



Wandsworth Local Plan Review Hearing Statement on behalf of SGN Mitheridge Ltd

Main Matter 3 – Wandsworth Town (Policies PM2, WT1 to WT22) Site Allocation WT4 (‘WT4’) Gasholder Site, Armoury Way, SW18 Wandsworth Local Plan

1 Introduction

- 1.1 SGN Mitheridge Limited is the owner of the Wandsworth Gasworks and Calor site (the “Site”), Wandsworth Town. SGN Mitheridge Limited is also the applicant for hybrid planning application 2022/3954 which seeks comprehensive redevelopment of the “site”. Common Projects is managing the project on behalf of SGN Mitheridge Limited.

2 Background

- 2.1 SGN first engaged Wandsworth Council in 2013 to assist in the creation of an appropriate policy framework for decommissioning the gas works and the realisation of a new residential quarter for Wandsworth Town. SGN has subsequently taken part in Wandsworth’s Local Plan review at each stage of consultation to inform the current adopted development plan policy for the site which promotes residential led mixed-use development.
- 2.2 Mitheridge and Scotia Gas Network (SGN) formed a Joint Venture Partnership called SGN Mitheridge Ltd to bring forward the redevelopment of the Site on the Wandle Delta. It is an exciting opportunity and one that will help complete the transformation of underutilised brownfield land along the River Wandle.
- 2.3 SGN Mitheridge Limited has held pre-application discussions with the London Borough of Wandsworth (the ‘Council’), the Mayor of London and the Council’s Design Review Panel since 2020. Following these extensive discussions and public consultation a hybrid planning application was submitted on the 26th September 2022.

3 Test of Soundness

- 3.1 Site Allocation WT4 is a deliverable site allocation. Modifications are however necessary to ensure that the allocation is sound considering other policies of the plan.
- 3.2 WT4 is not sound, it is neither justified nor effective¹.

¹ NPPF paragraph 35



Note continued

- 3.3 It is not positively prepared, or deliverable, and has not been shaped by early, proportionate, and effective engagement².
- 3.4 The policy does not support development that makes efficient use of land and does not consider local market conditions and viability³.
- 3.5 The policy does not optimise the use of land in the area to meet as much of the identified need for housing as possible⁴.

4 Policy LD4 and Appendix 2

- 4.1 Quod has submitted representations specifically to Main Matter 13 Achieving High Quality Places (Policy LP1 – LP9) separately.

5 Representations

Map 4.1 Spatial Area Map: Wandsworth Town

- 5.1 Map 4.1 Spatial Area Map: Wandsworth Town includes “valued views and vistas. There is a proposed valued view and vistas located on inaccessible private land in WT4, not publicly accessible. This is not a valued view.
- 5.2 The Council’s modification PPMM/005 proposes to amend Policy PM2 Wandsworth Town A(6) as follows: “*Development proposals will be required to respect and enhance the valued views and vistas established in Map 4.1 Spatial Area Map: Wandsworth Town*”.
- 5.3 The valued view is not justified. It does not appear in the Wandle Delta Masterplan (2021); the Local Views SPD (2014); or UDS⁵ 2021.

WT4

- 5.4 WT4 fails to recognise the specific characteristics of the site as a former gas works site⁶, and is not in general conformity with the London Plan under section 24(1)(b) of the Planning and Compulsory Purchase Act 2004.
- 5.5 Unlike the Wandle Delta Masterplan 2021, WT4 does not yet sufficiently recognise the constraints associated with site delivery.
- 5.6 In response to our Regulation 19 representations, the Council has responded stating that “*Regarding land contamination, the site allocation is not considered to be in conflict with the requirements set out in the SPD, paragraph 4.46 recognises that the site may require extensive decontamination work*”⁷.

² NPPF paragraph 16 (b) and (c)

³ NPPF paragraph 124 and (b)

⁴ NPPF paragraph 125(a)

⁵ Urban Design Study 23/12/21

⁶ London Plan Footnote 59

⁷ Wandsworth Schedule of Reg 19 Consultation Reps – comment order (page 688)



Note continued

- 5.7 This is insufficient, as paragraph 4.46 is ambiguous and does not provide specific guidance on the implications of these abnormal costs *“4.46 The cluster contains a former gasholder and significant infrastructure that supported its former use, including a gas mains and gas ‘governor’ which may make it subjected to substantial decontamination, enabling and remediation [costs]. Development will need to carefully consider the impact this infrastructure will have on any proposal”*.
- 5.8 The current draft wording omits the word “costs” after the word “remediation”.
- 5.9 The GLA has agreed that the abnormal costs (c.£20M+) meet the policy tests of the London Plan Footnote 59 *“At this level of cost, the abnormal element of the development has a significant impact on viability and would be reasonably considered to be ‘extraordinary’ as envisaged in Footnote 59.”*
- 5.10 The Council’s advisors agree and confirm that “the site contains substantial levels of contamination of the soil and groundwater and requires abnormal costs to address this including earthworks, demolition, utilities and infrastructure costs (Executive Summary Carter Jonas Report May 2022)”. The viability assessment submitted and agreed by the Council’s advisor evidences a significant deficit on a current day basis inclusive of these abnormal costs with 35% affordable housing provision, pointing to the need for flexibility within the Local Plan to support the Council’s site allocations.

6 Proposed Modifications

- 6.1 We have set out our detailed modifications within our Regulation 19 representations.
- 6.2 The modifications fundamentally seek to ensure that the analysis undertaken within the Wandsworth Delta SPD Masterplan is carried over into the W4. This is necessary to ensure that the allocation is read as a whole. Without this the other elements of assessment carried across would be read in isolation which is not appropriate.
- 6.3 The following wording is proposed at paragraph 4.46 of WT4, and summarises the analysis of Wandsworth Delta SPD Masterplan paragraph 2.2.12 (Land Use); 5.6.4 (Height, Scale and Massing); 5.6.13/14 (Building height strategy); 5.8.2 (Viability and delivery); 5.8.10 (Gross capacity estimates); 5.9.11 (Gasworks Cluster Delivery)

“Para 4.46 - Wandsworth Gasworks presents substantial delivery challenges in relation to a long history of gas production and storage. Given the industrial nature of the area further consideration will need to be given to the cluster to fully understand specific contamination and/or servicing issues. In addition to the landownership challenges the site contains existing utilities restrictions, easements; a Hazardous Substances Consent; a former gas holder and significant infrastructure that supported its former use, including a gas mains and gas ‘governor’. The site may be subject to substantial decontamination, enabling and remediation costs. A combination of these factors may have an impact on deliverability, capacity and viability and these will need to be considered at application stage to ensure that the allocation remains deliverable and can meet the policies of the plan when read as a whole. The policies set out in this plan may be applied flexibly to ensure that the site is viable and deliverable.”