# Lots Road Neighbourhood Forum

2 Stadium Street London SW10 0PS www.lotsroadforum.org

Ms. Shanali Counsell Planning Applications The Town Hall London SW18 2PU

16th June 2024

Dear Ms. Counsell,

Re: Planning Application 2024/1322: Glassmill site, One Battersea Bridge

#### Objection submitted by the Lots Road Neighbourhood Forum

I am writing in my capacity as Chair of the Lots Road Neighbourhood Forum, designated by the Royal Borough of Kensington and Chelsea for the purposes of Neighbourhood Planning under section 61F and 61G of the Town and Country Planning Act 1990, as amended. The Lots Road Neighbourhood Forum Area includes both Lots Village and Cheyne Walk up to Battersea Bridge, an area that will be highly impacted by the proposed Glassmill development through the loss of visual amenity, the negative impact on the Thames Conservation Area, the overlooking and overshadowing of the buildings and the consequences for traffic and transport on both sides of Battersea Bridge.

#### Loss of visual amenity

We believe that the proposed development will have both negative impact on the Thames Conservation Area, with terrible consequences for the historic views and surroundings that create the backdrop to this precious part of London's riverside landscape.

At the heart of our concerns is the view that the proposed development is much too tall and will overwhelm the established RBKC Cheyne Conservation Area and the Thames Conservation Area with their numerous important listed buildings. These include: Grade I Chelsea Old Church; Grade I Royal Hospital Chelsea; Grade II\* Lindsey House; Grade II\*Crosby Hall; Grade II\* Albert Bridge and numerous Grade II buildings in Chelsea. This loss of visual amenity that will be felt by local residents on both sides of the river.

The height and scale of the proposed building will also have a negative impact on neighbours and those who live close to the site by overshadowing and the loss of privacy this entails.

The proposed building would also cause significant nighttime intrusion into the homes of nearby residents due to the significant light pollution created by the building.

# Incompatibility with Wandsworth's Local Plan

The proposed building also flies in the face of Wandsworth's Local Plan adopted in July 2023, which clearly states the Council's intention to restrict proposals for tall and mid-rise buildings outside tall building zones. This was an issue that was given considerable attention and consideration during the local plan process and inspection, and the Inspector made clear the concern that any exceptions could lead to:

'a free for all in relation to tall buildings across Wandsworth. Such an approach would not be in accordance with the London Plan or be appropriate given the proximity of Westminster World Heritage Site and other Designated Heritage Assets that are spread across the Borough, as well as sensitivity in terms of amenity/living conditions and other important conservation and design considerations. The quality of many parts of the Borough would be vulnerable to buildings that are out of place with their surroundings as a result of their height.' (Planning Inspectorate's Report on the Examination of the Wandsworth Local Plan of 23 June 2023, Paragraph 116)

We believe that the Glassmill proposals directly reflect the concerns of the Inspector in regard to Wandsworth's tall building policy. It should also be noted that in the Local Plan, the site is not included in the tall buildings zone and even considering the adjoining tall building zone, there the height is restricted to 12 storeys, far below the 34 storeys proposed by the rapacious Glassmill developers.

# Negative Impact on Local Traffic and Transport

The negative impact on local transport and traffic. Battersea Bridge is a key piece of infrastructure for traffic moving through South Chelsea and Battersea, and a building project of this scale will bring the areas on both sides of the river to a standstill and pose an unacceptable threat to all road users. This is particularly the case given that the site is hemmed in by double red lines which prevent 'any stopping, loading or parking at any time', something that has not been properly considered for both the construction phase and the eventual occupation of the proposed building which will have its proposed residential access on the red route.

To remind you, para 111 of the NPPF states that development should only be prevented or refused on highway grounds if 'there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe'. We believe that this test for refusal is more than met by the proposed development.

It should also be noted that once completed, the volume of new homes proposed will also impose yet another burden on a constrained transport system in this part of London. The site has a PTAL 3 rating that represents only average public transport connectivity, while at the same time the scheme provides only 18 car parking spaces for 143 apartments forcing the burden onto this inadequate transport system.

#### Unacceptable consequences for the environment

The Glassmill site is already almost wholly filled with a relatively modern 7 storey concrete framed building, capable of being repurposed within the site. Demolition should not be allowed without full and proper justification for the loss of a huge amount of embodied carbon.

# Poor design quality, living standards and public realm

The submitted application proposes a development that:

- Fails to resolve the fire hazards of a 34 storey building, showing a lack of concern and understanding of the post-Grenfell environment.
- Fails to meet GLA play space requirements in the podium space for the affordable occupants and provides nothing at all for the market occupants.
- Fails in 50% of the affordable homes to meet London Plan Guidance that new homes should be dual aspect
- Fails to deliver high quality public realm.

In making these objections we wish to associate our views with those expressed by The Chelsea Society, the Cheyne Walk Trust, the Putney Society and the Wandsworth Society. I would also draw your attention to the S.O.B.B. petition on change.org, which at the time of writing has gathered to 2,500 objections to the proposed development and is a clear indication of the views of the local community that lives in and around Battersea.

Lastly, if there are any points in our objections that require greater clarification please do not hesitate to contact me.

Yours sincerely,

Richard Jacques

Chair, Lots Road Neighbourhood Forum