

**BATTERSEA SOCIETY RESPONSE TO THE DRAFT LONDON PLAN**  
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## **Introduction**

The Battersea Society welcomes the opportunity to comment on the draft London Plan, in particular in relation to our area of interest, the former borough of Battersea. This includes significant development areas including the Vauxhall Nine Elms Battersea Opportunity Area (VNEB) and Clapham Junction

Our comments are set within our extensive experience of the impact of the development of the Opportunity Area and the intensification of development along York Road/Lombard Road. The Society has consistently fed in comments and discussed with TfL, Wandsworth and developers aspects of these developments.

The principles set out in the draft plan accord well with the views we have expressed on these developments and we would hope the notion of 'Good growth' could be realised in the design and approval of future developments.

However too many high density and aesthetically-wanting schemes have been approved which do not reflect this ethos and are now in the pipeline. They frequently do not fully reflect approved development plan documents, are having a detrimental impact on the local environment and quality of life and reflect the lack of an integrated approach from the start.

## **Need for a Strategic Approach to Development**

There has been a significant failure to take a strategic, integrated approach to the intensification of the area from Lambeth Bridge through to Wandsworth Town on the part of all concerned: City Hall, both the Mayor's office and TfL, and by Wandsworth Council.

Impacts such as pressures on traffic, transport and social infrastructure have been addressed piecemeal. Poor air quality resulting from the scale of new building is not acknowledged. This has been compounded by recent examples where the Mayor has overridden local concerns and approved developments seen locally as far from the 'Good Growth' principles set out in this draft plan.

The fact that this intensification is essentially development of a type advocated in this draft plan is a matter of concern. We urge all those involved to acknowledge the need for a strategic and integrated approach.

## **Implementation of the Plan**

There is some ambiguity in the nature of this plan. Legally it forms part of the formal development planning process. However to achieve much of its underlying holistic ethos of 'Good Growth' requires action by agencies, and under legislation, outside the formal planning process. Thus while we welcome this objective we have concerns about the feasibility of its implementation given the level of staffing and professional expertise of those in planning departments.

We also consider there are internal stresses within the Plan between intensification and the protection of the environment which are such that its more benevolent aspects relating to health and quality of life are unlikely to be achieved.

## **Policies**

We comment below on a number of the specific policies on which we have concerns and then indicate those which we particularly welcome as part of a new strategic framework.

### *Areas of Concern:*

#### *A: Intensification – pages 2 - 4*

- GG2 making the best use of land
- GG3 Creating a healthy city;
- D8 Tall buildings
- H2 Small sites; D 1 -3
- SD1 Opportunity Areas
- E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function
- SD5 Offices, other strategic functions and residential development in the development in the CAZ

#### *B: Affordable housing – page 4*

- H6 Threshold approach to applications;
- H12 Housing size mix

#### *C: Transport – page 4 - 5*

- Policy T3 Transport capacity, connectivity and safeguarding
- Policy T5 Cycling

#### *D: Areas where policies are welcomed – page5*

## **Detailed Comments**

### **A: Intensification**

#### **GG2 making the best use of land**

We have major concerns about higher density development proposed in policy GG2B. High density in Battersea has tended to equate to high rise flats. While we have no general opposition to high rise development per se, what we have seen is a lack of integrated planning in relation to the location of individual developments one to another, combined with mediocre design and choice of materials. The policy directive that development should be: '*well-connected by public transport, walking and cycling*', does not work in practice unless the aggregate impact of each development is assessed.

To date each new development takes little note of the effect on public transport of other approved high rise schemes in the pipeline. Much is made of the capacity of Clapham Junction and other local overground stations. There is already intense pressure at peak times and we fear that sooner or later there will be a major accident at one of these. Section 2.1.26 acknowledges that Clapham Junction requires development to accommodate future passenger numbers. But the time span for this will be well after the impact if felt of developments already approved.

### **Policy GG3 Creating a healthy city; Policy D8 Tall buildings**

While we welcome the provisions of this section we doubt whether they will be given sufficient priority over the need to deliver additional units. In particular, the need for policy D83: environmental impact is critical. The environment around new developments in Nine Elms is bleak and windswept. In spite of landscaping at ground level the impact of wind tunnels and high canyon like pedestrian walk-throughs do not reflect the Healthy streets (GG3) objective in the plan. No suggestion is given as to how the desire for yet higher densities can be reconciled with wind and pollution levels at street level.

### **Policy H2 Small sites: D 1-3 To deliver the small sites targets in Table 4.2, boroughs should apply a presumption in favour of .... small housing development which provide between one and 25 homes**

Many of the properties within the conservation areas of Battersea meet the detailed criteria of this policy. There are extreme pressures for conversion and over-development throughout Battersea and this is leading to environmental degradation of local heritage assets and to access to such housing being restricted to the super rich. This policy will not increase housing supply for those in real need, in fact it will provide a perverse incentive for owners to extend houses with purely vanity projects or for speculative gain. This policy highlights the internal tensions of the Plan when compared with the objectives of **Policy HC1 Heritage conservation and growth section C** which aims to protect heritage assets.

### **Policy SD1 Opportunity Areas**

The inclusion of Clapham Junction as an opportunity area linked to Crossrail2 makes sense. However without any timescale and no justification for the proposed scale of employment and housing growth, the proposals in the draft plan are likely to act as further uncertainty in the area. The station needs urgent attention to deal with current safety and congestion issues, not to mention longer trains on mainline routes, heavier traffic on London Overground and the uncertainty about the timing and precise nature of Crossrail 2.

The weak reference at the end of para 2.1.26 to the need to integrate with the Housing Zone (and although not stated) the redevelopment of the Winstanley estate, renders this section defective in failing to provide any practical strategic framework for the Borough, for local business or for residents affected by the estate redevelopment. The Battersea Society therefore support SD1 A for '*the collaborative preparation and implementation of planning frameworks*' for each opportunity area. The preparation of a master plan for the whole area including the Winstanley regeneration should be taken forward urgently. The station and the shopping centre are within a Conservation Area and any development proposals must seek to retain the heritage of the station and its immediate locality.

### **Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function ; Policy SD5 Offices, other strategic functions and residential development in the CAZ**

We welcome the objective in **Policy E5** for retaining SILs. However we are concerned that Policy E7 which supports intensification through delivery of residential and other uses in SILs could severely affect the nature and level of employment in the Queenstown Road SIL where pressure from residential development is high. This is one of the few remaining areas for small and mixed businesses serving the opportunity area and the rest of CAZ. We therefore consider that **Policy SD5** needs to be applied sensitively in this area and we would hope that the employment capacity in Battersea is not reduced by substitution of business use for residential.

While we are not opposed to intensification of employment areas it must be set in a wider local context of proper internal road access, delivery and parking provision linked to external major routes and public transport

## **B: Affordable housing**

### **Policy H6 Threshold approach to applications; Policy H12 Housing size mix**

The Mayor's target for affordable housing has had little real impact in the VNEB area. While Wandsworth maintains it has met the minimum requirement for affordable housing, what is actually needed is social rented housing. The draft plan has nothing substantial to say about this. We have major concerns that to meet the minimum 35% target developers will only provide small affordable units unsuited to families or provide excuses to fund off site units.

By accepting smaller units within the affordable quota within the CAZ (H12 A6), and elsewhere in Battersea, the future looks bleak in terms of accessible family housing for low income groups. Demand for employment in lower paid local services is likely to rise given the nature of the population moving into Battersea. Lack of suitable local housing means that again there will be increasing pressure on local public transport as such employees are forced to commute ever further, from cheaper housing areas they can afford or access.. Hardly conducive to the espoused healthy living of this plan.

Rapid delivery of additional housing units is paramount and we regretted seeing no reference in the draft plan to meeting part of this need by providing good quality multi-bedroom prefabricated houses.

## **C: Transport**

### **Policy T3 Transport capacity, connectivity and safeguarding**

We consider the policies in the draft London plan fail to adequately recognise the pressure on both the public transport system and on key roads into central London. We expressed major reservations in response to TfL's Transport Plan for London. The latter has to provide the strategic framework for the London plan.

As indicated throughout this response we do not believe that there is a coherent integrated approach to transport planning demonstrated by the individual approval of high density development in the corridor from Lambeth Bridge through to Wandsworth Town. Repeatedly there is over reliance on the capacity of Clapham Junction, overground rail and existing bus route which at peak times are grossly overloaded.

We consider therefore that **Policy T4 E- requiring assessment of cumulative effects** should be an absolute requirement for each new development with continual reassessment of impact as developments are built and occupied.

### **Policy T5 Cycling**

Reliance in the future on cycling and walking (as suggested in **Policy GG2 E**) should not be at the expense of adequate public transport for those for whom cycling or walking is not an option. The plan needs to acknowledge the need for much more work to be done in relation to the continued need for separated cycleways, for adequately managed shared use spaces, for building understanding between cyclists and pedestrians and for the recognition of the actual or potential conflict between pedestrians and cyclists on major

routes where such shared use safeguards are not in place e.g. the Thames Path and routes through public open spaces such as Battersea Park. We also consider that for purely practical reasons cycling and walking is not always a feasible option for the elderly or parents with infants.

#### **D: Policies we particularly welcome**

We endorse the proposals set out in the following and trust that action will be taken without delay.

- Policy H11B; Ensuring the best use of stock through control of 'buy to leave'
- Policy H13 Build to Rent
- Policy E9 Retail, markets and hot food takeaways
- Policy E10F Visitor infrastructure control of apart-hotels and short-term lettings
- Policy S1 Developing London's social infrastructure and Policy S2 Health and social care facilities (though both these are laudable they do require a holistic approach to policy delivery outside merely the planning system)
- Policy S6 Public toilets
- Policy HC7F Protecting public houses

Battersea Society February 2018

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