

VAUXHALL NINE ELMS BATTERSEA OPPORTUNITY AREA PLANNING FRAMEWORK

CONSULTATION DRAFT

RESPONSE BY THE BATTERSEA SOCIETY

The Battersea Society's involvement

The Battersea Society is the recognised civic society for Battersea (the area which formerly constituted the Metropolitan Borough of Battersea and includes that part of the Opportunity Area lying within the present London Borough of Wandsworth). As such it has followed closely preparation of the Borough Council's Local Development Framework, commented on the many documents produced, and participated in the Examination in Public of the Core Strategy.

We have taken a special interest in proposals for sites within this Opportunity Area. We have received or attended presentations on the Covent Garden Market Authority's proposals and the new US Embassy, and arranged or participated in numerous meetings with Treasury Holdings about their plans for the Battersea Power Station site.

Because of our belief that a comprehensive approach to planning of the wider area is essential we prepared and published in June 2008 an outline planning brief for its redevelopment under the title *The future for Nine Elms*.

This response

The Battersea Society welcomes publication of a draft Opportunity Area Planning Framework (OAPF) which represents a strategic approach to development of the Vauxhall Nine Elms Battersea (VNEB) area. We are grateful to the Greater London Authority (GLA) planning team for meeting the Planning Committee of our Society to explain and discuss the proposals it contains. In this response we focus on strategic issues for the Opportunity Area. Our views on many more detailed issues have been set out, or will be set out, in other appropriate contexts.

In 2006, in responding to Wandsworth Borough Council's Core Strategy at the Issues and Options stage, we expressed concern at the lack of progress towards regenerating the Opportunity Area that had been designated in the London Plan, given its great potential and the extent to which it is underused at present. We urged that the future of the entire area ought to be the subject of extensive public debate.

We wanted to see the draft OAPF provide the basis for such a debate. We regret that publication of a non-technical summary of the OAPF has been much delayed: the draft OAPF

was unveiled in November, but a non-technical summary did not appear until mid-March, received no publicity and was given a very limited distribution (even we obtained a copy only by an indirect route). The GLA extended the consultation period on the draft OAPF from the end of January to the end of March, but even so it ended only a fortnight after publication of the non-technical summary. This means there has been no opportunity for the local community, not least the wider public in East Battersea most affected by the Planning Framework, to have any general discussion of the proposals.

We are putting forward here a considered response to the draft OAPF, prepared by the Planning Committee of the Battersea Society. We believe this represents the views and interests of the local community generally, and also the interests of sound and effective planning.

However, several studies of fundamental significance for the Opportunity Area are only now in progress or about to start: the Development Infrastructure Funding (DIF) study, a study of the requirements for new social infrastructure, and an analysis of the likely impact on existing retail centres of the retail floor space proposed at Battersea Power Station. On those matters, therefore, we may wish in due course to add to or elaborate on this response.

Need for an effective strategy

Our greatest and most immediate concern is that the Mayor of London's aim of a strategic approach to development of the VNEB area, which led to its designation as an Opportunity Area, might not in the event be fulfilled. Planning applications are already coming forward to Wandsworth Borough Council from individual developers. Their motivation, particularly in the present economic situation, may be to obtain the maximum short-term and medium-term profit from their sites, without sufficient regard to the OAPF.

The Mayor is proposing the creation of a whole new quarter of London, the equivalent in scale to a new town. Decisions taken now will determine the form that quarter will take. If it is truly the Mayor's aspiration to provide a model for new urban living, that will require careful co-ordination in the design and structure of the urban landscape across the area as a whole. There is a looming danger of residential sites being developed piecemeal, poorly related to one another and to other uses, including for example the new US Embassy.

Our concern that a comprehensive approach to development could be pre-empted was reinforced by the Preferred Options Site Specific Allocations Document published by Wandsworth Borough Council in December 2009. While this acknowledged the need for comprehensive planning of the VNEB area by including an Area Spatial Strategy, it also dealt separately with as many as 25 sites within the Nine Elms area, not to mention a further 6 sites in the Stewarts Road Industrial Area which it considered under a different heading. In responding to the consultation on it we urged that it should be revised before being adopted in order to reflect the final form of this OAPF.

Outline planning permission has already been given for one major project in the Nine Elms area, a new US embassy. There is also some urgency about identifying proposals that will allow a start to be made on conserving and converting to new uses the long neglected Battersea Power Station. No decisions should be taken on other proposals, however, until the OAPF is available in its final form. We include in that the current proposals by Treasury Holdings for the area east of Battersea Power Station. These provide a particularly telling

example of the adverse consequences of not taking a comprehensive approach to development, as we have argued in our objection to the current planning application; the relevant part of that objection is reproduced at annex A.

A comprehensive approach to development requires the co-operation of all the significant landowners in the Opportunity Area. Our impression is that two publicly owned bodies, Royal Mail and Western Riverside Waste Authority, have so far held back from full involvement in the process. We believe it is essential that there continues to be a major waste transfer station within the Opportunity Area and we attach great importance to retaining the large number of jobs the Royal Mail sorting office provides for local people. Nevertheless there appears to be scope for using land more efficiently in ways that would not conflict with those objectives and would enhance the overall quality of the redeveloped VNEB area. We urge Royal Mail and Western Riverside Waste Authority to engage positively in further discussions to produce a fully comprehensive strategy for the Opportunity Area.

Need for effective governance

A strategy is only as good as the arrangements in place to implement it. We understand discussions are taking place between the GLA and the two borough councils about appropriate governance arrangements to take forward implementation of the OAPF. All past experience of large-scale urban regeneration highlights the critical importance of effective partnerships, policy co-ordination and forward commitment by all the agencies involved in achieving timely and successful redevelopment. We urge the Mayor of London and the leaders of the two borough councils to press forward urgently the discussions on governance and bring them to an early resolution. Equal energy should be devoted to taking forward the further studies mentioned above so that, after taking into account the outcomes from those studies, a robust OAPF can emerge in final form.

Boundary of the Opportunity Area

The Opportunity Area has been significantly extended since it was first designated. Broadly speaking we agree the area now designated represents an appropriate and viable area for planning redevelopment. However, the draft OAPF focuses on the original area and does not deal adequately with the added areas.

The area originally designated in the London Plan in 2004 comprised the Power Station and Covent Garden Market sites, the land to the east between the borough boundary and the river, and Vauxhall Cross in the borough of Lambeth. Amendments to the London Plan adopted in February 2008 have extended the Opportunity Area to include the whole of the borough of Wandsworth between the river, Queenstown Road/Silverthorne Road and the borough boundary, in other words the area defined by the borough council in the Core Strategy of its Local Development Framework as the 'Nine Elms and north-east Battersea area' (OAPF figure 2.4) apart from a physically separate industrial area between railway tracks west of Silverthorne Road. It also now includes the Albert Embankment and Spring Gardens area of Lambeth. This seems sensible, because that is both an adjoining riverside area and a major part of the hinterland for Vauxhall Cross.

The areas added in Wandsworth are the National Grid gasholders (now scheduled to be decommissioned), the Stewarts Road Industrial Area and the large area of public housing

south-west of New Covent Garden Market. The newsletter *Nine Elms future* published by Wandsworth Borough Council seems to imply, by referring to distribution of 'the Mayor's consultation document' to 'residents and businesses in the central Nine Elms area', that a decision was taken not to carry out systematic consultation with residents of the public housing or existing businesses in the Stewarts Road Industrial Area, even though they are within the Opportunity Area. It would be regrettable if that is in fact the case.

In the many panoramic aerial views of VNEB the Stewarts Road Industrial Area is largely out of the picture. The OAPF ought to pay more attention to the difficult issues involved in modernising and rationalising it in order to make it more attractive to businesses, improve access and circulation, and make more efficient use of the land. On the transport side there is a bare reference to improving the quality of the existing Wandsworth Road station, but no mention of the major gain in accessibility that will result from making that station part of the extended East London Line.

The area of public housing is dismissed in the non-technical summary by saying 'The framework does not propose changes to the existing communities in and around the area.' That might call into question whether it ought to be included in the Opportunity Area. The Battersea Society considers it was right to include it, and we indicate in a later section the policies we think should apply to it.

The London Plan defines a Central Activities Zone (CAZ) and applies specific policies to it. The Opportunity Area originally designated coincided broadly with an extension of the CAZ; the CAZ boundary was to be refined before being incorporated in the Development Plan Documents produced by boroughs. We can see the case for now regarding the original Opportunity Area as part of the CAZ, even though its historical character has been very different. However, it would not be appropriate to include in the CAZ the Stewarts Road Industrial Area and the area of public housing mentioned above, which have subsequently been added to the Opportunity Area; the Battersea Society would be strongly opposed to any attempt to do so.

The strip of land between Queenstown Road and the railway line from Victoria to Battersea Park station is mostly occupied by the very recent Chelsea Wharf development. We consider it should not be included either in the Opportunity Area or in the CAZ; the railway line provides a clear physical boundary. Because it has now been developed with multi-storey modern buildings the western half of this strip of land (nearer to Queenstown Road) should also be removed from the Battersea Park Conservation Area by means of a boundary change.

Objectives for redevelopment

In our planning brief in June 2008 we endorsed the following objectives for the Opportunity Area:

- making much better use of the area – a large part of it is lying unused at present
- co-ordinating development of the area in order to achieve the best overall results for London as a whole
- ambitious targets, as set out in the London Plan, for jobs and homes

- preserving Battersea Power Station and finding new uses for it
- enabling New Covent Garden Market to continue to operate on part of its present site by redeveloping the remainder of its site for other uses.

At the same time we questioned the need to make tall buildings the main focus for redevelopment of the area. One of the main arguments advanced for tall buildings is to give an area a clear identity. We pointed out that, with Battersea Power Station at its western end and the group of tall buildings around Vauxhall Cross at its eastern end (soon to be dwarfed by one with about 60 storeys), the Nine Elms area is instantly identifiable within London, and therefore already has a strong 'sense of place' in those terms. We see the challenge for planners and designers as being to create a high-quality urban realm, a thriving community, and a sense of place at ground level.

We propose adding to the objectives for VNEB:

contributing to remedying deprivation in existing housing estates in the Opportunity Area, and also in adjoining areas with high deprivation.

Housing

The figure for new homes in the original London Plan for what was, for this purpose, a similar area is a minimum of 1500 over the 15 years to 2016. The revisions to the London plan adopted in 2008 raised the figure to a minimum of 3500 in the period 2001-26. That was already regarded as ambitious. The proposal now is a massively higher figure of 16,000 new homes over the next 15-20 years.

The draft OAPF considers five development options, ranging from low density residential (option 1: 4200 homes in buildings of 2-4 storeys, plus 8000 jobs) to high density residential plus 'retail and office destination' (option 5: 27,000 jobs and 16,750 homes). It puts forward as the preferred option a slightly scaled down version of option 5. We discuss below the employment and retail content of the preferred option. The status of its figure of 16,000 new homes is unclear and needs to be clarified: the wording on page 36 of the draft OAPF is 'minimum 16,000 homes'; but the non-technical summary says the OAPF 'has identified the potential for 16,000 new homes', with the implication that this is regarded as the practical limit on capacity, given the objective of also providing a large number of new jobs. The latter interpretation is supported by the statement (page 38) that [original] option 5 'acts as a maximum envelope for testing public transport and highways interventions'. If 16,000 new homes is regarded as the practical limit on capacity, the question is then whether it would produce densities over this large area that would be unacceptable in terms of the quality of environment they would create.

The draft OAPF calculates that its preferred option (strictly speaking, the original option 5) requires a density of 255 dwellings per hectare (page 59) and that these could be accommodated in buildings of 8-10 storeys compliant with the London Plan policy on provision of on site open space. Case studies have been used to illustrate different housing densities. The Lillington Gardens estate in Pimlico is used to demonstrate a civilised environment at a density of 156 dwellings per hectare (page 49). For higher densities the only case study the draft OAPF has been able to find to use is an extremely dense development (477 dwellings per hectare) at Tabard Square, London Bridge, and this is repeated three times (pages 53, 57 and 61); the number of storeys is not given.

The calculations for housing capacity in the draft OAPF do not include any contribution to the requirement for strategic open space. Whether the preferred option would produce residential developments that provide an acceptable environment in other respects can only ultimately be tested through scrutiny of individual schemes. Even if the densities examined and recommended in the draft OAPF can be shown to provide a desirable urban environment, worthy of central London in the 21st century we are concerned that individual developers will seek to go beyond them and achieve even higher densities.

The current planning application for the Battersea Power Station site appears to produce densities at the very top end of the density matrix in the London Plan, although the developer claims it does not go beyond that. It also appears to take a disproportionate share of the housing total for the whole Opportunity Area. The outcome is a proposed development that has been identified by the Commission for Architecture and the Built Environment as threatening the setting of Battersea Power Station. It takes the form of a group of 18-storey slab blocks reminiscent of some of the most notorious public housing schemes of the 1960s, but going beyond them in the closeness of the blocks to each other, producing admitted problems over lack of daylight to the lower floors. We question whether the result is acceptable, still less whether it ought to be regarded as a model for new urban living.

We have a general concern that a vicious circle may be created in relation to densities: first a high density development is assessed as requiring a new Underground line to serve it, then even higher densities are demanded in an attempt to finance the Underground line from private sources. The end result could be very damaging to the whole future nature of the VNEB area.

The impact of any density expressed in terms of dwellings per hectare depends on the type of housing provided; the primary measure used in the London Plan density matrix is habitable rooms per hectare. The draft OAPF quotes (page 66) figures in the Mayor's draft Housing Strategy for the proportions of family-size units that should be included in new developments; and the non-technical summary says (page 3) that developers will be expected to meet those aspirations (which the Battersea Society strongly supports). However, those proportions cannot be applied to the overall amount of housing proposed in VNEB because they relate to categories of affordable housing; the draft OAPF leaves it open how much affordable housing will be provided and of what types. It says merely that the Mayor and the planning authorities will be seeking 'the maximum reasonable amount of affordable housing'.

The Battersea Society repeats the view expressed in our planning brief in June 2008, that the policies for provision of affordable housing applied in the Opportunity Area should be the same as apply elsewhere in (in our context) the borough of Wandsworth.

There seems to have been no consideration of the sizes of unit that would be desirable within market housing in order to enable a balanced community to emerge in what is the equivalent of a new town.

We agree the OAPF should not include physical redevelopment of the large area of existing public housing. However, we urge that it should contain policies for improving the quality of that area, including the quality of the public realm and the facilities available. Those policies should be integrated with provision of social infrastructure in the areas that are to be redeveloped.

Jobs

We urge that careful attention is given to the contribution retention and expansion of employment in the Opportunity Area can make to countering deprivation and promoting opportunity on the existing estates discussed in the previous paragraph and in adjoining areas with high deprivation. Relevant measures for this purpose include, not only planning policies, but also encouragement and assistance to employers to recruit local people, and where necessary training to provide local people with the necessary skills.

As with housing, the proposed number of new jobs in the Opportunity Area (20,000 to 25,000 over 15-20 years) is much greater than the figures previously in the London Plan (about 8000, described as the 'indicative employment capacity'). Unlike housing, the net change in employment is likely to be significantly different to this gross increase because the designation of Nine Elms and New Covent Garden Market as a Strategic Industrial Location was removed in 2008 and sites which have hitherto provided employment will be converted to other uses. To the extent the new uses provide employment it is likely to be of a different type.

We understand the Covent Garden Market Authority expects future employment on its site to be broadly equivalent in total to the present level, and the Battersea Society very much welcomes that.

As well as paying more attention to improvement of the Stewarts Road industrial area (see above) the OAPF ought to assess the extent to which increases in employment there, particularly employment for local people, can compensate for losses of employment that will result from redevelopment of industrial land elsewhere in the Opportunity Area. Wherever possible we should like to see businesses servicing the central London economy remaining in the Opportunity Area in rationalised premises on existing sites.

Retail

The draft OAPF incorporates up to 60,000 m² of retail floor space at Battersea Power Station and a smaller, but unquantified amount at Vauxhall. However, the justification for the proposed provision at Battersea Power station is not clear.

There are few shops in the Opportunity Area at present, the only significant one being Sainsbury's supermarket in Wandsworth Road on the edge of the area. However, there are a number of shopping centres within quite a short distance. Section 5.5 of the draft OAPF seems to confuse 'major' and 'district' centres in the London Plan hierarchy and the relevant symbols are wrongly labelled in figure 5.6. The assertion that none of the town centres in close proximity to the Opportunity Area are well served by buses is clearly incorrect:

the major centre at Clapham Junction is linked to the Opportunity Area by two bus routes in Nine Elms Lane and two bus routes in Wandsworth Road

a number of bus routes link Vauxhall to the extensive CAZ frontages at Victoria, and also to the district centre at Elephant and Castle which, according to table A2.2 of the Draft Replacement London Plan, may become a major centre during the plan period

two bus routes along Queenstown Road and one from Vauxhall link to Kings Road and Knightsbridge, and other, more distant major and international centres.

The high density development options examined in the draft OAPF assume that Battersea Power Station would become a retail destination with 100,000m² of floor space. The figure of 60,000 m² is substituted for that on the ground that it was the figure tested in Wandsworth Borough Council's retail needs assessment in 2008. It seems hard to justify even this lower figure in an era when there is likely to be an excess of retail floor space in London: internet shopping is continuing to make inroads, the Draft Replacement London Plan makes an unrealistic assumption about growth in household disposable income, and it is improbable that retail demand from tourists will continue at its current very high level. In formulating its preferred development option the draft OAPF (page 38) seeks to evade the need for justification by replacing the explicit and well understood term 'destination' by a much vaguer term, 'CAZ frontage'.

There is no breakdown of the proportions of the implied retail demand that would come from people already within the Opportunity Area and people travelling to it as a destination in order to shop. Even with a new Underground line Battersea Power Station will not have sufficiently good accessibility to draw people in for shopping from a wide area. People living in South London will be able to reach Oxford Street at least as easily. To reach Battersea Power Station people living in South West London would need to use one of the transport modes the draft OAPF claims are inadequate to convey people from the Opportunity Area to existing shopping centres, and would mostly have to pass one or more of those centres in the course of their journey. Existing travel and shopping patterns from Wandsworth point across the river to Chelsea, Fulham and Kensington.

There will certainly be a need for new retail space within the Opportunity Area. We agree with the draft OAPF that its form will be a key issue in terms of improving the vitality of the Opportunity Area, and that retail development should deliver a good quality public realm well connected to the existing movement network. Some new retail space has already been provided at Vauxhall, and may in time come to include a CAZ frontage. The Battersea Society also supports the retail element in the project being promoted by the Covent Garden Market Authority under the name The Garden.

The Battersea Society has concerns on two grounds, in advance of the retail impact assessment, about the amount of retail space proposed for Battersea Power Station. First, we are doubtful about its viability. But, even if it were to be unsuccessful, it might nevertheless have a seriously damaging effect on the future prosperity of some nearby centres, and in particular the long established Battersea Town Centre at Clapham Junction. The Retail and Leisure Assessment submitted by Treasury Holdings with the current planning application for Battersea Power Station is in our view too dismissive of the potential for Clapham Junction, with its unique accessibility by public transport, to develop more extensive high quality shopping provision. We note that, despite the proposal in the OAPF, the Mayor's position with regard to the consideration of planning applications remains unfettered and subject to retail impact assessments being completed.

Open space

The Battersea Society endorses most aspects of the proposed Public Realm Strategy (chapter 9). However, we have serious reservations about the credibility and appropriateness of the proposed linear park, described as 'a new strategic green link'. We

note that the high density development options examined in the draft OAPF do not include any contribution to meeting the requirement for strategic open space. It appears the linear park is an ingenious attempt to meet all or part of that requirement in a way that causes minimal disruption to other proposed land uses. However, even if other parts of it could be regarded as satisfactory strategic open space, that part which consists of a stretch of Battersea Park Road clearly is not.

A much better method of increasing the amount of strategic open space in the area would be to return to open space the significant portion of Battersea Park which, as a relic of the Festival Pleasure Gardens, has been converted to exhibition and hospitality uses. Those uses could with advantage be relocated to Battersea Power Station.

Tall buildings

The non-technical summary says most of the Opportunity Area 'will see development at eight to ten storeys in height'. We welcome this as an assurance that most of the area will not contain buildings of more than eight to ten storeys, but we hope it will continue to contain some buildings lower than that.

Tall buildings are proposed 'along the riverside and [in] other prominent locations', subject to not intruding into protected views of the Houses of Parliament. The Battersea Society remains strongly opposed to tall buildings along the river that would detract from the dominance of Battersea Power Station and threaten this reach of the river with the kind of canyonisation that has blighted reaches further upstream.

Conclusion

This response has been developed at a time when several studies of fundamental significance for the Opportunity Area are awaited. It sets out major concerns about aspects of the draft proposals, not least the need for an effective strategy for the whole area and the need for effective governance. It identifies the very high housing densities being proposed and the limited evidence given that such densities will meet the Mayor's aspiration for the area, the equivalent in scale to a new town, as a new model of urban living.

The Battersea Society urges that planning permission should not be given for new schemes until an OAPF has been agreed and adopted which addresses these and other issues raised in our response.

The Battersea Society looks forward to contributing further in the months and years ahead.

March 2010

Example of failure to achieve comprehensive planning

(extract from objection by the Battersea Society to current planning application 2009/3575 by Treasury Holdings)

There appears to be great uncertainty about plans for the development of the area east of the power station. No dates are given for work to be started on this part of the site. We have already pointed out that the block proposed nearest to the east side of the Power Station would crowd up against it, destroy its monumentality and isolate it from Nine Elms. We note that it would also require demolition of the former water pumping station. We have submitted a separate objection to the listed building consent that would require. Further to the east there are major unresolved constraints on redevelopment (well illustrated in the map on page 12 of the brochure the developer produced for purposes of public consultation) in the form of the Cringle Dock Waste Transfer Station and a protected wharf for aggregates.

The proposals the developer has submitted for this part of the site are manifestly unsatisfactory, piecemeal and provisional. They involve two blocks which are completely unrelated to the Vinoly master plan, and are of an excessive height which has no justification in terms of urban design. The block near the river would intrude into the river frontage in a particularly awkward and ugly way. Irrespective of the decisions eventually taken on the remainder of the developer's proposals, we urge strongly that this part of the proposals should not be approved, and the developer should be required to provide properly thought out and timetabled plans for this part of the site at a later stage.