

# **PROOF OF EVIDENCE OF MR JOHN DAWSON ON BEHALF OF THE WANDSWORTH SOCIETY**

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## **1.00 INTRODUCTION**

**1.01** The Wandsworth Society is a civic society founded in 1971 to provide a focal point for those interested in the environment of the central part of the London Borough of Wandsworth. We are a registered charity and were registered with the Civic Trust. The Society is independent of any other organization and has no political affiliation.

**1.02** For all of the 39 years of our existence, we have been striving for a better environment for the town centre and the River Wandle. We have over the years prepared proposals for dealing with the problems of traffic and the need for coherent development and regeneration. Our most recent paper, *Wandsworth: Planning for a Successful Town Centre* (August 2006), was presented to Councillors in February 2007, and is attached as Appendix A. We consider this to be relevant in assessing the impact of the current developments in the town centre, particularly the Ram Brewery scheme.

### **The Scheme**

**1.03** This Inquiry principally concerns the site of the former Ram Brewery and the adjoining Capital Studios and Duval Works, referred to below as The Ram Brewery site. The site was the subject of three planning applications dated 22 February 2008, Ref.2008/0955, 2008/0964 (Listed Buildings) and 2008/0969 (Conservation Area).

**1.04** The proposed development comprises eight new buildings on a combined site of 3.66 ha, together with the retention of the stable block and the group of mainly listed buildings in the south east corner of the site. The residential element totals 829 units, of which 363 private flats are within two towers of 42 and 32 storeys. The commercial element of the scheme comprises 18,485sqm (GIA), of which 12,204sqm (GIA) are for retail or café, bar and restaurant uses (A1-A4).

**1.05** There are two other applications relevant to the Inquiry:-

- i. Cockpen House, 20-30 Buckhold Road , Ref.2008/0960 dated 22 February 2008, for the erection of four 5-16 storey buildings to provide 207 flats of which 115 are to be affordable

- ii. An amended application on the Ram Brewery site, Ref 2008/0955, made in August 2009, to remove one floor (1,010sq m) from Block D and reduce the footprint of the towers.

**1.06** On the 4 June 2008, we objected to the Ram Brewery application on the following principal grounds:-

- i. the height of the proposed towers
- ii. the density and massing of the scheme
- iii. the insufficient amount of affordable housing provided
- iv. the lack of sufficient public landscaping
- v. the failure to provide a link to the Thames Riverside
- vi. the failure to provide a bus interchange
- vii. the shortage of public parking
- viii. the cumulative effect on transport and services

**1.07** We also objected to the Cockpen House application on the principal grounds of the height, massing and layout of the scheme and its cumulative effect.

**1.08** We are also concerned that certain aspects of the presentation of the scheme, relating to scale and to the visual effect of the taller blocks, could have been misleading. We will present evidence, and an expert witness, in support of these contentions which we have summarized in Appendix E.

**1.09** The Pre-Inquiry Note of 9 September 2009 outlines matters to be addressed particularly at the Inquiry in paragraphs 6 and 7. Our evidence seeks to present the Society's objections as far as possible in the order set out in paragraph 6 of the Note, although we will not be presenting evidence on Hazardous Substances. References to the London Plan are picked up where relevant within this proof.

## **Planning background**

**1.10** The Society has considered the proposals in the light of:

- i. the Unitary Development Plan (adopted in August 2003) excluding the 12 policies which have not been saved
- ii. the submitted Local Development Framework of which the Core Strategy is the subject of a Public Hearing expected to begin in February 2010
- iii. the London Plan (consolidated at February 2008)

**1.11** In preparing our evidence, we have also referred to the guidance and advice contained in PPS1, PPS3, PPG13, PPG15 and also ODPM Circular 05/2005 – Planning Obligations. Extensive reference has also been made to the Officers’ Committee Report, , referred to as (CR), on the 22 February 2008, applications.

## **The Application Sites**

**1.12** The Ram Brewery site fell within the Central Wandsworth Industrial Employment Area under Policy BIN 2 of the approved UDP. This policy, however, was not saved by the Secretary of State in 2007. The Buckhold Road site fell within the Business Village Industrial Employment Area, similarly discontinued.

**1.13** The Ram Brewery site falls wholly within the Wandsworth Town Centre Conservation Area.

## **2.00 PPS1 – DESIGN PRINCIPLES**

### **A. Building Heights**

**2.01** We believe that residential towers of 42 and 32 stories are totally inappropriate in Wandsworth Town Centre. There is no precedent for buildings of this height in SW London, or indeed anywhere in the capital apart from the City and Docklands. The taller tower exceeds the height of the London Eye (135m) and both towers are higher than Battersea Power Station(113m) and the Tate Modern(99m).

**2.02** The height of the taller of the two blocks proposed is stated to be 145.4 metres (477 ft.) The lower tower is 114.0 metres high (374 ft). This compares with the 94.5m block (311 feet) proposed at Riverside Quarter in 2005, which was widely opposed locally and rejected by the Council. Similar tall blocks were proposed both at Battersea Reach and Clapham Junction but withdrawn in the face of local objection. Tall buildings on two sites in Putney (84-88 and 131-133 Upper Richmond Road) were refused permission by the Council as being inappropriate, although both had much better public transport options than the poorly served Ram Brewery site.

**2.03** The justification in Minerva’s Environmental Statement for the height of the Ram Brewery towers is similar to that put forward by the Riverside Quarter developers who, in their design statement, spoke of “maximising the amount of area higher up, where river views are of more value”. In paragraph 4.29 of the statement, Minerva refers to achieving “the required density” and in para. 4.31 they state that the two towers option “still maximises the Development potential of the site”.

**2.04** In planning terms there can be no requirement to achieve a maximum density to satisfy development potential, which is subjective and must take into account reasonable planning constraints. In particular “maximisation of development” on the site cannot be justified at the expense of the Wandsworth skyline. Towers of this height will be visible from within the Borough and from many parts of north and south London, not as part of a grouping of tall

buildings which complement each other, as in the City and Docklands, but as a one-off intrusion out of all proportion to their surroundings.

**2.05** The maximisation of development in order to maximise the development return cannot be relevant when considering the planning merits of the scheme.

**2.06** We cannot share the Applicant's view in their paragraph 4.29 that "towers were also considered beneficial as a landmark feature for Wandsworth Town Centre". We believe that development on a human scale is needed in the town centre, not a 145.4m (477ft) tower for a small number of private occupiers.

**2.07** The Southside development to the south of the High Street comprises 4 x 23 storey towers, 28 storey Sudbury House and 11 storey spine blocks, together with substantial low-rise commercial buildings in the surrounding area. Southside is, however, on a site almost twice the size of the Brewery with the buildings alongside public roads generally 2/3 commercial storeys high, and the spine blocks are set deep within the centre of the site away from the main roads like Garratt Lane. As a result, although they remain very dominant, they are less so from public roads. The spine blocks enjoy the relief offered by the open space of King George's Park and the heavy tree-lined service road alongside – a benefit not enjoyed by the blocks in the proposed development.

**2.08** On the Brewery site, to the contrary, the 9 storey high central blocks, whilst 2 storeys lower than Southside spine blocks, are much closer to the public realm and thus will have a profound and stifling impact upon the surrounding streets, particularly those close to the east-west boundaries. The buildings will loom very large indeed above the passer-by and within the hinterland to the site.

**2.09** The Capital Studios site alone should be singled out for attention as the massing of the corner blocks of 16, 11 and 9 storeys is built to the back edge of the pavement opposite the "locally listed", Georgian, Crane Public House, less than 23 metres away. The 16 storey building, separated only by the 25 metres width of the River Wandle corridor from the 32

storey tower block nearby, is going to read monumentally on the corner of Wandsworth Plain and Armoury Way. The building here will only be one storey lower than the towering block now completed by Wandsworth Bridge, within the Battersea Reach scheme.

**2.10** There are other concerns relating to the height of the towers. The developers concede in Chapter 18 of their Environmental Statement that there could be “negligible to minor adverse effects” to the surrounding area from overshadowing and reduced daylight. We believe these are major issues. We are also concerned about overlooking and loss of privacy for homes in Barchard Street and the west side of the Tonsleys. The east tower will loom gigantically over these areas immediately to the east. Finally, we are concerned that the quality of the public areas will be adversely affected by Venturi wind tunnel effects, conditions predicted by the Council in their Committee Report (3/48CR).

**2.11** In the scale and magnitude of the Ram Brewery development we see the same errors in respect of setting and context as Southside of 40 years ago. The gross town planning error of Southside was its failure to respond to its site and setting. Its bulk, height and longitudinal massing cause it to divide Wandsworth’s east and west sides. They are separated visually by a wall of building. The geography particularly was ignored by the architects; the character and setting of the valley was lost.

**2.12** The Wandsworth Society did not expect to see the same mistakes repeated. From the Tonsleys in the east, the development will stop the views across the Wandle and town centre to the west. The development will continue Southside’s linear wall northwards. It is inappropriate for its geographical setting.

**2.13** In the Council’s decision on the application to redevelop 131-133 Upper Richmond Road, we noted that one of the principal reasons for refusal was that “the proposal by reason of its height and scale would form an overbearing and unduly dominant feature uncharacteristic of the surrounding area and prevailing buildings heights, would have a detrimental impact on the streetscape, and would have an inappropriate relationship with adjoining properties contrary to UDP Policies GEN7, TBE1 and TBE5, Core Strategy Proposed Submission :Policies PL4,

PL14 and IS3 and London Plan Policy 4B.10”. This proposal was for a 16 storey block approximately one mile west of the Ram Brewery site. We believe this ground for refusal describes exactly the effect of the much higher towers in the Ram Brewery scheme, and it should have been a principal reason for refusal of the application under consideration.

## **B. Presentation**

**2.14** We are concerned that the sheer size and scale of the proposals are difficult to appreciate from the submitted documents (Appendix E: Plans and Photographs). The design, scale and massing of all the building blocks will, at close quarters from the surrounding streets, be overwhelming and dominant but this is not apparent from the photographs in the developer’s document “Heritage, Townscape and Visual Assessment”. We will call expert evidence to demonstrate the difference between the building profiles in the submitted photographs and the realistic scale of the proposed scheme

## **C. Layout**

**2.15** The proposed development offers two exceptionally tall buildings on part of the site, but their great height and size is not compensated for by the release of land at ground level. In the past, one of the justifications for tall towers was that they do just this, and provide an attractive open landscaped setting at the bases of such towers. This is not the case in the Ram Brewery application.

**2.16** We believe there are major deficiencies in the layout of the scheme including: \_

- i. The listed stable block is dwarfed by the monolithic structures either side, which does not enhance this part of the scheme
- ii. The two opposing slab blocks (blocks B & C) at nine storeys above ground level will overwhelm the remaining Listed Buildings immediately to the south.
- iii. The scheme does not offer low-rise, high-density development which could, with careful design, offer an attractive environment with a series of squares and courtyards.
- iv. We are not being offered replacement studio/work units either, which would create a mixed usage with development. The old industrial brewery buildings would provide scope for such use.

- v. The opportunity to open up the banks of the River Wandle with pleasant pedestrian walkways is wasted by building so close to the river. This has not allowed for adequate planting of trees, shrubs etc to soften the building and to provide refuges for wild life.

**2.17** None of these options is being offered; instead, the proposals show very tall buildings and high density blocks with limited public open space and landscaping.

#### **D. Scale**

**2.18** We calculate that the scheme contains just over 1000 habitable rooms per hectare. We are aware that density is no longer a prime test as to the acceptability of housing schemes, but this density is even higher than most of the Riverside schemes now developed. Our concern is that a development of such a high density is not necessary to meet the future housing needs of the Borough (for the reasons mentioned in 3.09 below) and in itself will lead to pressure on services and utilities. The massing of the blocks and the height of the towers could be considerably reduced if a lower density and a more human scale were adopted.

**2.19** Council Policy H12 (p78 UDP) states that housing development will only be permitted if its density, scale and layout enable development to relate satisfactorily to its surroundings and the character of the area, and meet the Council's policies on design, space and amenity.

**2.20** We have shown in the sections on Building Heights and Visual Appearance (section 2, A & F) that the proposed development does not, in our opinion, relate satisfactorily to the existing town centre nor does it meet a number of basic design requirements (section 3,C).

#### **E. Open spaces and landscaping**

**2.21** We are disappointed at the lack of public open space and the poor quality of public landscaping.

**2.22** The pedestrian mall area does not appear particularly enticing, with few trees or soft planted areas to ameliorate the relatively hard finish of the buildings down the central mall. Overall, at ground level, very little green landscaping is provided. The provision for the

private flats will not be accessible or visible to the public, and the circulation space in the scheme appears to be a rather barren area of paving, with a gross area of 1.02ha, which could be enhanced by attractive planting.

**2.23** There appears to be little planting of significance along the riverside that would enhance the walkway in the summer months and break up the heavy massing when viewed from the western bank of the Wandle. Such planting would also provide a very much more attractive outlook from the residential accommodation facing west across the river.

**2.24** The open area to the south of the Stable block would provide an ideal space for more intensively planted areas. Only 34 semi-mature trees are to be replanted (replacing 27 lost mature trees) and their growth will presumably be limited by being sited on top of the basement car park. More provision of grass and planting areas and possibly a play area for children would help humanise the large paved areas.

**2.25** Additional planting could be implemented along the Ram Street frontage to soften these new buildings and along Armoury Way to relieve a small portion of the traffic noise and to provide a more pleasant outlook from the first floor of Block D behind the Stables.

**2.26** It appears that there are only three trees to be planted on the Capital Studios site at the northwestern corner. No trees are shown along the riverside on this bank to provide a habitat for wildlife and break up the very high profile of the buildings proposed on this site.

**2.27** We have reasoned elsewhere that the riverside walkway along Block B is too narrow, if it is desired that a continental style environment be created with outside tables and chairs. The total width of this walkway is shown as 7m which, if half is used by the traders of the ground floor units, would leave only 3.5m for pedestrian flows. We believe that this is too narrow, could become congested and possibly threatening to families and may be insufficient in case of emergencies.

## **F. Visual Appearance**

**2.28** In our opinion, the proposed towers are a massive intrusion into the Wandsworth skyline and are entirely disproportionate in their scale to the town centre. We believe that it is generally agreed that the towers of the Southside shopping centre were a serious mistake of the 1960's planning policies.

**2.29** We believe that the developers are quite wrong in suggesting in paragraph 10.6 of "Heritage, Townscape and Visual Assessment" that where the towers feature predominantly "they enrich the view and act as visually distinctive and interesting landmark features". They do not, in our opinion; rather they dominate to the exclusion of any other buildings, old or new, and from many view points they will converge and amass with the Southside blocks.

**2.30** In the same paragraph, they say that "minor adverse visual effects are very localized". They are not minor- how could they be with 42 and 32 storey blocks being the tallest buildings in South West London? Adverse visual effects will occur from many different locations around the centre, not just two as they state. The towers completely dominate the views, judging from the developers' own visual assessments, from streets in the Tonsleys, around Old York Road, St Ann's Hill, Buckhold Road, Garratt Lane and, to the west, from the top of West Hill and from Wandsworth Park.

**2.31** If these proposals are accepted, we will see the mistakes in planning and townscape terms that were made forty years ago repeated. The Southside Centre demonstrates this very clearly, but nowhere is this better illustrated than on two of the applicant's submitted elevations, nos 0301/06 and 0316/05, where the disparities between the height of the west tower and the existing High Street shops to the south, and the height of the east tower and the adjoining stable block are dramatic - the towers are, respectively, 10 times and 21 times higher than these existing buildings

### **G. Retail Design**

**2.32** We are concerned that the present design is unlikely to suit many non- food retailers who should be the core attraction to the proposed scheme.

**2.33** The weakness of the scheme is that it is neither a casual nor a destination shopping area. The former provides for shoppers to browse for goods, selecting their choice from retailer's available stock. A destination centre is one which has special attractions and will draw from a wider catchment area than the immediate vicinity.

**2.34** The proposed scheme leads nowhere and in our view does not provide a significant retail appeal to attract those retailers who are not represented in the town. There are a number of vacant shop units in the Southside shopping scheme which could accommodate those High Street names not presently represented.

**2.35** The principal entrance and exit is less than 10metres in width leading from the High Street which is likely to get congested at peak shopping times if the scheme is even moderately successful. The developers have provided no on-site shoppers car parking, relying on the northern car park of the Southside shopping scheme, which is outside the developer's control. It is likely that this part of the Southside scheme will be rebuilt in the future; thus the extent and availability of the parking in this area is in doubt. We understand that some car spaces may be available in the basement parking of the Capital Studios site in Block F but this will only be outside normal business hours and some distance from the main retail area.

**2.36** The shopping content cannot provide a major space user, which is required as an anchor tenant as this would conflict with the established planning policy (UDP PolicyTCS9) as being outside the approved town centre retail area. Without such a draw we do not believe that the scheme will attract specialty retailers of any calibre. Examples of the difficulty in letting ground floor retail space in secondary locations are readily available at Battersea Reach, Point Pleasant and Riverside West.

**2.37** The riverside walk for food and leisure uses should be an attraction. However, we believe that the walkway is too narrow at 7m in width. When tables and chairs are provided outside the building line, a walkway of only about 3.5m will result. This is inadequate and would be congested at times of high usage. We also question the accessibility as pedestrian access will only be available on routes which are not protected from inclement weather.

**2.38** We believe that the grid adopted for the individual shop units of 7m or thereabouts is likely to be restrictive for many retailers. The retail areas shown in Block C facing Ram Street and those in Blocks D,F and G are likely to prove most difficult to let and might even have to be adapted for other purposes in due course, as happened on the nearby riverside developments.

**2.39** Overall, we are worried that other than the food and leisure uses, retailers will not be keen to trade from the shopping area and, as a result, the ground floor main mall could turn into a waste land of vacant secondary shop units comparable to the north mall of the Southside centre.

### **3.00 PPS3 – HOUSING**

#### **A. Affordable Housing**

**3.01** Affordable housing, which is becoming a more and more pressing need in the Borough, was to be provided to a level of 30.75% (322 out of 1047) in Minerva’s earlier plans. The Mayor’s strategic target in Policy 3A.9 of the London Plan is that 50% of housing provision should be affordable, although the current Mayor stated, in October, that he wished to see this changed from a percentage-based target to a numerical one.. We believe that the number of affordable homes on the Ram Brewery site should be increased to at least 33% in line with Policy 1S5 of the LDF, thus providing 274 units out of 829.

**3.02** During the later negotiations with the Council, just before the application was submitted, the developers reduced their total of affordable housing from 30.75% to 11% and the public was not made aware of this significant change until the Committee Report was published. Only then, did we find out that a reduction in affordable housing had been made to enable adequate contributions from the Section106 obligation to fund road improvements. This 11% is to be concentrated wholly on the Cockpen House site. Consequently, there is no affordable housing on the Ram Brewery site, where 829 dwellings are proposed.

**3.03** PPS3 advises in “Achieving a mix of Housing”:-

- i. (20) “key characteristics” of a mixed community are “a variety of housing, particularly in terms of tenure and price, and a mix of different households such as families with children, single person households and older people”. It continues
- ii. (24) “in planning at site level, the local Planning Authority should ensure that the proposed mix of housing on large strategic sites reflects the proportion of households that require market affordable housing, and achieves a mix of households as well”. This should be read with

- iii. (22) where councils are advised to set out in their Local Development Framework documents
- households that require market affordable housing and their proportions = x% market and y% affordable housing
  - profiles of household types requiring market affordable housing e.g. multi-person dwellings, including females and children and their proportions = x% single persons, y% couples and z% families
  - the size and type of affordable housing required

**3.04** In respect of the above National Planning Guidelines, the Ram Brewery fails on all counts. Its central location, and the encouragement with which the Council has supported the regeneration of the town centre, together with its importance as a “piece in the jigsaw” linking the Riverside sites and the centre, highlight its strategic status.

**3.05** Government policy clearly states that such a large site should reflect the various types of tenure and households, both by affordability and size. It states that a mix should be made of these groups which should be integrated on individual strategic sites. The breakdown of dwellings, however, on the Ram Brewery site shows no social rented housing, no intermediate housing but 100% market housing of 829 dwellings. Of these, 42% are 1 bedroom flats, 39% are 2 bedroom flats, 16%, 3 bedroom and 1.5% 4 bedroom flats. These do not represent a mix of tenure types or of size of dwellings or of occupants needing housing.

**3.06** Equally, the affordable housing provision on the combined sites is in breach of the Council’s own housing policy. In the UDP, its strategic objectives include (144/p63 UDP) seeking to “maintain a well-balanced mix of housing, including affordable, rented and owner-occupied housing”, but major developments recently built or planned have provided very high proportions of 1 and 2 bedroom dwellings rather than family homes.

**3.07** The Ram Brewery itself provides a very high proportion – 81% - of 1 and 2 bedroom dwellings.

**3.08** On 22 October 2009, at Wandsworth Town Hall, a presentation on affordable housing was attended by 979 people (John Watts, Deputy Head, Professional Services Division, Support), 400 more than at a similar presentation two years ago, thus demonstrating the latent demand in the area. The Ram Brewery development is not a major contribution to housing need in the area, nor indeed would the flats to be built be of a price or type that would meet urgent social needs locally.

### **Housing Targets**

**3.09** The London Plan sets out a ten year target for Wandsworth of 7450 homes, with an annual target of 745 homes. New housing provision targets in London, effective from 1 April 2007, gave a reduced 10 year target for Wandsworth of 6,920 homes, 692 annually. According to the Council's Annual Monitoring Report 2007/8, this target is being comfortably exceeded, with 1,782 projected completions over the first two years and 4,772 (compared with a target of 3,460) deliverable in the next five years from 2009. 8,572 more homes are predicted between 2014 and 2023. Thus there appears to be very little pressure to provide the relatively few, "top of the market" flats that would be lost if the scheme was drastically reduced. The loss of a number of flats of that nature would not reduce the contribution that is needed urgently for the more vital lower-priced and family-sized housing in the Borough.

## **B. Housing Design**

### **3.10 Design Principles**

Both national and Council policies stress the need to design "appropriately" on sites. PPS3 gives guidance on National Housing Policy. In its section entitled "Advancing High Quality Housing", it makes the following unequivocal statements:

- i. (13) design, which is inappropriate in its context or which fails to take the opportunities available for improving the character and quality of an area and the way it functions, should not be accepted
- ii. (14) residential development is to be aimed at "maintaining and improving local character"

- iii. (16) matters to be considered when assessing design quality of a development include whether it is “well integrated into, and complements the neighbouring buildings and local area more generally in terms of scale, density, layout and access; creates or enhances a distinctive character that relates to the surroundings and supports a sense of local pride and civic identity”.

**3.11** Council policy states equally that new housing developments will need to be carefully designed in accordance with policies contained in the TBE chapter of the UDP and H11 – new build housing. Policy H12/p78 is quite clear **as to** what is required of housing developments, which will be permitted if density, scale and impact enable the developments to relate satisfactorily to their surroundings and the character of the area, and to meet the Council’s policies on design, space and amenity”.

### **3.12 Detailed design**

Good “design is indivisible from good planning” (33.PPS1) and the Borough’s planning criteria are directed towards producing good design in line with government directives. Yet, within the 2008 Committee Report on the Ram Brewery application, about a very substantial new development proposal on a cleared site, these criteria are brushed aside. For example:

- i. amenity in terms of sunlight and daylight. We learn that “the vast majority of the proposed rooms in dwellings meet BRE guidelines”. Those that do not tend to be deep-plan rooms where full depth light penetration is difficult to achieve – often the lower level flats which receive lower standards of natural light levels within the centres of the blocks. Although all the proposed flats, we are told, are of a good standard, and generally will enjoy a good outlook, we are not told how many flats are affected to the contrary.

The quality of light and enjoyment of at least 1 hour of sunlight per habitable room in the winter is the BRE standard to be achieved and the Council seems to recognise this important criterion in this particular development (6/49CR). Why, therefore, do the

flats in question not meet BRE criteria? It is because the proposals are too dense and tightly packed. The massing of all blocks on the Ram Brewery site is very substantial and, inevitably, the buildings have an effect upon one another. Where flats are at the base of long slab blocks facing a similar block opposite, they will suffer – e.g. blocks B and C.

- ii. This last point is substantiated in the Officer’s report (p50), where the Council’s criterion of distance between blocks is stipulated as 20m (171/p76 UDP). We learn, however, that (a) between blocks B and C the distance is 17m across the shopping street; (b) the distance between blocks B and C across the internal courtyard is 18m; (c) the Capital Studio blocks E and F are down to a “not ideal” 16m but “would not warrant refusal”; (d) the distance between blocks F and G is 11m.

We have estimated the number of flats affected by the reduced distances. A conservative number on the Ram brewery site seems to be (a) 42; (b) 65 and 21; (c) 28; and (d) 28. This gives a total of 184 or 22% of dwellings on the Ram Brewery site. There should be very few, perhaps none, on a new development. We would suggest that a number of these dwellings, particularly at the lower levels, would be affected also by breaches of BRE day and sunlight guidelines. There are also a number of the flats facing one another in blocks A and B where they are 6m apart and where obscure glazing is suggested as a means of avoiding overlooking.

- iii. The Committee Report (5/50CR) continues by acknowledging that the proposals do not meet the Council’s amenity space standards for residential units either. The Council’s criteria set a standard of 20sqm/flat. However, inclusive of both private dwelling land, common amenity areas serving flats and dedicated play areas set aside for residents, these average only 6sqm/flat. This represents a shortfall of 70% on the Council’s own criteria! Some of this limited space is sited cramped between the pairs of slab blocks forming blocks B and C, where the distance criterion is breached too.

To emphasise further the limited benefit of the amenity space provided, the Report states that “Many of the amenity spaces ..... would have more restricted sunlight..... However, this is a consequence of the nature of this high density development”. Thus the Report is faulting the design of the development at its most fundamental, detailed level - the quality of the proposed homes themselves – and states it is because it is too high a density.

- iv. The Committee Report, having drawn attention to the above failings in the design of the proposals, then dismisses them in two startling asides – (4/50CR) and the last sentence of (5/50CR) – both of which advise “caveat emptor”! Another similar warning is given on the Cockpen House site (2/57CR). The Report is about a new development on a cleared site and yet it acknowledges that the design fails to meet basic criteria “as a consequence of the nature of this high density development”.

On these points alone therefore, at the heart of the proposals, the development meets neither the Council’s criteria nor the Government’s PPS1 quality of design criteria.

## **4.00 PPG3 - TRANSPORT**

### **A. The Transport Assessment**

**4.01** We have serious reservations about the effect of the scheme on private and public transport in the Wandsworth area

**4.02** We have assumed, for the purposes of this section, that no alterations will be made to the existing road traffic flows in the absence of an approved, costed and implementable road traffic scheme.

#### **Roads**

**4.03** Traffic congestion in Wandsworth town centre has been a major concern for many years. Without the ability to exclude through traffic, little will be achieved. The partial pedestrianisation of the High Street would be a significant improvement which will result in the necessity to re-route local east-west and north-south existing flows. Intersections such as that at the northern end of Garratt Lane with the High Street are likely to require only minor alterations. The West Hill/Putney Bridge Road junction, however, will require significant alteration and inevitable land acquisition.

#### **Cycles**

**4.04** The Applicants have made good provision for cycle parking in the basement of the proposed schemes for residents; however, we question whether cyclists who only wish to spend a short time at the retail or leisure part of the scheme will be adequately catered for. We are doubtful whether cyclists will be permitted to ride through the scheme or, indeed, would want to, bearing in mind there will be no convenient exit at the northern end. There does not appear to be bicycle standing provided at Mall level or any provision for cycle paths through the mall. These would cause a conflict of use between cyclists and pedestrians. This contravenes Council Policy TBE1 where new dwellings will only be permitted when there is “safe and convenient access for cyclists within the development and to surrounding areas”.

**Car Parking**

**4.05** Basement parking will be provided for residents but there will be none for casual shoppers or leisure users during the day, and limited basement parking on the Capital site at night alone. We believe that this will be insufficient to support a retail scheme of 12,204sqm (G1A). The nearest public off-street parking will be in the northern car park of the Southside shopping scheme which is outside the control of the Applicant. We understand that no additional parking will be required when the northern end of the Southside scheme is redeveloped. We think that the existing, unmodernised, 1960's car park to the northern end of the Southside Shopping Centre is too remote and unattractive to serve the shops north of the High Street

**4.06** On-street parking in the immediate vicinity is restricted by permit; thus, outside normal shopping hours, there will be even more pressure, particularly for evening and night-time use of the leisure facilities. The restricted parking at basement level on the Capital Studios site provides some spaces, but few users of the facilities will wish to walk outside in bad weather. We are also concerned that little use will be made of this parking area because of difficult access, involving lifts/staircase to ground level. This site will also be very difficult to access from the west.

**Vehicular Access to Basement Service and Car Parking Areas Block C**

**4.07** We are concerned about the car and service vehicle access arrangements from Ram Street.

**4.08** Access for vehicles to the service areas and car parking will be from the north and these vehicles will have to cross the northbound flow of traffic when entering the basement ramp. Likewise, when leaving, all vehicles will have to cross the northbound flow and join other southbound traffic approximately 90m from the traffic light intersection with the High Street. Any vehicle wishing to travel in an eastbound direction will then have to travel west to the junction with Putney Bridge Toad, then join the eastbound flow along Armoury way towards the Wandsworth Bridge roundabout.

### **Vehicle Access to Blocks E, F and G.**

**4.09** We are also concerned that the access to Blocks E, F and G from Wandsworth Plain will be difficult. Presuming Wandsworth Plain remains northbound one way, access to the basement service area will require a very sharp right hand turn off the section of the road used as a bus stand.

**4.10** When leaving the basement area, all traffic will have to proceed northbound and enter Armoury Way turning eastward only. This will mean that traffic wishing to travel west will have to journey either to Ram Street (probably already congested) or travel on to the junction with Fairfield Street and then rejoin traffic on the existing one-way system through the town centre. This will add to the already congested traffic conditions.

### **Pedestrians**

**4.11** The partial pedestrianisation of the High Street between the development and Southside cannot be carried out unless the new gyratory system is in operation, which could be up to 15 years time (or never) by the Council's own admission. (see section 6.03 below)

**4.12** Access to the scheme for all pedestrians from the north Riverside area will be less than satisfactory. The scheme makes no provision for a dedicated or protected pedestrian route (save for the possible bridge link in the future). This will, therefore, mean that either on-demand pedestrian traffic light controlled crossings will have to be provided or centrally-controlled light which will, inevitably, lead to congestion, frustration and possibly accidents occurring.

## **B. Public Transport System**

### **Rail**

**4.13** Wandsworth Town Station (approx \_ mile from the nearest point of the site) is already at full capacity during rush hour periods. Network Rail has no current plans to lengthen the platforms in the near future to accommodate 12 car trains nor have the operators any immediate plans to increase the capacity of the trains. Permission for the development at East

Putney Station (84-88 Upper Richmond Road) was refused upon grounds, amongst others, of lack of overland train capacity (Application No2008/3321).

## **Buses**

**4.14** The local bus services are running close to capacity at peak times; clearly there is more space during the midday period. However, the present routing of the services does not permit a single bus terminus in the town centre. With the future partial pedestrianisation of the High Street and re-routing of bus and service vehicles, we believe that provision could be made for this facility, but the current scheme does not provide for this.

**4.14** At the moment, there is a spread of bus stops around the centre, some of them difficult to locate and illogical. We think that this redevelopment provides an opportunity to create a proper bus interchange, possibly in the north east corner of the site or on the High Street. It is likely that, if the retail content of the scheme is to be successful there will be an increased need for buses and it is vital that the present haphazard and scattered bus stop locations are better positioned and coordinated.

## **Overall**

**4.16** An important criterion in indentifying appropriate locations for tall buildings is their relationship to the Transport Infrastructure (CABE/English Heritage: Guidance on Tall Buildings). In their Committee Report (2/96 CR), the Applicants state, in their response to the comments received, that the site has a PTAL of 5 “and is therefore very accessible by public transport...”.

**4.17** However, on Map 6 (p186/UDP) the PTAL shown for this part of Wandsworth Town Centre is 4 not 5, which indicates the site has significant shortcomings in public transport provision. Bering in mind the colossal scale of the Ram Brewery scheme, we consider the transport provision to be inadequate and that Wandsworth Town Centre cannot be considered an appropriate location for such tall buildings.

## **5.00 PPG15 - HISTORIC ENVIRONMENT**

**5.01** The application sites lie wholly within the Wandsworth Town Conservation Area (WTCA). The UDP (Paragraph 75) states that “development in conservation areas should respect the character, appearance and grain of the particular area”, and Policy TBE 10 states, unequivocally, that “development will not be permitted if it would:

- a. harm the character, appearance or setting of a Conservation Area
- b. fail to respect the grain of the area”.

In our view, the intrusion of the two towers fails to respect the character of the town centre, which retains its historic and civic core in mainly low-rise buildings. Views into the Conservation Area would be radically affected both by the towers and the powerful scale, height and density of the spine blocks which divide the site east/west.

**5.02** Policy PL12 in the draft LDF Core Strategy states that “the heritage core of the town centre will be safeguarded, protecting the Conservation Area from any possible harmful development by ensuring that the new development at the Ram Brewery ...will be set away from the listed and other sensitive High Street Buildings”. This cannot be achieved with such tall towers; no part of the Conservation Area can be free from their domination.

### **A. Conservation Area and Historic Buildings**

**5.03** The Ram Brewery site is the fulcrum of Wandsworth Town Conservation Area (refer Map1 and Core Strategy map). Within 500 metres of the site there are 43 Listed properties. Of these, 33 are within 250 metres of the site, 10 of which are Grade II\* Listed. This is the largest concentration of Listed Buildings in the borough, and will be affected, many quite profoundly, by the proposed development. The listings point to the historic importance of Wandsworth’s town centre.

**5.04** We would expect that the Council would seek to be the guardians of these buildings, their setting and scale, and indeed, when the Council designated the Town Centre as a Conservation Area in the 1980’s (it straddles the historic core east to west across the Wandle valley), it recognised this fact.

**5.05** With the exception of the Brewery complex, the Grade II\* buildings within the Conservation Area are generally between 2 and 4 storeys high. This is particularly relevant to the character of the Area and its scale. The heart of the Conservation Area is the High Street with All Saints Church at the mid-point and Wandsworth Plain, with the excellent Church Row terrace of 6 Grade II\* houses and 3 Grade II houses, adjoining. Within the centre of the Borough of Wandsworth, this historic core is unique and still retains its integrity. We note that English Heritage's written submission supports our case for refusing consent on those grounds.

**5.06** Conservation Areas are defined as "areas of special architectural or historic interest, the character or appearance of which is desirable to preserve or enhance" - that is the wording of the legislation in which Conservation Areas are enshrined. (Ref PPG15)

**5.07** The proposed developments do not meet these criteria. The proposed blocks both on the main Ram Brewery site and on the Capital Studios site will overwhelm the historic Listed Buildings around and within their sites, which, as a consequence, will be reduced to insignificant proportions

**5.08** It need not happen for, whilst it is generally acknowledged that these sites are ready for development, an appropriate scale of rebuilding could enhance the Conservation Area. With this in mind, we refer to the Council's Conservation Area Character Statement No19 entitled "Wandsworth Town". It is very succinct. It describes the topography, historic buildings and townscape and its uses. It also lists its negative elements – the "unsympathetic post-war development", badly altered shop fronts and buildings, significant vacancies and dilapidation and the severe impact of traffic.

**5.09** The Character Statement highlights the importance of Listed Buildings and buildings of special local interest in the town centre, together with their historical associations. It stresses that the most important area is the "town centre core" with the greatest concentration of quality buildings and townscape assets. It highlights the "numerous small alleys and small yards off the High Street", the cluster of buildings at the Armoury Way/Dormay Street junction,

Barchard Street and the Grapes Public House, and states that the Ram Brewery “presents an impressive façade that provides an important and unique identity and character to the town” whilst it notes that the Arndale Centre “has a largely negative effect on the townscape here”.

**5.10** What should be the Council’s reaction to the proposed development in its historic town centre – a centre protected by Conservation status?

**5.11** We consider that the Council needs to follow its own advice, enshrined in the UDP and summed up in policies TBE10 and 11 (sections 74-76 pp31-32 of the plan). The UDP states that the Council has designated as Conservation Areas those parts of the Borough which it considers to be of special architectural or historic interest – “the character and appearance of which it is desirable to preserve and enhance”. It explains that one such area is the town centre of Wandsworth.

**5.12** The policies to which we refer are not addressed directly in the Committee Report. Indeed, P42/para2states “-although proposals would impact upon the Listed Buildings and the Conservation Area they should not cause significant harm to either the settings or views of heritage buildings or to the character and appearance of the Wandsworth Town Conservation Area”. It continues – “any harm would be offset by the noticeable heritage benefits the scheme would achieve”. Clearly the Report admits that “harm” will be done to the Conservation Area and would cause some “harm” to the Listed Buildings. These are breaches of National and Council policies. We question too the statement that the scheme will achieve “noticeable heritage benefits”.

## **B. Conservation Area – “sub-areas”**

**5.13** The Council, in seeking to justify parts of the town centre being a suitable location for tall buildings, states, in the Committee Report, that the WTCA can be split into 5 distinctive “sub areas” (pa3/p44CR).

These “sub-areas” are not defined but, with reference to our Map1, they appear to be:

1. the Putney Bridge Road area, including the Queen Adelaide pub and the Oakhill Road Arts and Crafts terrace of houses
2. West Hill and upper Wandsworth High Street to All Saints Church
3. the central area from Dormay Street to the High Street
4. the Spread Eagle to East Hill block
5. East Hill and part of the Tonsleys

**5.14** Strangely, however, the Council sub- divides the central area (3 above) into two, and amalgamates the High Street frontage element with area (2) above, and isolates the remainder of the site as a third sub-area. It reasons that the northern part of the central area “block” of the Conservation Area is of poor townscape quality. As a result, the northern part has the “potential to effect noticeable enhancement” (4/45CR), which will consist of the two tower blocks and a “free standing pavilion block ranging between 9 and 16 storeys at the north end facing Armoury Way”. It is this block which will stand only two pavement widths and a four-lane carriageway (24m) from the Crane PH and 50m from the listed Wentworth House. This building is no pavilion. It will be grossly out of scale with its neighbours except, of course, the towers alongside, which are between 2 and 2.5 times taller.

**5.15** The Council’s reasoning fails, in our view, because the Central Area (3 above) of the Conservation Area is an integral part of the town centre as a low-rise industrial site with Listed Buildings at each end which are directly related to each other by their history and ownership, and to the industrial area beyond in Dormay Street. In massing, height and enclosure, the Central Area is the very essence of the town centre Conservation Area. Its industrial history and, indeed, its townscape reflect the scale of the pre-industrial historic buildings to the west and locally listed buildings and streets surrounding it to the north and east. To complete the list of characteristics, we must add the sky! Above the Central Area, the skyline is broad and high and open.

**5.16** We believe that the Council originally created the Central Area “block” (3 above) as part of the town centre Conservation Area as a foil to Southside which stops abruptly by the High Street. We believe the creation of the Conservation Area was a policy decision to register the

actual scale and industrial townscape of the town centre, the remains of its historic core of buildings and streets.

**5.17** By supporting the huge scale of the development at the north end of the Ram Brewery/Capital site, the Council is turning its back on the *raison d'être* for the Conservation Area for which it is responsible. The sub-division of the WTCA cannot be used to justify part of the town centre being deemed appropriate for massive buildings which will dominate the whole town.

### **C. Impact on Listed Buildings**

**5.18** 43 Listed Buildings are situated in the Wandsworth town centre area, 33 within 250m of the site.. The town centre has grown and changed significantly over the last few decades; however the proposals do not preserve or enhance the environment today. Within the site, there are three listed buildings:-

- i. the Brewery complex in the south-east corner of the site
- ii. the Brewer's House at No70 Wandsworth High Street
- iii. the stable block towards the north of the site.

**5.19** The Council's UDP Policy TBE 13 states that "... Other development will not be permitted if it would harm the setting of a listed building". The setting of the listed buildings in the town centre, and others near by, will be adversely affected and will be neither preserved nor enhanced in the face of the scale of the new development. In particular, Church Row, one of South London's finest terraces of early 18<sup>th</sup> c houses, All Saints Church, Wentworth House, The Grapes, the Town Hall, the Court House and all the locally listed small-scale housing in Barchard Street, and The Crane in Armoury Way will be overwhelmed and dominated by the height of the towers and the blocks.

**5.20** Within the site, the developers have suggested that the setting of the listed stable block will be enhanced. This cannot be so, bounded as it is to the east and west by towers 21 times and 16 times its height. Approached from the south by a narrow, deep canyon between the central blocks, the listed building will be lost amid the surrounding giant buildings. Drawing

No. 0316/05 emphasises this, while Drawing 0301/06 shows how far the other listed brewery buildings on the south-east section of the site will be dominated.

**5.21** We argue in Appendix E that the representations of the development proposals belie the significant impact they will have on the Listed Buildings. The size of the towers alone will ensure that they will be observed from viewpoints looming above the Listed Buildings. From viewpoints from the side, the pair of towers will read as a single mass. For example, from lower East Hill, No 26 to the north and the Town Hall will have their skylines blocked by a 77m wide phalanx of towers some 220m distant. From the north-west, looking over Wentworth House, the skyline will be blocked by a 64m width of the combined towers 75/80m away. At 145.4m and 114.0m tall, these two tower blocks will impose themselves on the settings of the Listed Buildings whether close to or at neighbourly distances away. Their impact will be contrary to policy TBE13 and national policy PPG15.

**5.22** We recognise that the Town Centre approaches, particularly from the south, are dominated by the “ugly, overpowering Arndale Centre” (now Southside), a “mammoth package of covered shopping area, 516 flats” etc, completed in 1974. (Pevsner and Cherry: “The Buildings of England”) It is certainly due to the Arndale’s presence that the Council sought to protect the remainder of the town centre by giving it Conservation Area status. Thus, we have to ask why the Council considers the proposed development acceptable within the parameters they have established already.

## **6.00 CONDITIONS OF ANY PLANNING PERMISSION**

**6.01** The following items shown on the Council's list of potential obligations should be treated, we believe, as conditions attached to any planning permission, rather than being paid for out of the amount the developers could reasonably be expected to set aside to fulfill planning obligations under S106:-

- i. Public rights of way through the site
- ii. The Riverside walk alongside the River Wandle
- iii. Highway improvements required to facilitate the development
- iv. Provision of affordable housing
- v. Community facilities within the Brewery buildings and the preservation of these buildings
- vi. Car park management
- vii. On-site cycle parking
- viii. A children's play area

**6.02** The principal matters that we believe should be treated as planning obligations as part of a Section 106 Agreement and under Section 278 of the Highways Act 1980 are:-

- i. Highway improvements
- ii. Improvements to Wandsworth Town Station
- iii. Provision of a bus interchange, co-ordination of town centre bus stops and provision of enhanced bus routes
- iv. Improvements to the access between the Thames Riverside and the town centre, including provision of a broad bridge link across Armoury Way
- v. River Wandle enhancement works

**6.03** We believe, however, from studying the Council's Report on the Section 106 agreement(Paper No09-758), approved by the Executive on 28 September 2009, that this particular agreement is wholly unsustainable as it proposes that:

- i. payment will be in tranches with the most substantial contribution of £15 million being paid only when 70% of the housing is sold/occupied

- ii. the balance of the payments could take many years if the developers adopt an unrealistic approach to values and marketing
- iii. there is no agreed and approved time for the road improvements
- iv. there has been no public consultation in respect of road improvements
- v. land acquisition will almost certainly require compulsory acquisition which, in turn, will delay any work
- vi. costs for such a scheme are estimated at £38million but there is uncertainty that the work could be carried out within this budget
- vii. TfL, who will be the implementing body, have specified that they have no funds to contribute. Without obtaining a bond, which cannot be supplied, or negotiating with a developer of significant substance, the Council cannot, and should not, take the risk of all the money not being available.

### **Planning Obligations**

**6.04** The Secretary of State’s policy, as set out at paragraph B5 in the ODPM Circular 05/2005, requires that planning obligations must meet all of a number of tests. The Circular states, in paragraph B6, that it is not legitimate for unacceptable development to be permitted “because of benefits or inducements.....which are not necessary to make the development acceptable in planning terms”.

**6.05** Paragraph B9 states that planning obligations “should not be used to secure contributions to the achievement of wider planning objectives that are not necessary to allow consent to be given...”.

**6.06** The public was quite unaware of the deal being struck between the developers and the Council with regard to the tranches of money being provided to fund significant road improvements, until the publication of the Council’s Planning Committee Report. Out of a total of £40.916 million under the Section 106 Agreement, £38 million is to fund the gyratory works. There may be contrary views as to how the total should be spent. Perhaps a higher level of affordable housing would be preferred, closer to that specified in the LDF, rather than the majority of the money being sacrificed to road improvement projects.

**6.07** We believe that there has been no comparable financial arrangement made in connection with other major developments in the Borough close to the town centre for monies to be set aside for this major road improvement (see Appendix C). However, in March 2008, the Council decided that development contributions towards the improvement of the local traffic infrastructure should be negotiated.(Paper No 08-205)

**6.08** It could be inferred that there is a close relationship between planning permission being granted for this scale of development and the availability of £38 million towards road improvements, and there is a obvious disparity between the Ram Brewery development and the other central Wandsworth developments listed in Appendix C. Yet, the necessity for road improvements affects all the sites to some degree, and has been the subject of the Council's concerns over the last decade or more.

**6.09** We believe that a strong incentive in the acceptance by the Council of such an intense development of the Brewery site must have been the opportunity to fund the road improvements. The development could be seen, as the scheme progressed through its consultation stages, as a means for the developer to enable the road improvements to be carried out and thus to dilute opposition to such a vast scheme. This could be seen as an inducement, within the terms of the Secretary of State's policy.

**6.10** The raising of funds through S106 Obligations for resolving "historic infrastructure problems" also breaches the Secretary of State's policy. The Ram Brewery project itself does not require the trunk road infrastructure to be re-engineered stretching from West Hill to Smugglers Way. The Wandsworth Society took legal advice from a leading Planning Chambers about this. (Ref:AD)

**6.11** A further doubt about the validity of the 106 Agreement is whether it can be implemented legally by a third party (i.e. TfL) as no line for the new 2-way road has been identified nor final costs agreed, leaving an open-ended commitment with a possibly unbridgeable gap between monies set aside for the road improvements and their actual cost. If the scheme proves more

expensive than £38 million, the shortfall will have to be found from sources elsewhere. and this certainly cannot be guaranteed at this stage.

**6.12** We cannot be certain, either, that it will be feasible for a new 4-lane, 2-way carriageway to be designed within the constraints of the projected route through Wandsworth, taking into account such issues as cross-circulation of local and trunk roads, bus route provision etc.

**6.13** Whilst the Wandsworth Society has been promoting the restoration of the High Street to two-way traffic, partial pedestrianisation and the re-routing of through traffic around the town centre for over 23 years, we do not accept that a development on the unacceptable scale of the Ram Brewery proposal should be the price to pay to achieve our ambition.

**6.14** In our view, it is quite wrong to load the whole cost of improvements to the traffic infrastructure on to a single scheme, at the expense of other benefits to the community such as affordable housing. Provision should have been made well before March 2008 for developments in the neighbourhood to bear their fair share of the costs of necessary future road improvements.

## **7.00 OTHER RELEVANT CONSIDERATIONS**

**7.01** We have a 3 other material planning concerns which fallk within the scope of sub-para 6(h) of the Assisting Inspector’s note. These are:-

### **Linking the town centre and the River Thames**

**7.02** In our 2006 paper we advocated that the area to the north of Armoury Way, through to the bank of the Thames, should be opened up by providing a wide bridge link over Armoury Way. Paragraph 4.10 of the LDF Core Strategy states that “ the closure of the Brewery provides the opportunity to complete the riverside link and improve accessibility between the riverside and the town centre” Yet the submitted plans only show a narrow and inadequate “potential bridge link” between Block D and the leisure club.

**7.03** We proposed a “ new attractive, non vehicular thoroughfare to run... over Armoury Way by means of a generous bridge or a wider ramped deck...”.We believe that this is what the developers should be asked to provide by creating a broad link across Armoury Way, rather than merely promising to provide space for a very minor link in the future.

**7.04** The key to giving access to the Thames Riverside from the High Street is the Ram Brewery site. It is in direct alignment with Southside, follows the Wandle and faces, on the opposite side of Armoury Way, land upon which the continuation of a bridge could be planned and built when this site is developed. However, at no stage has the applicant, the Council’s officers or Councillors (Ref: AD) been prepared to consider the Brewery site strategically as part of the town centre. They see a stand-alone development site, disregarding the site’s broader town centre context, and ignoring the opportunity to improve the environment of the centre of Wandsworth as a whole.

**7.05** At consultation, the Applicants showed 2 pedestrian crossings across Armoury Way which we considered sub-standard and showed a lack of long-term consideration for pedestrians and cyclists. Under pressure, the Applicants made room for a ‘future footbridge’

but access to it by stairs would rule out prams and cyclists or, if ramped conventionally, would be of impractical height and length and too large to fit within the development as planned.

**7.06** In the context of the scale of the development a narrow, awkward-to-use footbridge is inappropriate and an opportunity lost. The Brewery site is about 210 metres long; to rise to 7 metres above Armoury Way to clear traffic would see a gentle incline through the site of 1:30 gradient. It would be barely discernible.

**7.07** The lack of a suitable means of crossing Armoury Way is unacceptable in view of the Council's requirement to create town centre links to the Thames Riverside developments. There is no satisfactory means for pedestrians (for families, people with prams and anyone walking to the riverside) or for cyclists is to cross the busiest road in the Borough carrying in the region of 30,000 vehicles daily.

**7.08** A bridge link using the development as a thoroughfare, and as a natural route to and from the town centre to the Thames, landscaped and policed by street-side housing, retail, industry etc could become a thriving future artery. We believe that for any future scheme to be acceptable, it must accommodate a bridge link as an integral feature of the development.

#### **The Council's strategy on Employment land.**

**7.09** As part of the reallocation of land uses, where employment use is extinguished, a suitable alternative site should be found. This has not been adhered to throughout the Borough as many industrial sites have been surrendered to more intensive and financially valuable land uses. The new riverside residential developments, where no alternative employment land has been provided, are an example of this.

**7.10** We have serious concerns over the amount of employment space lost as a result of the whole of the application site being taken out of the Borough's IEA provision. Firstly, there is no provision on the application site (or at Cockpen House) for the replacement of industrial, workshop or warehouse space (except for the micro-brewery) and we are doubtful whether alternative land can be found elsewhere to meet the Council's obligation to replace lost floor

space. Secondly, there is a danger that where traditional employment is lost, it will be replaced by higher value space, out of the financial reach of local businesses, as is likely to happen at the Business Village in Broomhill Road..

**7.11** With reference to the draft ‘Core Strategy Plan’, we find that in a borough of 281,800, the number of designated “strategic industrial locations” totals 3 – 1 in Summerstown and 2 railway enveloped sites in Battersea. There are 6 “locally significant industrial areas” – 2 in the Wandle delta, 3 in Southfields and 1 by Earlsfield station. These are all small sites with limited numbers of industrial premises.

**7.12** The Council has re-designated these 6 remaining industrial areas of employment, including the Ram Brewery site, to mixed use or housing. The Ram Brewery site alone represents some 20% of the industrial employment land in Central Wandsworth.

**7.13** The huge increase in housing in this area of Wandsworth is creating a related increasing need for small industrial units to service the new homes (e.g. car repairers, plumbers, electricians) but the construction of the flats is removing the ability of these small tradesmen to operate within a reasonable distance of their workshops. Consequently they are having to move rapidly to the outer suburbs.

**7.14** In addition, we were informed by the Council Leader, as you will see with reference to Map 1 of our paper “Wandsworth: Planning for a Successful Town Centre”, that both the Homebase and B & Q sites could be developed for housing in the future. The Osiers Road/Enterprise Way industrial site is likely be redeveloped shortly and, in turn, the above two sites are likely to come on-stream; the need, therefore, to redevelop the Ram Brewery site with very high density housing is open to question. Indeed, with Wandsworth comfortably exceeding its current housing targets, the need to lose 90% of the remaining employment site appears unnecessary.

**The cumulative effect of the proposals**

**7.15** We have expressed concern, when submitting our observations on major schemes around the centre of Wandsworth, that while the individual impact of the schemes on the local infrastructure may be small, their cumulative effect can be substantial.

**7.16** Looking at road traffic, the developers calculate in their Environmental Statement (Table 11.15) that the average increase in the town centre traffic-flows due to this development would be 2.14 to 2.56%, with higher projections in Ram Street and Wandsworth Plain. The Town centre at peak times already suffers from severe congestion and it is doubtful that the TfL proposals now in the pipeline will relieve congestion overall, even if they greatly improve the High Street.

**7.17** If all the committed schemes are taken into account, the developers calculate a week-day peak increase of 9-10% in traffic flow - a potentially disastrous outcome! The Metropolitan Police felt they could not support the development on the grounds of:

- i. increased traffic in the one-way system which was already under capacity and would lead to a rise in response times for the emergency services
- ii. the strain on public transport system already working at well over capacity.

(See Appendix D: Letter from the Police.)

**7.18** The Applicants, in their conclusions in Chapter 11 of their Environmental Statement, accept that part of this increase will have to be absorbed by public transport. The problem here is that station capacity at Wandsworth Town is already over-stretched, improvements to the Station would be costly and difficult and an increase in rail traffic is probably impossible to achieve. The same concerns apply to East Putney District Line service.

**7.19** Aside from public and private transport, we are also aware that the continuing increase in population in this part of Wandsworth is putting excessive demand on sewerage, water supply, refuse collection and medical services. At least part of this cumulative effect has been caused by allowing schemes of ever increasing height, density and population to be built on sites such

as Battersea Reach, Riverside Quarter and, in the Town Centre, in Hardwick's Way and the Business Village.

**7.20** In our view, the Council must do everything it can to limit over-development of major sites such as the Ram Brewery. We believe a limitation on the height of the towers, the scale of the slab blocks and the overall density of development is essential to avoid unacceptable pressure on transport and services.

## **8.00 Cockpen House, Buckhold Road**

### **Allocation under existing approved UDP**

**8.01** We have dealt above with the allocation of affordable housing within the combined Ram Brewery and Cockpen House sites and the loss of employment uses resulting from the redevelopment of both sites. In this section, we deal with our other objections to the proposed scheme for the Cockpen House site.

**8.02** The site falls within the Business Village Industrial Employment Area, shown on the Core Strategy Proposals Map of July 2008 as a “mixed use former Employment Area”. We refer in our Section 8 above to the loss of such sites and their replacement. The development proposals do not show any space allocated on the site for replacement industrial workshops or storage, nor are we aware of any provision to replace this loss elsewhere in Wandsworth.

**8.03** Bearing in mind the setting of the site opposite King George’s Park and on the relatively quiet Buckhold Road, we consider this a more appropriate site for housing than much of the Ram Brewery site which is bounded by heavily trafficked roads, and which, in part, may be better suited for new industrial or employment use.

**8.04** Without precise details of the sizes of the flats we estimate that on this \_ hectare site the planning density is above 1200 habitable rooms to the hectare. Such a density is far too high. The consequence of this is a closely-packed set of tall buildings rising from 5 to 16 storeys.

**8.05** Should the density be reduced by a half in order to relax and reduce the scale of the development to about 110 flats, these could largely be retained as affordable homes bearing in mind that this site is being used by the applicant to balance the affordable housing numbers lacking on the Ram Brewery site.

**8.06** A block of 16 storeys is too high and unjustified for this small site. The neighbouring 10 storey block now being built in Hardwick’s Way clearly demonstrates that this is too high in relation to the town centre and the Conservation Area. Already the new building offers a dark,

northern cliff-like face as a backdrop to the centre which is grim and quite un-neighbourly in context. This effect was warned about in the Borough Planner's report to the Council at that which was ignored.

**8.07** Consequently a large, tall slab block of 16 storeys to the immediate south of the Hardwick's Way new-build development will have a profound impact on the Conservation Area less than 40m away to the north. It will stand sentinel, dark and high above the new development, and above the town centre and current developments in nearby Hardwick's Way.

**8.08** We consider the height of the 16 storey block should be reduced to a maximum of 8 storeys and the adjacent 'U' block reduced accordingly, to say, 4 and 6 storeys maximum. This would permit sunlight to percolate into Hardwick's Way and improve its ambience, reducing its impact on the skyline above the trees of King George's Park.

#### **Cumulative Effect and impact upon the town centre Conservation Area**

**8.09** We believe that the cumulative effect of the recent spate of developments immediately behind the south side of the High Street, both adjoining and sometimes within the Conservation Area, has not been taken into account in the past to the detriment of the area. The significant and in our view damaging changes to the town centre as a result of these developments, some of which are still being constructed, is quite profound and deeply disturbing. The UDP (para 75), stresses the importance, under PPG15, of dealing sensitively with proposals on land adjoining Conservation Areas. To give consent for the Cockpen House development would be to ignore this guidance.

**8.10** Viewed from the East by the Ram Brewery traffic lights, as a backdrop behind these developments will stand the towering 16 storey block of the approved Business Village to be built on rising ground and thus raising its height by several storeys in relation to Buckhold Road.

**8.11** To permit a further 16 storey block on Buckhold Road would add to the cumulative effect of a ring of tall buildings around the town centre. It would have a most harmful effect. Indeed, the Council states in (3/55CR) that the tower, in terms of scale, will affect the setting of the Metropolitan Open Land and Conservation Area.

**8.12** A photograph (Ref; AD) taken looking south down Church Row illustrates the extraordinarily harmful impact of the dark northern face of the new 10 storey block on Buckhold Road. The 16 storey block would stand to the right and above the new scheme to the further detriment to the Town Centre, the Conservation Area and the fine listed buildings in Church Row whose roofline setting has already been damaged.

**8.13** The full impact of the Cockpen House proposal from all viewpoints in the town centre, and from a distance must be assessed in deciding whether the current scale and massing is appropriate.

**8.14** We believe the current proposal is unacceptable on the above discussed criteria and contrary to Council policies TBE10 and the guidance in PPG15. These policies are exact, very clear and easy to understand; they demand respect for the characteristics of Conservation Areas.

## **Design**

**8.15** The buildings are very densely packed on the site. In the recent past, a site of this size, bounded by existing buildings on a northern boundary of 8m and on an eastern boundary by between 9 and 12m, would have been developed respectfully to a modest neighbourly height and density – namely, low-rise, medium density, possibly terraced housing or maisonettes/flats grouped around a private space.

**8.16** These proposals, however, as at the Ram Brewery site, seek a mix of both high and low rise, high density building.

**8.17** The Council's UDP policy TBE4 states that "new development will not be permitted.....[if it creates] an excessive degree of enclosure". These proposals are generally built within 5m of their southern, western and northern boundaries and on the boundary to the east side of the site. This encloses the residential buildings to the east in particular, and this effect will be exaggerated by the overshadowing of the neighbouring accommodation for much of the day. The outlook of the adjoining flats staring into the face of the proposed development will be overwhelming and, at 8 and 6 storeys high. the blocks will exclude daylight and sunlight and a glimpse even of the sky.

**8.18** The Committee Report states (2/57CR) that the closeness of the proposed development to the new 2-6 Hardwick's Way development, across a road 9 m away "was inevitable when the development to the NE of Hardwick's Way was approved. None of the units in 2-6 Hardwick's Way have yet been occupied, so anyone moving into 2-6 Hardwick's Way should be aware of the [proposed] development before they buy or move in."

**8.19** Reverting to TBE4 again, "an excessive degree of enclosure" can be seen in the scale of the courtyard flanked by 3 blocks and stopped by a 16 storey tower to the west. For many residents in the 3 north facing flats and at low level elsewhere, the feeling of enclosure, severely reduced outlook, sight of skyline, direct daylight and sunlight will be pronounced. The alarming consequences of this tight form of enclosure can be seen in the envelope of buildings around Hardwick's Square.

**8.20** Furthermore, the proposed amenity space, both private and communal, is about 6sqm per dwelling. The Council's policy is for 20 sqm per dwelling. The Committee Report (5/57CR) considers this not to be unreasonable, but, at only 30% of required amenity space, this is an unacceptably low level of provision.

**8.21** Thus, as with the Ram Brewery development proposals, the Cockpen House development, at this basic design standard of distance between neighbouring properties, and

lack of amenity space, is in breach of Council policy. Again, the design is over density at the expense of adjoining residents. A low-rise, medium density scheme would have been a suitable neighbour to the new flats to the north and east of the Cockpen House site.

## **9.00 SUMMARY AND CONCLUSIONS**

There are many aspects of the proposals for both the Ram Brewery site and the Cockpen House site to which we strongly object.

In the order in which they are dealt with in the above proof of evidence, they can be summarised as follows:-

1. The height of the proposed towers is out of all proportion to any existing buildings built or approved in South-West London.
2. The towers are out of scale with the centre of Wandsworth and will dominate and overwhelm the centre of the town.
3. The layout of the scheme fails to compensate for the height of the towers, and is far too dense and is lacking in human scale.
4. The massing and density of the scheme should be greatly reduced.
5. The provision of open space and landscaping is unimaginative and inadequate.
6. The visual appearance of the scheme is overbearing and detrimental to the surrounding neighbourhood.
7. The retail content of the scheme will not satisfy local needs nor those of retailers.
8. The car parking provision is inadequate to support a retail scheme of this size.

9. There is insufficient affordable housing provided across the two schemes, which fall short of the provision demanded in the draft LDF and the London Plan.
10. The residential content provided is not of the size or type required to satisfy local housing needs.
11. There are many failings in the design of the housing on both the Ram Brewery and Cockpen House sites and many flats fall short of Council or Government standards.
12. The road system is inadequate to cope with another development of this scale in Wandsworth .
13. Public transport in the town centre is overcrowded and inadequate.
14. The proposals are harmful to the character and appearance of the Conservation Area, and fail to respect the grain of the area.
15. The massive scale of the scheme totally destroys the setting of the many listed buildings in the centre of Wandsworth, both within and outside the site.
16. The applicants cannot guarantee to meet the funding required under the S106 agreement and funds are no known to be available from elsewhere.
17. The S106 agreement places the responsibility of funding the proposed gyratory system on this development alone, which has led to over – intensive development and the loss of other possible public benefits.
18. The scheme fails to provide a suitable bridge link across Armoury Way between the town centre and the riverside area.

19. The heavy loss of employment land on the Ram Brewery and Cockpen House sites is not being replaced by affordable employment accommodation elsewhere in the area.
  
20. The cumulative effect of these two schemes places unacceptable pressure on local transport and services.

The proposals on both the Ram Brewery and the Cockpen House sites are, in our view, unacceptable for the many reasons set out above. We ask the Secretary of State to direct that planning permission for both is refused.

## **APPENDIX A - “Wandsworth: Planning for a Successful Town Centre”**

**1.00** Along with neighbouring Amenity Societies, the Wandsworth Society has been asking the Council to prepare plans for the borough’s town centres at Putney, Wandsworth and Clapham Junction. Whilst in broad strategic terms the Council will address specific sites within the town centres, it will not address each town centre specifically in long term planning detail.

**1.01** In 2006 – three years ago – the Wandsworth Society published its report “Wandsworth: Planning for a Successful Town Centre”.

**1.02** In our report, the Wandsworth Society tackles the changing face of the town centre, identifying all the current development sites and also known prospective developments. The difference between our Report and the Council’s approach to the town centre is that we are looking to the future, trying to link up the disparate parts of the town and gauge its character and setting and the appropriate scale and massing of new developments with respect to the historic buildings and the Conservation Area, whereas the Council in its submitted Core Strategy is merely suggesting what might not be suitable.

**1.03** In the Report, we have described:

- i. the co-ordination required in planning ahead for the town centre (P1/Intro)
- ii. Introduction - why an overview is necessary (P1/A)
- iii. the unique potential of the town centre, its history and scale (P1-2)
- iv. development potential (P2-3)
- v. our concerns about current planning approach (P3-4)
- vi. the need for a strategy (P4/C) addressing impact, cumulative effect, principal gain
- vii. a strategy (P6 onwards) addressing the Wandle and Thames sites, the railway station, roads, Listed Buildings and Conservation Areas, new bus routes serving the Riverside sites and town centre
- viii. conclusions and recommendations

**1.04** We believe the Wandsworth Society’s Report is a wholly positive, creative and forward looking approach to the future of the town centre, where development potential with direct

links to the Riverside housing is recognised, but the whole viewed with an appreciation of the historic core with its many Listed Buildings - 43 – the largest concentration within the Borough.

**1.05** The Report states that what is required when future development sites come forward piecemeal is to draw the disparate parts of the town centre together and to make residents and visitors alike able to walk traffic-free from the Thames riverside to the town . We intended to show an understanding of the town and its potential to be the historic centre of the Borough developed in an appropriate scale suitable to its setting.

**APPENDIX B – Tall Buildings**

**Ref: AD Letter 3 September 2009**

## APPENDIX C - S106 Contributions from Other Schemes

**1.00** The table below details five relatively recent, large Wandsworth town developments, including Battersea Reach to the east of Wandsworth Bridge which is similar in size to the Ram Brewery development and so far has planning permission for 658 homes.

**1.02** None of these schemes has contributed any money towards a kitty for funding the gyratory road improvement.

**1.03** The table shows the actual contributions made by each scheme and sets the numbers of dwellings planned as a proportion of the Ram Brewery development and its proposed contribution.

Site	Homes	Contribution	Proportion of scheme in relation to development: 1036	Pro-rata contribution to developments: £40.916 million
Battersea Reach	to date 650	£350,000 (+ bonds of unknown value)	63%	£25.7 million
3 <sup>rd</sup> phase Riverside Quarter	186	£1,850,000	18%	£7.47 million
Hardwick's Way	138	£238,400	13%	£5.4 million
Riverside West	-	no value given; list would suggest small contribution only		
Bridges Wharf	252	£521,000	24%	£9.8 million
Business Village	212	£500,000	20.4%	£8.3 million

**1.04** Whilst we do not have all the data required for the table to be considered scientific and the retail and ancillary elements are excluded, the schemes are similar in their content. Judged alone on their sizes in respect of housing in proportion to the Ram Brewery sites development, it is clear that on a pro-rata basis they have not contributed monies at the rate asked for at the Ram Brewery. Had they been, a kitty for the gyratory improvements could have been growing and the amount called for from the Ram Brewery developer would be considerably less, i.e. no more than would be required to fund the difference between the value of the road works and the kitty.

**APPENDIX D – Letter of objection from the Metropolitan Police**

## Appendix E– PLANS AND PHOTOGRAPHS

### 1.00 Presentation of Plans and Photographs

#### A Plans

**1.01** Wandsworth Council’s technical planning requirements state that drawings are to be presented at the following scales:

- 1:1250 statutory location plan
- 1:100/200 block plan of site
- 1:50/100 elevations
- 1:50/100 plans, including roof plans
- 1:50/100 sections and site levels

All drawings should include a scale bar 0-10metres.

**1.02** The Applicant has presented his drawings as follows:

#### Brewery and Capital sites

- block plan of site and floor plans - 1:500
- elevation and sections – 1:250
- amended elevations – 1:170

#### Cockpen House

- floor plan of site – 1:250
- elevations and sections – 1:250

**1.03** We would comment that:

- i. drawings at these scales are irregular. In our experience, 100% of all planning submissions meet the Council’s and National policy preferred scales
- ii. the amended A1 elevations at 1:170 scale are most irregular and cannot be used to determine any size or height drawn.
- iii. the plans at 1:500 are 1/5<sup>th</sup> normal size and give the project a “bijou” feel. Some fine lines are very difficult to register.
- iv. the elevations at 1:250 scale are misleading. To a layman, they portray sympathetically proportioned buildings of a “normal” scale, but, of course, these

are drawings two and a half times smaller than normally presented to a Committee or the public.

- v. had the drawings presented to the Committee actually been produced at the correct size – 1:100 – they would have conveyed the staggering scale of the development.
- vi. on some elevations – e.g. 317 – the towers are not shown in outline or solid; on others – e.g. 315 - one tower is shown solid, the other behind it in outline whilst on 316, both towers are in outline. On all drawings, the outlines are very faint indeed. Where the towers, or other blocks, are shown in outline, the impact of the scheme as a whole is lost and the lower blocks, at 1:250 scale, look misleadingly like 1:100 scale.(Ref. iv above)

**1.05** We find, overall, that the drawings are misleading to lay people, and contrary to national Policy Guidelines.

## **B Photographs**

**1.06** The Applicants submitted 46 views or “Accurately Verified Images” with their application. We are contesting the methodology of these views, and will call an expert witness to do so.

**1.07** Our principal objections to these views are:

- i. they are all taken at a wide angle focal length and thus push back the image to make it appear more distant and remote
- ii. at standard 50mm focal length, the closest to the way the eye sees, the impact of the Applicant’s images multiplies in effect
- iii. on 4 of the most damaging photomontages to the Applicants’ proposals, faint outlines are substituted for the solidity and modelling of the buildings, leaving the background constant through three representations - current, project proposals and cumulative effect. These are:
  - view 31 ref 9.137 to 9.141 from Dormay Street

- view 35 ref 9.104 to 9.106 fro Buckhold Road
- view 9 ref 9.39 to 9.43, the Tonsleys.

**1.08** No views have been submitted by the applicant of the impact on some important local Listed Buildings – the Town Hall, properties on East Hill or The Grapes Public House in Fairfield Street.

**1.09** Views from the west looking east are remote ones which, with wide angle format, make the town centre a very distant feature – views 17, 18, 20 – until All Saints Church - view 19 – where a very wide angle photograph creates a distant perspective of what is actually the close, neighbouring Church Row Terrace, with the proposed development appearing even more distant and low-key behind, The opposite will be the real effect.

**1.10** Overall the applicant’s photographs play down the impact of the development markedly. This would mislead lay people and Councillors about the true effect the buildings would have on the wider town centre and beyond if they were built.

### **Additional representations**

**1.11** We have had produced by a specialist in this field several additional photomontages which illustrate the profound effect the development will have on the town centre. They are all based upon 50mm focal length photographs so that the genuine impact of the proposed development can be gauged.

**1.12** These consist of views from Armoury Way – 3no – Garratt Lane, Southside, Wandsworth High Street/Putney Bridge Road junction, Fairfield Street, the Tonsleys and from Wandsworth Plain of the Ram Brewery/Capital sites, plus a view from the River Wandle bridge on the High Street of the Cockpen House development.

**1.13** It is clear from all these photomontages that, in reality, the proposed development will profoundly change the scale of the town centre, the setting of the Listed Buildings and the

character of the Conservation Area as a whole. Of equal importance, it will cause the loss of the broad open sky which gives the town centre its particular quality of openness.

Application No 2007/2999 - August 2007

Site Business Village

Total financial commitment £500,000

Section 106 Agreement main requirements

Highway

Transport

CCTV

Signalisation of improvements Buckhold Road/Neville Gill Close

Improvements to Wandsworth Town Station £100,000 (within £500,000)

Payment of £100 per new residential unit for car club/bicycle purchase/Oyster card

Public routes through adjoining schemes

CCTV £50,000 (within the £500,000)

Street lighting

Nursery/crèche

25% affordable housing – 9 social rented; 44 intermediate/home buy

Legal fees capped at £6,000