

Wandsworth Society

Please reply to:
49 Wandsworth Common West Side
London SW18 2EE

Planning and Building Control
Wandsworth Borough Council
The Town Hall
Wandsworth High Street
London SW18 2PU

For the attention of Mr Daniel Piercy

Dear Sirs,

**Re: Application No 2022/3954
Former Gas Works, Swandon Way, Calor Gas Units 9 and 10 Delta Business Park, Smugglers Way
and Land West of the River Wandle, The Causeway London SW18**

Objection

We have considered the information provided with this application and wish to object to the application on the following grounds:

Our representations are referring to the Wandle Delta Masterplan which received the Council's agreement and was adopted on the 28th September 2021. The numbered paragraphs specified below refer to this document.

The Wandsworth Society made representation to the Masterplan proposals by letter dated 19th March 2021.

Part of the Society's concerns stated in our representation to the Masterplan proposals were that the heights proposed were excessive as up to 10 storeys, on this part of the Plan area, what is now proposed at 30 storeys(Plot A1) beggars belief!

Members of the Wandsworth Society have engaged with the development team at the developer's invitation on three occasions during the past two years.

Our detailed comments are set out below:

Chapter 4 sets out the Vision and Objectives which clearly state the proposed mixed use of the Delta area, "with an accessible and permeable network of streets and spaces". Easy access for pedestrian and cyclists was proposed.

With no additional crossings at grade or at high level for either of these users, the application fails a key target of the Masterplan.

Placemaking

4.2.2 "Create a sustainable neighbourhood....through high quality design of buildings and spaces". The application fails to meet this objective as the Hybrid application has no detail of Blocks A2 and A3. The design of Block A1 cannot be considered sufficiently innovative to be considered as high quality design, as required under current National Guidelines.

The design for Block B is considered by the Society to be innovative and well presented.

“A balanced approach to density and massing which responds to the character, context and sensitivity of individual sites is required”.

The application fails to respond to this objective as the proposed massing of Block A with a height of 30 storeys is quite “out of context” next to the River Wandle. The site of the tower cannot be considered to be a “town centre” site nor is it close to a “cluster” of buildings of a similar nature. The application cannot be considered to “make a positive contribution to local character and context”.

Inclusive Growth

4.2.3 “Promote the delivery of a balanced and diverse mix of uses through: Affordable and diverse workspace and homes”. The proposed mix of homes does not meet this criteria, as no low rise family houses are provided, however the workspace is merely ground floor “office/retail/community space” in Blocks A1, A2, A3, Block B does provide a mix of uses which is welcome. This site is in an Economic Use Intensification Area, the workspace provision does little to achieve this aim.

People First.

4.2.4 “Secure a more people-centric area as part of a wider Central Wandsworth through: “Creation of green streets and new connections with emphasis on cycling and walking, rather than vehicle use”. No new “local links” are created as no additional provision is made for crossing Armoury Way, by a bridge link nor are there any new north/south routes created except along the Wandle Riverside. The objective of having east/west routes also fails as land adjoining the rail embankment is not included within the application site.

Chapter 5. Overview

5.1.2. The guidance supplements the adopted planning policy framework summarised in Chapter 3. The status of the document as an SPD means that new or amended sites cannot be introduced in the SPD. The SPD guidance is “structured as follows: routes and movement, open spaces/public realm. Block structure, heights scale and massing, environment and sustainability among others”. Figure 22 of the Masterplan provides detail.

5.2.4 We are pleased to see the Wandle Trail extended north from Armoury Way. There is no “natural” straight line access from the Wandle east to Swandon Way as land immediately east of the application site is not included in the proposals (in separate ownership with no apparent “rights of way”) although this is shown as providing vehicular egress from the application site. Access to Wandsworth Town station will therefore be somewhat circuitous.

Walking

5.2.7 The application proposals provide no “legible” walking connections through the site.

5.2.10 The application does not provide the required “key routes” across this part of the Delta Plan area.

Cycling

5.2.12 No legible cycling routes are provided, thus the application fails to adhere to the Masterplan SPD.

Public Transport.

5.2.22 The proposals do not demonstrate how any enhancement is made to local walking and cycling provision to Wandsworth Town station. Access to bus routes are also not improved, without additional pedestrian crossings of Armoury Way and Swandon Way

Private vehicles and servicing.

5.2.27. It does not appear from the plans provided that adequate provision has been made for service vehicles to reach the ground floors of Blocks A1, A2 or A3. No turning or short term stopping space appears to be provided.

The Wandle Trail

5.3.11 We are pleased to see the landscaping proposals for the riverside, north of Armoury Way, which would hopefully bring the biodiversity benefits outlined in the Masterplan. We are however very concerned that much of the Trail will be overshadowed for much of the day should the application be approved, as with buildings adjoining the riverside up to twelve floors in height, the shadow cast will last until at least midday. The Masterplan identified that part of the site adjoining the River Wandle as having buildings not exceeding four storeys tiering back(eastward) away from the river to a maximum of eight storeys.

Play streets and green corridors

5.3.16 The Masterplan proposed a green corridor running east/west through the site. This will not be provided if the site, shown within the red border on the plans provided, is available for both vehicular and pedestrian use.

Employment and workspace.

5.5.20-23 No provision is made for the type of workspace identified as being in demand.

5.5.24/25 The Masterplan states “that employment use should form a significant part of any proposal”. This is not the case in the application.

Cultural uses

5.5.39 We are pleased to see/be advised that part of Block B will be available for such uses as will part of the ground floor of Block A2, this comment does not override other objections in principle.

Height Scale and Massing

Overview. 5.6.2 The Council has an existing Local Plan Policy framework adopted in the Core Strategy and DMPD, supplemented by “Tall Buildings Maps”. The policy identifies the height at which a building is considered “tall” and seeks to direct development to areas where tall buildings may be appropriate.

5.6.5/6 “The emerging Local Plan will need to conform to the London Plan and the UDS will build upon the guidance set out in the study. The Urban Design Study recommends that within the Masterplan SPD area, clusters of tall buildings be focused north of the rail line. The guidance also recommends that “tall buildings must respect the small scale of the River Wandle”. This includes “ensuring an appropriate set back from the river to respect its setting, avoid overshadowing and providing high quality public realm along the riverside”. The proposed 30 storey tower is south of the rail line thus does not adhere to this direction.

Sensitivity to tall buildings.

5.6.11 With the existing adopted Local Plan, development proposals must provide an assessment of their impact on any sensitive assets or features to include of any impact of the following elements: Local views. A view from Putney Bridge shows the tower to be completely dominant. The tower will dominate the Wandsworth Town Conservation Area adjoining. The tower and Blocks A2 and A3 in view of their proposed height will also “overbear” the Wandle Trail and overshadow the river and its habitats.

Suitability for tall buildings.

5.6.12 The adopted Local Plan requires a tall building assessment of the suitability for any tall elements, such criteria includes: occupying a significant location, or the site to be adjacent to an existing cluster of tall buildings, neither of which apply to this application.

Building Height Strategy.

5.6.13 Key areas considered to be sensitive which require careful moderation include: Wandsworth Town Conservation Area, Old York Road Conservation Area, Bell Lane Creek and River Wandle, low scale housing on Sudlow Road. See Figure 37 of the Masterplan.

5.6.16 “ The massing of buildings along the Wandle should be stepped back and varied in height to reflect its smaller scale and more varied character. Careful consideration should be given to overshadowing and to avoid adverse impact on habitats”. This is simply not the case with the buildings proposed.

Height, scale and massing.

5.6.17 Key principles: “massing must relate to the scale and character of the streets which they address, distribution of heights should be arranged to exploit the sun’s path, maximise daylight to private and public open spaces at different times of the day and year. Proposals should avoid overshadowing of rivers. Massing of urban blocks should be varied to offer visual intrigue and delight”. The submitted proposals achieve none of the requirements of the Masterplan.

Chapter 5.8 Illustrative Masterplan

Figure 42 Illustrates heights adopted by the Masterplan. It should be noted that the western portion of the application site shows heights of 4-8 floors, the eastern portion 4-10 floors.

The heights proposed far exceed those recommended and adopted in the Masterplan Gasworks cluster See Figure 45.

Principles

5.9.10 Among other principles: consideration to be given to the special ecological and wildlife habitats and allowance for the sensitivity of these should be made in the siting, height and design of buildings and the riverside walk. Varied height, scale and massing of buildings, varied massing along the Wandle riverfront, low rise buildings facing the railway arches, to provide a more “human” scale. The submitted proposals do not adhere to these principles.

Conclusion.

We are concerned that the heights, massing and density of the proposed buildings on Plots A1, A2 and A3 will overwhelm the Wandle Trail adjoining the River Wandle, cast significant shadows on both the River, The Trail and provide virtually no sunlit areas at ground level between the proposed buildings on the site itself. Ecologically this is extremely poor and badly conceived.

The site is not a “town centre” site nor is it within a “cluster” of other tall buildings, thus a significant breach of adopted planning policies would occur if a “one off” tower of the type proposed on Plot A1 was permitted. The Masterplan provided for tall buildings to be located north of the rail line, this is not the case with this application.

We are less concerned with the approach adopted for the previous gas holder area Plot B which we believe has been dealt with in an innovative way. We are however concerned and aware that there may be limited demand from the proposed users(elderly and possibly infirm) for such accommodation in this location with very limited access to green outside space. High level amenity areas, as proposed, may have limited appeal.

The plans provided do not adhere to the Masterplan proposals to provide suitable and easy pedestrian and cyclists access both north/south and east/west. There do not appear to be any designated cycle routes.

We understand that the proposals will be virtually “car free” with service access provided from Smugglers Way. Vehicular access for refuse and emergency access will be provided from Armoury Way, eastbound only at this stage.

We do not believe that for a scheme of this nature it is appropriate to proceed with a Hybrid application, in the case of Plots A2 and A3, as at detailed design stage significant changes could be made.

The plans provided do not show any vehicular access to Plots A1, A2 or A3 for either day to day deliveries or for other requirements. This cannot be dealt with from underground as no basement space is provided.

We understand the requirement to bring a significant site back into use but as the Quod Financial Viability Addendum dated 21/09/22 Revision 00 states, no allowance for a site cost/value has been made in the assessments of viability, however from the viability presented the proposed scheme shows a **significant deficit of -£50,421,968 on cost.**

In our view it would be irresponsible of the Council to grant consent, knowing that redevelopment of the site, as proposed in the current application is unlikely to be undertaken in view of the financial restraints imposed in financing such a scheme.

We trust that you will consider this response and recommend refusal of the application as presented.

Yours faithfully,

Philip Whyte,
Leader planning Group
Wandsworth Society