

The former Ram Brewery site, Wandsworth

in the London Borough of Wandsworth

planning application no.2008/0955

Strategic planning application stage 1 referral (old powers)

Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999; Town & Country Planning (Mayor of London) Order 2000

The proposal

Demolition of some buildings, the alteration and change of use of retained listed buildings, and the erection of eight new buildings, including 32 and 42-storey tower blocks, as part of a residential-led mixed-use development to provide: 831 residential (including 207 affordable) units; 12,204 sq.m. of retail shops, restaurants and drinking establishments; 2,226 sq.m. of office accommodation; 2,673 sq.m. of community/leisure space; 473 sq.m. of showroom space and 909 sq.m. for a new micro-brewery/Young's Heritage Centre; together with the creation of new vehicular and pedestrian access points; 10,197 sq.m. of public open space, including a riverside walk ; an energy centre; 415 residential and 77 public/commercial car parking spaces, 1,108 cycle spaces, service areas and associated landscaping.

The applicant

The applicant is **Minerva (Wandsworth) Ltd** and the architects are **EPR Architects Ltd**

Strategic issues

The key issues to consider are: the loss of industrial land and the principle of a **mixed-use redevelopment** for the **regeneration** of Wandsworth town centre. The scheme proposes **retail, housing, alternative employment, and public realm** improvements; which in turn raise **urban design, and architectural quality** issues, particularly the design of **tall buildings** in this town centre location; **parking/transportation; access and equalities; climate change and energy** provisions, **Blue Ribbon Network, biodiversity, air quality** and **noise** considerations.

Recommendation

That Wandsworth Council be advised that, in principle, the proposed mix of uses on site are acceptable from a strategic planning perspective, but concern remains over the acceptability and design of the tall buildings proposed within the scheme and the delivery of a satisfactory resolution to the traffic flow problems on the Wandsworth gyratory. Additional work or information is required in relation to energy, access, children's playspace and air quality; and the recommendations of Transport for London and the London Development Agency, as indicated in the body of this report.

Context

1 On 1 April 2008, Wandsworth Council consulted the Mayor of London on a proposal to develop the above site for the above uses. Under the provisions of the Town & Country Planning (Mayor of London) Order 2000, the Mayor has the same opportunity as other statutory consultees to comment on the proposal. This report sets out information for the Mayor's use in deciding what comments to make.

2 The application is referable under Categories 1A, 1B, 1C, and 3E of the Schedule to the Order 2000:

1A: *"Development which- (a) comprises or includes the provision of more than 500 houses, flats, or houses and flats."*

1B: *"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-(c) outside 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 in respect of which one or more of the following conditions is met - (c) the building is more than 30 metres high and outside the City of London."*

3E: *"Development which does not accord with one or more provisions of the development plan in force in the area in which the application site is situated and -(a) comprises or includes the provision of more than 2,500 square metres of floorspace for a use falling within any of the following Classes in the Use Classes Order -*

(i) Class A1 (retail)

(ii) Class A2 (financial and professional)

(iii) Class A3 (food and drink)

(x) Class D2 (assembly and leisure)

3 If Wandsworth Council subsequently resolves to grant planning permission, it must first allow the Mayor an opportunity to decide whether to direct the Council to refuse permission.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 has been taken into account in the consideration of this case.

5 The Mayor's comments on this case will be available on the GLA website www.london.gov.uk.

Site description

6 The 3.66-hectare application site is in one of the oldest and most historic parts of the borough. It straddles the River Wandle and is situated on the northern edge of Wandsworth town centre. It is bounded to the south by the heavily trafficked Wandsworth High Street, to the west by Wandsworth Plain, to the north by Armoury Way, and to the east by Ram Street. The perimeter of the site is either walled or fenced.

7 The site comprises the former premises of Young's Brewery (Britain's oldest subsisting brewery) to the east of the river; and the premises of Capital Studios (a film and television production firm) and Duval Works (a light industrial brick building), both to the west of the river.

8 The brewery site contains the Grade 2* listed Portcullis House and Brewhouse, and the Grade 2 listed Brewery House and old Stable Blocks. The latter were used to accommodate the horses and carts employed in the beer distribution process. The area features several other large industrial buildings, to which servicing access is derived from Ram Street on the east and the High Street on the south.

9 There are no listed buildings on the studio or Duval Works sites, which contain a series of two and three-storey brick buildings and a hard-surfaced car park to the north of the former; access to which is obtained from Wandsworth Plain.

10 In terms of their wider surrounding, the Southside Centre (previously the Arndale Centre) is situated to the immediate south and remains the principal shopping precinct within the town centre, which also provides an active retail frontage with upper residential and commercial uses on Wandsworth High Street. The immediate north is characterised by industrial-type uses, including a gas holding site, vehicle repair centre, a council depot and waste transfer station; and further north, towards the River Thames, by high-density residential developments such as Riverside West and Battersea Reach. The east and west of the site are typified by a mix of residential and commercial uses; including local landmarks like the All Saints Church and King's Arms Public House.

11 The A3 Wandsworth High Street/West Hill and the A217 Ram Street, Armoury Way and Wandsworth Plain are all part of the Transport for London Road Network). The site has a public transport accessibility level of 5, on a scale of 1 to 6, where 6 is excellent. Wandsworth town centre and the site are well served by 11 bus routes during the day and 3 night bus routes. Wandsworth Town National Rail Station is within 500m of the site, providing links to Central London. East Putney Underground Station is less than 1km away and is served by the District Line.

Details of the proposal

12 The application proposes a comprehensive redevelopment of this centrally located but relatively inaccessible site in the heart of Wandsworth. The scheme would entail demolition of non-listed buildings, the alteration and change of use of the retained listed buildings, and the erection of eight new buildings, including two (32 and 42-storey) tower blocks, as part of a residential-led mixed-use development to provide:

- 831 residential (including 207 affordable) units;
- 12,204 sq.m. of retail shops, restaurants and drinking establishments
- 2,226 sq.m. of office accommodation
- 2,673 sq.m. of community/leisure space
- 473 sq.m. of showroom space and
- 909 sq.m. for a new micro-brewery/Young's Heritage Centre
- 10,197 sq.m. of public open space, including a riverside walk
- The formation of new vehicular and pedestrian access points
- 415 residential and 77 public/commercial car parking spaces
- 1,108 cycle spaces
- Service areas and associated landscaping
- An energy centre.

13 The two-storey listed stables in the north, and the predominantly three-storey listed brewery complex in the south-eastern corner of the site, would be retained and converted to provide a range of retail shops, restaurants, drinking bars and a nursery/community space. The courtyard areas in front of the stable block and brewery complex would be transformed into new urban spaces linked to each other by a north-south pedestrian route through the application site. The brewery complex would also contain the proposed Young's Heritage Centre and Micro Brewery.

14 The two residential towers would also be sited in the north of the site, on either side of the listed stable block. The shorter western tower (comprising two basement, ground, plus 29 upper floors) would be situated adjacent to the River Wandle, and the taller eastern tower (comprising two basements, ground and 39 storeys above) between the stable block and Ram Street.

15 The other new buildings would consist of a series of separate blocks of varying height, identified in the submitted material as Blocks A to G, as described in the following summaries.

Block A:

16 Block A would be sited in the south-western corner of the site. It would be six storeys high on the north, dropping to four in the south. The block would provide a retail use on the ground floor with access from the central pedestrian lane running north-south through the site; and 15 units of residential accommodation on the upper floors, accessed from the north, all for sale on the open market.

Block B:

17 This elongated block would be sited to the west of the site, closest to the River Wandle, from which it would be separated by an 8 metre-wide strip. It would comprise two interlinked elements- a seven-storey building on the west, adjacent to the river; and a higher, but parallel, nine-storey building on the east, adjacent to the central walkway. The ground floor would be occupied entirely by retail uses, whilst the upper floors would provide 180 residential apartments for open market sale. An area of private amenity space would be created at first floor level, between the two elements of the block, which would be accessed from the north, south and west.

Block C:

18 Block C would be situated on the eastern side of the site, between the central walkway and Ram Street. Like Block B, it also comprises two sections: a nine-storey western element of similar height and massing to the eastern section of Block B, on the opposite side of the pedestrian lane; and a five-storey eastern section that reflects the reduced height of the listed brewery to the south and existing residential properties across Ram Street. The western element (Block C1) would provide ground floor retail use, 1,274sq.m. of office space on the first floor, and 85 shared ownership apartments on the remaining floors. The eastern element (Block C2) would contain 18 residential apartments, including four-bedroom family units. A landscaped amenity area would also be created at first floor level, in the space between the two elements.

Block D:

19 Block D is a three-storey, predominantly glazed, health and leisure facility, with landscaped roof terrace, to be sited in the area between the northern elevation of the listed stable blocks and the busy Armoury Way. The building is designed to ensure that the listed stables remain the focus of views from the south.

Blocks E and F:

20 These interlinked blocks would be situated in the southern portion of the former Capital Studios site, on the western side of the River Wandle. Its ground floors would provide some riverside retail and restaurant uses, with the remainder all allocated to business uses (class B1). Block E would abut Wandsworth Plain to the west, rising to five storeys. Its upper floors would offer 16 social-rented apartments, including three four-bedroom family units, and 22 shared ownership apartments. Block F would be closer to the River Wandle and its upper floors would provide 56 apartments, of which 12 would be for shared ownership and the remaining 44 for open market sale. Like other blocks, an amenity area would be created at first floor level, in the space between the two blocks.

Block G:

21 Block G would be situated on the northern portion of the old studios site, in the extreme north-eastern corner of the application site, and close to the junction of Wandsworth Plain and Armoury Way. It would comprise three separate cores, the tallest of which would be fifteen storeys high and located in the centre. Its shorter, eastern wing drops to nine storeys adjacent to the River Wandle, whilst its western wing would rise to eleven storeys abutting the junction. The predominantly residential block would offer a mix of 22 market, 36 social rented and 18 shared ownership units, with roof-top gardens to provide amenity space for the residents. A showroom would also be provided to animate the adjoining street corner.

22 Basements are proposed over most of the site, with upper and lower basements beneath the brewery complex and former studios site, to accommodate the ancillary plant, services, and car and cycle parking spaces.

23 It is important to note that this application closely linked (especially in relation to affordable housing provision) and considered in parallel with the Cockpen House application, which relates to the development of a smaller site, also previously owned by Young & Co, and situated on Buckley Road, some 200 metres from the Ram Brewery site.

Case history

24 A brewery existed on the site for approximately 450 years until 2006, when brewing ceased, the site was sold for development and Young & Co relocated its business away from the Wandsworth. Capital Studios obtained planning permission to use its portion of the site in 1962, whilst Duval Works was granted permission in the 1970s.

25 There is no relevant planning history on the site and no strategic planning applications have been made previously.

Strategic planning issues and relevant policies and guidance

26 The relevant issues and corresponding policies are as follows:

- Economic development and regeneration *London Plan; the Mayor's Economic Development Strategy*
- Retail *London Plan; PPS6; PPG13*
- Tourism/leisure *London Plan; Managing the Night Time Economy BPG; Good Practice Guide on Planning for Tourism (DCLG)*
- Employment *London Plan; PPG4; draft PPS4; Industrial Capacity SPG*

- Housing *London Plan; PPS3; Housing SPG; Providing for Children and Young People's Play and Informal Recreation SPG;*
- Affordable housing *London Plan; PPS3; Housing SPG*
- Density *London Plan; PPS3; Housing SPG*
- Mix of uses *London Plan*
- Urban design *London Plan; PPS1*
- Tall buildings/views *London Plan; View Management Framework SPG*
- Historic Environment *London Plan; PPG15*
- Transport *London Plan; the Mayor's Transport Strategy; PPG13; Land for Transport Functions SPG*
- Parking *London Plan; the Mayor's Transport Strategy; PPG13*
- Access *London Plan; PPS1; Accessible London: achieving an inclusive environment SPG; Wheelchair Accessible Housing BPG; Planning and Access for Disabled People: a good practice guide (ODPM)*
- Equal opportunities *London Plan; Planning for Equality and Diversity in Meeting the spatial needs of London's diverse communities SPG; Diversity and Equality in Planning: A good practice guide (ODPM)*
- Sustainable development *London Plan; PPS, PPS Planning and Climate Change Supplement to PPS1; PPS3; PPG13; PPS22; the Mayor's Energy Strategy; Sustainable Design and Construction SPG*
- River Wandle/flooding *London Plan; Mayor's draft Water Strategy; PPS25, RPG3B*
- Biodiversity *London Plan; the Mayor's Biodiversity Strategy; Improving Londoner's Access to Nature: Implementation Report; PPS9*
- Ambient noise *London Plan; the Mayor's Ambient Noise Strategy; PPG24*
- Air quality *London Plan; the Mayor's Air Quality Strategy; The Control of dust and emissions from construction and demolition BPG; PPS23*
- Waste/minerals *London Plan; the Municipal Waste Management Strategy; PPS10*

27 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 Unitary Development Plan 2003 and the London Plan (Consolidated with Alterations since 2004).

28 The following are also relevant material considerations:

- The Wandsworth Core Strategy (Preferred Options) September 2007/draft Site Allocations Development Plan Document

Economic development and regeneration

29 Wandsworth is identified in the London Plan as a 'Major Centre' in the South West London sub-region, but is neither designated as an 'Opportunity Area' or an 'Area of Intensification'.

30 The application site lies within the Wandle Delta of Wandsworth – i.e. the area on either side of the River Wandle, between the town centre to the south and the River Thames to the north. The site was designated as an Industrial Employment Area in the Wandsworth UDP, however, the Council's recent Core Strategy (Preferred Options) document notes that, whilst the retention of an industrial designation might protect employment land, it would exclude the delivery of much-needed residential development and result in a missed opportunity to regenerate the town centre and riverside. Subsequently, it is allocated for a mixed-use development.

31 For many years, the main focus of the area was the monolithic 1960s Arndale shopping mall situated south of Wandsworth High Street, and the adjoining Council housing estate comprising four high-rise blocks. The area suffered serious decline in the 1990s, as the Arndale Centre became increasingly outdated in the face of competition from alternative shopping venues; and the town centre continued to be blighted by an increasingly high volume of through-traffic on the A3 Wandsworth High Road and the South Circular trunk road, which form a one-way orbital system that bisects the town centre, deters pedestrian movement and detracts from the local environment. In turn, the Arndale Estate and its environs became a serious pocket of deprivation.

32 Between 1997 and 2004, Wandsworth benefited from the government's Single Regeneration Budget (SRB) funding on projects within the town centre, with particular focus on the Arndale Estate. The funding enabled considerable improvements to be made to the Arndale Estate and attracted major private sector investment in the shopping centre; culminating in its renaming as the 'Southside Centre'. It also facilitated townscape improvements in the town centre and works to enhance the amenity potential of the River Wandle. Funding was subsequently broadened to include regeneration of the Wandle Delta in general, but the need for further inward investment in the area has remained since the SRB funding ceased.

33 For its part, the London Plan (paragraph 5.134) predicts a significant growth in population in the inner part of the South West London sub-region, including the major town centres like Wandsworth. Those centres would benefit from an appropriate growth in retail consumer demand and deliver the resources needed to increase housing, improve the public realm and facilitate a diversification of uses complemented by good public transport accessibility.

34 The Ram Brewery site occupies a strategically important location within the town, lying to the north of 'Southside Centre', between the High Street and Armoury Way. In particular, the Council's Core Strategy aspiration is that a Ram Brewery redevelopment would enhance the existing heritage buildings; and deliver a high quality public realm, good quality housing, retail uses that complement the retail offer of the Southside Centre, good pedestrian links through the site and increase public access.

35 In principle the development presents significant opportunities to revitalise the town centre and create an attractive focus of activity for the local community. It would also attract further investment in the Southside Centre, which should remain the focal point for shopping activity.

Retail development

36 The development proposes 12,204 sq.m. of retail space, including food and drinking establishments as well as shops. This element of the scheme is subject to central government guidance in PPS6 (Town centres) and the town centre and retail development policies 3D.1 (*Supporting town centres*), 3D.2 (*Town centre development*) and 3D.3 (*Maintaining and improving retail facilities*) of the London Plan. In particular, the London Plan requires borough DPD policies to encourage additional comparison goods capacity in larger town centres and convenience goods capacity in smaller centres; relate the scale of new retail, commercial and leisure development to the size and role of the town centre and its catchment; and encourage appropriate development on sites in town centres in the network.

37 Given the 'edge-of-centre' status of the application site, the proposed retail space is subject to the 'need' and 'sequential' tests advocated in PPS6. Those tests complement the aims London Plan policies that support and encourage the location of retail, leisure and other uses in town centres; whilst discouraging them outside the town centres.

38 In terms of 'need', the relative decline of Wandsworth town centre (described in the preceding section) led to a substantial outflow of retail expenditure, especially on comparison goods, to other centres higher up the shopping hierarchy. In particular, the centre has 20% less

retail floor space than the GLA (Town Centre Analysis) indicative threshold of 50,000 sq.m. for a 'Major Centre'; multiple retailer representation (at 35) is restricted in comparison to the benchmark (60); and trade retention is low within its core catchment zone; and the vacancy rate is above national average, both in terms of units and floorspace. At the same time, there is significant population and expenditure growth to provide additional capacity for retail development in the town centre, as indicated in a previous paragraph of this report. Considering all these circumstances, there is a demonstrable need to modernise and enhance the retail offer of Wandsworth town centre, in order to maintain its role as a 'Major Centre'.

39 To meet that objective, one of the options considered in preparing the borough's Core Strategy (Preferred Options) document was to encourage new large-scale retail development on the Ram Brewery site, however, the Council does not support an approach that would undermine any of the other town centres in the borough, given its policy of promoting all five centres in parallel with each other. The preferred option is therefore to secure small-scale complementary retail space on the Ram Brewery site, with the South Centre maintained as the main focus of shopping in the town centre.

40 With regard to the sequential test, it was evident that with the exception of potential scope to extend the Southside Centre, no suitable or viable alternatives to the Ram Brewery site were available within the town centre. Proposals have already been made by The Metro Shopping Fund to extend the Southside Centre with a retail offer which Minerva consider to be complementary to its own proposals on The Ram Brewery site.

41 A further consideration is the scale of retail development proposed and its likely impact on the vitality and viability of other town centres. The first point to note is that all 12,204 sq.m. of 'retail' space would be speculative and for flexible use within use classes A1 to A4 (i.e. retail, financial and professional services, restaurants, and food & drink establishments). Secondly, it is anticipated that there would not be a significant amount of convenience shopping space within the new development and that the type of retailing accommodated in the Ram Brewery development would be fundamentally different from that likely to be introduced at Southside or any other part of the town centre. In fact, many of the competing 'Major Centres', such as Wimbledon and King's Road East, offer a greater range of independent and high quality comparison retail outlets than Wandsworth does at present.

42 In summary, Wandsworth town centre lacks the critical mass to allow it to operate at the level to which it is designated in the London Plan shopping hierarchy. There is a need for the centre to claw back trade already lost to other town centres in its catchment area; and a legitimate concern that there would be a net reduction in Wandsworth's turnover, even with an extension to Southside, if no additional retail space is delivered to the town centre. For these reasons, no other centre in the borough likely to experience accumulative trade diversion of more than 5.8% or be adversely affected in terms of vitality and viability. On the contrary, it would uplift the retail health of a 'Major Centre and accord with the relevant retail policies summarised at the beginning of this section.

Tourism/leisure

43 Policy 3D.7 of the London Plan relates to the provision of tourist accommodation and facilities. Amongst other things, it requires boroughs to support existing and encourage the development of new tourist attractions that complement the wider policies in the plan, especially for regeneration and town centre renewal.

44 A visitor centre opened at Young's Brewery in 1998 and became a local facility for tourism in central Wandsworth. To revive that attraction, the redevelopment proposals include a micro-brewery, based on the site's brewing heritage, within the listed building situated in the south-east corner of the site. A market/arena would also be provided within the public spaces for pre-arranged events and public access would be provided to a high-level viewing platform on the

shorter of the two tower blocks to be sited on the northern fringe of the site. These proposals accord with the policy aspirations of the London Plan.

Employment

45 An important issue to address is whether the loss of a locally designated site accords with policy 3B.4 (Industrial Locations). The response is that the site is not designated as a Strategic Industrial Location in the South West sub-region. Although it was designated as an Industrial Employment Area in the borough UDP, the Core Strategy (Preferred Options) document is at an advanced stage in its progress towards final submission and should therefore be accorded significant weight. The latter identifies the site for mixed-use redevelopment. Given its town centre location and absence of protection as a strategic industrial location, the local designation is consistent with London Plan policy.

46 The development would generate significant level of employment in its own right. The opportunities include a broad range and variety of construction, retail and office employment on the site. At the construction phase, the applicant estimates that the development would generate approximately 370 jobs on and off the site. The applicant has indicated that the brewer, Young & Co, has expressed an interest in occupying the 2,226 sq.m. of office space, which has the potential to yield 120 jobs. Based on an average employment density of 20 sq.m. per job, the retail space would also support some 500 jobs across a broad spectrum of skills, many of which would be suitable for local people by reason of their proximity.

47 In essence, the development would provide a significant uplift (almost 1,000 new jobs) over the employment levels typical of the most recent industrial uses on the site. Additional comments on this are provided by the London Development Agency in a subsequent section of this report.

Housing issues

48 A total of 831 residential units are proposed and would make a significant contribution to the strategic target to build 7,450 homes in the borough between 2007/8 and 2016/17, with an annual target of 745, as indicated in table 3A.1 of the London Plan.

49 The housing would be provided at a density of 227 units per hectare, or 631 habitable rooms per hectare. This is slightly below the indicative range (of 650-1100 habitable rooms per hectare) provided in the London Plan for a site in a central location with good public transport accessibility. This likely to be due to the presence of listed buildings on part of the site and a variety of other uses that form part of the mixed-use redevelopment of the site.

Affordable housing

50 London Plan Policy 3A.10 requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mix-use schemes. In doing so, each council should have regard to its own overall target for the amount of affordable housing provision. Policy 3A.9 states that such targets should be based on an assessment of regional and local housing need and a realistic assessment of supply, and should take account of the London Plan strategic target that 35% of housing should be social and 15% intermediate provision, and of the promotion of mixed and balanced communities. In addition, Policy 3A.10 encourages councils to have regard to the need to encourage rather than restrain residential development, and to the individual circumstances of the site. Targets should be applied flexibly, taking account of individual site costs, the availability of public subsidy and other scheme requirements.

51 Policy 3A.10 is supported by paragraph 3.52, which urges borough councils to take account of economic viability when estimating the appropriate amount of affordable provision. The 'Three Dragons' development control toolkit is recommended for this purpose. The results of a toolkit appraisal might need to be independently verified

52 Wandsworth Council has set an overall borough target of 33% in its emerging Core Strategy document. Where borough councils have not yet set overall targets as required by Policy 3A.9, they should have regard to the overall London Plan targets. It may be appropriate to consider emerging policies, but at present, little or no weight can be attached to these as they have not been subject to consultation or tested by public examination.

53 Of the 831 residential units proposed on site, 207(25%) would be affordable and comprise a mix of social rented and shared ownership tenures. The breakdown of residential accommodation would be as follows:

tenure	number of bedrooms				total
	1-bed	2-bed	3-bed	4-bed	
market	257	256	107	4	624
social rented	9	33	19	9	70
shared ownership	73	61	3	0	137
affordable total	82	94	22	9	207
overall total	339	350	129	13	831

54 The provision translates into a social rented to intermediate housing ratio of 34:66 by dwelling units, or 41:59 by habitable rooms. In terms of dwelling mix, the table suggests that 60% of the units would contain two, three or four bedrooms. The relatively high figure is, however, distorted by a predominance of two-bedroom units. If the two-bed units were excluded, the figures would show a modest 17% three or four bedroom family units.

55 The relatively low level of affordable housing is to some degree offset by a higher provision at Cockpen House (which will be subject of a separate report). It is also set at this level due to the substantial contribution that would be made for transport improvements, in particular alterations to the one-way gyratory system (as outlined in the transport section below). Discussions are still ongoing between the applicant, Wandsworth Council, the GLA and TfL regarding the final level of this contribution and the need for a fall back position should the improvements not take place. The final offer of affordable housing may, therefore, change. Given the substantial benefits to the town centre that would be delivered by the alterations to the gyratory, the principle of having a reduced affordable housing contribution is accepted.

Children’s play space

56 Policy 3D.13 of the London Plan sets out that *“the Mayor will and the boroughs should ensure developments that include housing make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs.”* Using the methodology within the Mayor’s supplementary planning guidance ‘Providing for Children and Young People’s Play and Informal Recreation’ it is anticipated that there will be approximately 217 children within the development. The guidance sets a benchmark of 10 sq.m. of useable child playspace to be provided per child, with under-5 child playspace provided on-site. As such the development should make provision for 2,170 sq.m. of playspace.

57 The applicant proposes extensive areas of roof amenity space, typically at first floor level, between the residential blocks but has not quantified these for purposes of a proper assessment of designated play space in the submitted planning statement. Each of those spaces should be quantified and proposals for their equipment clarified for assessment, before the scheme is referred

back to the Mayor. The applicant should also indicate the accessibility of these spaces, as Block A and both towers do not appear to have direct access to these spaces. The spaces at first floor level are useful but are somewhat narrow to offer different kinds of playspace. The applicant should, therefore, demonstrate how a good range of play and informal recreation provision is made for children and young people, in line with the Mayor's supplementary planning guidance 'Providing for children and young people's play and informal recreation'. Part of the requirement could be provided on rooftops or in-door, subject to the provision of a good management strategy and funding and, in the case of in-door spaces, sufficient height. King George's Park is located approximately 400 metres to the southwest and comprises more open field playing opportunities.

58 Minerva has also indicated that appropriate financial contributions would be made towards the enhancement of off-site playspace and associated equipment.

Urban design and architectural quality

59 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within Chapter 4B, which address both general design principles and specific design issues. Policy 4B.1 sets out overarching design principles for London, and states that the Mayor will seek to ensure that new developments maximise site potential (see also policy 3A.3), enhance the public realm, provide a mix of uses, are accessible, legible, sustainable, safe, inspiring, exciting and respect London's natural and built heritage. Policy 4B.2 promotes high quality, world-class contemporary and integrated design. Policy 4B.3 refers specifically to the contribution of planning applications to the public realm and in particular the quality of design for waterside development. Policy 4B.4 encourages the retrofitting and reuse of buildings. Policy 4B.5 requires all development to meet the highest standards of accessibility and inclusion, and that the principles of inclusive design should be integrated into proposed developments, with information on how inclusion will be maintained and managed. These general design principles should be reflected in developments. Policy 4B.6 requires proposals to address the fear of crime and to minimise potential crime through good design. Policy 4B.8 requires proposed developments to preserve or enhance local context and distinctiveness, including social, physical, cultural, historical, environmental and economic characteristics.

60 London Plan policies 4B.9 and 4B.10, which relate to the specific design issues associated with tall and large-scale buildings, are of particular relevance to the proposed scheme. These policies set out specific additional design requirements for tall and large-scale buildings, which are defined as buildings that are significantly taller than their surroundings and/or have a significant impact on the skyline and are larger than the threshold sizes set for the referral of planning applications to the Mayor.

Layout and public realm

61 The Ram Brewery represents an important part of local history, but in urban design terms, it represents a single-use area that does not form part of the public realm, and because of its size, blocks desire lines for pedestrians, in particular east-west and along the River Wandle. The proposed redevelopment will add welcome car-free space for pedestrians and introduce new routes. The general lay-out of the scheme is supported, with new pedestrian space along the river, a direct route from Wandsworth High Street, opposite the entrance to the Southside Shopping Centre, to the northeast corner and towards the train station.

Massing and tall buildings

62 The prevailing height of the main new blocks of the scheme is nine storeys, with lower blocks of three to six storeys along the edges; a sixteen-storey block on the northwest corner of

the site; and two tall buildings (one of 32 storeys and one of 42 storeys) at the north end of the site, on Armoury Way. The town centre consists mostly of 3 to 6 storey buildings in varying urban grain. There are tall buildings within the town centre, with heights of up to 24 storeys. They are not particularly elegant buildings and do not constitute a cluster of tall buildings. To the south west a development have been granted planning consent on the site of the Wandsworth Business Village with a tower of 16 storeys.

63 Considering its town centre location; the need to generate a critical mass of people living and working on the site; and to signal regeneration of the site and the town centre, well-designed tall buildings could be in line with principles set out in policy 4B.1. Pursuant policy 4B.9 the tall buildings should *“create attractive landmarks enhancing London’s character, help to provide a coherent location for economic clusters of related activities and/or act as a catalyst for regeneration”*, and be *“acceptable in terms of design and impact on their surroundings.”* The location within a town centre could justify two tall towers, but all the above criteria have not yet been met. Policy 4B.10 includes further guidance on the design criteria for the towers. In particular, the towers do not form attractive city elements, when viewed from all angles, due to their detailed design.

64 In the longer distance townscape views the towers can be perceived as slender city elements signalling the town centre but from closer and middle distance views the architecture and detailing do not combine well with its urban context and the lower scale buildings on the site and this requires further work.

65 The towers have similar a-symmetrical triangular floorplates. This floorplate helps to provide a slender profile of the towers, but the sleek and sealed nature of the facades jar with the fine grain of the general townscape, and in particular, with the elaborate massing and architecture of the retained historic buildings. Tower 2 (the shorter tower on the west) includes publicly accessible bar/restaurant space (circa 200 sq.m.) on the 27th floor, which is welcomed.

66 The site does not fall within a strategic view as listed in table 4B.1 of the London Plan.

Conservation area and listed buildings

67 The entire site lies within the Wandsworth Town Conservation Area. The site includes a number of listed buildings, most of which form part of the Grade II* listed Ram Brewery complex at the southeast corner of the site, where the brewery was originally built and gradually expanded. All parts of the Ram Brewery complex that were built before 1935 are retained and re-used.

68 At the north end of the complex, on Armoury Way, but with a courtyard south towards the site, are the Grade II listed Ram Stables. This building, from 1896, with minor alterations from the 20th century, would also be retained and re-used for retail A1/A3 purposes. The Grade II listed Brewery Tap public house, on the corner of Wandsworth High Street and Ram Street, does not form part of the application site.

69 As proposed, all listed buildings on the site are retained and re-used for appropriate uses, in line with policy 4B.4 of the London Plan. In addition, the unlisted ‘Canteen Building’, built in 1897, would be retained as it contributes positively to the conservation area.

70 The introduction of public space to the site and the re-use of the listed brewery buildings would be beneficial for appreciating the historic characteristics of the brewery and would, therefore, enhance the setting of the conservation area.

71 The two towers are located on either side of the Stables building and because of their proximity (4 metres at the closest point) and contrast in scale, more information is required to demonstrate that this juxtaposition would produce a positive townscape.

Architecture and materials

72 The design of the new buildings is generally supported, with an exception to the two towers as described above (in the 'Massing and tall buildings' section). The lower blocks are well proportioned and provide a good degree of animation to the new public spaces. The materials range from reconstituted stone to brick, timber cladding, painted render and metal louvres. These are applied in a very regular grid, but the scale of the lower blocks is small enough not to let this repetition dominate the facades. The ground floor comprises public uses across the scheme and the open nature of these uses (which are along the main north-south route over two storeys) gives the development an appealing character.

73 All blocks run more or less north-south and therefore the large majority of dwellings are facing east or west. The vast majority are single-aspect, but given their orientation this is not necessarily a negative aspect. The choice for single aspect does, however, result in the location of noise-sensitive bedrooms facing onto Ram Street, Armoury Way or Wandsworth Plain from the first floor up. Most dwellings have private open space in the form of balconies but it is unclear why not all dwellings have private open or semi-enclosed space. Some balconies are too small to be of practical use. Most residential entrances are clear and legible but the entrances of blocks E, F and G are awkward and could be improved.

Transport for London's comments

Trip Generation

74 The general methodology applied to trip generation is acceptable, however, TfL has a number of detailed concerns that need to be clarified or addressed before this is fully supported.

Highways

75 TfL has concerns regarding the proposed highways layout, in particular the changes to Ram Street and the potential for conflicts between buses, taxis, cyclists, pedestrians and other traffic. TfL expects the proposed taxi drop-off pick area on Ram Street to be removed due to the potential conflicts between taxi overspill and subsequent impacts on the TLRN. The proposed pedestrian crossing facilities on Wandsworth High Street need to be further considered. Swept path drawings for all movements associated with the revised highway layout should be submitted. TfL wishes to discuss the proposed highway layout further with the applicant and borough at the nearest opportunity.

76 TfL requires that the TRANSYT modelling outputs are provided, along with results summary tables (including queue lengths and link lengths), to enable further understanding of the impacts on the surrounding highway network. If highway layouts are changed TfL will expect traffic models to be revised accordingly.

Future Highways Proposals

77 Through discussions with TfL the applicant has agreed to safeguard land along Ram Street and at the corners of Armoury Way with Ram Street and Wandsworth Plain, which correspond to land required to deliver any future highways proposals. In addition it is stated that in order to *'assist in the mitigation of the effect of the development on the highway network it is envisaged*

that the section 106 agreement would include a contribution by the applicant towards TfL's long term aspirations to reconfigure the highway network.' TfL welcomes this commitment; however the level of contribution has yet to be directly discussed with the applicant.

78 The council and TfL have been in discussions aimed at improving Wandsworth Town Centre and the surrounding highway network including Wandsworth High Street, converting Swandon Way and Armoury Way to two-way working, and making significant modifications to the Wandsworth Bridge Roundabout. Discussions have also included outline proposals for improvements to the urban realm, particularly in the Wandsworth High Street area.

79 TfL expects the cost of this scheme to be significant and is currently estimated in the region of £35-£40million. Such funding provision does not exist in TfL's Business Plan; therefore this scheme will only be taken forward on the basis of significant financial support through developer contributions. The delivery of any scheme is subject to detailed feasibility, traffic modelling, public support, acquisition of land and the necessary Traffic Management Act (2004) approvals.

Car Parking

80 A total of 415 car parking spaces is proposed in relation to the 831 residential units. This equates to a ratio of 0.5 spaces per dwelling. Given the high public transport accessibility level, town centre location and the cumulative impact of developments on the already congested highway network TfL expects the level of car parking to be reduced in line London Plan policy 3C.23 *Parking strategy and Annex 4*. An acceptable level of disabled parking provision has been proposed. In order to encourage sustainable travel choices, car parking spaces should not be allocated or sold with an individual dwelling but retained as a shared resource that can be managed through the travel plan.

81 A further 77 car parking spaces are proposed for shopping and commercial uses. However analysis undertaken on behalf of the applicant shows that existing car parking spaces within the town centre are currently under-utilised. For example the existing Garratt Lane and Buckhold Road NCP car parks have a combined total of 1,090 spaces with a current maximum occupancy rate of 29% during the week and 41% during the Saturday peak period. Taking committed development into consideration it is expected that the occupancy rates for weekday and weekend parking will increase to 50% and 73% respectively.

82 TfL considers the proposal for 77 car parking spaces on this site as a complete over-provision which could undermine the use of more sustainable non-car modes and is therefore contrary to the London Plan (2008) Annex 4, *Policies 3C.23 Parking strategy and 3C.24 Parking in town centres*. In addition Annex 4 states 'no non-operational car parking should be provided'.

Cycle parking

83 As a minimum one cycle parking space will be provided per residential unit and located at basement level, 55 spaces will be provided for employees and a further 122 visitor/short-stay spaces will be provided at ground level within the development. TfL welcomes this level of cycle parking as it is in line with London Plan guidelines.

84 It is TfL's view that the development, when considered cumulatively, will have a significant impact on the bus network, particularly off peak movement. TfL therefore requests that the developer provides a phased financial contribution over a 3 years period aimed at improving the off peak frequency of local bus services. Combined with the Cockpen House application, a contribution of £100,000 per year for 3 years is expected; services to benefit will be identified prior to completion of the development.

85 Given existing constraints within the Wandsworth Town Centre area TfL expects all existing bus stands to be maintained. Any proposed relocation of stands must be agreed with London Buses. In addition TfL expects the application to fully investigate and where possible provide additional standing space for buses within/surrounding the site. Further discussions with TfL are required.

86 TfL requests all existing, new or re-located bus stops within the immediate vicinity of the site to be in line with TfL's Bus stop accessibility guidance BPT01 (2006).

Construction Management Plan

87 TfL welcomes the considered approach to construction and site management. Given the proximity to the TLRN a full construction management plan (*compliant with the London Freight Plan*) must be prepared by the applicant and agreed by the Council and Highway Authority prior to commencement of works.

Servicing management

88 This site is located at a key point on the TLRN, therefore servicing activities needs to be adequately provided for within the boundary of the site and in such a manner that the safety or movement of traffic on the TLRN will not be compromised. TfL welcomes the fact that all servicing will take place on-site and a detailed servicing management plan is to be provided. This should be consistent with the London Freight Plan (2008) and be secured as part of the section 106 agreement.

Travel Plan

89 A framework travel plan has been submitted; however this needs to be developed further and in line with TfL's residential and workplace travel planning for development guidance 2008. The framework travel plan should include targets and explain how the proposed measures will be monitored and the success or failure of the travel plan evaluated. TfL expects the travel plan to be secured, enforced, monitored and reviewed as part of the section 106 agreement.

Summary

90 All issues set out above must be satisfactorily resolved before TfL can fully support this application. In particular discussions are required concerning the proposed highway improvements on Ram Street, crossings on Wandsworth High Street, contributions to buses and future highways proposals, potential for increased bus standing, development of the framework travel plan and the level of car parking proposed.

London Development Agency's comments

91 This housing led mixed-use scheme is supported in principle by the LDA, given the potential regeneration benefits to this part of Wandsworth located in the Central Activities Zone. The scheme looks to contribute to the objectives of the Economic Development Strategy for London through the delivery of healthy, sustainable, high quality communities and urban environments.

92 Wandsworth Council should be satisfied that this land is surplus to current and future demand as highlighted in the commissioned report undertaken by Roger Tym and Partners, *Future of Employment Land and Premises in Wandsworth Study (2004)*. In accordance with Policy 3B.4 of the London Plan, any release of Industrial land should be in accordance with meeting the Industrial

Capacity SPG, *Industrial Site Retention/ Release Criteria* as set out in paragraphs; 4.8 - 4.13. Subject to the satisfaction of the above tests this scheme is supported by the agency as it seeks to meet strategic and local requirements for a mix of uses such as housing and social infrastructure and help contribute to the rejuvenation of the town centre.

93 The LDA welcomes the commitment by the applicant to make a financial contribution towards primary and secondary education based upon the anticipated child yield and available capacity within the catchments area, as well as, a proposed creche and further community facilities as outlined in the associated Design and Access statement. The LDA however highlights the need for the Council to be satisfied that there will not be an overall deficiency in community facilities as a result of the 831 households proposed as part of this scheme in addition to the 207 flats proposed in the Cockpen House application. Should there be a need for additional social facilities as a result of this proposal; the developer should be asked to contribute the provision of any additional infrastructure required as part of any section 106 agreement negotiations.

94 In accordance with London Plan policies 3B.1 and 3B.11, the Council should seek to ensure that local residents and businesses benefit from jobs created by this proposal. Initiatives to create training and employment opportunities for local people and address other barriers to employment should be formalised through a Section 106 agreement between Wandsworth Council and the applicant. This should also include local opportunities for residents and businesses during construction as well as within the completed development, including the supply of goods and services and sub-contracting. The LDA recommends that any section 106 negotiations in relation to this application should be linked to that of the adjacent Cockpen House application.

95 The LDA would welcome a discussion with the Wandsworth Council regarding the inclusion of employment and training initiatives within the proposal.

Access and equalities

96 The applicant has confirmed that all the residential units would be built to Lifetime Homes standards, with 10% of them designed for wheelchair accessibility or easily capable of being adapted for that purpose. A further commitment has been made to ensure that all commercial and leisure uses proposed on the site would also be wheelchair accessible.

97 GLA officers would welcome a further opportunity to present the application to the London Access Forum, carry out a more detailed assessment of the access arrangements and, in the event of a Council resolution to grant planning permission, submit supplementary comments before the application is referred back to the Mayor.

98 On equalities, it is envisaged that the amount of retail space proposed by the development would generate the kind of full and part-time employment that would appeal particularly to people residing in relatively close proximity to the site; including students, nursing mothers and semi – retired people.

Climate change mitigation

99 The London Plan climate change policies as set out in chapter 4A collectively require developments to make the fullest contribution to tackling climate change by minimising carbon dioxide emissions, adopting sustainable design and construction measures, prioritising decentralised energy supply, and incorporating renewable energy technologies with a target of 20% carbon reductions from on-site renewable energy. The policies set out ways in which developers must address mitigation of and adaptation to the effects of climate change.

Energy

100 The energy strategy follows the energy hierarchy and is consistent with the requirements for decentralised energy, which is welcomed. However, the applicant should further reduce emissions through passive design and energy efficiency measures on the residential elements, further reduce the cooling demand of the development, and provide a low carbon cooling strategy for the residual cooling demand. The applicant should also provide the further information required in the text below on the CHP and renewable solution proposed.

101 The current strategy achieves an overall 32% CO₂ reduction on current Building Regulations.

Be Lean

102 Building Regulation approved software has been utilised to establish the Target Emission Rate (TER) and Dwelling Emissions Rate (DER) for the residential element of the development, and some modelling has been done for the new-build retail and refurbished retail units. The applicant should confirm that the modelling exercise includes all uses on the site (Ram Brewery Retail Heritage Building, Ram Brewery Leisure, Ram Brewery Offices etc) and summary output sheets of the modeling work for both the domestic and non-domestic energy analysis need to be provided in an appendix.

103 The baseline emissions calculations have not been estimated on a 'whole' energy use as required by the London Plan energy policies, which means they do not include emissions related to appliances and power loads. Baseline emissions should be provided on a 'whole' energy basis.

104 The Part L compliant emissions (TER level) for the development are calculated at 5,511,928 tonnes Co₂/year. Qualitative information on the range of energy efficiency measures to be adopted onsite are provided resulting in a 5% reduction in emissions for the tower apartments, 6% reduction for lower level apartments and capital studios apartments, and 10-15% reduction for the retail areas. Application of energy efficiency measures result in an overall 8.3 per cent reduction in emissions over the baseline for the whole development. There should be scope for further reductions in emissions, especially on the residential element, and the applicant should provide enhanced measures to achieve this to ensure consistency with the London Plan's energy hierarchy.

105 Furthermore, all uses of the development have a cooling load, including the residential element. Cooling demand should be reduced as much as possible through passive design measures before low carbon mechanical cooling solutions are considered. A demonstration of the efforts made to reduce cooling demand in both the residential and non-residential elements should be provided and quantified.

Be Clean

106 The energy strategy states that a single energy centre located in the basement and sub-basement of the Ram Brewery will serve all buildings on the site, which is welcomed. The applicant should confirm that every dwelling and building in the development will be linked to the single site-wide heating network, and that the single energy centre will contain all the items of energy generation plant. Details of the exact location and size of the energy centre should also be provided.

107 A 520kW_e CHP engine is proposed for the development. The CHP is sized on the electrical baseload and a private wire is proposed serving both the residential and retail units. The CHP will generate 30% of the site's energy requirements and reduce emissions by 16%. The energy strategy also states that several Energy Services Companies (ESCOs) have been approached and indicated, in principle, that they would be able to run and manage the plant in the centralised energy centre.

108 The applicant needs to demonstrate that the size of the CHP plant has been optimised in order to serve the majority of the total heat (hot water and heating demand) of the development.

Monthly total heat demand profiles should be provided that clearly illustrate how much of this demand will be served by the CHP, by the biomass boiler proposed and by the top-up gas boilers. The CHP should be optimised before the sizing of the biomass boiler is determined.

109 Details of the phasing of the development and at which point in time the CHP will be operational also need to be provided.

Cooling

110 All uses of the development have a cooling demand. The strategy does not state what the low carbon cooling strategy is for the site or individual elements of the development. While cooling demand has been reduced significantly on the retail elements, other uses such as the tower apartments and Ram Brewery Office show minimal reductions from the baseline scheme.

111 The applicant should further reduce the cooling demand and meet residual cooling demand through low carbon technologies. The rejection of CCHP is not accepted at this stage given the substantial cooling load of the development.

Be Green

112 A 1.2MW Biomass boiler is proposed. This will further reduce emissions by 14%.

113 Given that CHP and biomass boilers are both base load technologies and in light of the comments above on optimising CHP, further explanation of how these two technologies will be successfully operated in tandem needs to be provided.

114 Wood chip is the preferred fuel. The strategy states that the wood chip demand for the Ram Brewery site could be catered for. Further information should be provided on whether wood chip suppliers for this site have been identified, the number of deliveries per week anticipated and the storage space provided for the fuel. Air quality issues in relation to the use of biomass need to be considered carefully. Additional information needed includes:

- The make and size of the biomass boiler/CHP proposed
- Confirmation as to whether it is planned to fit the additional abatement technology to reduce air pollution emissions
- A breakdown of emissions factors for NOX and particulates from the biomass boiler, specifically dispersion modeling on a map of what both pollutants would be at ground level
- The type, height and location of the chimney
- Information on the fuel, the fuel supply chain and the arrangements that have been investigated to secure fuel
- Confirmation as to whether the equipment is compliant with the Clean Air Act a list of exempt appliances can be found at:
<http://www.uksmokecontrolareas.co.uk/appliances.php>
- Confirmation as to whether the applicant has notified the local authority under the Clean Air Act

Climate change adaptation

115 Developments are required to be adaptable to the climate they will face over their lifetime and address the five principles set out in policy 4A.9 of the London Plan. These are: to minimise overheating and contribution to heat island effects; minimise solar gain in summer; contribute to

flood risk reductions, including the application of sustainable drainage principles; minimise water use; and protect and enhance green infrastructure. Specific policies cover overheating, living roofs and walls, and water conservation.

Living roofs (policy 4A.11)

116 The applicants have confirmed that where appropriate accessible Living Roofs would be incorporated within the development. The provision should be maximised and secured by condition.

Flood risk management (policy 4A.13)

117 The Environmental Assessment contains a summary of the Flood Risk Assessment. The site is within flood zone 3a but is protected by existing flood defence structures to a high standard. The defences are designed to protect against a 1 in 1000-year tidal flood, as such the Flood Risk Assessment also determines that the River Wandle would not overtop the defences in this vicinity.

118 The Flood Risk Assessment examines potential breach effects and concludes that flood levels would be between 0.2-0.9m depending upon the nature and location of the breach. Residential accommodation is all at first floor level or above and that the one or more of the three planned footbridges would remain dry. This means that the development would be capable of passing the Exceptions Test from PPS25. However, it is notable that the report also comments that flooding to the basement is unlikely to exceed 0.3m. This appears odd in relation to the surrounding water levels.

119 The applicant has also undertaken to produce a Flood Response Plan. This should examine how the building will operate in the event of a flood, in particular what would really happen to the basement, whether building services (water, electricity, lifts etc) would be able to operate during a flood and how the basement flooding would be recovered. This should be secured by condition.

Surface water run-off

120 The development incorporates a significant proportion of brown, green and garden roof. It would also use rainwater harvesting; and storage for the remaining surface water. Residual rainwater would be discharged to the River Wandle rather than the combined sewer network. All of these measures are in line with London Plan Policy 4A.14 Sustainable drainage hierarchy and should be secured by condition.

Blue Ribbon Network

121 The development includes the re-alignment and semi-naturalisation of the River Wandle. This is to be welcomed as it is in line with the principles of London Plan policy 4C.3 and the River Restoration strategy for South London. These proposals include provision for access to the waterside along the length of the development.

Biodiversity

122 The application site includes a section of the River Wandle, included within a Site of Borough Importance for Nature Conservation, as identified through the adopted procedures for London. As the river flows through an artificial channel at this point here, it is just the watercourse that is of value for biodiversity. There is a diverse community of submerged plants, including the nationally scarce soft hornwort (*Ceratophyllum submersum*), as well as rigid hornwort (*C. demersum*), broad-leaved pondweed (*Potamogeton natans*) and curled pondweed (*P. crispus*),

all of which are uncommon in London. Birds seen regularly along the river include kingfisher, grey wagtail and grey heron.

123 Re-development should be sensitive to the presence of the River Wandle and any buffer landscaping should seek to conserve and enhance its biodiversity value using appropriate methods.

Air quality

124 The air quality report provides an accurate context of both the air quality and local planning background relevant to the proposed development. A clear understanding and appreciation of the relevant Planning Policy Statement (PPS23) is given, and reference to the new revised UK Air Quality Strategy is made as well as London wide and borough policy documents.

125 The assessment includes a number of receptors (existing receptor locations outside of the development as well as new receptor locations). It would have been helpful to include a map of receptor locations for interpretation of the modelled data. There has been inclusion of appropriate monitoring data local to the site, but it is unclear whether the diffusion tube data have been bias adjusted or not.

126 The ALG Guidance rather than the more up to date London Councils Air Quality and Planning Guidance has also been used. For the construction phase, the development is judged to have minor adverse impacts from construction traffic, with negligible impacts associated with emissions from construction and demolition plant, while construction dust is predicted to have a moderate adverse impact. The assessment has also demonstrated that emissions from the gas fired boiler and biomass plant attributed to the completed development are likely to be negligible. There is, however, no assessment made on which this conclusion is based and it is therefore unclear how these significance classifications have been arrived at. It is concluded that the completed development will have a minor adverse effect on local annual mean NO₂ concentrations and a negligible effect on PM₁₀ concentrations.

127 Some of the new residents will be exposed to nitrogen dioxide concentrations above current objectives. The assessment predicts that seven of the 831 residential units will experience air quality above the annual mean nitrogen dioxide objective/ Limit Value in the opening year. Sensitive uses have been modelled at first floor level and modelling shows that objectives will be achieved higher up the building. Using the NSCA Guidance, the introduction of exposure would constitute a slight adverse impact, which has not been included in the assessment. The predictions are above the Air Quality Objective, but not more than 5% above the objective and hence by the London Councils Air Quality and Planning Guidance are judged to be Air Pollution Exposure Criteria B, which suggests that appropriate mitigation must be considered. Suggested mitigation measures within the London Councils Guidance include maximising distance from pollutant source, use of proven ventilation systems, parking considerations, winter gardens, internal layout considered and internal pollutant emissions minimised.

128 The assessment includes discussion relating to cumulative impacts. The application is submitted with another proposal, Cockpen House, which is in the vicinity of the Ram Brewery site, with potential for cumulative impacts. The traffic impacts of cumulative developments have been explicitly included in traffic data used for the assessment of the operational impacts. No mention of cumulative impacts has been made with regard to construction impacts, which could be significant given the proximity of the two sites, and potentially similar timescales.

129 Management proposals to reduce the impacts from construction and demolition are discussed. A number of measures have been proposed from BRE Guidance and the GLA Control of Dust and Emissions from Construction and Demolition, Best Practice Guide. It is not considered

necessary to mitigate emissions associated with traffic flows from the completed development. A Travel Plan is proposed to reduce vehicle usage from the completed development.

130 The proposed development does not appear to present a significant impact on local air quality. There are marginal increases in both nitrogen dioxide and PM₁₀ but it is agreed that the impact of the traffic generated by the development is likely to be minor adverse for nitrogen dioxide and negligible for PM₁₀. However, new exposure is being introduced into an area already exceeding both the UK air quality objectives and predicted to exceed EU Limit Values for nitrogen dioxide in the year of operation. Although this has been mentioned in the assessment, it has been dismissed. Using the London Councils Air Quality and Planning Guidance this introduction of exposure is judged to be Air Pollution Exposure Criteria B, which suggests that appropriate mitigation must be considered. In addition, it is suggested that the impact of the biomass plant is more fully considered and that cumulative impacts in relation to the construction phase are also considered.

Noise

131 Residential properties on the northern part of the site may be subject to high levels of traffic noise from the adjoining Armoury Way. Units subject to the highest category of noise should therefore be designed to ensure that habitable rooms are sited away from the road, and appropriate noise attenuation measures are incorporated into the design.

Local planning authority's position

132 The Wandsworth Council planning committee is due to consider this application in parallel with the nearby Cockpen House application on 17 July 2008, with an officers' recommendation likely to be for approval.

Legal considerations

133 Under the arrangements set out in article 3 of the Town and Country Planning (Mayor of London) Order 2000 the Mayor has an opportunity to make representations to Wandsworth Council at this stage. If the Council subsequently resolves to grant planning permission, it must allow the Mayor an opportunity to decide whether to direct it to refuse planning permission. 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 comments unless specifically stated.

Financial considerations

134 There are no financial considerations at this stage.

Conclusion

135 The scheme has the potential to regenerate the use of a vacated industrial site in the highly accessible location of Wandsworth town centre, and to help reverse the relative decline of that centre by delivering a significant, but complementary, amount of retail and commercial space; making a positive contribution towards the Council's housing target; improving the public realm

and hitherto neglected riverside environment; retaining and enhancing the historic legacy of the site; and promoting greater accessibility through the site and the town centre generally.

136 Despite this, there are concerns over the design of the tall buildings proposed in this location, and a vital need to resolve traffic congestion on the Wandsworth gyratory that severely hinders accessibility through the town centre. Additional work or information is required in relation to energy, access, children's playspace, and air quality; and to address the recommendations of Transport for London and the London Development Agency.

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