

## **Response to Pre-Publication Regulation 18 Consultation Version of Wandsworth Local Plan**

**From: The Battersea Society Planning Committee**

### **FOREWORD**

The Battersea Society has considered the consultation in detail and hope that the supportive comments and constructive challenges that follow will help colleagues at Wandsworth Council in their next stage of consideration of the Local Plan. We share the Council's desire for a well thought through plan that continues to ensure that Battersea, and more broadly Wandsworth, continues to be a thriving borough and a great place to both live and work. We are happy to continue to work with the Council as the plan develops over the next few months. We are drawing our members' attention to this Local Plan consultation and will continue to keep them informed as it is finalised. If anything is unclear from our response we would be happy to discuss this.

### **STRUCTURE AND STRATEGIC CONTEXT**

#### ***Introduction***

Our core concern is that the Plan as currently drafted is poorly structured, inconsistent and incoherent, and does not represent a proper basis on which to determine policies and strategies for the next fifteen years. Significant changes will be required before it can meet the requirement of the National Planning Policy Framework (NPPF) that it should contain policies that are clearly written and unambiguous, demonstrate how they address relevant economic, social and environmental objectives, and avoid unnecessary duplication of policies.

The future vision for Wandsworth must be a key concept of the Plan and this vision for Wandsworth appears to be missing. In thinking about the future, surely the vision must be about the future of our great-grandchildren and what we leave behind for them, considering scientists' warnings about the way that natural resources are being used up and the effects of this on climate change. The Council should take this opportunity to make this the Wandsworth vision and focus policies around this.

We recognise that there were significant changes in the policy environment created by the Government's White Paper Planning for the Future introduced while the plan was being written including:

- Extensions to permitted development rights (PDR) including the right to add two storeys to existing blocks of flats, and to demolish offices to change them into housing.
- Changes to the Use Classes Order (UCO) which now brings together most retail and commercial uses under a new single Class E.
- Proposed changes to housing targets.

There have been further changes in national policies and further proposals since the plan was presented to Committee last November:

- Further changes to housing targets. These will have to be reflected in the next Local Plan.
- Changes to the London Plan (now published) which remove the protection for industrial land, and set a minimum threshold of six metres for tall buildings.
- Proposals to allow any Class E property to be converted to residential use without the need for planning consent and also to reduce the time for consultation on some infrastructure projects.
- Proposed changes to the NPPF and the publication of a new National Model Design Code.

Other policy changes include a requirement in the Greater London Authority's draft *Good Quality Homes for All Londoners* Supplementary Planning Guidance (SPG) to produce design codes for all significant housing developments. More generally, the Plan does not mention the post-Covid London Recovery Programme being developed and implemented by the GLA, or similar initiatives being developed by the Government at national level.

These policy changes would have justified some delay in publishing. . What is now being consulted on will have to be changed significantly although uncertainties and practical difficulties for officers and others will not have changed. This is concerning because if significant amendments are made before submission of the Regulation 19 document, this is the last chance for local groups and interests to comment on its form and content.

### ***The New Plan***

The Plan reads as three separate parts – Strategic Context; Spatial Strategy and Area Strategies; and policies on urban design, housing, transport, green and blue infrastructure and so on – largely unrelated to each other.

It is difficult to see how, if at all, the various strategies, objectives, goals and targets set out in Sections 2.35-2.55 – among others, for example, relating to environment and sustainability, transport, or health and well-being – relate to the overall goals and the environmental, social and economic objectives identified under the “Spatial Vision”. Nor is it clear how those goals and objectives relate to the more specific themes and principles identified for Placemaking, Smart Growth, and People First; or to the individual Area Strategies; or to the 62 policies set out in the rest of the Plan.

Instances of this lack of coherence and consistency include:

- The overlap set out in Sections 2.31-2.34 between the five overarching objectives set by the Council for Smart Growth as part of a recovery plan in response to the Covid-19 pandemic and its long-term vision on the one hand, and the strategic objectives set in the Council’s Corporate Plan on the other.
- The Corporate Plan specifies, “more homes and more choice”. This is not mentioned in the Smart Growth objectives, while the latter include an aspiration that Wandsworth should be the greenest inner London borough, not mentioned in the former.
- Placemaking - built on a three-part “framework” of Placemaking, Smart Growth and People First – is, we are told, at the heart of the Plan. Under the Placemaking head, the fourteen “principles or characteristics are identified, including identity and heritage; urban design; nature and biodiversity; work and opportunity; mixed use; active travel; and health and well-being”. But there is no attempt to relate these principles and themes either to the Corporate or to the Smart Growth objectives. Moreover the policies set out in the Area Strategies make no attempt to refer to the fourteen principles.

### ***Implementation***

While we recognise that there are many desirable policies and strategies in this, as in the current Plan, we must register a major concern regarding the extent to which policies have been, and will be, implemented.

It is our experience that policies set down in previous Plans have been no protection against undesirable development and have, in many instances, been observed more in the breach than observance. The final short and sketchy section of the Plan gives no comfort in this regard.

Finally, we agree that the site allocations in the Plan should be seen as the key delivery mechanism to meet the housing, employment, retail and other needs that have been identified, and that engagement with landowners, employers, and local community representatives should take place as soon as possible. But many of the allocations have been in previous Plans, and it is concerning that precisely when and how such engagement should take place, and with what outcomes, is far from clear.

Despite our criticisms, we have aimed at providing useful comments on the draft document and these follow, set out under the relevant sections, with a focus on the implications for Battersea.

### ***Chapter 21, Green and Blue Infrastructure and the Natural Environment***

A submission on this chapter will be made separately by the Open Spaces Committee of the Battersea Society.

### 3. PLACEMAKING AND AREA STRATEGIES

#### *Overall Comments*

We have strong concerns about the presentation of the Placemaking and Area strategies. The fourteen themes and principles on which the strategies are based are themselves overlapping – transport, development, and housing, for example, appear twice under different headings – and key terms – such as “responsive development” – are left unexplained and undefined. The list of themes in Table 3.1 is followed by a text box extending over five pages which claims to identify the “drivers” for each of the themes. However, what is presented is a mix of characteristics and features, policy objectives and goals, expressed randomly in the present tense and as future imperatives. There is no attempt to link the policies and objectives for each of the nine area strategies to the fourteen themes and principles. Hence it is impossible to judge whether the policies are in line with the Council’s overall Placemaking strategy and objectives.

We have reservations about the stated policy that boundaries for the area strategies should not be defined “as these are areas of planning focus interlinked with their surrounding areas”. Since most of the area strategies are based around town centres, we are not clear how this can be reconciled with the policies set out in the NPPF Section 7. We cannot understand what might be meant by the sentence (3.22) “It is anticipated that development proposals that have the potential to contribute to the vision of an Area Strategy will advocate the principles/content of the Area Strategy”. Nor do we understand why nothing at all is said about policies and strategies relating to the “linkages” between the different spatial areas identified on the Key Diagram Map 2.2.

We consider the pressure for development and land use changes in the York Road/Lombard Road area justify its being considered through a discrete area strategy, and not subsumed within Wandsworth Riverside

(see our comments below on that Area Strategy)

### 5 AREA STRATEGY FOR NINE ELMS

Our overall concerns with the strategy as presented are the treatment of liveability, density, provision of affordable housing, lack of daylight, transport capacity and need to separate pedestrians and cyclists within the linear park and along the Riverside.

**5.9:b** Should include reference to the fact that the Parkfield Industrial estate is part of Strategic Industrial Land (SIL) although technically outside the Opportunity Area (OA) as uses complement others in SIL.

**5.10** We welcome the designation of Kirtling Street/ Cringle Street as ‘an emerging neighbourhood’ rather than a collection of sites.

**5.11:** Should refer to bus routes through Nine Elms and their importance for linking Battersea to Vauxhall and the City. Capacity is likely to be a concern as building is completed. No mention is made of the importance of Vauxhall Bus Station as an entry point. There is only one bus route (344) which runs from Vauxhall along the whole length of Battersea Park Road and no direct route to the York Road area.

**5.15: place performance:** We understand the scores presented in Figure 5.1 were a result of internal discussion. Overall they appear very low compared with those for other parts of the borough. They do not differentiate between different parts of the OA (e.g. Vauxhall/Embassy area and Power Station/Battersea Exchange) which we consider would result in a contrasting range of perceptions about living and working in Nine Elms.

**Smart Growth A:** All calculations of housing to be provided should show it split by tenure. Too little is affordable, there are concerns about unmediated expansion of Co-living and build to rent.

**General point:** The new site allocations entries refer to the need for high quality and distinctive design for frontages onto Battersea Park Road. We suggest some form of Urban Design Guide is prepared for this and other major frontages (e.g. York Road, parts of Clapham Junction).

### **PM3: Nine Elms**

**Place Making E: Key Gateways:** We have generally been very disappointed with the design of proposed developments on corner junction sites throughout Nine Elms e.g. the corner office block of South London Mail site. Remaining sites need to be treated with more robust design guidelines. This design imperative should be noted in the Site Allocation Design Requirements for those sites abutting Battersea Park Road/Nine Elms.

**Smart growth L: Urban Logistics Hubs:** Excellent policy but despite the cross-reference to Policy LP51, it is not mentioned at all in Chapter 20, Sustainable Transport as a more general objective for wider areas of the borough and emphasised as something which will be actively pursued and required for development in local employments areas eg Battersea Design and Technology Quarter (BDTQ) and York Road/Lombard Road

**People First: H and F:** There is a need to improve accessibility to Battersea Park Station not just externally but also within the station itself. It would be clearer if subheads H and F were combined and the current section I followed immediately after.

As indicated in the Urban Design Study, the strategy should promote improved accessibility and movement throughout the separated elements of BDTQ. In particular there should be a requirement to take forward the suggested feasibility studies set out in the BDTQ Economic Appraisal and Design Framework (p 37) to provide direct links through railway arches and, where appropriate, over the rail lines.

**NE2 41-49 Nine Elms Lane, and 49-59 Battersea Park Road, SW8.** This is potentially a key gateway site (see above). Any new proposal provides the opportunity for an iconic building, especially given links to the linear park.

**NE12 New Covent Garden Market - Entrance Site, SW8.** We strongly support the proposal for this and NE2 to be considered as complementary sites. The general point about the importance of the design of this as a gateway site applies here.

## **6. AREA STRATEGY FOR CLAPHAM JUNCTION AND YORK ROAD/WINSTANLEY REGENERATION**

### ***Definition and Boundaries***

We disagree with the definition of this area, on two grounds. First the town centre and the Winstanley estate are two quite different areas, not one. While they are geographically close, they are separated by a substantially impermeable railway; and the town centre is fundamentally different from the dense housing of the regeneration areas.

Second, we have reservations about the definition of the town centre. As presented in this and previous Plans, it covers only the area defined by the protected core, secondary and other frontages. It thus excludes the southern half of Northcote Road, St John's Hill west of the railway bridge, and Falcon Road north of the railway. These streets all have substantial frontages of retail, service and other commercial properties, and they form part of the area covered by the Clapham Junction Business Improvement District (the existence of which is not mentioned in the Plan). They also form an important part of the retail and other commercial services offer for residents living in the Clapham Junction area.

The absence of the major part of Falcon Road (mentioned nowhere in the Plan) makes it especially difficult to justify the unhelpful joining together of Clapham Junction town centre with the York Road/Winstanley area. Nothing is said about possible development along the "linkage" sites identified in the Key Diagram Map 2.2 along Battersea Park Road (where the local centre is misplaced on the map), Lavender Hill and Queenstown Road which join Clapham Junction to Nine Elms, so it is impossible to judge what role these linkage sites are intended to play.

### ***Retail Needs Assessment and Urban Design Study***

We are surprised there is no mention of the Retail Needs Assessment (RNA) prepared for the Council by Lichfields in the first half of 2020 or of the strategic priorities for Clapham Junction it sets out. The Area Strategy is in this sense, therefore, framed differently from the strategies for other town centres such as Putney and Tooting. The RNA notes that vacancy rates tend to be lower, and rents higher, in the core of Clapham Junction, than in the borough's other town centres. But it is far from optimistic about the future over the next 10-15 years. Even before the full effects of the pandemic are taken into account, it projects combined losses of revenue and of floor space for convenience and comparison retail, and for food and beverage uses, far higher than for any other of the borough's town centres; the losses account, indeed, for nearly half the total for the borough by 2030.

Similarly, we find it odd that there is no reference to the area design guidance for Clapham Junction presented in the Urban Design Study commissioned by the Council. The recommendations, for example, to “create new destinations to enhance the visitor experience inspired by its past e.g. theatre/music venue/concept stores/design shops/galleries”, and to “reintegrate the Falcon Lane area to the town centre” are entirely ignored.

### ***Opportunities and Constraints***

The area is identified in the London Plan as a nascent Opportunity Area, reflecting the significant growth opportunities offered by Crossrail 2 and/or the proposals for a major rebuilding of the railway station. These opportunities are closely linked: it is unlikely that the existing station will be redeveloped without provision for a new Crossrail 2 station.

However, since the Government has recently directed TfL to cease all work on Crossrail 2 beyond protecting its designated sites, it is highly unlikely that any major development other than the York Road/Winstanley regeneration project will take place within the lifetime of the Plan. The site allocations for the town centre represent merely a wish list with little chance of fulfilment during the foreseeable future. The same can be said of policies such as facilitating and promoting a better public transport interchange.

This presents a major dilemma for the Council, the local community and other stakeholders. No-one wants to see stasis and planning blight for the next fifteen years. The Plan talks of working with Network Rail and TfL to produce a “Vision” for the Junction. But the opportunities for development in the town centre to take place during the lifetime of the Plan are highly constrained. This is symptomatic of other objectives throughout the Plan which lack any timescale. Timings might provide some confidence that objectives are realistic and achievable within the lifetime of the Plan.

What is needed is for the strategy to include some realistic suggestions for the lifetime of this plan to ensure that Clapham Junction is sustained as a successful centre, and that it responds effectively to changes in consumers’ and visitors’ behaviour. The absence of the kinds of innovative thinking being discussed by landowners and developers, community groups and policy makers across London and across the country is disappointing

Appropriate measures might include: developing structures for engagement and participation with local communities and other stakeholders; developing organisational resources and skills; promoting new community uses; experimenting and prototyping without fear of failure; innovations in asset management; and the development of arts and cultural uses, such as a cinema. These and other initiatives are essential if the Council is to work effectively with others in re-imagining what the future of the town centre might be. Working together with landowners, developers and others will be the more important as a result of the introduction of class E, and if extensions to PDRs reduce the protection for high street premises.

All four of the site allocations around the station are themselves constrained by the need to protect the as-yet-unknown possibilities for future rebuilding of the station itself and reconfiguration of the tracks surrounding it. In these circumstances, landowners and investors are unlikely to be attracted to invest significant sums on developments in the three site allocation areas.

### ***Offices***

Prima facie, one might expect that the excellent transport links would make the area suitable for significant office development. But experience to date suggests that this might not be the case. Of the two significant office buildings in the town centre, the PCS building has not been fully let for some years, and the first to the fourth floors of the Barclays Bank building, contrary to what is stated in the Plan, have been converted into flats, following prior approval given by the Council in 2017.

### ***Policies for the Area***

There is no attempt to relate the 23 policies for the area to the fourteen principles and themes set out in the overall Placemaking Strategy. As we have noted, it is therefore difficult to judge how the policies might fit with the principles and objectives of the Placemaking strategy. There is huge overlap and repetition across the 23 policies. Some of the fourteen principles are missing, including responsive development, 15 minute neighbourhood, and lifestyle choice; while mixed use, which is part of the Smart Growth element in the strategy, is mentioned only briefly under the Placemaking element. In many cases it is not clear how the policies and aspirations, such as improving both north-south and east-west connectivity and permeability, or reducing the impact of through traffic in and around the town centre, might be achieved. How this set of policies might support decision-making is thus far from clear.

## Site Allocations

We note the two separate maps of the area on pages 119-120. Why two maps are needed is not clear; but both of them have faulty legends.

- *CJ1. ASDA, LIDL and Boots sites, Falcon Lane.* There have been no significant developments on this site since it was included in the Site Specific Allocations Document (SSAD) as part of the current Local Plan in 2016. Consent was granted in June 2018 for demolition and rebuilding of the Lidl store (a proposal which met none of the requirements set in the SSAD). Fortunately, Lidl decided not to proceed with the development, and the consent will lapse in June 2021. We strongly support efforts to promote mixed-use development of the site, with active frontages to Falcon Lane and Lavender Hill. It is a disgrace that half the site is taken up with car-parking.
- The new site allocation largely repeats the 2016 version, but it now notes that the northern section of the site, adjacent to the railway, may be required for track/platform straightening works. This is likely to be a disincentive to developers; and we note that the last decade has shown little evidence of co-operation or engagement between the different landowners, rather the reverse. The site allocation also notes that the tunnel under (sic) Falcon Road is expected to be made more pedestrian friendly. This is mentioned again under CJ2 and CJ3; but nowhere in the Plan is it stated how this is to be achieved.
- *CJ2. Clapham Junction Station Approach.* On this site too there has been little development since it was included in the 2016 SSAD. Network Rail and others, however, have developed outline proposals for the complete redevelopment of the station, including this site. With large-scale mixed-use development on top of the station, this would be significantly larger in scale than the recent redevelopment of London Bridge Station, and Government support for such a development is uncertain. The draft Plan notes that any redevelopment of the station approach site must not prejudice any larger scale redevelopment, which is likely to require land at the north of the approach site. Again, this is likely to be a disincentive to developers. Hence it is unlikely that the proposed – and highly-desirable – public square will be created in the foreseeable future. In the paragraph under *Movement*, we do not understand what is meant by the sentence “As the southern entrance connects to the site, it should provide space for the pedestrian pathway to continue”.
- *CJ3. Land on the corner of Grant Road and Falcon Road.* No development has taken place on this site since it was included in the 2016 SSAD, nor is any currently planned. The site is included in the York Road/Winstanley Regeneration Master Plan; but the inclusion of a large part of it among the designated work sites for CrossRail 2 has precluded any further work on plans. The Council appears to hope that this safeguarding might be amended in 2020/21 (sic); but it is unclear how the “refreshing” of the current safeguarding directions currently being discussed by TfL and the Government will affect the site. The site allocation mentions the gated housing at The Falcons which borders the site to the north (but not the similarly-gated GradPad development), along with a desire to achieve greater integration and permeability, particularly with the town centre and the Winstanley Estate. But there is no indication of how this might be achieved, or how gated developments might be persuaded to open up. Nor do we understand what is meant by developers contributing towards cost of dedication of land at the corner of Grant Road with Winstanley Road.
- *CJ4 Land at Clapham Junction Station.* This is a new site allocation, covering land at some distance to the west of the station, mainly in railway sidings and carriage sheds. Most of the site, apart from the former Station Master’s house, is twenty feet or so below the street level of St John’s Hill (not Road, as stated in the Plan) and Plough Road, with a narrow access only via the latter. The site is also designated as a work area for CrossRail 2. It is not clear whether the Council has discussed the feasibility of this proposal with Network Rail, nor what kind of development is envisaged. Would the sidings and carriage sheds be removed, or would they be retained, with development on top of them? Nor is it clear how any development might inter-relate with the CJ2 proposal for the station approach, which is more than 100 metres distant, across at least eight railway tracks, and with the Brighton Yard entrance to the station in the middle. We have severe reservations as to whether anything like what is suggested in the site allocation is feasible.

*CJ5 Winstanley/York Road Regeneration Area.* The Battersea Society has expressed on many occasions its major reservations about aspects of the plans for this area: about the major densification, with a more-than-threefold increase in the number of housing units; the designs, especially of the York Road towers; the failure to provide any

substantial increase in the amount of affordable housing provided; the circulation of traffic in and around the area; and the impacts on congested public transport. We shall not repeat our detailed concerns here. But in the current document we are puzzled - in the light of the site allocation CJ3 - as to what might be meant by the statement that "Proposals should place a particular focus on addressing the poor urban environment at the Falcon Road end of Grant Road/Bramlands Avenue and the challenges arising from the bus stands and turning area". And we are disappointed that there is no consideration of how the current bus stand area could be developed to provide expanded bus waiting and boarding to alleviate congestion on the narrow pavements to the south of the station.

## **11. AREA STRATEGY FOR WANDSWORTH RIVERSIDE**

### ***Definition***

This strategy is misnamed. It has relatively little to say about the vast majority of the riverside between Beverley Brook and Vauxhall, apart from one policy relating to the riverside at Putney. Although it is described as an "overarching" strategy, it has nothing to say about the riverside aspects of the strategies for Putney (section 7), Wandsworth Town (4), and Nine Elms (5). On the other hand the strategy includes references to, and site allocations for, areas that are a significant distance from the Thames, including King George's Park (more than 500 metres away), and Randall Close (200-300 metres away). But the key part of the strategy relates to the area between Wandsworth Bridge and the Cremorne Railway Bridge.

It would be preferable, therefore, to limit discussion in this section to a comprehensive overview of the public realm and to provide general development management guidance for of the waterfront from Putney to Vauxhall. This would provide a strategic framework for the consideration of employment, and site-specific and employment issues in the relevant subject chapters.

In addition there is sufficient development activity in the York Road /Lombard Road block to justify its having an area strategy in its own right. (The identified sites on Map 11.1 support such an approach). This could pick up the omissions in chapter 18 covering these sites, remove the site detail from this chapter on Wandsworth Riverside and give more emphasis to traffic and transport issues along that stretch of York Road/ Lombard Road area than in the draft. These should include the need for a pedestrian and cycle bridge at Cremorne and plans for a study into the desirability and feasibility of re-opening the station at Battersea High Street.

The comments below are a response to the consultation draft but we would hope the regulation 19 document could have such a new Area Strategy section for the area between Wandsworth and Cremorne bridges.

### ***Thames Path***

Neither the area strategies nor this overarching strategy have much to say about the principles and requirements relating to development along the riverside, beyond some references to the Thames Path. Apart from a few references to the need for improved access to the river, and for active frontages along the Path, there is no reference to the recommendation of the Urban Design Study that "building form must strike a balance between achieving optimal riverfront views without creating a dense wall of development that blocks visibility from buildings and public spaces behind it". Perhaps this is because many existing developments have failed to strike that balance. Nor is there any reference to the policy under LP 54 that the Path should be at least six metres wide, an aspiration that is not met at present on many parts of the Path in Wandsworth.

### ***Policies for the area***

Once more, there is no attempt to relate the repetitive set of nineteen policies to the fourteen principles and themes set out in the overall Placemaking Strategy. Nothing is said about public transport, or about promoting work and opportunity, or facilitating lifestyle choices. It is astonishing that, despite the York/Road Lombard Road area being identified in Section 18 as an Economic Use Protection Zone, nothing specific is said about either protecting or promoting industrial uses. Even worse, the site allocations include several sites (RV1, 4, 6, 7 and 8 for example) which operate successfully at present for industrial use, but nothing is said about protecting or enhancing that use. It is also

unclear how the encouragement of arts and cultural activities (as mention in PM9, People First, D) sits alongside the industrial activity. This further argues for separate treatment of this dynamic part of the Borough.

### **Site allocations**

On the low-resolution version of the Plan, the map on page 180 does not show individual sites 1-11. More substantively, we are very disappointed that most of the sites are relatively small (some very small), with no attempt to create clusters (cf the clusters identified for Nine Elms and Wandsworth Town). This is despite the Council's adoption in December 2015 of Supplementary Planning Guidance (SPG) for the Lombard Road/ York Road Riverside Focal Point and the commitment in the 2016 SSAD to develop an Area Spatial Strategy, to provide further detailed consideration of this area. The current Plan seems to represent, without explanation, a highly-regrettable step back from that SPG. This is made worse by the exclusion of some sites, including the York Road petrol station and the Access Storage sites.

- *RIV1 Former Price's Candles Factory.* This site was included in the 2016 SSAD, but the area behind the building occupied by Barker and Stonehouse and to the south-west of Bridges Court Road remains undeveloped. A planning consent for a building of 25 storeys granted in 2017 has now lapsed. That consent is in tension with the statement that buildings will be considered tall if above eight storeys. It is not clear how the requirements set out in the Plan might be met in post-pandemic market conditions.
- *RIV2 Dovercourt site, York Road.* On this site too there has been little development since it was included in the 2016 SSAD. Although planning consents were granted in 2014 for mixed use developments of up to 15 storeys, these have not progressed. Those consents are again in tension with the statement that buildings will be considered tall if above eight storeys. And again it is not clear how the requirements set out in the Plan might be met in post-pandemic market conditions. Prospects could well be enhanced if the site were combined with RIV6, the building supplies shed on the other side of Bridges Court Road.
- *RIV3 41-47 Chatfield Road.* It is difficult to understand why this site is not extended to cover 11-25 Chatfield Road. Consent was given late in 2020 for a development covering both sites, subject to legal agreement; and ideally the allocation should cover numbers 27-39 as well. This piecemeal approach in the Plan does not maximise the possibilities for high-quality development.
- *RIV4 Gartons Industrial Estate.* It is baffling that this site allocation does not include the adjacent site RIV10 200 York Road, Travelodge Hotel. RIV4 once more largely repeats the 2016 SSAD, although there have been no proposals for development since then. Joining the two sites together would improve the chances of achieving high-quality development.
- *RIV6 36 Lombard Road..* See RIV 2.
- *RIV7 Travis Perkins, 37 Lombard Road.* This site, also covered in the 2016 SSAD, occupies a prominent position on Lombard Road, Gwynne Road and Harroway Road, and adjoins the Harroway Gardens open space to the east. The building supplies business is busy, and it is not clear that it could be combined with the mixed-use development proposed. Nor is it clear where Travis Perkins could find a similarly-well-connected site elsewhere in the borough.
- *RIV8 19 Lombard Road, 80 Gwynne Road.* There has been no development on the site since it was included in the 2016 SSAD, and it is difficult to see why developers should come forward with proposals in post-pandemic circumstances. It is also difficult to see how, as suggested in the Plan, the site could be developed to coordinate with and extend the improvements in the public realm associated with the relatively recent development on the other side of Lombard Road without significant improvements for pedestrians crossing that road.
- *RIV9 The Chopper P.H., 58-70 York Road.* This site, on which a fourteen-storey building is now being erected, should be removed from the site allocations.
- *RIV10 200 York Road, Travelodge Hotel.* This site, as noted above, should be combined with RIV4, Gartons Industrial Estate.



- *RIV11 Battersea Church Road/Crewkerne Court Garage, Somerset Estate.* The Society has expressed strong reservations about the proposals being developed by the Housing Department for an overbearing tall building on this site.
- *RV12 Randall Close Day Centre and adjacent Surrey Lane Estate Car Park.* As noted above, we find it difficult to understand how this site can be regarded as part of Wandsworth's Riverside. The Society has expressed reservations here too about the proposals, now approved, for the erection of three new buildings without providing a detailed consideration of how they might be more effectively integrated with the rest of the Surrey Lane Estate and the adjoining Mission Hall.

### 13. SITE ALLOCATIONS OUTSIDE THE SPATIAL AREAS

*OUT2 259-311 Battersea Park Road:* There is no reference to the new up market retirement development currently nearing completion, and which is unlikely to be redeveloped in foreseeable future. It is essential that a library be re-provided as it is an important facility at a considerable distance from other libraries. While a street frontage might be desirable, it is essential that off-road parking be provided if there is a replacement supermarket. It does not make sense to treat the whole site as a single one for new development (though obviously needs to be coherent overall). It needs to be broken up into separate elements where comprehensive redevelopment would make sense, e.g. shops plus library.

*OUT5 Bridge Lane Medical Group Practice* This site was not included in the 2016 SSAD, and it is difficult to understand why it is included in the present Plan. The medical practice works effectively, there have been no proposals for development since 2010, and it seems unlikely that any proposals will come forward in the foreseeable future. There is no reference to the previous permission (which has probably now expired). We are concerned that new development would be too high even at 6 storeys to be sympathetic to the conservation area. The site is at an important junction and benefits from the space it provides within the streetscape

*OUT6 Haydon Way* The site is not, as stated, "currently" used as a care home; it was abandoned many years ago, and the building is considered unsuitable for that purpose. It clearly needs to be redeveloped, but in ways that are sensitive to the surrounding buildings and their residents. The site is not suitable for the kind of co-living development which was refused in 2020; and in line with Policy LP 31, this should be explicitly stated in the site allocation.

### 14 ACHIEVING DESIGN EXCELLENCE

#### *LP1 Urban Design*

A. It is unclear what the development principles set out here will mean in practice. Point 4 talks of 'edges defined by buildings'. Too often buildings cover their entire site and sit uncomfortably close to often narrow pavements and roads. Point 9 should include a requirement that there is off-road provision for servicing, deliveries, set down and pick up and for disabled parking. Most roads in Battersea are heavily trafficked and the Council's aim should be to avoid all on-street stopping and parking along main roads.

Point 12. In order to be fully accessible, buildings should have good disabled parking provision on site not on the roadway.

We query the practical value of the term 'high quality public art'. How is this determined? Could the RCA engage with the public on this?

B. The actions proposed by the Council to promote good urban design may be good in theory but they are often unsatisfactory in practice. Response from public engagement events and from the Design Review Panel often has little impact on the application presented – which is then regularly approved. Details of pre-application advice should be made publicly available. Masterplans are subverted, as in the case of the South London Mail Centre Site, both by the selling on of sites with no requirement to follow the masterplan, and by the many reserved matter applications. This

problem is compounded by the lack of regular review of the *cumulative* effect of changes, as well as the need for continued review of changes to individual sites, and a lack of encouragement for public input to amendments.

### **LP2 General Development Principles**

A. It would be great if the principles relating to the effects on neighbours as well as on current and future occupiers and users were adhered to. Much of Nine Elms fails to meet these standards.

B. The requirements relating to transport infrastructure ignore the fact that it might not be possible to add additional transport infrastructure for the foreseeable future. The Council and TfL should provide a time-scale for upgrades to Clapham Junction, added capacity on the overground, additional bus services and any start to Crossrail 2

C In relation to the impact on existing users in Town Centres, it seems inevitable that Nine Elms in general and the Power Station development in particular will have a negative impact on other town centres within Battersea.

We note 14.15 that living conditions will be protected 'as far as possible'. We query how 'on-site' judgements can be made before buildings are in place.

### **LP3 The Historic Environment**

We are broadly supportive of the policies which are sensible and thoughtful. However, these will be of value only if implementation follows the spirit as well as the letter of the policies; and if the Council employs sufficient specialist officers to manage the process.

A: There is a lack of reference to the useful guidance provided for development in Conservation Areas. We suggest adding final subsection:

8: in Conservation areas a Design and Access statement should normally be submitted reflecting guidance in the relevant Conservation Area Appraisal and Management Guidance document

E: 'substantial public benefit' appears to be too often a value judgement made by planners and the Planning Applications Committee to the benefit of a developer.

### **LP4 Tall Buildings**

Overall these appear to be aiming to micro-manage applications and at worst will provide a tick list for developers and their planning consultants to check off.

Many area strategies include mention of tall being 5 or 8 storeys but ignore the fact that many 20+ buildings have already been approved.

Point 5. We applaud the requirement that proposals should be supported with graphic 3D modelling although this should show the bulk of the proposed new building, not just a red outline with the existing background showing within the outline.

Point 7. The requirement that buildings should respect and not overwhelm the proportions of the local environment is admirable but regularly ignored by developers and, in practice, the Council both in granting permission and in its own proposals (Crewkerne Garages a case in point).

Point 9. The policies seem to accept that tall buildings may be located near the street edge. We urge that they should, wherever possible, be set back from the pavement.

Point 16. We support the requirement for shade analysis, but the effect of shade on planting should always be included.

Point 19. The suggestion that non-residential use of the ground floor should include public spaces is admirable, but it is too seldom provided in practice.

Too often the PAC and the planners find the justification given for a tall building to be 'convincing'. Adverse effects should be *avoided*, not *mitigated*.

It appears to us that developers routinely pay a price for land which assumes the Council will find their need for height and density to provide viability persuasive. Thus there is a vicious circle of over-priced land and over-tall and dense buildings.

#### ***LP5 Residential Extensions and Alterations***

The need for alterations to conform to Conservation Area guidelines should be included from the start not just in relation to hard standing. Apart from this, these policies are common-sense.

#### ***LP6 Basements and Subterranean Developments***

Some mention of the need to avoid damage to neighbouring properties should be included together with the need to avoid neighbour nuisance, e.g. noise from lower level extensions, light nuisance from subterranean roof-lights etc

***LP7 Small Sites Development LP8 Shopfronts LP9 Advertisements*** No comment

### **15 TACKLING CLIMATE CHANGE**

**The environmental objectives and aspirations** outlined in the supporting text are in keeping with Wandsworth's stated ambition to become the greenest borough in inner London but the policies themselves sometimes fall short of these aspirations:

- *Carbon pricing.* Although the offset price per ton has been increased from £60 to £95, which is an improvement, this could go further. Lewisham currently has a price per ton of £104.
- *Carbon offset payments:* Wandsworth's record of collection of carbon offset payments is comparatively poor; to date £2,290,000 has been secured and £22,300 has been collected while other boroughs have secured much greater amounts (Croydon, £8,000,000 secured £450,000 collected; City of London £3,000,000 secured £238,000 collected). More robust requirements for collection, such as requiring payments at commencement of on-site works as it is in Islington, rather than prior to first occupation, would go a long way towards enabling more proactive use of the carbon offset fund. Information on prioritisation of offsetting project types seems to be missing

Some policies are framed too much as **possibilities or options rather than specific commitments**.

#### ***LP10 Responding to the Climate Crisis***

**B1:** The requirement for high standards such as meeting BREEAM 'Outstanding' is weakened by saying 'unless it can be demonstrated that this would not be technically feasible.' This caveat is symptomatic of many policies and their implementation throughout planning documentation.

**G:** developers '*may*' be required to fund post-construction monitoring of renewable and low-carbon equipment to demonstrate full compliance with the commitments identified within the permission rather than '*will*' be required.

**H:** '*Retrofitting should be maximised*' but there is little indication of what is being done to actually maximise.

### **LP11: Energy infrastructure:**

Applicants are *'required to consider'* the installation of low, or preferably ultra- low NOx boilers. Given the climate emergency there should surely be a requirement to fulfil rather than consider fulfilling and a requirement rather than a preference for ultra-low NOx boilers.

**Policies which do put us ahead of the pack and are therefore to be particularly welcome are:**

#### **LP10:**

- B1: Requirements to achieve higher standards e.g BREEAM 'Outstanding' up from 'Excellent' and
- B3: encouragement to meet BRE Home Quality Mark or Passive House.
- I: Inclusion of a firm policy on overheating

#### **LP13 Waste Management**

- K: The requirement for Circular Economy Statements (for all referable applications)

**Areas which fall particularly short taking of meaningful action on climate change include:**

**LP10 D.** 15.15 'Where development viability is a concern, affordable housing will be prioritised over zero carbon contributions.' This is a very short-sighted approach which could lead to higher retrofit costs later in order to meet national targets.

#### **LP 11 Energy Infrastructure**

The Council has invested considerable sums in the Embassy Quarter Heating Network and the Battersea Power Station Heating Network but although new developments need to demonstrate future connectivity, Section 15 lacks definitive directives on, and provision for, monitoring progress on the use of decentralised energy networks by both new developments and existing properties which could switch from existing boiler plant and connect to the network.

#### **LP13 Waste management**

Wandsworth has a poor record on recycling with only around 22% of Local Authority Collected Waste being currently recycled when the London Plan sets out a target of 65% by 2030.

While the Local Plan adequately addresses requirements for provision of recycle *facilities* themselves, there is insufficient provision in the plan to ensure that the proportion of recyclable waste actually reaching these facilities can be increased e.g. through requiring on-site recycle collection facilities in privately owned blocks or adding recycling sections to on-street waste bins. The Council should carry out a study of best practice in other London boroughs and set out a programme designed to achieve the target of 65% within the next nine years.

## **16 PROVIDING FOR WANDSWORTH'S PEOPLE**

### ***LP15 Health and Wellbeing***

As with so much of this document, there are offers to 'promote and support development' but without any specific plans for steps to be taken by the Council itself.

All the points mentioned are desirable but there is more the Council can do. For example, in making Council owned land available for allotment use either in the long or short-term and requiring there to be disabled parking within the boundaries of a development rather on the roadside. There should also be mention here of monitoring air quality, and promoting development which aims to reduce current levels, and which causes no additional pollution. For example new buildings should be built to achieve net zero as far as emissions are concerned and design policies should make this a fundamental concept. Materials must be produced using low energy methods, be sustainable and use timber rather than upvc. Material deliveries must be as local as possible and any planning permission must include conditions relating to these requirements. Energy sources must be included as part of the approval conditions.

In terms of transport, the Council should endorse and promote the planned expansion of the Ultra-Low Emission Zone (ULEZ) and seek ways to do more to get the message across to schools and parents. Car use for school journeys must be discouraged and, if essential, car sharing made mandatory..

We know that the Council does aim to tackle climate change in all its policies but there is more it can do to make this explicit.

#### ***LP16 Public Houses and Bars***

In practice the Council has not always been successful and has allowed proposals where historic and architectural interest has been lost, and where we doubt proper efforts have been made to maintain a public house or similar activity.

#### ***LP17 Social and Community Infrastructure***

There is more the Council can do. The proposed loss of a community space on the Surrey Lane Estate is an example of lack of practical support for this policy. While we understand the pressure for housing, the exclusion of other infrastructure in order to maximise units might not lead to the best outcome for the community. Encouragement should be given to ensure that best use is made of existing community facilities including activities outside their primary use (e.g. opening up school and religious buildings for community uses).

#### ***LP18 Arts, Culture and Entertainment***

As we have mentioned elsewhere, much more could be done in relation to Clapham Junction town centre. In time there could, and should, be a cinema in the area, perhaps related to the conversion of the Arding and Hobbs building or within part of the Grand.

We are surprised that little reference is made to the Royal College of Art and its role as a world leader in industrial design and applied art. As highlighted in relation to the BDTQ there need to be stronger links developed across these sectors within Battersea.

#### ***LP19 Play Space and LP20 New Open Spaces***

We welcome these policies which should form part of the masterplan for any new development from its outset.

The principles of LP20 could prove useful in considering existing open spaces and their wider context.

#### ***LP21 Allotments and Food Growing Spaces***

This is welcome but why are allotments included at LP15 and then with more detail here?

#### ***LP22 Planning Obligations***

We cover specific concerns about these in relation to transport within our comments on Chapter 20.

#### ***LP23 Utilities and Digital Connectivity Infrastructure***

We support these policies and can only emphasise the need to reduce street clutter and minimise intrusive structures including In Link and other advertising structures on pavements and within railway stations.

## **17 PROVIDING HOUSING**

### ***Population and Migration.***

Both the Housing Needs Assessment (HNA) and the Plan seem to regard the current high levels of inward and outward migration by young adults as a given, about which nothing can be done.

We disagree, profoundly. Current levels of migration are unsustainable and incompatible with the Council's aim to establish stable local neighbourhoods and balanced, cohesive communities. This has implications for all aspects of housing provision, particularly relating to affordable housing and housing mix.

Wandsworth's population, like London's, is increasing significantly, though there is some evidence of a fall in London's population during 2020. A significant part of the increase is the result of major new housing developments at Nine Elms and along the River Thames. The population is also highly-skewed towards the young. Data from the Office of National Statistics (ONS) shows that Battersea has the highest proportion of 25-34 year-olds of any Parliamentary constituency in the UK; and Putney and Tooting are not far behind. ONS and NHS data also show very high levels of both inward and outward migration from Wandsworth. Young people in particular are attracted to move in by Wandsworth's convenient location, with easy access to the West End and the City. Most of them live in shared rented flats, and then move out because they are unable to find the kind of housing they want, at an affordable level, as they progress to the next stage in their lives. To what extent this pattern will change as a result of the pandemic is not clear.

### ***LP 24 Provision of New Homes***

We cannot see how housing targets will be achieved without massive and inappropriate densification of current residential areas. As the amount of land available in the borough for large-scale residential development continues to fall, this pressure will increase.

Wandsworth completed 2,735 new homes in 2015-16, but since then provision has fallen by over a thousand. Although Wandsworth exceeded in 2017-18 and 2018-19 the housing delivery target of 1,812 set in the London Plan, in 2019-20 it fell short by 276 (17%). The target has now risen to 1,950<sup>1</sup>, and if the Government implements the new targets announced in December 2020, it will rise to 3,425 by the time the next Local Plan has to be prepared. The figures presented in LP24 (and repeated in Table 17.3) for new housing in the five years up to 2027-28 and the ten years to 2033-34 show new housing of 20,702 over the full ten years. Just under two thirds of them will be provided in the areas covered by the seven Area Strategies, the vast majority in Clapham Junction/York Road/Winstanley, Wandsworth Town, and Nine Elms. But over a third will be in other areas, unidentified in the Plan.

### ***LP 25 Affordable Housing***

The HNA notes that there are 8,800 households on the Council's Housing Register, and estimates that there is a need for nearly 3,600 affordable homes each year over the Plan period, nearly twice the overall target for new homes. Despite such high levels of demand, the Council has a long record of failure in seeking to meet even its current targets of 33 per cent affordable homes across most of the borough and a deplorable 15 per cent in Nine Elms. Policy LP 25 now states that the Council will "seek to secure the Mayor's strategic target of 50 per cent of all new homes to be affordable", subject to viability constraints. Achieving that target across the borough will be especially difficult for a number of reasons:

- The minimum thresholds set are 15 per cent in Nine Elms, 35 per cent in most of the rest of the borough, and 50 per cent only on public and currently-industrial land (the latter two minima as in the London Plan). We deplore the proposal to continue the 15 per cent target for Nine Elms, especially since nearly half the new homes expected to be provided in the borough over the five years 2023-24 to 2027-28 will be in that location. We cannot understand how those thresholds are consistent with the overall 50 per cent target.
- The Council's record over the past decade suggests that viability assessments repeatedly conclude that even the minimum thresholds are unachievable.
- The Government's proposal to increase from 10 to 50 the minimum number of homes to be built on a development site that must commit to providing affordable housing.

We strongly regret the Plan's failure to adopt a tenure split for affordable housing of 60 per cent affordable rent and 40 per cent intermediate products, in favour of a 50:50 split. And we reject the reasoning provided, that a 50:50 split "will help to bridge the housing offers available to a range of households"; and that a 60:40 split would fail "to consider the importance of creating mixed and balanced communities". The latter argument is especially perverse in the light of the evidence presented above about population and migration. We acknowledge that the London Plan includes London Living Rent in the intermediate tenures rather than the affordable rent category, which affects the balance between them. But we also note that London Affordable Rents have tended to be set at a higher level in Battersea than in

---

<sup>1</sup> The explanation of the London Plan targets given in para 17.2 is repeated in para 17.8

neighbouring boroughs; and that evidence suggests that intermediate tenures such as equity sharing have not met the policy goal of providing a route to home ownership.

We also regret that the Plan does not accept the London Plan policy that the proportion of affordable housing in a scheme should be measured by habitable rooms, in order to ensure that affordable homes are delivered in a range of sizes, including family-sized homes. We reject the Council's view that it is more appropriate to measure affordable housing by units. Measuring in that way provides an incentive to provide too many small units, especially studio accommodation and one-bedroom flats.

#### ***LP 26 Housing Mix***

As we note above, current levels of inward and outward migration, especially by young adults, are incompatible with the Council's aim to establish stable local neighbourhoods and balanced, cohesive communities. In that context, the policies in the Plan to focus new housing provision, both for the market and (even more so) for the affordable housing sectors, on one-bedroom and two-bedroom units is perverse.

Wandsworth has a higher proportion of one-bedroom units, and a lower proportion of three-to-four-bedroom units, than the London average; and the dearth of family-sized housing, available at prices that young adults can afford, is a key driver of outward migration and militates against the creation of stable and cohesive communities. The provision of new family-sized housing should be a priority for the Council; but it has not in recent years met even the limited proportions of three-four-bedroom-units set in previous Plans. The new Plan's reliance on limited measures to guard against the sub-division of existing family-sized houses, concentrated among the Victorian and Edwardian terraces typical of many parts of south Battersea, is simply wrong. It will exacerbate existing imbalances and inequities between different parts of Battersea, with similar effects in the rest of the borough.

#### ***LP 28 Conversions and Protecting Existing Stock***

For reasons outlined above, we support the limited measures to prevent conversions of existing houses of less than 150sqm (rather than the 120sqm threshold used previously); and to require family-sized units in conversions of houses more than 150sqm. We also support the ban on change of use for residential accommodation to short-term lets.

#### ***LP 31 Housing with Shared Facilities***

Evidence suggests that designated Houses in Multiple Occupation (HMO) are vastly outstripped in volume by the numbers of houses and flats shared by young adult friends. Flat sharing and houses with one or more lodgers are pervasive across the borough. Nevertheless, the policies proposed for HMOs strike a reasonable balance. We support the proposed resistance to large-scale purpose-built shared living accommodation. We would certainly not want to see any further developments of this kind such as that in Chatfield Road which recently received consent, or that proposed for Hazel Court.

#### ***LP 33 Specialist Housing for Vulnerable People***

The HNA estimates that over-65s will rise from 9.6% to 12.1% of households in Wandsworth by 2037, and that households of over-75s will increase by 58%. It also shows a huge under-provision of specialist housing compared with the guidelines suggested by the Housing Learning and Improvement Network (LIN). The HNA suggests that adapting existing homes should be a priority for disabled people under 65. This is reflected at paragraph 17.68 in the new Plan, but it is not included in the policies set out here. We urge that it should be.

#### ***LP 35 Visitor Accommodation***

Airbnb and similar services are having profound and often damaging effects in parts of Battersea and other parts of the borough, and we are disappointed that this is not addressed in the Plan. It refers to the 90-day rule, but says nothing about how it is to be monitored or enforced. We believe that action is required to ensure that damage is not done to some communities over the next few years.

As we note in our comments on Section 19, we have reservations about the policies set out here with regard to the location of hotels and hostels.

## 18: BUILDING A STRONG ECONOMY

**Introduction.** We consider that the implications of office and industrial development are inadequately covered: overall there is a lack of recognition of traffic, public transport and general access and servicing implications both for those working on sites and deliveries/visitors. The needs of disabled workers needing parking are woefully neglected.

### ***LP36: Promoting and protecting offices***

There is no reference to the recommendations of the Employment Land and Premises study on offices (pp122-4).

**Flexible rental structure:** There is a lack of support for, and cross-reference in this section. to rent assistance/ support for start-up offices as set out in **LP41**

### **LP36 C and A:**

Section C refers to offices - unlike those for large enterprises such as Apple and the US Embassy - located outside the Central Activities Zone (CAZ); but it must be made clear that the smaller enterprises referred to in C will be significant as service and ancillary support to the larger firms.

**LP36 E and 18.32 – 18.34** We urge Wandsworth to pursue use of Article 4 directions to protect existing commercial spaces, even in light of latest Government proposals now offices are Class E. If this is not feasible the plan should set out what action would be taken to protect existing offices, wherever possible

### ***LP37 Managing Land for Industry and Distribution***

What are the implications for the protection of industrial land removed from London Plan, as directed by the Secretary of State?

**SIL Queenstown Road:** there is a failure to take forward the Employment Land Study including the recommendation for intensification of the SIL south/east of Silverthorne Rd (in the context of forecast need for 8.6 ha more industrial land, and projected loss of 7.6ha).

**Parkfield Industrial estate.** There is ambiguity about this area (between the rail lines south of Battersea Park Road and west of Queenstown Road). It is not referred to in the text, but on **map 18/1 Economic Land** the area is designated SIL. This is a significant industrial area, fully let for which there should be a more explicit policy especially covering access and type of uses (see comment below on 18.59).

**18.41 forward: Battersea Design and Technology Quarter (BDTQ):** There should be reference to linkage between potential activity here with that in RCA Quarter/Ransomes Dock (Vivienne Westwood) Focal Point through complementary research and development functions.

### ***LP38 Mixed Use Development on Economic Land***

**Focal Points of Activity:** There are some significant gaps in elements of the strategy. While there are many references to Focal Points of Activity (**11.3, LP37C3, 18.49 etc etc**) there is no introductory discussion of exactly what they are or their function, notably no reference in para **18.5** and **map 18/1 Economic Land**.

Thus there is no ready explanation of where they stand alongside the other typology of industrial area (which is where they appear to sit although there may be other elements of activity) Is the suggestion **in 18.66** to maintain industrial activity north of York Road realistic, especially in the Chatfield Street area, given residential development pressures? Site allocations for Lombard/York Road would actually allow removal of successful industrial land.

The proposals for the York Road/Lombard Road Focal point as presented do not reflect the thrust of the Cultural Strategy for the area, published in 2018. The type of new development coming on stream (such as the Royal Academy of Dance, the redevelopment of Access Storage and the Collective) would appear to be a more realistic strategic approach than that outlined in the site specific discussions. Much of that Cultural Strategy should also apply to the area around the RCA/Ransome's Dock.

**Employment protection areas:** The designation of these appears haphazard. In **18.59** the proposal to designate Culvert House and the View may be sensible but needs fuller justification and some indication of how space in the View will be promoted and marketed. In addition, has any assessment been made of the impact of increased activity on these sites (alongside pressures from access to Parkfield Industrial estate) for traffic movement around the Culvert Road/



Battersea Park Road intersection? Culvert Road is regularly used as a rat-run along Sheepcote Lane to and from the Latchmere Road.

**Smaller protected sites:** There do not seem to be any common criteria as to which sites have been mentioned or omitted. Why include 124 Latchmere Road and 187-207 Lavender Hill (the latter being mainly residential) without including the nearby Shakespeare House (wholly offices) and the SHARE community building on Altenburg Gardens?

#### ***LP41 Affordable, Flexible and Managed Workspace***

This section should include specific reference to the Borough's policy for new mixed-use work/shared living facilities such as the Collective in Chatfield Street and the proposal put forward for Haydon Way. There should be a direct link to any complementary policy to that set out in **LP31C**

### **19: ENSURING THE VITALITY, VIBRANCY AND UNIQUENESS OF THE BOROUGH'S CENTRES**

The pandemic has had a catastrophic effect on many businesses in the borough's town centres: and there must now be huge uncertainty about the projections set out in the RNA completed in the first half of 2020. Supporting the recovery of town centres and businesses must now be a key strategic aim for the Council, working with other bodies including the Business Improvement Districts and the GLA's London Recovery Programme.

There is little evidence in the Plan of innovative thinking: developing structures for engagement and participation with local communities and other stakeholders; developing organisational resources and skills; promoting new community uses; experimenting and prototyping without fear of failure; innovations in asset management. These and other things are essential if the Council is to work effectively with others in re-imagining what high streets might be.

#### ***Protection and Planning Controls***

Changes in Government policy have added significantly to the uncertainties. The new Class E introduced in September 2020 covers most kinds of commercial use, from shops and restaurants, to offices, clinics and day nurseries. The Plan "embraces the flexibility that the new Use Class E provides". It also acknowledges that changes of use within the same use class (ie Class E) do not constitute development and therefore do not require planning permission. The Council's ability to exercise control over changes of use has therefore been significantly reduced. That loss of control will be made much worse if the Government implements its current proposals to extend PDRs to allow the conversion of any Class E premises to residential use.

At the same time, however, the Plan offers promises of protection for some key characteristics of the borough's town centres, local centres and important local parades. Thus LP 45 states that the Council will guard within town centres against over-concentration of similar uses in specific areas; that it will seek to retain retail floorspace to maintain a strong retail core for the long term; that it will seek to preserve continuity of active frontages, with shopfronts; and that it will seek to restrict conversion to residential uses to rear and to the upper floors of premises used for commercial or community uses. How any of this protection is to be provided, however, is open to considerable doubt. The Article 4 Directions currently in place are unlikely to be of any use in future.

#### ***Town Centres, Local Centres, Important Local Parades and Designated Frontages***

The RNA suggests that the Council should review its town centre and other boundaries, and its strategic approach to designated frontages, which have not been reviewed for many years. There is no indication in the Plan that the Council has done so, and we suggest that it should. We have noted some oddities in our response to the Area Strategy for Clapham Junction: the absence of any designation for the commercial properties on St. John's Hill west of Spencer Road, for those on Northcote Road between the junctions with Wakehurst Road and Honeywell Road, or for those on Falcon Road north of the underpass. The distinction between those properties and others which are designated, such as 3-5 Lavender Sweep, 1-45 Lavender Hill, the Important Local Parade consisting of three shops at 59-63 Broomwood road, or 47-67 East Hill is far from clear.

We believe that there are many other unexamined peculiarities relating to town and local centre boundaries, and to the distinctions between core, secondary and other frontages across the borough. The current designations are not fit for purpose, and may lead to perverse decision-making.

### ***LP 48 Evening and Night-Time Economy***

The night-time economy is crucial to the resilience of many town centres, especially Clapham Junction; and it has been badly hit by the pandemic. We believe its importance is underplayed in the Plan, and we have particular concerns about the policy to support further developments for this use in the Focal Points of Activity along the River Thames. This puts the vitality of town centres at risk as they seek to recover from the pandemic.

### ***LP 49 Markets***

The markets in Northcote Road, Battersea High Street, Balham, Tooting and elsewhere in the borough play a vital role in supporting the vibrancy of local and town centres. But they have suffered acutely in the pandemic. Hence we are concerned by the suggestion here that new markets should be supported when the Council's priority should be to ensure that existing markets are sustained and enhanced.

### ***LP 50 Meanwhile Uses***

We share the wide consensus that pop-up shops and other enterprises can play a key role both in bringing life to local and town centres and in acting as seedbeds for new enterprises. We therefore support measures to encourage landlords to sponsor and promote pop-ups; but we are disappointed that the Plan – despite repeated mentions of encouragement – offers little detail on the kinds of encouragement or support that will be provided by the Council. The policies set out here are inadequate.

### ***Other policies***

Section 19 stresses that policies set out in other Sections of the Plan – such as LP17 on social infrastructure, LP18 on arts and entertainment, LP35 on visitor accommodation, and LP 36 on offices - are intended to provide support for local and town centres; and that the Plan must be read as a whole. But it is disappointing that there is little attempt in Section 19 to bring these policies together and present an overarching strategy. This is the more disappointing because some of the policies cited – for example, LP17 on social infrastructure and LP 18 on arts and entertainment, along with LP 19 on play spaces – say nothing about focuses for provision in town or local centres. Similarly, LP36 on office space states that offices in town centres will be protected, without saying how; and LP46, along with LP35 on visitor accommodation, actually supports the development of hotels in edge-of-centre locations and in the Focal Points of Activity along the River Thames, without subjecting them to the sequential test that applies to most other developments, thus risking the vitality of the town centres.

## **20 SUSTAINABLE TRANSPORT**

The draft fails to recognise the significance of transport links for those living and working in the borough. It does not address the major barriers there are for cyclists and pedestrians because of some overloaded junctions and through routes. This has been noticeable for some years as new developments have been approved and built with often poor provision of complementary public transport or safe pedestrian linkages. We are not convinced that the general nature of the policies set out in this chapter will address these issues any better in the future.

### ***LP51 Sustainable Transport.***

It is disappointing that there is no mention, despite the cross-reference in some of the Area Strategies, to the use of urban logistics hubs for last mile deliveries by electric vans and bikes. These could play a valuable role throughout the borough.

B: The policies here are very weak in supporting walking as a form of active travel. Covid has highlighted the extent to which residents have increasingly adopted walking as a sensible means of reaching their destinations. There is reference to supporting 'Healthy Streets' policy without clarifying this is the Mayor's policy or in the area and subject strategies setting out explicit ways in which this will be taken forward. Acknowledging the importance of walking routes and ensuring there are safe, street level crossings at major junctions, and they are well lit, should be included in this policy.

B.6: Does the term 'parklet' mean a miniature park using a car parking space on the roadway as advocated by London Living Streets or does it mean 'public open space'. The inappropriate use of the term to refer to shrubs in two or three planters is unhelpful.

B.9: We are supportive of provision for both pedestrians and cyclists but it is essential that, where shared, this is properly managed, ideally with separate spaces for each user rather than a free-for-all. More should be done to stop cyclists using pavements.

Santander bike racks and free-standing Lime and other cycles for hire should have respect for pedestrians. There are instances of free standing cycles left for days in the middle of a footway and Santander racks taking up much of a pavement.

### ***LP52 Transport and Development***

There is an underlying flaw in the basis of this policy in that it assumes that existing public transport and road capacity is adequate and working well. Certainly in the Battersea /Nine Elms area merely walking round during the evening peak hours will show this is clearly not the case. Experience suggests the overloading of public transport provision is similar elsewhere, for example in Wandsworth Town Centre and Putney.

A.1 on good public transport access levels is in practice useless as a high PTAL does not mean that there is capacity. The effect of other planned and approved developments should be considered, not just many individual developments, all with the same PTAL and using the same transport infrastructure. Cumulative assessments should be made.

A2 and 4: The Council and TfL need to demonstrate that the infrastructure is capable of supporting improvements within a realistic time-frame.

### ***LP53 Parking, Servicing, and Car Free Development***

B. With the increasing number of deliveries it is essential that off-street space for set-down and pick-up be provided and that requirement E be fully complied with.

We consider the omission of car-parking within a development can be counter-productive with the lack of off-road space for residents to 'stable' their cars for use on out-of-town trips a disadvantage.

F and H 'Minimum' number of disabled car parking spaces should be realistic and off-road. We see large developments with disabled parking some way from the building and office development suggesting that one or two disabled parking bays be provided. What is considered best practice for the ratio of disabled parking spaces in relation to the number of office jobs proposed?

I. On-street Parking: 2. The need for *any* on-street parking in relation to larger developments on main and/or heavily trafficked roads is unacceptable and 3, what does this mean?

K. and L These policies on car-free and low-car developments are repetitive. See comments above regarding capacity, number of disabled parking spaces.

M. The restriction against parking permits takes no account that in the evening and at weekends residents and their visitors should have priority for parking space and not have to compete with residents of notionally car free developments. We have been disappointed at instances where the Council has allowed the condition that residents not be eligible for parking permits to be waived after planning approval has been given. The Council should consider extending the hours of parking control where this is to the advantage of residents.

N The Council should ensure that residents of affordable housing units are not priced out of parking spaces within a development.

## ***LP54 Public Transport and Infrastructure***

B. 3 the requirement that riverside walks should, where possible, allow for provision of cycling, ensuring pedestrian safety needs modification. Where cycling takes place it should be within managed space rather than a free-for-all of shared space.

D. 2 the requirement that minicab offices will be allowed only where “at any time” parking restrictions are in place will be effective only if it is properly enforced. There needs to be practical action planned to avoid the environmental harm and street congestion caused by Uber and other drivers lurking (often with engines running) to be called for a pick up.

## **21: GREEN AND BLUE INFRASTRUCTURE AND THE NATURAL ENVIRONMENT**

Being submitted separately by the Open Spaces Committee of the Battersea Society

## **22: IMPLEMENTATION, DELIVERY AND MONITORING**

This appears to be a reiteration of areas of the plan rather than being ‘an overview of the ways the Council will deliver and monitor the delivery and of the Local Plan’s vision, objectives, area strategies and policies’.

Delivery relies heavily on others and there is little or no detail of the Council’s own strategies and initiatives. Rather ‘the Local Plan will be implemented and delivered through a combination of private sector investment, the work of other agencies and bodies ...’ It may be unfair to say there is no sense that the Council is the main driver in this; but the constant reference to other agencies throughout the document, and our past experience of good policies set down but subverted through negotiation, gives little comfort that this will be the case.

It would be helpful to include as an appendix in tabular form the main agencies involved – in addition to landowners and developers - in successful delivery of policies included in the Plan. This would not imply any direct commitment but provide an idea of where effort might be required for joint working and cooperation. Some areas clearly are totally dependent on individual or private submission of development proposals. However where public bodies, or several sectors, are involved an indication in broad terms of anticipated timescales would also be helpful for known programmes of work.

It is unfortunate that the Infrastructure Delivery Plan (IDP) will not be available until the regulation 19 version of the Plan is produced. It appears that the Authority Monitoring Report for the current Local Plan is in arrears and we look forward to commenting on the latest version of this, and of the IDP for this draft Plan, in due course.

Planning Committee, Battersea Society

[planning@batterseasociety.org.uk](mailto:planning@batterseasociety.org.uk)

14 February 2021