

Planning policy on ‘tall’ buildings in the London Borough of Wandsworth – a joint statement by the Battersea, Putney and Wandsworth Societies and the Clapham Junction Action Group

Topic: LDF Core Strategy

Subject: “Tall buildings”: LDF policy IS3(d)

1.00 Introduction

- 1.01 The Wandsworth, Putney and Battersea Societies, and the Clapham Junction Action Group, represent the northern half of the borough. We are responding to the Inspector’s concerns about Wandsworth Council’s “tall” buildings policy IS3 (d).
- 1.02 The Societies wish to see straightforward, clear statements of policy prospective developers cannot misunderstand.

2.00 Council Policy – our observations and objections

- 2.01 The Council claims it has carried out the borough wide urban design study that CABI and English Heritage recommend should be the basis of a policy on tall buildings. This claim rests heavily on character appraisals carried out for conservation areas. Conservation areas represent only a minor proportion of the borough. Moreover, it was only very exceptionally that any of the studies of conservation areas have addressed the appropriateness or inappropriateness of an area for the construction of tall buildings, and we believe none of them have addressed the appropriateness or inappropriateness of the impact on the conservation area of constructing tall buildings in adjoining areas.
- 2.02 The basic criterion used in policy IS3d for accepting a location as suitable for a tall building is the availability of public transport or, if public transport is not readily available in the location, the activity related to a particular focal point. Issues of urban design are explicitly relegated for consideration at the development control stage. Thus the policy lumps together the borough’s five designated town centres as possible locations for tall buildings simply on the basis that they are town centres. In none of these cases is there an ‘overall vision for the future of a place’ (CABI and English Heritage guidance, 2.6) or any indication that the proposed policy on tall buildings is ‘part of an exercise in place-making informed by a clear long-term vision’ (2.5).
- 2.03 The basic criterion the Council has used fails to meet the requirement that policies for tall buildings should be based on urban design considerations. The policy also surprisingly confuses the height of buildings with high density. It is now generally recognised that high density can be achieved without tall buildings.
- 2.04 The Council’s policy on tall buildings is also unsound in that it fails to include a satisfactory definition of a tall building. Policy IS3d refers to buildings ‘which significantly exceed the prevailing height of surrounding buildings’, but gives no definition of ‘significant’.
- 2.05 The meaning of ‘tall’ is left unacceptably vague, and further confusion is introduced by variations in the terminology used in the Core Strategy. In particular the section of

dealing with the Clapham Junction area consistently uses the term 'taller', making the comparison in some cases with single-storey retail warehouses. If this wording is intended to cover buildings as high as 42 storeys it is gratuitously misleading, and therefore unsound. In short the Core Strategy put forward by the Council fails to comply with the guidance from CABE and English Heritage (2.6) that 'scale and quality requirements for new tall buildings be established within the local development framework ... in advance of specific proposals'.

2.06 Over the last 3 years or so the Council has been asked by our groups to produce 'Master Plans' for some of the town centres which have been identified for regeneration – Putney, Wandsworth, Clapham Junction (Battersea) – and the Vauxhall/Nine Elms/Battersea Opportunity Area. These plans should -

- i. identify the character of each area
- ii. define the scale, heights and general massing of development deemed satisfactory
- iii. say how development is expected to integrate into the transport and services infrastructure
- iv. describe how the development should relate to neighbouring areas eg. Wandsworth town centre and the riverside developments

2.07 However, the Council does not accept that the objective of such plans is to guide developers. Sites are considered separately, with development control responding to each site in turn. This is neither 'Framework' nor 'Future' planning. We want the Council to be instructed to formulate such Area Plans, for consultation and local community agreement, before their inclusion in the LDF Core Strategy.

3.00 A synopsis of the Societies' views are as follows.

3.01 "Tall" buildings, those significantly taller than their neighbourhood, must be considered in their urban context. Proposals for such buildings should not simply attempt to show that they do not harm matters their surroundings but that they contribute positively to the character, appearance and quality of their immediate surroundings and the wider area they will affect.

3.02 "Tall" buildings must stand up to scrutiny in terms of need, appropriate location, architectural quality in their own right and their contribution to urban design.

3.03 Wandsworth Borough is neither a city nor a commercial centre (apart from a small fringe in the Central Activities Zone) but largely urban and residential. We identify the following policy constraints by which Planning Permission for "tall" buildings would be refused for breach of any of them:

- **TB1 Conservation Areas** where historic environmental considerations and character are of significance
- **TB2 Buffer zones** to Conservation Areas where a building would have an adverse effect upon a view or setting or focal point within a Conservation Area
- **TB3 Transport** where proposals are further than 400 metres from a major transport node and/or there is insufficient capacity of, or access to, public transport
- **TB4 Residential** where a proposal will be within or adjacent to a residential area and have an adverse impact on the public and private realm

- **TB5 Views and Open Spaces** where a proposal will have an adverse effect (a) locally and/or (b) in a wider London context upon its open spaces, views and historic buildings, and their settings.

3.04 Along with the above specific planning issues, the following matters which arise from the gist of Wandsworth Council's "tall" buildings policy and our knowledge and experience of the Council's aims for the future of the Borough, also need consideration when drawing up a policy for "tall" buildings.

- '*Landmark*', '*signature*', '*iconic*' or similarly described buildings should not be encouraged for their own sake and not where in conflict with 1-5 above.
- *Economics* must not be a planning factor determining the future of a site including such issues as site purchase costs.
- *Appropriate publicity* should be agreed with Council Members and officials at the pre-application stage and should use images which demonstrably reflect the true appearance, height and mass of the development measurable against neighbouring buildings.
- *Pre-application discussions* between developers and Council Members and officials to be minuted and/or recorded and made available to the public recording predictions, understandings and agreements reached between them, the Council's procedures and negotiations should be transparent.

3.05 Further consideration should also be given to sustainability issues for any building but especially for "tall" buildings. Any "tall" building must prove to be sustainable in terms, for example, of its negative carbon footprint, judged by construction, maintenance, services infrastructure, traffic and transport over its lifetime.

3.06 All tall buildings should be tested for possible uncomfortable wind speeds at street level.

4.00 Conclusion

Our Societies are most concerned that:

- i should individual boroughs adopt ad hoc strategic policies about "tall" buildings, their impact could be far reaching, leading inevitably to an insidious, thin spread across London's suburbs of individual tall buildings or loose clusters of them as one locality mimics another, raising the built skyline;
- ii that policies on Conservation Areas and the protection of Listed Buildings and their settings, townscape and the wider built environment should be reinforced. Whilst existing policies are sound and currently supported by Governments strategic objectives in PPG's, they can be disregarded without arguments for doing so being subject to vigorous analysis.

That is why, the Wandsworth, Putney and Battersea Societies, and the Clapham Junction Action Group, require clear guidelines on "tall" buildings, as has been presented.

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