

DP3221/EH/DS

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Planning and Development Services  
Housing and Community Services Department  
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Dear Sir/Madam,

## **LONDON BOROUGH OF WANDSWORTH LOCAL PLAN 2022 'PUBLICATION' (REGULATION 19) CONSULTATION**

### **REPRESENTATIONS ON BEHALF OF BATTERSEA POWER STATION DEVELOPMENT COMPANY**

On behalf of our client, Battersea Power Station Development Company ('BPSDC'), please find enclosed representations to the London Borough of Wandsworth ("LBW") 2022 Local Plan 'Publication' (Regulation 19) consultation ('the Draft Local Plan'), particularly relating to the ongoing redevelopment of the Battersea Power Station site to deliver a sustainable new town centre under the masterplan planning permissions granted on the site since 2011 ('the BPS Masterplan').

#### **Introduction and Context**

The comprehensive phased regeneration of the Battersea Power Station site, including the restoration works to the Grade II\* listed Power Station, began in 2013. Nine years on, Phase 1 is completed and occupied, and Phase 2 (the Power Station) and Phase 3A are due to be completed this year (2022). Occupation of Phase 4a is due to begin in 2022 and complete in 2023. In total, the masterplan will deliver a new town centre for Wandsworth comprising at least 2,500 new homes and over 3 million sq. ft of commercial floorspace, including office, retail, hotel, leisure, community and cultural uses.

As the masterplan is currently only halfway through delivery, it remains important to BPSDC that the Wandsworth Local Plan reflects the objectives of the Masterplan that have to date been shared with the Council, the GLA, Historic England and other local stakeholders. Ongoing certainty and consistency are important for the delivery of the remainder of the scheme.

Whilst the intention is to deliver the remainder of the masterplan through Reserved Matters applications under the existing planning permission, we cannot preclude the potential for further Section 73 applications being required in order to complete the regeneration of the site. As such, it is important that the Local Plan recognises that the implemented masterplan permission is a material consideration and that new policies should not be introduced where they would contradict the masterplan planning permissions already granted on the site.

Accordingly, please find our comments below, which we respectfully request are taken into consideration. We have commented on the sections of the Draft Local Plan that are materially different to the adopted Local Plan and are particularly pertinent to the regeneration of Battersea Power Station.

#### **The Battersea Power Station Central Activities Zone (CAZ) Retail Cluster**

Draft Local Plan Paragraph 2.14, Policy PM3 (Nine Elms) and Map 19.1 (Designated Centres and Frontages) identify Battersea Power Station as an 'emerging retail cluster'. This aligns with the London Plan (2021) Policy SD4 (The CAZ), which identifies Battersea Power Station as a 'potential' retail cluster, which is replicated at the Draft Local Plan Policy LP41 (Wandsworth's Centres and Parades). Draft Policy SD4 further states that CAZ retail clusters are 'significant mixed-use clusters with a predominant retail function and in terms of scale, broadly comparable to Major or District centres in the London Plan town center network'.



The designation of Battersea Power Station as an ‘emerging retail cluster’ is supported by our client, which aligns with the significant existing and future delivery of commercial floorspace across the Battersea Power Station site. However, in light of the opening of the Power Station (Phase 2) and High Street (Phase 3A) later this year (2022), we would question the need to preface this designation with *emerging* and would instead suggest that the site is defined as an established retail cluster to reflect the imminent openings.

Whilst our client is wholly supportive of the proposed allocation as a retail cluster, our client is strongly of the view that the boundary indicated by the purple dashed line on Map 5.2 and 5.3 should be amended so that it encompasses the entirety of the BPS Masterplan, as the commercial floorspace to be delivered within the BPS Masterplan extends across all phases of the development. Additionally, the public open space (shown on pages 114 and 115) appears to expand into an area where Phase 7 of the BPS Masterplan is located – this should be revised to omit the encroachment into Phase 7.

### **Nine Elms Area Strategy**

Draft Policy PM3 at paragraph 5.38 states *‘Taking a place-based approach, it is necessary to consider the inter-relationship of the sites within the cluster and its integration with surrounding developments in accordance with the Area Strategy and the vision and objectives of the Plan, rather than on a project by project or individual development basis’*. Whilst our client supports the intent for collaboration within the Kirtling Street Cluster, it is worth noting that the future phases of the BPS Masterplan will continue to be brought forward via reserved matters submissions for the plots in its ownership.

Map 5.2 (Spatial Area Map: Nine Elms) and Map 5.3 (Spatial Area Map: Kirtling Street Cluster) set out in the Draft Local Plan identify a number of strategic spatial allocations. These are generally supported, however, some elements do not align with the vision of the BPS Masterplan, including the suggested north-south pedestrian route located to the east of the BPS Masterplan Site, adjacent to plots 1 and 3. Our client therefore seeks assurances that the vision set out in Maps 5.2 and 5.3 is consistent with the consented position set out in the latest BPS Masterplan planning consent, including the information included within the supporting Design Codes.

It is also worth noting that the NLE Western Entrance shown on page 110 is in the incorrect location and should instead be located on the High Street.

### **Employment and Business**

Draft Local Plan Policy PM3 states that economic development and regeneration of the VNEB Opportunity Area within the CAZ will be focused at the Power Station and the Embassy district near Vauxhall. It further states that the council will seek to incorporate the provision of affordable workspace, where possible. As the BPS Masterplan has already been implemented under an existing outline planning consent which does not have any allowance for affordable workspace provision, any future section 73 applications submitted in relation to the floorspace already consented under the outline planning consent should not be subject to the requirements of Draft Policy PM3, specifically the requirement to deliver affordable workspace.

Additionally, draft Local Plan Policy LP2 (General Development Principles) states that *‘development must take into account the operational needs of existing businesses and not prejudice the activities of existing uses/operations’*. We would question whether such a policy requirement, which is concerned with the specific needs of existing businesses/tenants, falls within the remit of planning policy. As such, we would suggest that this line is omitted from the policy wording, particularly given that Draft Policy LP14 already seeks to ensure new development does not lead to detrimental effects on existing and new users or occupiers.

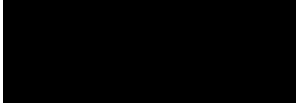
### **Summary**

We welcome the ambition and scope of the Draft Local Plan however; we do have concerns over the potential application of some of the policies with regards to existing planning permissions and are keen to ensure that we can continue to work collaboratively with the Council to deliver the comprehensive regeneration of the Battersea Power Station site.



We trust our comments will be acknowledged in progressing the Draft Local Plan, and we would welcome the opportunity to further engage in the planmaking process in the future. Please contact David Shiels or Eleanor Hulm of this office for further information.

Yours faithfully,



**DP9 Ltd.**

CC Gordon Adams, Head of Planning, BPSDC