

THE FUTURE FOR NINE ELMS

AN OUTLINE PLANNING BRIEF

PREPARED BY THE BATTERSEA SOCIETY

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1. Nine Elms is on the brink of a total transformation. Major development schemes are being prepared for Battersea Power Station and New Covent Garden Market, and many other proposals are likely to come forward. The Battersea Society, as the local civic society, seeks to articulate the views of the local community on planning issues. We are concerned that the great hopes for the future of Nine Elms will not be realised unless there is an overall strategy that enables planning decisions to be taken in a co-ordinated way and to maximum benefit. We have produced this Outline Planning Brief in order to set out a vision for the future shape of Nine Elms and in the hope it will provide the initial basis for such a strategy.
2. The Vauxhall/Nine Elms/Battersea area was designated as an Opportunity Area in 2004 in the Mayor's London Plan. Part of that area lies in the London Borough of Lambeth but the bulk of it in the London Borough of Wandsworth. The area covered by this Planning Brief is the Nine Elms and North East Battersea area identified by Wandsworth for the purposes of its Local Development Framework (LDF) and shown on the map at **annex A**; we refer to this as 'the Nine Elms area'.
3. We have taken account of the relevant provisions of the London Plan and provided a short summary of their key features in **annex B**. In Wandsworth the LDF will replace the current Unitary Development Plan (UDP). In September 2007 the borough council published for consultation its Preferred Options for the Core Strategy of the LDF, including proposed planning policy PL 7 for Nine Elms and North East Battersea; we reproduce that as **annex C**. In responding to that consultation the Battersea Society made points which are developed more fully in this Brief. In relation to the Power Station the ; Development Brief Wandsworth prepared in 1983 remains extant (see paragraph 45).
4. In this Outline Planning Brief we discuss what should be the objectives for development in the Nine Elms area and how they can best be realised. We then comment on whether achieving those objectives requires, or should be allowed to include, tall buildings.

OBJECTIVES FOR DEVELOPMENT

5. There are certain *general objectives* we believe should now be pursued in relation to all development, but more particularly in such an extensive development area in such a prominent position in the world's greatest city:

- all new buildings and the spaces between them ought to be of high architectural quality
 - all new buildings, and the area as a whole, must be very efficient in use of resources
 - development needs to be phased and co-ordinated to ensure local services and facilities keep pace with increases in population and employment and any existing inadequacies are redressed.
6. The Battersea Society endorses the following *specific objectives* for the Nine Elms area which are already features of existing planning policies:
- there is a need to make much better use of the area – a large part of it is lying unused at present
 - development of the area should be co-ordinated in order to achieve the best overall results for London as a whole
 - there should be ambitious targets, as set out in the London Plan, for jobs and homes
 - Battersea Power Station should be preserved and new uses found for it
 - New Covent Garden Market should continue to operate on part of its present site, and to make that possible the remainder of its site should be redeveloped for other uses.
7. We consider the objectives for development in more detail under the following headings:
- a sense of place
 - environmental imperatives
 - housing needs
 - providing employment
 - local services and facilities
 - retailing
 - transport

A sense of place

8. Nine Elms has been an industrial area since the first half of C19. There was some general industry, but a major component was providing

services for what is now central London and for adjoining areas. The water, gas and electricity industries have all occupied large sites, as have the railway companies operating out of Victoria and Waterloo. Railways and the gas industry continue to be dominating features of the area. The water and electricity industries now occupy only small sites, but have been replaced by other services provided for central London, including postal and courier services and a wholesale food market.

9. The original Opportunity Area designated in the London Plan 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 earlier this year have extended the Opportunity Area so that it now includes the whole of the borough of Wandsworth between the river, Queenstown Road/Silverthorne Road and the borough boundary – broadly the area shown on the map at annex A. The Battersea Society agrees it is sensible to plan in a co-ordinated way for the whole of this wider area.
10. The London Plan also defines a Central Activities Zone (CAZ) and applies specific policies to it. The Opportunity Area as originally designated is included in the CAZ, and that seems appropriate in view of its historical and current role in relation to central London. The boundary of the CAZ is to be refined before being incorporated in the Development Plan Documents produced by boroughs. The Battersea Society would be strongly opposed to including in the CAZ the areas which have subsequently been added to the Opportunity Area – in particular the new developments facing Battersea Park (the South Eastern railway line out of Victoria provides a clear physical boundary further to the east) or the large area of public housing south-west of New Covent Garden Market.
11. The Nine Elms area contains a genuinely iconic building in Battersea Power Station. Its outline appears on Wandsworth's borough logo, on the home page of the council's website, and in many other contexts across London. The eastern end of the Opportunity Area is marked by the group of tall buildings around Vauxhall Cross, soon to be dwarfed by one with 50 storeys. This combination of buildings makes the Nine Elms area instantly identifiable within London.
12. The challenge for planners and designers is to create a high-quality urban realm and a sense of place at ground level, more especially for pedestrians and cyclists. According to Wandsworth borough council, public consultation on its LDF has revealed there is 'considerable interest in improving the identity of Nine Elms, particularly the townscape'. One landscape feature calculated to reinforce the area's identity would be planting in a prominent location a new group of the eponymous (in 1645) nine elms.

13. The area's industrial heritage should be celebrated. At the Power Station key parts of the interior of the A station, including the control room, should be restored and open to the public. The listed water pumping station which now forms part of the Power Station site should also be preserved. It could be converted into a bar or restaurant, or an industrial museum, but ideally a river-related use should be found for it.
14. Plaques and interpretation panels should be provided throughout the area to mark such aspects of its history as the original 1838 terminus of the London and Southampton Railway (which continued in use by eminent passengers and gave Russian its word for a railway station), the Nine Elms locomotive works, and the building of Battersea New Town from 1790 onwards.
15. Over the Lambeth boundary, and at present hidden completely by hoardings, Brunswick House is a graceful house of 1758, and a unique survival in this part of London.
16. The Battersea Dogs and Cats Home, in modern buildings, is a distinctive feature of the area which should be retained.

Environmental imperatives

17. Because of the overriding need to reduce greenhouse gas emissions and adapt to what is now inevitable climate change, and in the light of policies now being adopted both nationally and for London, a key objective must be that all new buildings should be very efficient in their use of resources. In view of this area's longstanding links with the energy and water industries (paragraph 8), the aim should be to make it a showcase for environmental sustainability, going even beyond current statutory requirements. The circumstance that redevelopment will be on such a large scale opens up important additional opportunities in that respect.
18. The most important consideration is energy use. From now on all new buildings of all types in the Nine Elms area should be carbon neutral. In the case of residential buildings this will be a deliberate anticipation of the Government's target that all new homes should be carbon neutral from 2016 onwards. Carbon neutrality should be achieved primarily through sophisticated design using high levels of insulation, natural ventilation, heat pumps and photovoltaic panels.
19. To the extent that supplementary heating and cooling may be required at certain times, it should be provided by a districtwide combined cooling, heating and power (CCHP) scheme or schemes. Wandsworth borough council should ensure that redevelopment will include the pipe networks necessary for that purpose, in accordance with policies in the London Plan. Use of trucked in biomass as fuel for CCHP (as in some

recent London developments) is unsustainable and should not be regarded as acceptable. If, however, advanced waste management plants are constructed in the area (see paragraph 43 below) there may be scope to use fuels produced in processes such as anaerobic digestion.

20. As a result of climate change control of excessive heat in summer will become an important consideration, not only within buildings, but in urban streets. At Nine Elms the nearness of the river is a favourable factor. However, there also needs to be an overall strategy to prevent adverse effects from outdoor summer temperatures in the area. This should include streams and pools of water within all new developments and maximum use of vegetation to provide shade.
21. Water features can also form part of sustainable drainage systems. Such systems should be mandatory for all major developments in order to reduce the rate of runoff and, through harvesting rainwater, conserve water resources. Landowners should be required to collaborate so that a sustainable drainage system can be designed and constructed for the whole of the area, or at least substantial parts of it, rather than separate systems for individual sites.
22. All new developments in the Nine Elms area should be required to have green roofs; these further reduce runoff and also help to mitigate excessive heat. Further measures to conserve water resources should include requirements to recycle grey water, and where possible obtain drinking water from boreholes on site.
23. Nine Elms is within the Thames flood plain, but this is deemed to be effectively protected in London by the Thames Barrier, and need not therefore be a constraint on redevelopment. The tidal status of the river creates an opportunity to use tidal pools as a small-scale energy source, for which there are historical precedents in this area.
24. As part of reducing carbon dioxide emissions the transport system serving the Nine Elms area should be environmentally sustainable. We discuss that aspect in a separate section below (paragraphs 68-77).
25. Waste management for an extensive area of London is carried out in the Nine Elms area. At present this largely consists of loading municipal waste onto barges for disposal lower down the Thames by an unsustainable method, landfill. Landfill will be phased out in response to European legislation and replaced by increased recycling and other methods of disposal. Environmentally favourable methods of transport, such as river barges, should continue to be used for waste and other bulky materials in future. We discuss later the future need for, and location of, waste management sites (paragraphs 42-44).

Housing needs

26. The London Plan target (annex B) is that a minimum of 3500 homes should be built in the Nine Elms area in the 25-year period 2001-26; of this total the Greater London Authority (GLA) estimated that 1700 can be provided in the original Opportunity Area in the 15-year period to 2016. As we are already 7 years into the period to which the target applies, Wandsworth should calculate and publish the total number of homes which have been built in the Nine Elms area since 2001, or are now under construction, or have received planning permission. There have been major developments in recent years at Vauxhall Cross in the original Opportunity Area and at Chelsea Bridge Wharf in the extended area, and a development on the site of John Milton School in Battersea Park Road is almost complete.
27. Planning permission for residential development was given to the previous owners of the Power Station site, Parkview, and the proposals put forward by the present owners are likely to include housing. There is also scope for residential development on part of the Covent Garden Market site. A scheme has been in preparation for a development in Queenstown Road, to replace the Marco Polo building.
28. New planning applications for housing will be determined on the basis of the London Plan, and in due course on the basis of Wandsworth's LDF (which will have to be in general conformity with the London Plan). The Battersea Society considers that the same policies should be applied to housing in the Nine Elms area as elsewhere in the borough; and that, as well as contributing to the overall target in the London Plan for additional housing in Wandsworth, the Nine Elms area should also contribute to the borough council's target to provide 3725 affordable homes in the borough over the period 2007/08–2016/17.
29. As part of its Core Strategy Wandsworth is proposing a strengthening of housing policies by comparison with the borough's UDP:
 - the proportion of affordable housing sought by the planning authority in major developments will increase from 25% to 33%
 - where viable, a higher proportion than 33% will be encouraged
 - it is recognised that 'new housing developments should include a mix of types and sizes of dwellings', and that this has not usually been the case in the past
 - within the category of affordable housing, 'a mix of intermediate (equity share) and social rented accommodation will be sought, particularly on larger sites'.

30. While these policies would be a move in the right direction, the Battersea Society contended in its response to the Core Strategy Preferred Options in October 2007 that they ought to be made more explicit and (where that has not already been done) quantified.
31. New housing in the Nine Elms area should be a mix of privately owned, social rented and shared equity homes. It should include homes suitable for families with children, and not solely homes for one-person or two-person households. A proportion of new homes should be built to the Lifetime Homes standard. All new housing should contribute to the environmental objectives articulated in paragraphs 17-22 above.
32. The depressed state of the housing and financial markets is likely to have an adverse effect on the amount of open market housing constructed in the Nine Elms area over the next few years, and knock on effects on the provision of affordable housing. However, it is reasonable to expect that more favourable conditions will return in later years.

Providing employment

33. The Nine Elms area is a vital source of employment for the population of Battersea and adjoining areas. The Battersea Society wants to see the number of jobs available there maintained and increased. Consultation on Wandsworth's LDF has revealed 'general support for the promotion and protection of industry' in the Nine Elms area.
34. Figures given in the London Plan for jobs in Opportunity Areas are less categorical than the figures given for homes; they are described as representing the 'indicative employment capacity' of an area. Information is not readily available on existing employment in the Nine Elms area, nor on changes since the base year of 2001. It is not clear how an estimate of capacity has been arrived at, nor whether it is intended to represent a gross or net addition to existing employment. The practical implications of these uncertainties are much greater in the case of jobs than in the case of homes (paragraph 26) and the GLA should provide immediate clarification of the status of the London Plan figure for jobs in the Nine Elms area.
35. The London Plan says the Nine Elms area has an indicative employment capacity of 8000 over the 25-year period 2001-26 (annex B). This is an increase of 400 (5%) on the figure in the original London Plan for the original Opportunity Area. In effect, that represents a considerable scaling down of expectations, in that the original figure was for a 15-year period and for only 40% of the current area.
36. It is difficult to forecast future numbers of jobs in a small area. We believe the primary basis for planning policies for the Nine Elms area should be to identify the types of employment which it is desirable and

realistic to retain in the area or attract into it, and which are likely to have a continuing viability there.

37. While any employer in the Nine Elms area will in practice draw labour from a wide area, types of employment which can draw a substantial proportion of their labour from nearby are particularly desirable for three reasons:
- limiting the length of journeys to work implements national planning policies by reducing the need to travel and thus reducing carbon dioxide emissions, especially if the journeys are then short enough to be made on foot or by cycle
 - that also reduces pressure on a London public transport system which is at increasing risk of overload, especially in rush hours
 - maintaining a wide range of employment opportunities could bring significant economic and social benefits by helping to reduce the high levels of unemployment which currently exist in parts of inner London, including parts of Wandsworth.
38. One possible source of employment would be large-scale retailing. However, we do not regard that as a desirable activity to introduce into the Nine Elms area, for reasons we set out below (paragraphs 61-67).

Existing employment

39. Nine Elms Lane and Stewarts Road have proved to be desirable locations for postal and courier services. The Battersea Society supports the emphasis Wandsworth has placed on retaining this kind of activity. Referring to it as 'warehousing' is misleading, in that the small size and high turnover of items handled generate higher ratios of employment to space occupied than in many kinds of warehousing. One feature in common with warehousing is the use of single-storey, or at least low-rise, buildings. While we do not want to see a change in the activities carried on, opportunities to redevelop existing premises to reduce the amount of land needed for a particular activity should be taken, provided the outcome will be an overall increase in employment in the area.
40. The Covent Garden Market Authority proposes to consolidate the market on a smaller site. While trade with retailers has declined as supermarket chains have become more and more dominant, trade with restaurants and other caterers has been growing. Caterers may require some form of preparation to be carried out prior to purchase, thus increasing the value added by the market; and the market is widening its coverage beyond fruit and vegetables to other fresh foods. These trends have favourable implications for employment.

41. We regret the probable loss of the Flower Market, but we have not had an opportunity to consider the factors which may have led to that outcome.

Waste management

42. Waste management is a vital function in any urban area. Cringle Dock is used to transfer municipal waste, primarily from Lambeth, into barges. It is safeguarded in that use by the London Plan, unless appropriate compensatory provision is made. A consequential constraint in planning policies is that development should not be permitted on sites adjacent to Cringle Dock (which include the Power Station site) if that might prejudice use of Cringle Dock for waste management purposes. However, the Walbrook waste transfer station in the City shows that, given intelligent design, waste management and other uses can co-exist in close proximity. We are concerned that Wandsworth's proposed Core Strategy does not acknowledge waste management as a use in the riverside area (see annex C and the map at annex A).
43. Waste management could be a source of additional employment in the Nine Elms area. The new types of waste management facility that will be required in London in future may have a higher labour content. The London Plan apportions future quantities of waste to borough councils and requires them to find land to manage those quantities. Wandsworth intends to propose sites for this purpose in its Site Specific Allocations Document later this year. The proposed Core Strategy identifies the Stewarts Road area as a preferred location. New sites proposed for waste management facilities will have to be considered against criteria in national policy and the London Plan. Wandsworth also intends that waste management facilities should not be located where they would adversely affect the operations of adjoining firms or the amenities of the surrounding area.
44. The London Plan's criteria for the location of waste management facilities include 'the full transport impact of all collection, transfer and disposal movements, particularly maximising the potential use of rail and water transport'. Given its considerable advantage of a riverside location, we urge that a study be made of the scope for reorganising existing activities on the Cringle Dock site as landfill is phased out and using the space released to accommodate new waste management facilities. The Stewarts Road area is less suitable as a site for new facilities because water transport could not be used. If Wandsworth does nevertheless propose new waste management facilities in that area, we urge that it does everything possible to ensure they will be served by rail.

The Power Station site

45. The Power Station site is crucial to the future of the Nine Elms area, not only because of its size but because of the length of time it has been vacant. While it may well be able to accommodate some new housing, the priority for the community has been jobs. The Parkview scheme claimed to provide 3000 jobs, over and above jobs during the construction phase; but, following that scheme's collapse, this figure cannot be regarded as any longer relevant. In response to an enquiry from the Battersea Society the borough council has said that its position on use of the site remains as in 1983: with certain provisos, 'the Council will welcome any use or mixture of uses which makes the beneficial re-use of the building and its site possible'.
46. The Battersea Society believes the most commercially promising use for the site would be as a new major centre for the media and creative industries. This is a flourishing sector in which London, and indeed Wandsworth, are particularly strong. Firms in this sector would value closeness to the West End and the South Bank. They would also value a close association with such an internationally recognisable building. Lack of convenient working space for the creative industries is an acknowledged problem in London. There is an expanding creative quarter on the other side of Battersea Park, which includes two large architectural practices, the fashion designer Vivienne Westwood, and a campus being developed for the Royal College of Art which includes start-up units.
47. However, many firms in the creative and media industries are small, and may be reluctant to be first to move to a completely new location. Moreover, providing new premises for small firms may not be the most obviously profitable activity for developers. It will be essential to attract one or more large firms as anchor tenants. There seems to be a realistic prospect of attracting a newspaper group and/or a major advertising agency. The Telegraph group has recently moved back from Canary Wharf to Victoria; and Associated Newspapers, currently in Kensington High Street, has been rumoured to be looking for new premises.
48. Once anchor tenants are on board, many other kinds of development will be perceived as viable, including restaurants and bars, operating not only during the day but into the evening. This will provide a sound basis for taking full advantage of the Power Station's riverside location and making it into a popular centre for leisure and recreation. Many people might arrive by boat from the middle of London, reviving the tradition of the 17C and 18C Vauxhall Pleasure Gardens a short distance downstream. As the principal focus for leisure use the idea of a roof garden on the Power Station building could be taken up again.

49. Once there is evidence of momentum, the Power Station site will become much more attractive as a creative quarter for small or start-up firms. Space for them can be provided at low cost within the Power Station building, initially in the A side Turbine Hall, which is in relatively good condition, and had the most interesting interiors. As demand gathers pace, it will be straightforward to provide more units by constructing inexpensive modules inside the flanks of the Power Station building. A very large space would still be left in the middle of the building for more ambitious projects.
50. The previous Mayor talked of the need to establish an international convention centre in London. The present Mayor has not yet been able to say whether he will give effect to that. Planning had not in any case reached the stage of identifying a suitable location for such a centre. Battersea Power Station might look like a suitable site in view of the very large amount of space available there and the difficulty of finding other uses for the Power Station building. Conference facilities and associated hotels were indeed a central feature of the Parkview scheme, although not directly utilising the Power Station building. In the Battersea Society's view, however, this could not be regarded as a suitable site for an international convention centre unless there were to be major improvements in its accessibility by public transport.

Other new sources of employment

51. Much of the land between Stewarts Road and Silverthorne Road is currently used for activities with a low ratio of employment to size of site, for example car breaking and self storage. Moreover, there is a high turnover among occupiers. There is significant scope for increasing the amount and quality of employment there. New employment could result from business and logistical uses, as well as industrial uses. In Wandsworth's proposed Core Strategy the wording of the last but one paragraph of policy PL 7 (see annex C) should be brought into line with the supporting text in recognising that.
52. For the potential to be realised there will have to be big improvements in the quality of premises available and in their surroundings. While Wandsworth has said that 'Measures will be introduced as part of local regeneration initiatives', we want to see it make a more specific commitment to bring about carefully targeted improvements, in conjunction with the London Development Agency.
53. Elsewhere in the Nine Elms area high-quality hotels could be a significant source of additional employment. A 4-star hotel, part of a Portuguese chain, is under construction as part of the Chelsea Wharf development. Two large hotels formed part of the Parkview scheme for the Power Station site, but foundered with the rest of that scheme. This Opportunity Area has been identified by the GLA as a primary location for new visitor accommodation, and specifically for budget, 4-

star and lifestyle hotels. New proposals may well come forward, therefore.

Job opportunities for local people

54. The objective must be to maximise permanent employment in the Nine Elms area. Redevelopment will give rise to large numbers of jobs in construction, but only in the short term. As pointed out at the beginning of this section, the future level of employment in this area is not something it is easy to forecast. Nevertheless, successful redevelopment of the Power Station site, new hotels, retention of Royal Mail and other logistics firms, a reinvigorated Covent Garden Market, and upgrading of the area between Stewarts Road and Silverthorne Road should produce in combination substantially more employment than exists at present. Some additional employment would also come from expansion of local services, which is discussed below.
55. We emphasise the importance of providing jobs in the Nine Elms area for local people. On past form most construction workers would come from elsewhere, many from other countries. Special measures should be taken – by public bodies, by further education colleges, and by developers under requirements placed on them by the planning authority – to maximise the proportions of local people employed in both construction and ongoing activities in the Nine Elms area. That should include enabling local people to become better qualified to compete for the jobs that will become available. The Job Shop operating in the area has been an initiative of this kind. So far it has been able to achieve little of its original purpose; but it should be retained, and its work further developed.

Local services and facilities

56. Major developments in the Nine Elms area, in particular major developments of new housing, must be accompanied, or preceded, by the provision of appropriate local services and facilities (paragraph 5). These should include public open spaces, crèches, and any necessary augmentation of medical facilities and schools (taking into account deficiencies that currently exist in these respects in the Nine Elms area or in neighbouring areas). For developments to qualify as sustainable local services and facilities should be within walking distance. Developers should be required to provide the necessary funding through section 106 agreements.
57. Looking at wider needs for local services, Nine Elms would be a better location than the Salesian College site for the new Roman Catholic secondary school proposed in Wandsworth. With a larger site, top-class sports facilities could be incorporated, and made available to the local community as well as to pupils. The Mensa school, Newton Prep, on the boundary of the Opportunity Area, already attracts pupils from a wide area.

58. With increases in population and employment there will be an increased need for local shops. Wandsworth should take advantage of this to develop the shopping parades around the transport node at Battersea Park station into an attractive local centre. At the eastern end the shops being opened at Vauxhall Cross and the Sainsbury's supermarket off Wandsworth Road, just outside the Opportunity Area, could be regarded as a nascent local centre. It may also be desirable to provide for a few local shops elsewhere in the Opportunity Area.
59. It will be up to future landowners in the area to decide whether to perpetuate the large Sunday Market which has been held for a number of years on the New Covent Garden Market site.

Retailing

60. Wandsworth's Development Brief for the Power Station in 1983 ruled out major retail elements. It envisaged that 'the development of retailing uses which have as the largest element, one supermarket/retail warehouse, would be acceptable if those uses are compatible with, and assist, the overall scheme for the Power Station'. In the event the planning permissions obtained by Parkview did not include a supermarket or a retail warehouse; but they did include a large amount of space for retailing, ostensibly as ancillary to other uses on the site.
61. Retailing is not a suitable primary use in the Nine Elms area. The population resident in the immediate vicinity will continue to be restricted by geography and other uses, even if a large amount of new housing is built. The area is surrounded by existing shopping centres recognised as important in the London Plan. Kings Road East is less than a mile away as the crow flies, the 'international' centre of Knightsbridge less than two miles away, and Oxford Street only a little more than two miles. To the south the 'major' centres of Battersea (Clapham Junction, including Northcote Road) and Brixton are within two miles. In addition a significant new shopping development has recently opened at Victoria, and the very large centre at White City will open soon. A new shopping centre at Nine Elms might well have difficulty in successfully challenging all this competition.
62. If a large amount of car parking were to be allowed at Nine Elms that might be regarded as giving a shopping centre there a competitive advantage over nearby centres (though not over White City). But it would be contrary to current planning policies to allow a large amount of car parking (paragraph 71). It would encourage continued reliance on private cars for journeys which could be made by other modes. And it would increase congestion in an already congested part of London.

63. Even if not especially successful in its own right, there is the danger that a shopping centre at Nine Elms would have very damaging effects on nearby town centres which are well integrated in the urban structure, which are easily accessible by sustainable modes of transport, and which current planning policies seek to maintain and invigorate. If those centres were to decline, it would be a considerable loss for the relatively large populations for whom they are much more convenient than Nine Elms could be.
64. In the light of these considerations the Battersea Society is very concerned that the Nine Elms area, and the Power Station site in particular, are being spoken of as a major retail centre. Some recent news, though not directly related, is potentially sinister in this context: Wandsworth has decided to collaborate with Kensington & Chelsea and Lambeth in producing the Retail Needs Assessment which is one component in preparing its LDF. Retail Needs Assessments project future demand for, respectively, convenience and comparison shopping and compare that with the retail space currently available or in the pipeline. While it is not part of their purpose to identify sites for retail development, the Power Station site happens to be centrally located in relation to the area occupied by these three boroughs, and from any other point of view they are perhaps surprising partners.
65. The amount of 'ancillary' retail space that would have been allowed under the planning permissions obtained by Parkview was so large that it led the GLA, in proposing alterations to the London Plan in 2005, to bracket the Power Station with Brent Cross and the new White City development as 'out, or edge, of centre retail and other service provision and proposals, which are heavily car dependent', which should be 'managed in ways that reduce this dependency' and 'provide exemplars of modern, sustainable retail provision and enhance the quality and competitiveness of London's retail offer'. These alterations were drawn up and published before the change in ownership of the Power Station; it is unfortunate that, despite the altered circumstances, the reference to Battersea in this context was carried forward into the revised London Plan issued in February 2008. The inclusion of Battersea was in any case questionable, but the current position is that Treasury Holdings/Real Estate Opportunities have yet to decide on their preferred uses for the Power Station site and seek planning permission for them. It is thus inappropriate and unnecessary to regard the issue of retail space on this site (as the GLA did) as implicitly a matter of making the best of a bad job, given an unavoidable 'legacy' (the GLA's word).
66. We urge Wandsworth and the GLA to make clear statements that the Nine Elms area will not be allowed to develop as a retail centre. Wandsworth should also make it clear that this statement supersedes the references to retailing in its 1983 Development Brief for the Power

Station. The statements we are seeking would not prevent specialist retailers from forming a valuable part of the creative quarter we envisage on the Power Station site (paragraphs 46-49); but the scale and nature of retail development allowed should be controlled much more rigorously than in the planning permissions obtained by Parkview.

67. A further consideration is that retail development at Nine Elms would be contrary to the London Plan's policies for retailing in the CAZ, which focus on strengthening the West End, and otherwise on the existing retail fringes in the Central Area.

Transport

68. Redevelopment will place much greater pressure on the transport system in and around the Nine Elms area. Consideration of any planning application for a new development must include thorough analysis of the transport demands it is likely to generate. All developers must be required to produce and implement Travel Plans for their development. Planning permission must not be given for new developments unless satisfactory solutions to the transport demands they generate can be identified and are in place. Where necessary, the developer must be required to meet or contribute to the cost of those solutions.
69. A fundamental objective must be to establish a sustainable transport system throughout the Nine Elms area. Wandsworth and Lambeth must ensure that safe and convenient routes for walking and cycling are defined and constructed at an early stage, including completion of the Thames Path along this length of river. Although the need for improved north-south access through the railway embankment between Vauxhall and Queenstown Road has been highlighted in planning documents, a possibly greater need is for east-west access in the southern part of the Opportunity Area.
70. In view of its responsibility for management of the road network, Transport for London should make an early assessment of the effects on traffic from the likely scale and nature of development in the Nine Elms area, and revise this regularly as more information becomes available. Apart from provision of cycle routes, we do not at this stage foresee a need for major changes to the road network, although some junctions may need to be redesigned. Thessaly Road and Stewarts Road were closed at their northern ends some 40 years ago to prevent vehicles using them as rat runs between Wandsworth Road and Battersea Park Road. That should remain the position, although an exception might need to be made for local bus routes.
71. New developments must be designed in such a way as to discourage ownership and use of private cars and encourage use of other modes. Applying current policies will limit the amount of car parking provided to

a much lower level than was allowed in the planning permissions obtained by Parkview for the Power Station site. All developers should be required to provide on-site facilities for car clubs and secure cycle storage on a large scale, and at workplaces also other facilities needed by cyclists or runners such as showers.

72. Adequate provision of public transport will be crucial. Accessibility by public transport is not as good as the cat's cradle of railway lines crossing the area might suggest. However, there is good access by rail at the periphery, through Vauxhall Underground and train stations at the eastern end and Battersea Park and Queenstown Road stations at the western end. Wandsworth Road train station provides access to the southern part of the area, but with only a half-hourly service at present.
73. Parkview obtained planning permission for the rebuilding of Battersea Park station, including a new entrance in Queen's Circus; but Treasury Holdings are not willing to proceed with that scheme. That means Battersea Park, Queenstown Road and Wandsworth Road stations are all in urgent need of upgrading. Various studies are taking place on increasing the capacity of lines into London termini, for example by lengthening platforms to accommodate longer trains. Some of the measures being studied would improve the levels of service to the stations serving the Nine Elms area, but other measures could have adverse impacts on them.
74. The one major public transport project that is well advanced and would benefit the Nine Elms area (albeit this seems to have been overlooked hitherto by the borough council) is the East London Line Extension through Wandsworth Road station to Clapham Junction. However, only the southern part of the Opportunity Area would benefit and the project is as yet unfunded. Planning documents suggest the project known as Crossrail 2 (in an earlier guise, the Wimbledon-Hackney line) is relevant to this area, but its route and nature are as yet undetermined, and it could not in any case come into operation before 2022.
75. Previous analyses of the transport demands that would be generated by development of the Power Station site led to the conclusion that the existing and foreseeable availability of public transport (including enhanced bus services) would not be adequate. Conditions attached to the original planning permissions obtained by Parkview required it to provide a shuttle service of trains from Victoria station. That plan was abandoned after Network Rail concluded there was no capacity at Victoria to accommodate such a service (although the possibility of introducing it at a later date was not ruled out, and Parkview would still have been required to provide space for a station on the Power Station site). The plan to rebuild Battersea Park station mentioned above was intended as a substitute, but has now in turn been abandoned.

76. In view of the collapse of previously proposed schemes and the limited relevance of currently planned improvements in London's public transport, other action will be needed to improve access by public transport to the Opportunity Area, and particularly to the Power Station site. Upgrading of Battersea Park station must form part of that, even if in a more modest way than in Parkview's plan, together with enhanced bus services; and appropriate contributions should be sought from developers to the cost of these improvements. However, they will not be sufficient by themselves, especially when account is also taken of the overcrowding that already occurs on rail and bus services and the numerous high-density residential developments either recently constructed or proposed in Vauxhall, North Battersea and Wandsworth – over and above whatever may be authorised and built in future in the Nine Elms area.
77. We believe the appropriate solution would be a tram line along Nine Elms Lane, Battersea Park Road and York Road (which was the route of a tram line in the first half of C20). The City Corporation has put forward a proposal for a tram line between Shoreditch and Battersea. We urge the GLA, Transport for London, the City Corporation and the borough councils to take forward this proposal and seek funding for it, including contributions from the developers of the Power Station site and other major sites in the area. There may be scope for linking this proposal with the separate proposal for the Cross River Tram.

River transport

78. Plans for development of the Power Station site must continue to include a pier, with a reasonable assurance that it will be used by regular riverboat services. As suggested above (paragraph 48), this could become a significant route for leisure journeys to and from the Power Station, although it is unlikely to become a major route for journeys to work or for personal business.
79. It is important to maximise use of the river and railways for bulk freight in order to minimise mileage by lorries on London's congested roads (even where there will still be a need for more local lorry journeys to and from the wharf or railhead). Movement of municipal waste has been covered already (paragraphs 25 and 42-44). Any new planning permissions for the Power Station site should include conditions as stringent as those in the previous planning permissions about using the river to remove demolition and excavation waste and bring in building materials.
80. The Opportunity Area includes two river wharves and a railhead for receiving aggregates and using them to supply concrete. Planning policies protect the river wharves in that use. They are now owned by the same company, and the one which adjoins the Thames Water site containing the Heathwall pumping station is not in current use.

However, we believe this Thames Water site is planned to become one of the main access points for constructing the Thames Tideway Tunnel (which will prevent storm overflows of untreated sewage). Even if there may eventually be a case for allowing the adjoining wharf to be redeveloped for other uses, it would be imprudent to consider any such proposal until it is clear whether use of this wharf may be necessary to ensure that the large quantities of spoil from the Tideway Tunnel project can be removed by river.

FORM OF DEVELOPMENT

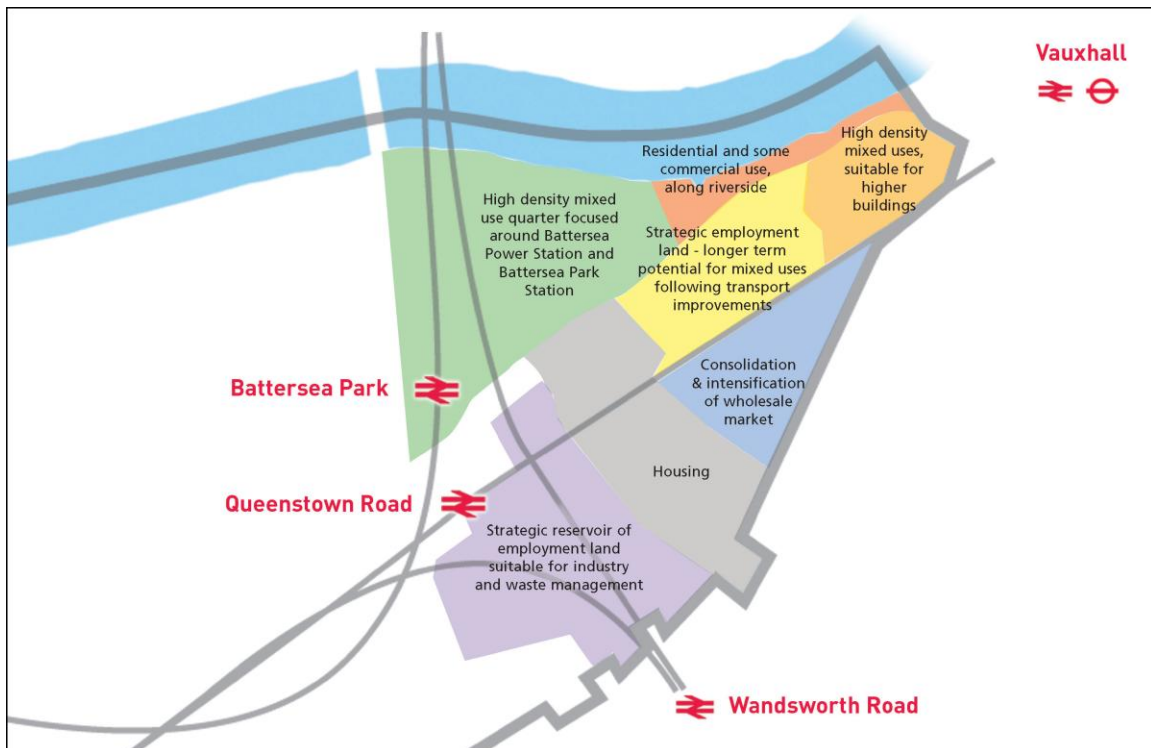
81. New development in the Nine Elms area should be at the relatively high densities in the ranges specified in the London Plan for a central area. Achieving those densities does not necessarily require tall buildings. High densities can be achieved in a more humane way with carefully planned buildings of more modest height, as in London's Georgian terraces and squares or, in a later era, Churchill Gardens in nearby Pimlico.
82. We are alarmed by references Wandsworth has made to a need to 'reinforce the skyline' and the desirability of 'landmark' buildings. These appear to be euphemisms for tall buildings, without regard to the quality of their design or the appropriateness of their location. The New York skyline is attractive (if that is the implied model) because skyscrapers have been carefully placed and are often of very high architectural quality. The Nine Elms area is already defined and punctuated by tall buildings (paragraph 11): the group at Vauxhall Cross, Battersea Power Station, and the 21-storey public housing north of Wandsworth Road. There may be a case for some additional tall buildings in the area, but only on carefully selected sites, where they will add to, rather than detract from, the area's character and identity.
83. Tall buildings should be located where accessibility by public transport is greatest. There is some advantage in visual terms if they form groups, close enough together to form a genuine 'cluster', but not so close as to seem overwhelming and oppressive in near views, or cause turbulence at ground level. For visual effect the tall buildings in a cluster should not be of uniform height. Suitable locations for a small number of tall buildings might be:
 - as extensions a short distance inland of the Vauxhall Cross group
 - at the southern end near Wandsworth Road station, where a couple of tall buildings could be placed with dramatic effect on rising ground, giving further emphasis to this apex of the Opportunity Area.

84. Locations where tall buildings should certainly not be permitted are:

- along the river bank between Vauxhall and Chelsea Bridges, where they would destroy the character of this reach of the river by being out of scale with buildings on the opposite bank, and also damage more distant views along the river
- elsewhere in the area around the Power Station – it should continue to dominate the skyline, as would have been the case under the planning permissions obtained by Parkview.

THE NINE ELMS AREA

Map of the Nine Elms and North East Battersea area taken from Wandsworth's draft Core Strategy Preferred Options for its Local Development Framework, published in September 2007



NB The descriptions on this map of land uses in different parts of the area represent proposals put forward by Wandsworth Borough Council and in some cases differ from the views of the Battersea Society expressed in the text of this Outline Planning Brief.

KEY PROVISIONS OF THE LONDON PLAN RELATING TO THE NINE ELMS AREA

Vauxhall/Nine Elms/Battersea is one of 28 areas identified as Opportunity Areas in the London Plan. As noted in the text of this Brief (paragraph 9) it was considerably extended in the revised London Plan adopted in February 2008. Its boundary has not been defined precisely; that has been left to the borough councils’ Development Plan Documents.

The table shows the London Plan’s overall objectives for the Opportunity Area in its original and current forms.

	size of area	indicative employment capacity	minimum homes
original London Plan	78 ha	7.6k 2001-2016	1.5k 2001-2016
current plan	195 ha	8k 2001-2026	3.5k 2001-2026*

** Of the increased number of homes, 200 are contributed by a reassessment of what can be achieved up to 2016 within the area originally defined.*

Statistics about the present situation in the Opportunity Area are not readily available, and the planning authorities need to remedy that. It is not clear how the figures in the table compare with the employment and housing already in the area, whether they represent net additions to what is there already, or how much of the development indicated will already have occurred between 2001 and now.

London Plan policy 2A.5 on Opportunity Areas reads as follows:

As part of the process of producing Sub-Regional Implementation Frameworks, strategic partners should work with the Mayor to prepare, and then implement, spatial planning frameworks for Opportunity Areas as shown on Map 2A.1, or to build on frameworks already developed. These frameworks will set out a sustainable development programme for each Opportunity Area, to be reflected in DPDs, so as to contribute to the overall strategy of the London Plan to:

- seek to exceed the minimum guidelines for housing having regard to indicative estimates of employment capacity set out in the sub-regional tables
- maximise access by public transport
- promote social and economic inclusion and relate development to the surrounding areas, especially any nearby Areas for Regeneration
- take account of the community, environmental and other distinctive local characteristics of each area
- deliver good design, including public realm, open space and, where

- appropriate, tall buildings
- co-ordinate development that crosses borough boundaries where appropriate

Part of the Nine Elms area is in the Central Activities Zone (CAZ) designated in the London Plan, and is therefore covered by the Plan's policies 5G.2 on strategic priorities for the CAZ, 5G.3 on offices in the CAZ, 5G.4 on retailing in the CAZ (quoted in paragraph 67 of this Brief) and 5G.5 on predominantly local activities in the CAZ. The London Plan also commits the Mayor to 'work closely with boroughs and other stakeholders to prepare a framework to secure the most appropriate development of the Zone and the links to other Opportunity Areas and inform relevant [Development Plan Documents]' (policy 2A.4).

To the extent that the GLA has taken forward planning of the Vauxhall/Nine Elms/Battersea Opportunity Area it has done so as part of preparing a Sub-Regional Development Framework (SRDF) for Central London. A draft SRDF published in May 2006 set out in an annex key issues, infrastructure issues and the position in April 2006. The amended London Plan now in force divides London into a different set of sub-regions, and Wandsworth and Lambeth now form part of the South-West Sub-Region rather than the Central Sub-Region. The indications are that the GLA is unlikely to devote much further effort to sub-regional frameworks; at most, SRDFs for the new sub-regions will be produced by redistributing the material in the previous drafts.

In the London Development Agency's thinking Vauxhall/Nine Elms/Battersea has formed part of a London South Central Area stretching north and east along the river bank to beyond Tower Bridge.

In February 2008 the GLA reported that an 'Opportunity Area Framework' for Vauxhall/Nine Elms/Battersea was 'being progressed' by Lambeth and Wandsworth borough councils, and that a draft was expected 'around end of 2008'. A proposed policy for Nine Elms and North East Battersea produced by Wandsworth as part of the Core Strategy of its Local Development Framework is reproduced here as annex C. Lambeth is preparing guidance for the Vauxhall area as a Supplementary Planning Document; a draft of that is expected in summer 2008.

Insofar as they are not compatible with it, the London Plan supersedes the borough councils' Unitary Development Plans (UDPs). The Local Development Frameworks which will replace UDPs and are now being prepared have to be in general conformity with the London Plan.

WANDSWORTH LOCAL DEVELOPMENT FRAMEWORK
CORE STRATEGY PREFERRED OPTIONS

[NOTE: As well as the Preferred Option it is proposing the borough council was required to set out Alternative Options which it had considered and rejected.]

**PROPOSED POLICY PL 7
NINE ELMS AND THE ADJOINING AREA IN NORTH EAST BATTERSEA**

Preferred Option

- High density mixed use development will be promoted north of Nine Elms Lane along the riverside, without prejudicing the three safeguarded wharves, to help create a "sense of place" and a dynamic mixed use quarter around Battersea Power Station and nearby sites, with improved public transport links to Victoria.
- The retention, consolidation and intensification of the wholesale market within the NCGM site will be supported, enabling the release of land near Vauxhall for high density housing. There is scope to reinforce the skyline towards Vauxhall by adding to the proposed cluster of tall buildings, and in the longer term scope to create a permeable framework of streets with new urban squares to provide valuable amenity space and giving a spatial setting and adding value to new urban development.
- Improvements to public transport provision will be sought, particularly the upgrading of the stations at Vauxhall and Battersea Park and in the longer term improvements to the central part of the area.
- The remaining employment land designations in the area will be reviewed once the future of the market is clarified in order to ensure that in the longer term the potential of the area to contribute to London's housing and employment needs is maximised, ensuring that capacity for those specific uses serving central London is provided for.
- The Stewarts Road area will continue to provide a reservoir of employment land for industry and waste management and enhancements will be sought to the environment of and access to the industrial area.
- The Council will work with Lambeth on developing the potential of the area to meet the London Plan Opportunity Area targets.

Alternative Options

- Encouraging higher value, higher density uses throughout the area to maximise its potential and increase housing and commercial capacity - this option is considered unfeasible given the poor existing public transport provision in the central areas. It is considered preferable to concentrate development initially in those areas which already have relatively good public transport, at the eastern and western ends of the area and improve public transport here first, and also encourage development to take advantage of the riverside environment. Sufficient sites exist in these areas to meet the London plan targets for the Opportunity Area. In the longer term, following further improvements in public transport, there may be scope for further redevelopment of the area south of Nine Elms Lane.
- Retaining the UDP IEA designation on NCGM site - the current IEA designation would prevent the introduction of new residential development which can help cross-subsidise the consolidation and intensification of the wholesale market. The Council supports the continuation of a wholesale market in this location and accepts that the introduction of higher value residential use is required to help fund the investment necessary for the market to move forward. Sustainability criteria indicate that the new housing would most appropriately be located at the Vauxhall end of the site, close to public transport