Wandsworth Society

Please respond to:

49 Wandsworth Common West Side London SW18 2EE

16th January 2024

Planning Applications Wandsworth Borough Council Town Hall Wandsworth High Street London SW18 1DA For the Attention of A Thwaites Esq

Dear Sirs,

Re: EIA Application No 2023/4628 Glassmill 1 Battersea Bridge Road SW11 3BZ

We refer to application No 2023/4628 an Environmental Impact Assessment Scoping Opinion.

As a preliminary observation, we are puzzled by the lack of clarification regarding the opinion/application that you have registered on the planning portal. We are disappointed that your description of this application has only very recently changed_to "THIS IS NOT A PLANNING APPLICATION." However, without any explanation of how comments will be considered, -this does not offer any assistance to the general public.

The Planning Explorer portal is currently inviting the community to submit comments until 31/01/2024, with the application details available on the page. We would welcome an official statement explaining how you intend to deal with the more than 330 representations that you have received and/or whether you plan to disregard them entirely.

Despite the current absence of any guidance regarding the consideration given to representations for this Environmental Impact Assessment, we wish to express our profound concern regarding this application.

First and foremost, the simple fact that officers are even considering such an application is disconcerting. Even in its previous iteration, a tower of 38 storeys would have been contrary to the environmental context. The revised Local Plan approved during the latter part of last year clearly set out the aims of your Council until the next review, and specifically that the height for this site should not exceed 6 storeys, although the draft was later amended, providing a small amount of flexibility, the Council also published a clear explanation of their intention (MM146):

"The Council wishes to maintain the thrust of its position by seeking to restrict proposals for tall and mid-rise buildings outside [tall building] zones."

In the Local Plan, the site is clearly not included in the tall building zone. In any case, even considering the adjoining tall building zone, height is restricted to 12 storeys, far below the 38-storeys proposed.

Therefore, we can only highlight the very serious consequence that any decision other than a straight forward rejection, based on the numerous breaches of the recently adopted local plan, would have. The most significant being simply to discredit the Council's policies and reduce the document(Local Plan) to having no consequence. If, as seems probable, pre app discussions were held with your planning officers, the guidance given to the applicant's advisers may have been grossly misleading if the interpretation of the guidance has led to the EIA now presented, which raises further questions that should be addressed.

Without providing specific comments on the application at this stage, we would like to express our support to the objections made by the Putney Society (which specifically list the policies blatantly ignored) and the Battersea Society, among others. We reiterate that none of the potential benefits proposed for the scheme presented would ever outweigh the critical harm that it would make.

It is evident that if the EIA application is accepted and processed positively by the Council, this will set a precedent for other similar applications which apparently ignore the Local Plan. As a consequence, the confidence in any future community engagement and consultation would be deeply affected and the credibility of the Council's local plan would be undermined.

We trust that the Council will provide unambiguous advice of non compliance that it will prompt the applicants to withdraw this EIA forthwith, thereby not wasting the officers' time nor the developers' money.

In further feedback, we kindly request that you implement adjustments within the planning portal to prevent potential confusion in subsequent scoping applications. Your written advice on how you plan to proceed in the future would be greatly appreciated.

We await your response to this letter.

Yours faithfully

Philip Whyte

Wandsworth Society Planning Group