described as ground and first floors and ground and upper ground floors. It appears that the two commercial storeys are counted as one. We think this is misleading, particularly when assessing whether or not these buildings are 'tall' and 'inappropriate' in the terms of the Local Plan.

The Local Plan also requires that the height of a building is expressed in metres as well as storeys,

**"2.43** The heights in this policy (that is Policy DMS 4 Tall buildings) are expressed as storeys and assume an average storey height of 3 metres. The ground floor of a development will be considered as a 'storey'. Applications for tall buildings will be required to express the height of buildings in storeys and metres in order for a robust assessment of their effects to be carried out".

With an average storey height of 3 metres, the height at which a development will be considered to be tall will therefore be 27m.

The tallest buildings on the site buildings A1 and C3 are 54.65m and 54.72m, that is twice the height at which a building would be considered tall. Both buildings are described as 15 storeys, but taking the 3.0m storey height from DMPD 2.43 they are, in Local Plan tall building terms, effectively 18 storeys. Building B3 the smallest building, described as 8 storeys, is 32.37m high, effectively 10 storeys.

The applicant should have described the development as between ten and eighteen storeys.

A 'robust assessment' of the development, and in particular of buildings A1 and C3 must conclude that at twice the height at which a building will be considered tall, and with twice the number of 3.0m 'storeys' as defined in the DMPD, these buildings are twice as 'likely to be inappropriate'.

Policies IS3 and DMS4

The Local Plan requires that tall buildings justify themselves by demonstrating that they bring benefits.

In section 8 of the Planning Statement the applicant seeks to justify the height of the development with a fleeting reference to Policy IS3, Good Quality Design and Townscape, and by attempting to demonstrate that the criteria set out in DMPD Policy DMS4 have been met.

Part of the introductory text to Policy IS3 under Tall Buildings is then quoted -

**"4.167** Tall buildings can, if well designed, create attractive landmarks underlining aspects of the borough's character and act as a catalyst for regeneration. They can be an efficient way of using land in line with sustainability objectives, and add definition to the borough's skyline". with the unsurprising but unsupported comment 'that the application would fully accord with this aspiration'.

The remainder of 4.167 is **not** quoted.-

"However, it is important that they (**tall buildings**) are sited in **appropriate locations, respect local context** and the historic environment, are acceptable in terms of design and impact on their surroundings and do not harm existing important views and skylines".

Policy IS 3d also states that

"Tall buildings ... **may** be appropriate in ... focal points of activity. Some locations within these areas will be sensitive to, or inappropriate for, tall buildings.

This location is not identified as appropriate for tall buildings and is not within an area in which tall buildings **may** be appropriate, areas themselves within which there will be locations that will be inappropriate for tall buildings. In the hierarchy of appropriateness for tall buildings, this location is therefore a poor third.

Policy DMS4 proposes fifteen criteria to be assessed to demonstrate compliance with Core Strategy Policy IS3d quoted above. The applicant addresses them in the planning Statement and Visual Impact Assessment. There is no sound argument in either document that the tall buildings that constitute this development justify themselves in terms of the benefits they bring, or that they are of high architectural design.

### **Scheme Benefits**

Policy IS 3 at item d. also requires that -

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

and refers to the detailed criteria for the assessment of tall buildings set out in DMPD Policy DMS4,

The benefits the applicant puts forward to justify these tall buildings are inadequate:-

### **Regeneration**

We do not disagree that a more intensive use of the site will have a regenerative effect, but question the contribution that the height of the buildings makes to that effect. The significant increase in the number of jobs is generated by the commercial uses on the ground and first floors and a reduction in the number of dwellings would not significantly reduce the economic benefits.

### **Townscape**

Many of the criticisms made of the Homebase scheme(2016/7356), particularly relating to the overbearing height and density, apply here. The Tonsleys lie almost immediately to the south and the *13 towers* proposed in this scheme will have an even more damaging impact on these low-rise residential streets

There are seventeen townscape views in the Townscape and Visual Impact Assessment. In fourteen of these views the impact of the development is considered to be 'beneficial', two of the other views are assessed as having a neutral impact, and one a negligible impact. The determinant for a beneficial assessment is that the development is visible, and that as it has 'high design quality' incorporating 'the highest architectural standards' and thus its presence on the skyline will enhance the view. This is simply not good enough. It is not a given that terminating a view or reconfiguring the skyline will be perceived by everybody in the same light. What some may consider attractive, others will find overbearing and dominant.

The architects have produced a considered scheme but it is not of such distinction that the mere sight of it can be claimed to have a beneficial effect on the townscape.


**Public realm**

The only public realm benefit is the route through the site, a demand of the SSAD which requires -  
 "a safe and attractive new public access through the site from Swandon Way to Smugglers Way, on a north-south alignment"  
 This new route through the site has to be provided- it is a benefit that would still be provided if the buildings were less tall.  
 Other open areas at high level will only be available to occupiers of premises in the scheme.


**Density of development**

At 1052 hr/ha and 367 u/h the development is at the upper end of Table 3.2 density matrix in the London Plan. The B&Q site is close to Wandsworth Town station, and within 800m of Wandsworth town centre but this is not sufficient to justify a density marginally below the top of the range for a site in the Central area with the highest PTAL score.

Units / hectare		PTAL 4- 6																			
	50	75	100	125	150	175	200	225	250	275	300	325	350	375	400	425	1000	1050	1100		
	Suburban																				
	Urban																				
							Central														



Habitable room / hectare		PTAL 4- 6																					
	200	250	300	350	400	450	500	550	600	650	700	750	800	850	900	950	1000	1050	1100				
	Suburban																						
	Urban																						
									Central														



At Chapter 7 para 3.30 of the London Plan it states

"Where connectivity and capacity (of transport) are limited, density should be at the lower end of the appropriate range".

At 4.165 in the Core Strategy, Nine Elms is uniquely identified as an area where:

"there will be scope to build at the highest densities paying regard to the London Plan 2015 density matrix ..."

If Nine Elms, with the Vauxhall bus station, the Vauxhall Victoria Line station, Battersea Park and Queenstown Road stations in close proximity, and with its own planned underground extension is uniquely in the borough, the area with 'scope to build at the highest densities', this must surely mean that development at the high end of the density matrix is inappropriate on the B&Q site.

We believe it is clear that this site is not appropriate for development at the highest density contrary to the intention of both the current Local and London Plans.

### **Effect on infrastructure**

This development will house 920 people. The applicant seeks to demonstrate it will place only marginal burdens on demands for health, education and transport. We are not persuaded that this addition to the cumulative demands arising from existing and proposed developments in the area will not have a meaningful effect, particularly on rail services. There is no mention in the Transport Assessment of the existing peak time overcrowding at Wandsworth Town station and at Clapham Junction.

### **Trees**

The Landscape Design and Access Statement identify the trees bordering the site as significant assets. The trees are identified as assets that should constrain development (p 14)

- Existing large mature trees to all site boundaries - currently offer high visual amenity values and are valued highly by the local residents.
- There are existing large mature trees within raised planters to the entire periphery of the site.
- The boundary to Swandon Way is described as an area where there is an opportunity to open up the site to public realm enhancement (plan p 15).

We are extremely disappointed that this assessment has been almost completely disregarded. Some 50 trees are to be removed many of these are described as Category B trees, that is trees which

"due to their good condition and good form, are considered to have the potential to grow into good quality trees if they are retained".

We welcome the 174 new trees that are to be planted, but the majority of these will be at the podium level, not in the public realm, and are no substitute for the loss of the existing trees. We note the measures proposed to protect the trees that are to be retained but have doubts that the trees will survive the intensive development of the site.

We attach as Addendum 1 a further detailed comment on the disregard that the applicants appear to have had to either pre application consultations or to the Tree Preservation Orders which apply to affected trees on the site.

### **Land use**

The loss of the existing use is likely to have a detrimental effect on the Local Plan ambition for the Thames Policy Area to provide a mix of uses. The loss of the retail use on this site, the Homebase site opposite and on York Road will remove from the wider local area a facility that is demonstrably popular and useful. The applicant suggests that traffic generation will be reduced by the change of use proposed, we consider the increased travel time to the nearest alternative should also be taken into consideration.

### **Summary and Conclusions**

We urge you to recommend refusal to the proposals presented, as we consider that the proposed scheme is too tall, too dense and has been designed with insufficient regard to the existing trees on the site which have Tree Preservation Orders granted recently by your Council.

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The proposals will provide additional employment, but that benefit is insufficient to justify the height, scale and massing of the development. The height and massing will have an adverse effect on the local area.

The additional burden placed on already overloaded transport facilities at peak hours by users could lead to dangerous conditions for passengers.

To be consistent with your Council's decision on the Homebase site on Swandon Way application No 2016/7356, consent should be refused.

Philip Whyte  
Leader Planning Group  
Wandsworth Society  
49 Wandsworth Common West Side  
London SW18 2EE