

Battersea Society

Responses to Modifications to the Local Plan

1. Battersea Design and Technology Quarter (BDTQ)

We object strongly to the exclusion (MM34, 36, 38 and many following amendments) of the Silverthorne Road site from the designated BDTQ.

We strongly support the continuing designation of that site as part of the Queenstown Road Strategic Industrial Location (SIL), and its use for the kinds of industrial purposes long-established there. But we see no reason why this should lead to the site's exclusion from the BDTQ, nor why the BDTQ cannot include different areas that are designated respectively as Locally Significant Industrial Areas (LSIAs) and SILs. That is entirely compatible with London Plan Policies E5 and E7; and we note that the definition of LSIAs and SILs differs only in the use of the words 'borough-wide' for the former and 'London-wide' for the latter.

Further development of the vision and masterplans for the BDTQ as originally conceived is clearly essential. It will inevitably have to take note of the different nature of the different sites it comprises, not least the contrasting buildings, structures and their uses on the different sites. But to miss the opportunity to develop a vision and masterplans for the whole area as originally conceived would be a grave mistake. For it is critically important that Silverthorne Road, as the largest of the three sites, should not suffer – with the sole exception of Battersea Studios – from stasis, remaining exactly as it is for the next fifteen years or more. If it is to remain an *effective* part of the SIL, the site, the businesses and services which use it must continue to develop.

If the GLA insists that the Silverthorne site should be excluded from the BDTQ, then it is essential that the Council should commission studies and develop plans in collaboration with the GLA - in line with the provisions of London Plan Policies E5 and E7 – 'to intensify and make more efficient use of' the site. Battersea Studios otherwise risks becoming even more isolated than it is at present. And since Network Rail is the major landowner on the site, it must be actively involved in this work.

2. Tall buildings

We object to the weakening of policies relating to tall buildings by the substitution of 'should' for 'must' throughout the Plan. Our concerns are based on many years of experience in seeing the norms set in previous Local Plans exceeded on what has seemed a routine basis. We can find no justification either in the National Planning Policy Framework (NPPF) or in the London Plan for the kind of flexibility in which the maximum heights set in the Plan will become a starting point for bargaining with developers.

We object especially to the change (MM146) which opens the door to tall and mid-rise buildings outside the identified tall and mid-rise building zones in the Plan. Again, there is no justification for this kind of flexibility in the NPPF; and it is incompatible with the London Plan Policy D9 B3, which states that "tall buildings should only be developed in locations that are identified" in Local Plans.

3. Clapham Junction

We are concerned by changes (MM86, 88 and 90) which seem to imply uncertainty about the development of the Urban Heart Masterplan for areas close to the station. The changes are inconsistent with the wording of the main text relating to the Masterplan in the box following paragraph 6.19, which repeatedly uses verbs that in logic imply that the masterplan *will* be developed. Indeed, the setting of a boundary for the masterplan implies that work was initiated as early as the autumn of 2021; and the Council has recently agreed that it should work with Network Rail, GLA/TfL and DTZ Investors to produce the masterplan.

We welcome the commitment in the recent paper approved by the Transport Committee to community engagement in developing the masterplan. But the work undertaken so far does not meet the requirements set in the NPPF, the National Design Guide, and the National Model Design Code that the development of masterplans should involve community engagement at every stage in the process, *starting with the scoping stage that defines the area to be covered*. It is disappointing that this requirement has not been met, and that even now there is no indication as to the forms that community engagement will take. We trust that this will be addressed as a matter of urgency, before further work on the masterplan is initiated.

4. Urban Design

We expressed concern at the EIP hearings, following comments made in our response to the Regulation 19 version of the Plan, about the drafting of LP1 A6, with its reference to 'spaces with their edges defined by buildings'. We pointed to the risk that this might provide a green light to developers who wish their buildings to cover their entire site, and thus to sit uncomfortably close to narrow pavements and roads. The risk was acknowledged at the hearing, and we understood that an amendment would be made; but that has not been done. We urge that it should.

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