

Homebase Swandon Way, Battersea

in the London Borough of Wandsworth

planning application no.2015/6608

Strategic planning application stage 1 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

Full planning application for the demolition of existing retail warehouse building and erection of three buildings ranging from nine to seventeen storeys with basement to provide a mixed use scheme including 324 residential units, 580 sq.m. of retail units (Class A1 and/or A2 and/or A3 uses), 244 sq.m. of crèche/day nursery and 1636 sq.m. of studio/office space (Class B1), with associated cycle parking spaces and 101 car parking spaces, playspace, landscaping and public realm improvements (including contribution towards a new northern entrance to Wandsworth Town Station).

The applicant

The applicant is **National Grid UK Pension Scheme** and the architect is **Allies and Morrison**.

Strategic issues

The principle of the proposed **residential-led, mixed-use redevelopment** of the site is supported in strategic policy terms, subject to the acceptable outcome of a **retail impact assessment** and further information on the current status of the nearby **gas holder**. In addition, the proposal to enable a new northern access to Wandsworth Town Station is strongly supported.

Specific issues relating to **housing, affordable housing, play space, urban design, inclusive design, sustainable development** and **transport** should be resolved prior to the final decision making stage.

Recommendation

That Wandsworth Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 75 of this report; but that the possible remedies set out in that paragraph of this report could address these deficiencies.

Context

1 On 11 December 2015 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. As agreed with the Council the Mayor has until 28 January 2016 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, 1B and 1C of the Schedule to the Order 2008:

- 1A – *“Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.”*
- 1B(c) – *Development (other than development which only comprises the provision of houses, flats or houses and flats) which comprises or includes the erection of a building or buildings outside of Central London and with a total floorspace of more than 15,000 square metres.”*
- 1C – *“Development which comprises or includes the erection of a building more than 30 metres high 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 application site is 0.99 hectares and is situated within the Wandle Delta in the London Borough of Wandsworth. Wandsworth Town railway station is located immediately to the south of the site boundary; however, the station cannot currently be accessed directly from the site. The site is bound by Swandon Way (A217) to the north and west, railway viaducts to the south and Old York Road to the east. The River Thames is approximately 300 metres to the north of the site. With regards to access, vehicles currently enter the site from the east via Old York Road and pedestrian access to Swandon Way is also possible from the northern site boundary.

6 In addition to being within walking distance to Wandsworth Town National Rail station and there are also thirteen bus routes within an acceptable walking distance of the site, with stops located on Swandon Way, Bridgend Road and Ram Street. As a result, the site has a varying public transport accessibility level (PTAL) ranging from three in the west to 6a in the eastern corner, on a scale of one to 6b where 6b is the most accessible.

7 The site is currently occupied by a Homebase DIY superstore and associated car park, however, it is understood that Homebase is consolidating its current stores and this unit will no longer be required. The existing building is a typical single storey, double-height retail shed; there is also a small pre-fabricated cabin building at the western end of the site which provides office accommodation for a car wash facility situated in the car park.

8 The area to the south of the site is characterised by low-rise terraced Victorian houses, some of which are included within the Wandsworth Town Conservation Area, however, the closest boundary of the Area is approximately 200 metres to the south of the site. There is also a small high street along Old York Road. To the north of the site and Swandon Way is a large B&Q store and a Holiday Inn Express plus associated car parking, in addition to a BP petrol station and a mixed-use, retail/commercial area to the north east. There are buildings of higher scale in this immediate area of approximately seven storeys with a taller mixed-use development of up to eighteen storeys further to the north east, known as Battersea Reach. A small park known as Bramford Gardens is also located immediately to the east of the site.

9 With regards to policy designations, the site is within the Thames Policy Area and within Flood Zone 3a. It is also identified in the Council's Site Specific Allocations Document (February 2012) as a site for regeneration. The document identifies the site as suitable for residential development, subject to the outcome of a flood risk assessment, and improved access to the northern part of Wandsworth Town Station. The Council will seek to secure the northern access to the station as part of any development.

Details of the proposal

10 The proposals are for the demolition of the existing retail warehouse building and the erection of three buildings ranging from nine to seventeen storeys in height to provide a mixed-use scheme including 324 residential units, 580 sq.m. of retail units (Class A1 and/or A2 and/or A3 uses), 244 sq.m. of crèche/day nursery and 1,636 sq.m. of studio/office space (Class B1), with associated cycle parking spaces and 101 car parking spaces. The proposals will also provide playspace, landscaping and public realm improvements, including contribution towards a new northern entrance to Wandsworth Town Station.

11 The proposals include a predominantly residential tower of seventeen storeys in height, referred to as the Station Building and two nine storey (seven plus two storey set back) buildings to the centre and west of the site, referred to as the Ggarden Building and Crescent Building. A new public plaza separates the tower from the two adjacent blocks and a new principle east-west route through the site, continuing from the existing access, will be provided and is referred to as 'mews street.'

Case history

12 The applicant engaged in initial pre-application discussions with GLA officers in December 2014. The discussions concluded that the broad principle of the residential-led, mixed-use redevelopment of the site was generally supported and the applicant's commitment to exploring the potential to create a new northern access route to the station was strongly welcomed. However, while the proposed approach to form and massing was generally supported, the applicant was advised that there was no strategic planning justification to support the 25 storey building originally proposed in this location and the applicant was strongly advised to reconsider the proposed height to a scale that better reflects local planning policy aspirations. Information and clarification was also sought regarding housing, affordable housing, residential quality, urban design, inclusive design, sustainable development and transport.

13 A follow-up design meeting was held in May 2015 to discuss revised proposals. Strategic concerns were still raised with regards to the proposed 25 storey tower element which remained as part of the scheme and the applicant was advised that it would need to provide a robust justification for a building of that scale and was strongly advised to model an alternative scheme with a tower of twenty storeys for comparison purposes. The ground floor layout had been further developed to address those concerns raised at the initial pre-application and was broadly supported. The applicant was strongly encouraged to continue discussions with Network Rail with regards to providing the new northern access to the station.

Strategic planning issues and relevant policies and guidance

14 The relevant issues and corresponding policies are as follows:

- Principle of development *London Plan*

- Housing & affordable housing *London Plan; Housing SPG; Draft Interim Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG*
- Tall buildings/views *London Plan*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG*
- Inclusive design *London Plan; Accessible London: achieving an inclusive environment SPG;*
- 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*
- Transport *London Plan; the Mayor's Transport Strategy*

15 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 (2010), Development Management Policies Document (2012), Site Specific Allocations Document and Proposals Map (2012) and the London Plan (Consolidated with Alterations since 2011).

16 The following are also relevant material considerations:

- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework
- Wandsworth Local Plan Review, Second Proposed Submission Versions (October 2014) – Core Strategy, Development Management Policies Document, Site Specific Allocations Document, Policies Map Changes Document and Sustainability Appraisal; currently submitted for examinations (March 2015).
- Draft Interim Housing Supplementary Guidance.
- Draft Minor Alterations to the London Plan 2015.

Principle of development

17 As described above, the application site is within the Thames Policy Area, which resists the loss of existing employment floorspace (specifically B1, B2, B8 and related sui generis). The current use of the site is A1 retail and therefore there is no B1/B2/B8/Sui Generis floorspace to protect in this instance. However, as part of the mixed-use development proposals, the development will provide 1,636 sq.m. of office accommodation for small to medium sized enterprises (SME), which is strongly supported in accordance with London Plan Policy 4.2. The applicant should set out the existing and projected employment yield for comparative purposes.

18 The development includes 580 sq.m. of retail floorspace, which will be divided into two separate ground floor units of 286 sq.m. and 294 sq.m. that will front onto the new public plaza. In accordance with local development management policy DMTS 2 (Out-of-Centre Development), as the site is outside of Wandsworth Town Centre and will deliver more than 300 sq.m. of retail floorspace, the proposals must be accompanied by a retail impact assessment, the scope of which is to be agreed with the Council and proportionate to the scale of development proposed. The applicant has carried out a Sequential Site Assessment to support the town centre uses proposed, in consultation with the Council and has set out that none of the nineteen sites identified that could be sequentially preferable were suitable or available within a reasonable period of time. Furthermore, it was considered that the proposed level of retail would support the new residential community, that it would be in a sustainable location immediately adjacent Wandsworth Town train station and that it would complement the existing town centre offer. Overall, the applicant considers that the proposals would satisfy the sequential test. The applicant should share the assessment with GLA officers before for an appropriate assessment can be made with regards to the acceptability of this element of the scheme.

19 Notwithstanding the above, the provision of SME workspace will help improve Londoner's access to new employment opportunities and the delivery of a significant number of new homes will contribute towards meeting London's housing need. Therefore, subject to it being demonstrated that retail uses proposed will not adversely impact on the nearby town centre, the principle of a mixed-use residential-led redevelopment would be supported.

Northern access to the station

20 The opportunity to provide a new northern access to Wandsworth Town station as part of the redevelopment of this site is supported within the Council's Site Allocations document and has been strongly supported at a strategic level throughout the pre-planning application process. The applicant has been consistently encouraged to continue exploring this opportunity with Network Rail and it is welcomed that this has been pursued. While it is acknowledged that the design of the new access will be subject to a separate planning application, it is understood that the applicant is looking to transfer the land required to deliver the new access as part of this application and it is envisaged that an agreed scope of works, illustrative sketch and cost plan will be agreed with Network Rail and secured as part of the section 106 agreement. In addition, the necessary funding for these works will also be secured by planning obligation. This is strongly supported and helps justify the scale of development proposed, and the GLA welcome further detail on the nature of the planning obligations as they progress and the delivery time scales for the new access.

HSE consultation zone

21 The site is within the Health and Safety Executive (HSE) consultation zone for the nearby Fairfield Gas Holders; more specifically it is within the middle and outer zone. It is understood that the gas holders are not currently operational but that the hazardous substances consent remains in place and therefore this remains a material planning consideration.

22 It is noted that the gas holder site is identified within the Council's Site Specific Allocations document as a redevelopment site suitable for industrial uses and the applicant has set out that through discussions with Southern Gas Network (SGN), it understands that it is the intention of SGN to decommission the gas holders to enable the redevelopment of the site. Evidence of these discussions should be provided if available to verify these intentions.

23 Further information is requested from the Council on whether it intends to revoke the hazardous substance consent, as while this still remains there is still potential for the gas holders to become operational in the lifetime of this development.

Housing

24 The proposals would deliver 324 residential units via the mix illustrated in the table below:

Unit type	Private	Intermediate	Total no. units
One bed	106	44	150
Two bed	132	32	164
Three bed	10	0	10
Total	248	76	324

Affordable housing

25 In accordance with London Plan Policy 3.12, the applicant will be required to demonstrate that any future planning application delivers the maximum reasonable amount of affordable housing. As set out in the table above, at present the development would deliver a total of 76 intermediate units in the western block, or the crescent building. This equates to 23% affordable housing.

26 It is understood that the supporting financial viability appraisal has been submitted to the Council for further scrutiny. However, at this stage, the supporting viability information has not been shared with the GLA and therefore officers are unable to appropriately assess the current offer against London Plan Policy 3.12. Before the application is referred back to the Mayor, the Council's independent assessment of the viability appraisal must be submitted to the GLA to confirm that the maximum reasonable amount of affordable housing would be achieved. If the assessment demonstrates that the scheme can afford to deliver a greater amount of affordable housing, any additional affordable housing should be provided on site, in line with London Plan Policy 3.12.

27 Policy 3.12 of the London Plan and the Housing SPG note that there are circumstances where boroughs should consider whether it is appropriate to put in place provisions for re-appraising the viability of schemes prior to implementation, in order to maximise affordable housing provision. This approach is established in the Council's recently adopted Planning Obligations SPD (March 2015) which sets a policy context for the Council requesting an 'end of development' review where schemes are delivering less than 40% affordable housing in accordance with Core Strategy Policy IS5. Given the low affordable housing offer and the site's location within the Clapham Junction to Battersea Riverside Housing Zone, which has an impetus to accelerate the delivery of housing including affordable housing, the GLA would support the Council in requesting such a review for this scheme.

28 In light of the above, at this stage it is not yet possible to determine whether this application accords with London Plan Policy 3.12 and further discussion with the Council and applicant is required regarding this aspect of the scheme.

Tenure

29 London Plan Policy 3.11 establishes a strategic target of delivering affordable housing on a basis of 60:40 social/affordable rented: intermediate housing. The proposed delivery of 100% of the affordable housing offer as intermediate units is therefore not compliant with local or strategic planning policy. Regardless of whether funding is received from the Council; the affordable provision should include both social/affordable rent and intermediate tenures and therefore in accordance with London Plan policy, the applicant is strongly advised to explore the options for including an affordable rent product onsite. Full justification for the final tenure mix

would be required prior to the stage two referral, including how it corresponds to local need in consultation with the Council's Housing department.

Housing choice

30 London Plan Policy 3.8, together with the Mayor's Housing SPG seeks to promote housing choice and seek a balanced mix of unit sizes in new developments, with particular focus on affordable family homes. The current proposals would not provide any affordable family accommodation and therefore further discussion is required subject to the outcome of the above viability assessment. In addition, it is noted that the unit mix will not meet the 5% minimum target of family sized accommodation as required by local policy. As this element of the scheme is developed further, the applicant should ensure that an appropriate mix of units is provided, taking account of local policy requirements and need, and the strategic priority afforded to affordable family accommodation.

Residential standards

31 As set out in the urban design section below, the residential quality of the units is high. The applicant has set out that all of the units will meet the Mayor's minimum space standards as set out in table 3.3 of the London Plan and will have access to private outdoor amenity space in the form of a balcony or terrace. The applicant should provide an assessment of the residential design against the standards set out in the Mayor's Housing SPG and the Draft Interim Housing SPG which reflects the Governments Technical Housing Standards which came into effect on 1 October 2015. The Mayor intends to adopt the new technical guidance through a minor alteration to the London Plan. In advance of this the Mayor has released a policy statement setting out that from 1 October 2015 the relevant London Plan policy and associated guidance in the Housing SPG should be interpreted by reference to the nearest equivalent new national technical standard.

32 The whole of the London Borough of Wandsworth is designated as an Air Quality Management Area (AQMA) and the applicant has carried out an air quality assessment which concludes that future occupants are unlikely to be exposed to unacceptable levels of pollution. As a result no mitigation measures are proposed.

33 In addition, there is potential for the proposed development to be exposed to significant levels of noise from transport on Swandon Way, the nearby railway viaduct and from the nearby London Heliport that would exceed standard guidance. The applicant has carried out a noise assessment which has identified that a number of mitigation measures including acoustically specified facade materials, high performance glazing and the use of mechanical ventilation systems to reduce the need to open windows for relief from overheating, will be required to achieve an acceptable internal level of noise. The applicant should also demonstrate how the balcony design will ensure they are usable and experience an acceptable level of noise. The measures set out within the noise assessment should be secured by planning condition.

Children's play space

34 Using the methodology in Appendix Two of the Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG (2012), and based on the residential schedule provided, the applicant has calculated an expected child yield of the development of nineteen, of which twelve would be aged under five years old. Based on this, the Mayor's SPG indicates that the development would generate a total play space requirement of 190 sq.m. for play and informal recreation, of which 120 sq.m. should be provided on site for children aged under five.

35 The applicant has set out that the scheme provides a total of 555 sq.m. door-stop play, however, it is not clear as to whether this incorporates all of the public realm to be provided and this should be clarified. The scheme proposes a dedicated children's play area at the western part of the site, referred to as Crescent Gardens. This will have controlled access and the applicant should confirm that this facility will be available to all future residents. The play space utilises its location at the bottom of the adjacent National Rail embankment and it is intended that this is sculpted to create a low climbing wall, in addition to the provision of other playable features. Further information is required on the size of this play facility to ensure it meets the development's onsite needs.

36 It is noted that Bramford Gardens is located immediately to the east of the site which provides an existing play area and areas of open space, however, this is the only park located within 800 metres of the site. Noting the limited off-site recreational facilities and the pressure on it from other nearby developments, the applicant should provide further detail demonstrating that sufficient space will be provided by the completed development which will meet the differing needs for each age group. At present the information currently provided is not sufficient to demonstrate compliance with London Plan Policy 3.6.

Residential density

37 Given the characteristics of the site, the public transport accessibility level (PTAL) of between three and 6a and its central setting, the London Plan density matrix (Table 3.2 in support of London Plan Policy 3.4) would suggest a residential density of between 300 to 1,100 habitable rooms per hectare (hr/ha) for this development. Taking into consideration the site area and the total number of units proposed, the applicant has provided a density calculation of 833 hr/ha, which falls comfortably within this wide range. It is noted that the station building, which is the highest density element of the proposal is located in the area with the highest PTAL rating.

38 However, the applicant should confirm whether the density has been calculated using the net residential area in accordance with guidance in London Plan paragraphs 3.30 and 3.31 in support of London Plan Policy 3.4, and the Mayor's Housing SPG (2012).

Urban design

39 The scheme has developed through pre-application discussions with the GLA and the Council and as a result the proposals are broadly supported in strategic urban design terms. However, the applicant should address the issues set out in the following paragraphs.

Tall buildings

40 The Station Building, in the submitted proposals has been reduced from 25 storeys to seventeen storeys since the pre-application stage. The scale of the original proposals raised significant strategic concerns given the site's location outside of a designated town centre or Opportunity Area and while the principle of placing a taller element at the eastern end of the site to landmark the train station was acknowledged, the applicant was advised to reconsider the proposed height to a scale that better reflected local planning policy aspirations. In light of the above, this reduction in height is welcomed. However, the site allocation states that tall buildings in this location are likely to be inappropriate and as set out in Local Policy DMS4, the height at which a development in this location that will be considered tall is nine storeys. Therefore, the proposals trigger an assessment of the detailed criteria set out within local policy DMS4b, which broadly reflect those criteria in London Plan Policy 7.7. The applicant has provided a detailed response to the above criteria within a tall buildings assessment.

41 The scale of the Garden and Crescent Buildings which front onto Swandon Way do not raise any strategic issues as these are more consistent with the scale of more recent development to the north of the site and broadly reflect local policy guidance. Whilst, the Council's Site Allocations document defines the site and its surroundings as being suitable for buildings of up to nine storeys, it is noted that there are a number of high density developments including tall buildings coming forward in the Battersea Riverside area that exceed this height and it is therefore recognised that a taller element could be supported from a strategic perspective, subject to the development demonstrating significant planning benefit, the highest standards of place making and residential quality, and continued townscape analysis. In this respect, the scheme would deliver a number of planning benefits including the provision of high quality public realm including a new public plaza; an improved frontage on to Swandon Way with mature planting opportunities; the delivery of new SME workspace in the borough and most notably significant contributions towards delivering a new northern access point to Wandsworth Town Station which would be beneficial to both the new residential population and the wider area.

42 As set out above, the urban design rationale of providing a taller element on this site to landmark the train station is supported and will help improve legibility in the local area. The proposed height of seventeen storeys, relates to the taller scale of more modern developments in the vicinity of the site, most notably the Battersea Reach development and beyond. The applicant has provided a visual impact assessment depicting the proposals in eighteen local views agreed in consultation with the Council. In the longer views the proposals appear in context with the taller existing and consented schemes in Battersea Riverside area of the borough and do not raise any strategic issues. It is noted that the proposals will be visible from within the Wandsworth Town Conservation Area, as demonstrated by the modelled view from East Hill. It is therefore necessary to pay special attention to the desirability of preserving or enhancing the character or appearance of the area. However, when viewed from this position on the edge of the conservation area, the proposed tower, while clearly visible does not appear overly dominant or significantly detract from the foreground of the conservation area. In addition, a number of alternative views have been provided around this low rise area to the south of the application site but outside of the conservation area which demonstrate that the proposed development will be clearly visible and will provide a significant new element to the existing townscape. However, it is considered that this impact would not be adverse in nature or detract from the Victorian character of these streets and will deliver a building of a high architectural quality that will help increase local legibility.

43 Another key aspect of successful tall buildings is the way that they meet the ground. In this respect, the proposals will relate positively to the surrounding context at the street level by providing active uses fronting onto the existing public realm along Swandon Way, in addition to providing new active uses in the form of SME workspace, retail and creche uses on a new public plaza, and along the new mews street through the site which leads to an informal yard space. All of these routes will be publicly accessible and will contribute to improving the permeability of the site and the wider area. Furthermore, as discussed below, the residential quality also is of a high standard and will deliver high quality new homes in area of excellent public transport accessibility.

44 In summary, as set out, the proposal will deliver significant planning benefits in the form of delivering high quality new public realm, improved permeability through the site, delivery new high quality homes and SME employment opportunities in the borough, in the form of a high quality landmark building that will help deliver a new northern access to the existing station. Overall, the benefits will contribute towards the regeneration aspirations of the wider area and reflect the changing character of this part of Battersea. While it is accepted that the building is of a larger scale than its immediate context, it is not considered to be of significant harm to the local and wider townscape and on balance is in accordance with London Plan Policy 7.7. Notwithstanding the above, a key justification for the acceptability of the proposals is aiding the delivery of the new northern access to the station and as set out above; officers welcome further information on this aspect of the scheme as it progresses.

Layout

45 The ground floor is well thought out and is designed to optimise pedestrian permeability by providing a new principle east-west route through the site and to deliver a high quality of public realm of varying scales and degrees of enclosure. As set out above, a key factor for ensuring the future success and accessibility of the scheme is the ability to open up the northern access point into Wandsworth Town Station which is strongly supported.

46 Given the spatial constraints of the site, it is important that vehicular access is designed to be restricted as far as possible in order to maximise the amount of public realm and prioritise pedestrian activity. The new Mews Street that runs adjacent to the Network Rail embankment is intended as a pedestrian priority space; however, a significant proportion of this route also forms the main vehicular and servicing access to the development. While it is noted from the landscape statement that changes in paving materials will be used to delineate vehicular access from the pedestrian route, further detailed images are requested to demonstrate how a safe, conflict-free pedestrian environment will be achieved and how vehicle access will be clearly restricted. Furthermore, the applicant will be required to demonstrate how this key new route will be safe to navigate by people with visual impairments. Notwithstanding the above, the applicant's intentions to upgrade the embankment wall treatment to provide a green edge to this new Mews Street is welcomed and should be secured.

47 In response to discussions at the initial pre-application meeting, the western portion of the site has been developed to provide a better-defined area of public amenity space in the form of the 'informal yard', terminating in a zone of formal play space for the residents and the proposed creche. The applicant should confirm that vehicles will not be able to access this space. It is understood that the change in level along the western site boundary results in a retaining wall, which the applicant intends to utilise to form a level of enclosure to the playspace. This is supported, however, the design of the frontages to the crescent building should allow for sufficient levels of passive surveillance so that this area does not feel isolated and a secure environment is provided for children.

48 As discussed during the pre-application stages, the consistent building line along the Swandon Way boundary provides a robust edge and separation from fast moving traffic and this helps to optimise the quality of amenity spaces within the site. However, the proposals will result in the loss of all the existing London plane trees along the north frontage, but it is understood that these will all be replaced with new plane trees in similar locations that will front the new building line. As a result, the proposals will result in no net loss of trees on site and the applicant should provide further information on the maturity of the replacement trees to be provided. This is welcomed and will be fundamental to improving the existing environment along this busy road; however, the applicant should ensure that the size and positioning of trees along the northern elevation is carefully considered so as not to impact on the outlook/daylight levels of residential units and any tree planting proposed along Swandon Way will need to be agreed in advance with TfL's Arboriculture and Landscape Team. Furthermore, the applicant should have regard to the comments in the transport section below with regards to any potential impact on the TfL gyratory proposals.

49 The scheme has sought to optimise activity on all ground floor frontages and has been successful in achieving this by internalising bin/cycle storage, which is strongly supported. This is also made possible by containing all servicing access at basement level and this extends to the full extent of the site, allowing all four sides of the tower element to respond positively to the public realm. The podium deck of the middle block is accessible from all directions, avoiding areas of isolation and providing ease of access to all areas of the site and towards wider links. The depth of blocks has been carefully designed to optimise the size of the communal podium

courtyards while also enabling the inclusion of through units along the site's northern edge. The applicant should however confirm the minimum distance between habitable rooms in case this has been revised since the previous pre-application meeting. The applicant has also worked to ensure that inward facing corner units are configured so as to prioritise daylight/sunlight penetration into living spaces and the layout of the blocks results in over 60% of the units benefitting from a dual aspect. In addition, due to the generous number of residential cores, none of the floors in the development have more than eight residential units sharing an individual core, which is welcomed in accordance with the Mayor's Housing SPG standards. Overall, the development demonstrates a high level of residential quality. As part of the information requested in paragraph 35 of this report, the applicant should clarify the clear floor to ceiling heights.

Form/massing and architecture

50 As set out above, the scale and articulation of the Garden and Crescent Buildings is supported and is successful in introducing a sufficient degree of shelter and enclosure both to the scheme itself and in the context of the potential to form a 'boulevard' along Swandon Way. The intention to draw on the formal proportions of traditional mansion block typologies for the garden building is welcomed and the more varied fenestration of the crescent block has the potential to give character to the streetscape and avoids the collective massing of the scheme becoming monotonous or overbearing. The provision of a portal type opening providing access to the new creche, Mews Street and ultimately the new station entrance also helps differentiate between the two buildings and provides a clear and legible public entrance to the scheme. Overall, the proposed architecture and use of robust materials is broadly supported. With regards to the setback storeys at the upper levels, the use of a more slender reconstituted stone frame helps them appear more lightweight and contrasts with the heavier and more robust architecture of the main blocks. In addition, the use of reconstituted stone in the horizontal detail of the tower helps create a visual link with the stand alone tower element.

Inclusive design

51 The development will provide 10% wheelchair accessible housing in accordance with London Plan Policy 3.8 which is welcomed and this will be equally distributed across all three buildings, unit size and tenure. Sample flat layouts have been provided demonstrating compliance with relevant wheelchair housing design guidance and in order to ensure compliance with the new housing standards, the Council should include a condition to secure the Building Regulation standards M4(2) and M4(3).

52 The applicant has provided an access statement demonstrating the inclusive design principles have been considered throughout the design process in order to ensure that the both the non-residential and residential uses will be accessible by all. This is supported and the Council should ensure these commitments are carried through to the detailed design stages and secured by condition. Overall, the proposals are in general accordance with London Plan Policy 7.2.

Sustainable development

53 The applicant has applied the energy saving hierarchy detailing savings from energy efficiency measures of 16%, savings of 20% through the provision of Combined Heat and Power (CHP), and a further 3% saving from renewable technologies, in this case the installation of 200 sq.m. of photovoltaic panels on the roof. Overall this results in a total carbon reduction of 39% compared to a 2013 Building Regulations compliant development. While, the carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan, the comments below should be addressed before compliance with London Plan energy policy can be verified.

Energy efficiency

54 The demand for cooling will be minimised through solar control glazing and shading through balconies. The applicant has undertaken a dynamic modelling assessment to determine the overheating risk and the analysis shows that the CIBSE recommendations can be met for the sample dwellings. However, comfort cooling is proposed in some of the units and the use of the cooling system has been assumed in the assessment. The use of active cooling is not supported unless it is demonstrated that cooling demands have been minimised first by passive design in line with London Plan Policy 5.9. The applicant should therefore rerun the overheating assessment and demonstrate that the units are not at risk of overheating without reliance on the comfort cooling.

District heating and combined heat and power (CHP)

55 The applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development. However, the applicant has provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available. The development will be served by a site heat network supplied from a single energy centre located in the basement. The applicant should confirm that all apartments and non-domestic building uses will be connected to the network.

56 A 109 kWe gas fired CHP unit will be installed as the lead heat source for the site heat network and it has been sized to provide the domestic hot water load, as well as a proportion of the space heating. The applicant should provide information on the management arrangements proposed for the system, including anticipated costs, given that the management and operation of small CHP systems can significantly impact their long term financial viability.

Flood risk and sustainable drainage

57 A Flood Risk Assessment has been prepared and confirms that the site is partially within Flood Zones 2 and 3a and is defended to a high standard by the existing flood defences. The scheme is designed such that the lowest finished flood level of any residential property is at over thirteen metres AOD, which is well above any conceivable flood level. The less vulnerable ground floor uses may be subject to a low level residual risk; however, overall the proposals are acceptable in terms of London Plan Policy 5.12.

58 There are surface water flood risks in the wider local area, notably on Old York Road as it passes under the railway. The application proposes to utilise a range of sustainable drainage techniques to reduce surface water discharge and these include green/blue roofs, permeable paving and attenuation tanks. Together these techniques are design to achieve a three times greenfield run-off rate up to the 1 in 100 year storm event and the approach to drainage is acceptable within London Plan Policy 5.13.

Transport

Vehicular Site Access

59 It is proposed to use the existing vehicular access off Old York Road, located in the south east corner of the site. Only minor highway improvements are proposed to this priority junction. There will be no direct vehicle access onto the TLRN.

Car parking

60 The proposal includes the provision of 98 car parking spaces for the residential element of the development only which will be provided with electric vehicle charging points (ECVP) in accordance with the London Plan. This equates to a car parking ratio of one space per 0.3 units which is acceptable and the ECVP should be secured by planning condition. A total of eleven disabled car parking are provided for the residential component of the scheme only, this is below the one space per unit requirement that would be sought under the lifetime homes policy. It is therefore recommended that the allocation of these bays must be actively managed to ensure that they are always available to those in greatest need. In addition, further clarification is required for the parking for disabled staff and visitors to the ground floor commercial and retail units and this should be addressed as part of the car parking management plan which should be secured by planning condition. Transport for London (TfL) also expects the section 106 to ensure all future residents be exempt from eligibility for car parking permits in the area.

61 No on-site car club provision has been identified and therefore TfL would recommend that the applicant enters into discussions with a car club provider concerning the viability of providing a car club bay on site. As part of this, TfL would recommend that all new residents are offered two years car club membership to be secured by condition and managed through the residential travel plan.

Trip generation and modal split

62 Given the existing use on site the predicted net increase in peak hour vehicle trips generated by the proposed development, will have a minimal impact on the operation of the Strategic Road Network and TfL is satisfied that there is sufficient capacity on the public transport network (both bus and rail) to accommodate any uplift in trips.

Cycle Parking

63 The overall cycle parking provision proposed is in accordance with the 2015 London Plan and shower and locker facilities are provided for those members of staff wishing to cycle to work. Visitor parking spaces should be located in an accessible area close to building entrances and all cycle parking spaces should be safe, secure and easily accessible from adjoining cycle routes. Appropriate signage, preferably using the Legible London system should be provided.

Cycle Hire

64 The development is likely to increase demand for hire bicycles in the area and at current demand levels an increase of 24 docking points is required. TfL requires the applicant to fund and safeguard an appropriate area of land for a 24 point docking station; and a contribution of £180,000 to fund the assets, construction, surveys, planning, design and maintenance. Further discussions about the precise location are necessary and a location should be agreed prior to the application being determined. TfL expects this to be secured through the section 106 agreement along with the land and access rights necessary to deliver and maintain such a facility. To further encourage cycling, TfL would also recommend that all new residents are offered two years cycle hire membership to be secured by condition and managed through the residential travel plan.

Wandsworth gyratory removal

65 TfL is currently developing a scheme with Wandsworth Council to remove the Wandsworth town centre gyratory. The key objective is to reduce traffic dominance along the

high street and return the road network to two way operation. TfL is currently assessing what the impact of the increased traffic areas will be, which may increase traffic volume on both Swandon Way and Old York Road. A public consultation is currently underway and responses received will be used to inform the final designs. Changes are proposed at the Swandon Way and Wandsworth Bridge Roundabout and include junction and public realm improvements. TfL would welcome further discussion with the applicant to ensure that public realm improvements proposed as part of the development along Swandon Way integrate with the TfL scheme.

Crossrail 2

66 TfL and Network Rail are jointly promoting Crossrail 2 and a business case has recently been submitted to Government. The central safeguarded route (Tottenham to Wimbledon) which was consulted upon in 2014/15 would include serving Clapham Junction with higher frequency services. If committed, the route could be operational from 2031 and works could commence between 2021 and 2031.

Travel Plan

67 An ATTrBuTE compliant site wide framework travel plan which covers all uses has been provided and the final travel plan(s) should be secured, monitored, reviewed, and enforced through the section 106 agreement.

Freight and Servicing

68 A construction logistics plan has been produced and the final detailed version should be and secured by condition. The final plan should be drafted in line with TfL's new guidance available online and should promote road safety in line with current good practice. A delivery and servicing plan should also be produced and secured by planning condition.

Summary

69 In summary, TfL welcome further discussions with the applicant and Wandsworth Council on a range of issues including on-site car club provision, Legible London, the provision of a cycle hire docking station on site including contributions, how the scheme will integrate with the Wandsworth Gyratory removal scheme, car club and cycle hire membership for all residents and construction and servicing plans.

Community Infrastructure Levy

70 The Mayor has introduced a London-wide Community Infrastructure Levy (CIL) and the charging rate for Wandsworth is £50 per sq.m.

71 Wandsworth Council has adopted its local CIL and this includes financial contributions towards transport improvements. Wandsworth Gyratory removal scheme is prioritised within the Regulation 123 list as a strategic transport improvement to be funded in whole or part by CIL. Infrastructure should be funded in addition to site specific mitigation measures set out above and not duplicated.

Local planning authority's position

72 At the time of writing the local planning authority's position is unknown.

Legal considerations

73 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

74 There are no financial considerations at this stage.

Conclusion

75 London Plan policies on tall buildings, housing, affordable housing, play space, urban design, inclusive design, sustainable development, air quality, flood risk and transport are relevant to this application. The application complies with some of these policies but not with others and on balance does not comply with the London Plan. However, the possible remedies set out in this report could address these deficiencies.

- **Principle of development:** Subject to it being demonstrated that the proposed retail will not adversely impact on the nearby town centre, further information on the status of the nearby gas holder and detail on the planning obligations relating to the northern station access, the principle of a mixed-use residential-led redevelopment could be supported.
- **Tall buildings:** The reduction in height to seventeen storeys is welcomed and the scale of the garden and crescent buildings which front onto Swandon Way do not raise any strategic issues. While it is accepted that the station building is of a larger scale than its immediate context, it is not considered to be of significant harm to the local and wider townscape and will deliver significant planning benefits and on balance generally accords with London Plan Policy 7.7.
- **Affordable housing:** The supporting financial viability appraisal is currently subject to independent assessment on behalf of the Council. Further discussion with the applicant and the Council is therefore required with regards to verifying the maximum reasonable amount of affordable housing. In line with the above comments, the applicant should also fully explore options to include an affordable rent product onsite in order to accord with London Plan Policy 3.11. At present the proposals do not accord with London Plan affordable housing policy.
- **Residential standards:** Overall the scheme is capable of delivering a high residential quality, however, the applicant should provide an assessment of the residential design against the standards set out in the Mayor's Housing SPG and the Draft Interim Housing SPG which reflects the Government's Technical Housing Standards. The mitigation measures required by the submitted noise assessment should be secured by planning condition.

- **Children's play space:** Further information is required with regards to the current play space strategy before an appropriate assessment can be made in accordance with London Plan Policy 3.6.
- **Urban design:** The proposed layout, form, massing and architecture and generally supported from a strategic urban design perspective as are the public realm proposals. However, the applicant should provide further information regarding the treatment of mews street, the replacement tree planting strategy and the distances between the podium courtyards. In addition, the applicant should demonstrate that the proposed play space to the west of the development will receive a high level of passive surveillance to ensure it remains safe for children.
- **Inclusive design:** The proposals are in general accordance with London Plan Policy 7.2. In addition to securing those measures outlined in the submitted access statement, the Council should include a condition to secure the Building Regulation standards M4(2) and M4(3).
- **Sustainable development:** The carbon dioxide savings meet the target set within London Plan Policy 5.2; however, further information energy efficiency, the proposed use of comfort cooling and the management arrangements for the CHP is required before compliance with London Plan energy policy can be verified.
- **Transport:** Further discussion is welcomed with the applicant and the Council on a range of issues including on-site car club provision, Legible London, the provision of a cycle hire docking station on site including contributions, how the scheme will integrate with the Wandsworth Gyratory removal scheme, car club and cycle hire membership for all residents and construction and servicing plans.

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

Colin Wilson, Senior Manager – Development & Projects

020 7983 4783 email colin.wilson@london.gov.uk

Justin Carr, Strategic Planning Manager (Development Decisions)

020 7983 4895 email justin.carr@london.gov.uk

Jonathan Finch, Case Officer

020 7983 4799 email jonathan.finch@london.gov.uk
