



LONDON BOROUGH OF WANDSWORTH
LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC
WRITTEN STATEMENT

MAIN MATTER 4:
NINE ELMS
(POLICIES PM3, NE1 - NE13)

WEDNESDAY 16 NOVEMBER 2022

Abbreviations

BDTQ - Battersea Design and Technology Quarter

CAZ - Central Activities Zone

CIL - Community Infrastructure Levy

DIFS - Developing Infrastructure Funding Statement

DIRR - Developing Infrastructure Requirements Refresh

EADF - Economic Appraisal and Design Framework

ELPS - Employment Land and Premises Study

GIS – Geographic Information Systems

HELAA - Housing Economic Land Availability Assessment

IBP - Industrial Business Park

LP – The London Plan

NESB - Nine Elms South Bank

NPPF – National Planning Policy Framework

NPPG – National Planning Practice Guidance

OA - Opportunity Area

OAPF - Opportunity Area Planning Framework

PTAL - Public Transport Accessibility Level

SIL - Strategic Industrial Locations

UDS – Urban Design Study

VNEB - Vauxhall Nine Elms Battersea

WLP – Wandsworth Local Plan

Is the area strategy and are the site allocation policies for Nine Elms justified by appropriate available evidence, having regard to national guidance, local context, and are they in ‘general conformity’ with the LP?

The Areas Strategies in the Local Plan have been developed using a consistent approach having had regard to national guidance, the London Plan and the local context. Rather than repeating this across each of the Main Matters 3 to 11, this is set out once for the sake of brevity, in a separate Written Statement covering PM2 – PM10 inclusive. Each of the Main Matter statements in relation to each individual Area Strategy will therefore only cover matters of relevant to that place.

The Area Strategy policy (PM3) and site allocation policies (NE1-NE13) for the Nine Elms Spatial Area are justified by appropriate available evidence, having regard to national guidance, local context, and they are in ‘general conformity’ with the LP.

The primary sources of evidence are as follows:

- [Cultural Strategy for Battersea and Nine Elms](#) (SD-066)
- [Nine Elms on the South Bank Cycling Strategy](#) (SD-067)
- [Vauxhall Nine Elms Battersea Opportunity Area Planning Framework](#) (SD-082)
- [Nine Elms Public Realm Design Guide](#) (SD-084)
- [Battersea Nine Elms Development Infrastructure Requirements Refresh Study](#) 2019/2020 (SD-095)
- [Battersea Design and Technology Quarter Economic Appraisal & Design Framework](#) (SD-083)

The below outlines how the evidence which supports the Area Strategy has been prepared and how it meets the requirements set out in the question.

Introduction

Nine Elms Area Strategy is in accordance with the London Plan and defined it as an Opportunity Area (OA), sits partially within the Central Activities Zone (CAZ) and has the potential to deliver greater levels of housing alongside employment than the other CAZ Opportunity Areas referenced in the London Plan. In the OA, offices and other CAZ strategic functions may be given equal weight relative to new residential development.

Between 2012 and 2022, the Nine Elms area has undergone rapid change and development in anticipation of the two-stop extension to the Northern Line that opened in September 2021. This builds on the vision for Nine Elms established in the VNEB Opportunity Area

Planning Framework (OAPF) (SD-082). This strategy will ensure that by the end of the Plan period, Nine Elms will have continued to develop as a sustainable, distinctive, world-class, mixed-use neighbourhood, known for its culture, community and creativity, contributing and connected to wider London. It will provide local people with access to the river and new open space, shops, employment opportunities and community facilities and new and improved public transport connections and active travel routes. During the plan period, development of the remaining Site Allocations is expected to have been completed or commenced construction, and the final phase of planned investment in infrastructure projects which support the developments will be delivered.

Nine Elms has thirteen allocations made within the Area Strategy, including two clusters. Each of these sites has been assessed through the HELAA process to provide an overall housing capacity of 8,417 dwellings, which is reflected in Policy SDS1. Further detail on how each site should come forward is set out within NE1 – NE13, and these are set within the context of other policies within the Plan (e.g. LP4, Tall Buildings).

Policy PM1 provides an overarching guide to development and also points to any specific supplementary guidance. The Vauxhall Nine Elms Battersea Opportunity Area Planning Framework (SD-082) provides guidance for the development of this spatial area..

Developing the Placemaking Policies: PM3 Nine Elms

The Area Strategy boundary is principally based on the defined opportunity area boundary and the relevant Site Allocations to ensure they captured the local context as best as possible. A buffer of 100m is added to this in order to express the indicative nature of the Area Strategy boundary. Where the boundary meets the borough boundary with Lambeth Council there is no buffer area as Wandsworth has no authority beyond its own border.

The Area Strategy for Nine Elms: Local Plan Evidence Base

Alongside its setting within the national framework, the policies and strategy of the London Plan and the Vision and Objectives of the Local Plan, the strategy for the Nine Elms responds to its current context and character, which is essential to understand. Any analysis of the context and character for the Plan is informed by the comments to the Plan made by residents and people who know the centre.

In respect of the fourteen place based principles (and resulting 'spider' diagram), the Nine Elms Spatial Area performs well on resilience, but less well on choice and housing. Given the developing nature of the area this is likely to change dramatically over the plan period.

At the current time, the Nine Elms Spatial Area can be defined by:

- the riverfront along the Thames and the associated Thames Path;
- the New Covent Garden Market;
- Battersea Power Station;
- the existing Queenstown Road industrial area;
- Nine Elms Park;
- a prime office location which has begun to be established;
- safeguarded wharves and other key industrial sites;
- the moderate Public Transport Access Level (PTAL)

Nine Elms is an area undergoing a significant change and evolution. Whilst there is currently a significant amount of construction in progress and the area suffers from poor legibility, a lack of green spaces and discontinuity of the Thames Path, this is a temporary state. Industry and infrastructure have left an imprint of large-scale features and a legacy of an incoherent layout and poor connectivity

There is relatively little remaining historic fabric in Nine Elms, and thus any designated and non-designated heritage features are particularly valued: Battersea Power Station is a key heritage asset, as are the railway stations (Battersea Park and Queenstown Road), pubs and remaining Victorian houses. Battersea Power Station is an iconic London landmark, with its chimneys being a prominent feature on the London skyline and a symbol of Britain's industrial heritage.

The Thames River is an asset that is highly valued by the local community for its activity, interest and scenic qualities, such as the houseboats and planting adjacent to Riverlight Quay which are of a human scale and provide welcome greening to the area. The existing green space of Heathbrook Park is also particularly valued by the local community as a place of tranquillity and as a setting for events such as the Wandsworth Arts Fringe Festival.

Bearing in mind this character and context, and fitting into the framework established by strategic policy, the Local Plan sets out a distinct and bespoke vision for the centre (and for the Area Strategy) which includes but is not limited to:

- establishing a new centre in the form of a 'CAZ retail cluster' at the regenerated Battersea Power Station, creating an iconic shopping and leisure destination for London as a whole which also provides opportunities for and meets the needs of the local community;

- continuing to put culture and community at the heart of Nine Elms; working with partners and the community to create a sense of place and an integrated neighbourhood;
- foster community cohesion and provide access to high-quality facilities, culture and design;
- including affordable space for cultural and community uses and the creation of three creative quarters in line with the vision set out in the Cultural Strategy for Battersea and Nine Elms (SD-066);
- supporting the Vision for a successful, sustainable, mixed-use neighbourhood in Nine Elms by ensuring ongoing investment, delivery and co-ordination of infrastructure projects; including utilities, digital communications, transport, green spaces and public realm; and social infrastructure including education, recreation and health facilities, through direct delivery and in partnership with internal and external partners, working to a 5-10 year programme to completion;
- promoting improvements in active travel including the delivery of the Nine Elms Pimlico Bridge, for walking and cycling, connecting communities on the north bank of the Thames to Nine Elms, creating a world-class public realm and open space at the gateway landing site.

Within the Placemaking policy, PM3, this analysis and direction has given rise to a specific policy response geared towards its future success, couched in the needs of the borough.

The main issues arising in PM3 are:

- the need for a high-quality and integrated public realm and network of open spaces and promote active travel through provision for cycle and pedestrian connections;
- placemaking improvements to create an enhanced public realm, having reference to the strategy set out within the BDTQ Economic Appraisal and Design Framework (EADF) (SD-083);
- the requirements to maintain and increase the number of street trees of an appropriate size and species, as well as enhance the experience and quality of the public realm through carefully considered proposals that will create beautiful, high-quality, well-designed, accessible, and inclusive spaces and provide elements that encourage dwell time, such as seating and parklets, public art and, where appropriate, the infrastructure to facilitate community and cultural events;
- the need to support the emerging CAZ retail cluster at Battersea Power Station to provide a unique shopping, leisure and cultural destination that serves London as a whole, whilst also meeting the needs of local communities;

- supporting the important economic function of the Queenstown Road, Battersea SIL, Stewart’s Road Industrial Estate, the Council will support proposals which enhance, re-provide and/or intensify the industrial provision;
- promoting the growth of three creative quarters in Battersea and Nine Elms, which focus on cultural activities that have an established legacy and relevance to local communities, as well as attracting new cultural anchor tenants;

In this respect, the key evidence in shaping the Nine Elms has been:

- Cultural Strategy for Battersea and Nine Elms (SD-066)
- Nine Elms on the South Bank Cycling Strategy (SD-067)
- Vauxhall Nine Elms Battersea Opportunity Area Planning Framework (SD-082)
- Nine Elms Public Realm Design Guide (SD-084)
- Battersea Nine Elms Development Infrastructure Requirements Refresh Study 2019/2020 (SD-095)

And for the Battersea Design and Technology Quarter more specifically:

- Employment Land and Premises Study (SD-034)
- Industrial Intensification Primer, Mayor of London (SD-035)
- Industrial intensification and co-location through plan-led and masterplan approaches, Practice Note, Mayor of London (SD-036)
- Industrial Intensification and Co-Location Study: Design and Delivery Testing, Mayor of London (SD-037)
- The Potential for Urban Logistics Hubs in Central London, Cross Riverside Partnership (SD-038)
- Battersea Design and Technology Quarter Economic Appraisal & Design Framework (SD-083)

The Cultural Strategy for Battersea and Nine Elms (SD-066) sets out a vision for 2020 that includes the area being viewed firmly as a dynamic, successful mixed-use district with diverse opportunities for people to make their home, build their business or enjoy the best of London’s culture, entertainment and shopping. Four broad principles are established including Creative Industries, Sustainability, Heritage, and International Exchange which helped guide the strategies approach. This strategy has been integral to bringing forward cultural initiatives and uses to help make the Nine Elms Spatial Area more attractive to residents and the rest of the borough.

The impending transformation of Nine Elms Spatial Area and the ambition of the Mayor’s Cycling Vision means that it is important to integrate cycling into the emerging public realm, complementing the area’s increasing walkability. Nine Elms on the South Bank Cycling Strategy (SD-067) sets the scene by outlining existing and future development in NESB with respect to cycling. It examines the relationship between design and cycle mode share and identifies how a cycle friendly urban area should be delivered, looking both at the design components and the nature of the delivery and making recommendations for its implementation.

The Vauxhall Nine Elms Battersea Opportunity Area Planning Framework (SD-082) is supplementary planning guidance to the London Plan. It sets out the strategic policy framework for development within the OA, articulating the key policy directions established in the London Plan and Wandsworth Local Plan. It proposed guidance, interventions and strategies for Land Use, Housing and Social Infrastructure, Transport, Public Realm, Tall Buildings, Environmental, and Section 106 and CIL.

The Nine Elms on the South Bank Public Realm Design Guide (SD-084) provides a coherent set of principles for all of the Nine Elms Spatial Area which has helped focus the site allocations and the placemaking policy. It summarises and builds upon existing public realm design aspirations, guidance and policy including:

- General design principles
- Spatial and route hierarchies
- Public realm character areas
- Planting design and biodiversity
- Street surfacing materials and furniture
- Public realm lighting
- Sustainable drainage within public realm
- Safety and security
- Temporary development and interfaces between sites

WBC commissioned a refresh of the Vauxhall Nine Elms Battersea (VNEB) Development Infrastructure Funding Study (DIFS). The Development Infrastructure Requirements Refresh (DIRR) (SD-095) report on matters relevant to development infrastructure funding that have emerged since the original study. These include:

- need for infrastructure and existing projects in the three broad categories of transport infrastructure, utilities and social infrastructure (including open space)
- associated funding arrangements

- review of the programme costs to data
- phasing requirements

The Employment Land and Premises Study (ELPS) (SD-034) provides a detailed evidence base from which an appropriate supply of employment land and premises can be planned for, and provides a comprehensive strategy for balancing supply and demand. The main objectives of the ELPS are to:

- assess the quantity and quality of the Borough's current employment land provision and its suitability to continue to support B-use class employment activities
- assess the demand for B-use class employment space over the Local Plan period.
- compare the scale and qualitative characteristics of supply against forecast demand over the plan period, and
- provide evidence-based recommendations about the Borough's employment land policies.
- It also recommends that the Council should encourage the intensification and/or redevelopment of poor-quality existing space in the local office market and encourage development of office floorspace in the emerging Battersea Design and Technology Quarter (BDTQ).

The Council wishes to promote a creative and technology hub in East Battersea/Nine Elms, building on a strong existing creative economy which is forecast to develop further with future investment in the Nine Elms area, including the arrival of the UK HQs of Apple and Penguin Random House. The BDTQ Economic Appraisal and Design Framework (SD-083) contains sites that are subject to development pressure and likely to undergo some change in the foreseeable future. It also includes an Industrial Business Park (IBP) designation, which is currently being reconsidered as a policy designation. The purpose of the framework is to guide development aspirations in the area, inform scheme development and ensure co-ordination between different schemes to deliver a holistic and cohesive vision in line with the Council aims.

The Spatial Area Map at 5.2 shows how the different considerations are brought together with clusters of site allocations and Kirtling Wharf and the Battersea Design and Technology Quarter. Inset maps of both these clusters can be found on maps 5.3 and 5.4 which provide a more detailed illustration of the proposed changes. Development on Map 5.2 is focused along Nine Elms Lane with new routes and enhancements branching off from it. It is supported by Map 5.1 which identifies the cultural clusters planning for the spatial area and different cultural uses.

The Area Strategy for Nine Elms received several representations during the Regulation 19 consultation. A variety of respondents expressed their support in principle for the Battersea Design and Technology Quarter. Others argued that PM3 – C.6 promotes the development of the Nine Elms Pimlico Bridge but does not consider a non-bridge eventuality.

With regards site allocations multiple responses made the point that for NE9 Kirtling Wharf need to be improved and that it will be difficult for Phase 6 of the Battersea Power Station Masterplan Programme to come forward if NE11 Cringle Dock is not combined with NE9 Kirtling Wharf. Others argued that the site boundary leaves open an opportunity for fragmented development to the south and that the open space requirement is in direct conflict with the operations of the safeguarded wharf. Commenters explained that the site allocations at Kirtling Wharf (NE9) and NE11 (Cringle Dock) should reference the need for the 24-hour operation of the site and that reference should also be made to LP40 (Protected Wharves). The site allocation needs to more explicitly show that the operation, maintenance and access of the Thames Tideway Tunnel access shaft and associated infrastructure will not be impeded by any new development.

A number of modifications have been suggested to provide greater clarity and address some of the issues raised by the commenters including amending the NE9 Kirtling Wharf boundary to better reflect the most recent Safeguarded Wharves Directions and additional language has been added to some of the site allocations to ensure the proposed uses don't conflict with the safeguarded wharf uses or the Thames Tideway Tunnel Infrastructure.

Are the housing land site allocations in Nine Elms deliverable and do they show how they will contribute to the achievement of the WLP's overall housing requirement of at least 20311 new homes and its timescale for delivery?

The estimated capacity and delivery for the specific housing site allocations is published in the Authority Monitoring Report on Housing and forms part of the unpublished background information of the HELAA (SD-047) ¹(Please see the footnote below for explanation why this has remained unpublished). The Site Allocation capacity of 3,417 together with the 5,000 capacity of other non-allocated sites make up the total housing capacity for Nine Elms as shown in table 2.2 (New Home Distribution) of Policy SDS1. As set out in Policy SDS1, the Council considers that stating the overall capacity for each Area Strategy area, alongside the total capacity for the borough, is the most appropriate strategy for setting out how the borough will meet its housing requirement. Site specific capacities and details of the

¹ The list of sites with capacities were not published to avoid any pre-emption of the planning application process in establishing appropriate built form and densities for sites. This is consistent with the SHLAA methodology.

assessment of housing land site allocations have not been provided in the Site Allocations of the Local Plan or in the HELAA (SD-047) as it is not considered helpful and may prejudice the planning consideration of a site. This is consistent with the Greater London Authority's Strategic Housing Land Availability Assessment (SHLAA) 2017 methodology, and avoids any pre-emption of the planning application process in establishing appropriate built form and densities for sites.

However, for the purpose of assisting the Inspectors on the WLP examination process, the estimated capacity figures, and phasing for each Site Allocation are contained in Appendix 3 to written statement MM2 'Spatial Development Strategy'. Appendix 3 shows the estimated capacity for each site, which form part of the overall housing capacity figure set out in table 2.2 of Policy SDS1.

For sites with pending or approved planning permissions, the assessment of development potential relied on the levels of development identified within the permission, factoring in a probability of deliverability for pending permissions. For other sites, estimates of development potential, suitability, availability and achievability followed the methodology as set out in the HELAA (SD-047), which followed the methodology within NPPG Housing and Economic Needs Assessment 2020.

Estimates for housing potential on sites are derived from the Council's Urban Design Study (UDS) (SD-054), which applies a design-led approach to identifying capacity in accordance with Policy D3 of the London Plan. The methodology used for estimating the development potential is set out in greater detail in the UDS in Appendix H (SD-054). The capacities identified within the UDS are then adjusted, as appropriate, to account for existing residential uses and/or alternative uses anticipated on site, including those contributing to the economic capacity. It is important to note that the estimates derived from the UDS are indicative for the sites without planning permission and do not give a definitive number of units to be provided on site, as the ultimate capacity will be determined by the assessment of a planning application in accordance with the Local Plan.

For each site allocation a judgement was made on whether development on each site is likely to be viable and when it would likely come forward for development. Sources of information supporting this judgement included: (1) The Urban Design Study (SD-054) (2) The Wandle Delta Masterplan, which the Council has adopted as a Supplementary Planning Document (SD-076); (3) Pre-application records (which are confidential); (4) The results from the call for sites consultation; and (5) Knowledge of the site and landowner intentions and propensity to develop the land. (This involves an assessment of the 'history' of development of the site, for example, if it has previous planning applications

submitted/approved or any pre-application discussions. Or if there are any known ownership issues that may make it less likely to come forward until resolved). Further review, site by site, of the housing and economic capacity has also been undertaken to account for any changes required as a result of new evidence or policies relating to: (1) Physical constraints based on GIS hazard, constraint and policy layers in the Local Plan (which include flood zone layers, local views, policy areas and protected views); (2) Existing built form and building heights; (3) Existing heritage and sensitivity to growth (based on on-site or adjacent designated heritage assets, and findings of the Urban Design Study); and (4) Ownership, based on known constraints. (This is following the PPG on HELAA, if there have been any changes to the ownership of the site or legal impediment for development.)

Estimated timescales for housing delivery were assigned to the phases used in the London SHLAA, for comparability: (1) 2019/20–2023/24; (2) 2024/25–2028/29; (3) 2029/30–2033/34; and (4) 2034/35–2040/41. Development phasing was then annualised to each year between 2019/20 and 2039/40 inclusive, to allow for comparison to the proposed Plan period of 2023/24 to 2037/38. Housing delivery phasing details for the Site Allocations in Nine Elms are contained in Appendix 3 to written statement MM2 ‘Spatial Development Strategy’.

On the majority of the Site Allocations, the Council is already in discussion with the landowners, and it would be considered inappropriate to be more prescriptive within the Site Allocations, such as setting out a range of residential units or commercial floorspace to be delivered, as these discussions need to take place with the relevant landowners on a site-by-site basis, informed by discussions such as on site specific circumstances, local needs and viability, to ensure flexibility and effective delivery. Some of the sites represent longer-term opportunities, for key sites due to their siting or size, where the Plan seeks to influence development should they come forward through planning, and it would be unrealistic to specify content at this early stage.

The Nine Elms area is one of the largest regeneration projects in the country and has been and continues to be the focus for considerable new development since the adoption of the Nine Elms Opportunity Area Planning Framework (SD-082). Development has continued with an intense construction period in operation following the opening of the Northern Line Extension in Autumn 2021. The contextual paragraphs of the Nine Elms Area Strategy (from page 101 of the Plan) set out what has been and what is yet to be developed in the pipeline.