

DP3221/JS

2 March 2018

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Dear Sir,

## **THE DRAFT LONDON PLAN**

### **Representations on behalf of the owners of Battersea Power Station**

We write on behalf of our client, Battersea Project Land Company Limited ('BPLC'), to submit representations to the above consultation for your consideration.

BPLC is currently delivering the redevelopment of Battersea Power Station and surrounding sites, to create a new sustainable town centre for LB Wandsworth in the CAZ. When it is complete, the BPS masterplan will have provided commercial floorspace to support 17,000 permanent jobs, including 150,000sq m of Grade A offices, 75,000sq m of retail and cafes/restaurants, hotels and leisure space and a major new entertainment venue, as well as more than 4,000 new homes. It represents a significant investment into the London economy, driving the delivery of the Vauxhall, Nine Elms and Battersea Opportunity Area ('VNEB OA') through a contribution of approximately £245m to fund local and strategic transport infrastructure. This sum is principally to fund the Northern Line Extension ('NLE'), which BPLC are accommodating on site, but approximately £10m is also being contributed to Crossrail 1 through MCIL1, despite this not being in place when the masterplan was originally granted planning permission in 2011.

In addition to the masterplan, BPLC's development manager BPSDC also acts as development manager for the Cringle Dock Waste Transfer Station ('WTS'), alongside the site's owners Western Riverside Waste Authority. Planning permission has been granted for the redevelopment of the site to provide a new WTS with enabling development above.

BPLC strongly supports the strategic planning role performed by the GLA, and by extension the London Plan as a tool to promote development in London. Battersea Power Station's regeneration, and the wider regeneration within the Nine Elms Opportunity Area, is the result of successful close collaboration between strategic and local authorities, under the auspices of a Development Plan that promotes the delivery of new homes and jobs. The Draft London Plan, published in December 2017, needs to provide the same positive and supportive environment for development so that London can continue to be a place that people want to visit, reside, work and invest, and so that it can meet the myriad of challenges it faces in fulfilling these various roles. We support the ambition of the Draft London Plan and its vision for our great city, but have concerns that the desired outcomes may not be achieved as intended and set our detailed comments below within this context.



## **Battersea Power Station as a strategic development site**

The Battersea Power Station site has a long history and has been subject to a number of failed attempts at redevelopment. Over a 30 year period, the sheer complexity of the site and cost of delivery has seen off several determined developers; it is arguably the most challenging development project in London.

Because of the significant challenges in bringing this project forward, a flexible planning framework and collaborative approach have been essential in stimulating and facilitating the project. In order to continue delivery over a 15 year period, certainty is critical. BPLC purchased the site in September 2012 out of administration following the collapse of the previous developer and finally commenced delivery of this ambitious project, 30 years after the Power Station was decommissioned. The investment decision made by the international consortia was based on a set of planning obligations and parameters contained in the Outline Planning Permission, and the continuation of development remains dependent on those obligations and parameters. Where such obligations or parameters are changed without an understanding of their wider impact or an ability to compensate for any additional impacts, the delivery of an already challenging project becomes even more challenging and less certain.

As London relies more and more on strategic sites and major multi-phase regeneration schemes such as Battersea Power Station to provide the homes and jobs it needs, the particular factors involved in successfully delivering such projects over a long period of time become ever more important, and the imposition of policies and rules that place greater risk on these schemes has the potential for an ever greater impact on the delivery of the objectives of this Draft Plan.

### **Use of Section 73**

As highlighted above, the Battersea Power Station masterplan will be delivered over a 15 year period. Inevitably on such a large project, changes need to be made and, to date, these have been done via Section 73 amendment applications to the original Outline planning permission.

The decision to purchase the Power Station site was made on the basis of the planning obligations and parameters of the approved Outline planning permission. There is significant concern by the owners of the site that the Mayor will seek to renegotiate the original consent when a future S73 amendment application is submitted. Such a scenario could call into question the merits of the original decision to invest in the project and its future delivery.

**RECOMMENDATION:** That the Mayor makes it explicitly clear that new policies will not be applied to historic permissions where they are being amended by Section 73 applications and that new policies shall only be applied to the relevant amendments.

## **Chapter 1 – Planning London’s Future (Good Growth Policies)**

We support the principle of Good Growth, with all six policies working together with equal importance to deliver the best overall form of development.

### *Policy GG4 – Delivering the Homes Londoners Needs*

There is an inherent tension between elements A and B of this policy. Delivering more homes overall requires a measured approach to affordable housing, ensuring that viability and delivery factors for each site, and in particular for larger, more complex regeneration projects, are taken into account.



Whilst providing as much affordable housing as possible is of unquestionable importance, requiring a level of affordable housing that goes beyond that which a development can viably provide has the potential to impact on the delivery of all homes. An unviable scheme will not proceed. We do not consider that this would be beneficial for London, and therefore encourage a measured approach to affordable housing requirements.

Part E of this policy seeks to establish ambitious and achievable build-out rates at the planning stage, incentivizing build-out milestones. We do not agree with introducing stipulations on build out rates through the planning system, as they add yet another matter for negotiation and more requirements for development schemes to meet. It is unlikely that build-out rates can be set with confidence by a developer at the planning stage, when a scheme is not sufficiently progressed to enable realistic predictions. Notwithstanding our objection, if build out rates are to be set through the planning process, we would encourage further clarity on what incentives may be provided, but would strongly discourage any suggestion of penalties if build-out milestones forced upon a developer at the planning stage are not subsequently achieved. Setting build out rates will not succeed unless the procedural hurdles to delivery are also reduced – this includes the burden of information and documentation imposed by the planning system, and in this regard the Draft London Plan promises to impose more burden than the current Plan which could impact negatively on delivery.

We would, however, note that Battersea Power Station is an example of what is required in order to maintain a fast pace of delivery despite economic and other challenges. Developments must be allowed to respond to conditions and adapt their build out rates to suit a variety of factors. Ambitious build-out rates may be difficult to achieve and will have implications that the planning system will need to address.

**RECOMMENDATION:** Either remove the requirement to establish ambitious and achievable build out rates or clarify how their achievement is to be incentivized.

#### *Policy GG5 – Growing a good economy*

We support the promotion of London’s economic development, but question why affordable housing is included as element D in this policy when policy GG4 already identifies the strategic requirements for new housing. Economic development needs to be given appropriate weight in the Plan, rather than being relegated behind the provision of affordable homes.

**RECOMMENDATION:** Remove the reference to affordable housing in Part D.

## **Chapter 2 – Spatial Development Patterns**

#### *Policy SD1 – Opportunity Areas*

We support the continued promotion of Opportunity Areas. In particular, we support the requirement of A.4) to ensure that the Mayor’s agencies, including Transport for London, work together with others to promote and champion Opportunity Areas. We further support element A.7’s commitment to take action where necessary to overcome barriers to delivery, but would note that this strategic commitment needs to inform the setting of more detailed policies – in particular H6 and its supporting text at paragraph 4.6.13, which indicates that boroughs may want to set localized affordable housing thresholds for Opportunity Areas. Many already have, and these will continue to have weight where they have been set through the Local Plan process. The Draft London Plan should acknowledge that these localized levels of affordable housing are likely to be for less than 35% given the almost universal need for significant infrastructure improvements in these areas required to support the significant additional levels of new development.



**RECOMMENDATION:** Amend Part A5) to acknowledge that affordable housing targets in Opportunity Areas will need to maximise affordable housing alongside other funding requirements specific to OAs, including infrastructure provision.

*Figure 2.11 – Central London Opportunity Areas*

We support the continued identification of the VNEB OA, but question the reduction in the target for new homes and jobs from the current London Plan minimum of 25,000 new homes and 20,000 new jobs to 18,500 homes and 18,500 jobs – unless this is discounting what has already been delivered. The VNEB OA continues to provide a significant opportunity for new development, and we would not wish to see its capacity diminished.

**RECOMMENDATION:** Ensure that Figure 2.11 identifies the maximum target for new homes and jobs in the Vauxhall Nine Elms Battersea Opportunity Area, to maximise the contribution that the OA can make to achieving the London Plan’s objectives.

*Figure 2.16 – CAZ Diagram*

We support the continued identification of Battersea Power Station as a Potential CAZ retail cluster, in recognition of the new town centre being built on the site.

*Policy SD5 – Offices, other strategic functions and residential development in the CAZ*

We acknowledge the even weight given to offices and other CAZ strategic functions and residential use within the VNEB OA, but would note the ongoing intention to establish Battersea Power Station as an important office and retail destination, as well as a major new residential community. The masterplan development is approximately 40% commercial, reflecting this strategic balanced approach to land use in the VNEB OA.

## **Chapter 3 – Design**

*Policy D2 – Delivering good design*

We wholeheartedly support the ambition of this policy, but consider that some elements are overly prescriptive. In particular:

- The requirement at F for referable development proposals which are of a high density or include a tall building to have undergone at least one design review before a planning application is made. Whilst design review panels are one method of ensuring high quality design, they are not made available in all boroughs and those that do exist are not of a consistent quality. They are just one potential way to ensure good design, and should not be made a requirement. Instead, policy should require robust design scrutiny, but allow local authorities the flexibility to determine how this is best achieved;
- Part H which stipulates how boroughs should attach conditions, and suggesting that design quality should not be deferred to reserved matters (although the Draft Plan uses the term ‘referred’ matter, we presume it means reserved). We object to the request to provide construction details at planning stage when this will be prior to the involvement of a contractor, and therefore unreasonable to request. Scale and external appearance are matters capable of being reserved, and this will remain a statutory right for any applicant – especially on large and complex masterplan developments which may be designed and delivered over a long time period. In these situations, design codes provide part of the solution, but it would remain within



the scope of an outline permission to reserve much of the design to the reserved matters stage. Battersea Power Station provides a good example of the benefits of allowing much of the detail to come through reserved matters, as it has brought forward detailed designs by world class architects such as Foster + Partners and Gehry Partners within a Design Code approach. Had the Design Code been too prescriptive, the variety and innovation of these designs would not have been possible;

- The indication that boroughs should use architect retention clauses in legal agreements ‘where appropriate’ and the subsequent supporting text at paragraph 3.2.10 goes beyond what should be considered appropriate for this strategic document, and is unduly onerous. Such requirements can present unnecessary contractual difficulties for developers, and should only be required where a specific architectural practice has been used to gain planning permission for development that goes beyond the bounds of what may otherwise have been granted using an architect of lesser quality; and
- Paragraph 3.2.9 provides guidance to boroughs on the use of conditions to avoid ‘value engineering’ through future amendments. Minor amendments that are not referable to the GLA should not be considered in the Draft London Plan, and amendments post planning permission to make a scheme more deliverable are a natural part of the design process – especially where there is greater pressure on the financial viability process and greater cost and time involved in securing planning permission in the first place. Preventing or overly constraining this process will have a detrimental impact on delivery.

RECOMMENDATION: We request the following amendments to this policy:

- Amend Part F to remove the mandatory requirement for design review to acknowledge that not all Boroughs have a design review function, and that design review is not always necessarily the most appropriate method of ensuring high quality design;
- Amend Part H to remove the requirement for construction details at planning stage, and to refer only to architect retention clauses in exceptional circumstances, not as a matter of course;
- Amend paragraph 3.2.9 to reduce the scope of intervention into minor amendment applications and changes once planning permission has been granted.

### *Policy D3 – Inclusive design*

Some of the guidance contained within this policy and its supporting text replicates matters that are more properly covered by Building Regulations. This includes references to ‘robust emergency evacuation procedures’ at paragraph 3.3.5.

RECOMMENDATION: Amend the policy and its supporting text to avoid duplication with Building Regulation requirements.

### *Policy D4 – Housing quality and standards*

Whilst we support the aspirations of this policy, we consider that it contains too much detail. If adopted, providing a one bedspace single bedroom less than 2.15m wide would cause a development to be not in accordance with the strategic development plan, for example, and so we consider that this level of detail should be provided within supplementary planning guidance instead. The supporting text provides further examples of overly-detailed and prescriptive guidance, for example at paragraph 3.4.3 which stipulates the proportions of floor area that can have a minimum headroom of 2.5m.

RECOMMENDATION: Remove all detail that is not of strategic importance, to be covered through supplementary planning guidance instead.



## *Policy D6 – Optimizing housing density*

Part C states that a management plan should be submitted for developments that exceed the density thresholds identified in the policy. Paragraph 3.6.8 identifies what this management plan should contain. It is not clear why this management plan is required or how the information it requests, including running costs and service charges, can be known at the planning application stage. Some of the information is already required in any event. We do not consider that the affordability of services has any relevance to the density of a development, and as such object to the requirement to provide these management plans. The density of a development should be assessed at planning application stage, and only approved if it can be justified in design terms – noting that density is just one characteristic of a development and should not be considered in isolation from other issues such as design quality, residential amenity and impacts on the surrounding environment.

Part D identifies the measures of density that should be submitted with an application. However, these are not appropriate for mixed-use developments.

We consider that Part E is too prescriptive. These measures will vary greatly from site to site and without a guide as to what is appropriate in each urban context, there is significant potential for such measurement approaches to unduly constrain or shape development.

**RECOMMENDATION:** Delete the requirement to submit a Management Plan from Part C. Amend Part D to identify how these requirements relate to mixed-use development. Delete Part E.

### *Paragraph 3.7.12 – Meanwhile uses*

Whilst we support meanwhile uses, we do not consider that they are always appropriate or possible, and we would discourage a move towards seeking to impose tighter controls on them as this could have the opposite effect of the draft policy's intention. Part of their attraction is their ease and temporary nature, and there is a likelihood that landowners will be discouraged from doing them if requirements are then imposed on them in terms of their longevity and other 'obligations', as specified at paragraph 3.7.12. Meanwhile uses are only appropriate in limited situations. Often, particularly on constrained sites, land is required for logistics to deliver the permanent development, and the introduction of meanwhile uses could serve to disrupt or delay delivery.

**RECOMMENDATION:** Delete the requirement to establish parameters for meanwhile uses at the outset.

## *Policy D11 – Fire safety*

We question the need for this policy and suggest that matters such as fire safety should be left to Building Regulations where there is the expertise to assess such matters. The requirement to submit a Fire Statement adds unnecessary cost and burden to the planning application process.

**RECOMMENDATION:** Delete the requirement to submit a Fire Statement and allow planning applications to summarise their fire strategy within a Design and Access Statement with the detail addressed through Building Regulations as is presently required.

## **Chapter 4 – Housing**

### *Policy H1 – Increasing housing supply*



We support the aspiration to increase housing supply, and in particular to optimize the potential for housing on suitable and available brownfield sites.

#### *Policy H5 – Delivering affordable housing*

Whilst we support the ambition to provide more affordable housing, delivery will only occur if development is viable. Replacing the current maximum reasonable approach with numerical targets which provide less flexibility to respond to site-specific or economic challenges is likely to result in fewer affordable homes being delivered, not more, even if the headline percentages being granted planning permission are higher. We would also request that Part A is clarified so that it does not refer to mixed-use developments that provide no new housing, and to clarify that the affordable housing requirements only apply to net additional new housing.

**RECOMMENDATION:** Amend Part A to require the maximum reasonable amount of affordable housing, and to refer to ‘developments that include net additional new housing’, in place of the terms ‘residential and mixed use developments’.

#### *Policy H6 – Threshold approach to applications*

We do not consider it appropriate for the threshold to be capable of amendment using supplementary planning guidance, given that it is such a fundamental development plan policy. However, whichever route is used to assess whether the level should increase, it should also consider the impact that 35% has had on starts and equally consider whether it should be reduced.

We would note that the threshold approach set out in policy H6 does not prevent planning permissions being granted with less than 35% affordable housing, and should not be applied as if it does. There are many circumstances in which development would not be viable with 35% affordable housing, and in these circumstances the maximum reasonable amount should be sought, with review mechanisms as appropriate, so that delivery is not stalled. If policy H6 is applied in a way that prevents the granting of planning permission for developments unless they provide 35% or more affordable housing, it will have a detrimental impact on the delivery of new homes in London.

It is disappointing that the threshold approach does not recognise lower levels set in Opportunity Areas on the basis of sound evidence, taking into account the other requirements on development in an area which will principally be infrastructure. In the VNEB OA, as an example, the affordable housing requirement was set at 15% in recognition of the significant cost of providing the Northern Line Extension. Whilst levels being secured have gradually increased beyond 20% on average, to impose a 35% threshold would disregard the fundamental viability basis for development in the OA, and risk preventing further development from coming forward unless other costs are reduced to maintain the overall viability equation.

We object to the reference in part H to requiring viability information for section 73 applications which ‘alter the economic circumstances’ of a scheme. All section 73 applications have the potential to alter a scheme’s economic circumstances where they make material amendments, but to re-open the scheme’s viability each time scheme changes are proposed, unless they are significant and directly related to the provision of affordable housing, is excessive. Section 73 is a route that is particularly important for larger planning permissions where there is the likelihood for numerous changes to be required during the development’s lifespan. Often these changes are made in response to market circumstances or to developed design, to refine and improve the development and make the best use of the site. The imposition of a policy such as this which increases the cost, risk and uncertainty of this procedure will either discourage developers from optimizing their schemes, or create a process that adds delay and reduces the chance of delivery. Section 73 applications should not be used as a ‘second chance’ to increase affordable housing delivery where a planning permission has been granted on



certain terms which are not affected by the particular changes proposed. We would suggest that the **circumstances in which section 73 applications are required to provide viability information should be much more limited**, and that policy H6 should be more precise in defining these circumstances.

Furthermore, we would request that the Draft Plan clearly states that the intention of this policy is not to seek to renegotiate the terms on which extant planning permissions have been granted, but to assess the scope and impact of any proposed amendments within the statutory limitations on the section 73 procedure.

We query why Part J of this policy is appropriate. The Mayor of London Order defines the criteria for referable applications. If an amendment is not referable, it should remain for the Local Planning Authority to determine in accordance with the Development Plan.

**RECOMMENDATION:** We request the following amendments to this policy:

- Amend Part B to recognize lower threshold levels in Opportunity Areas where these have been set through the Development Plan process, and to delete the reference to the 35% level being increased through Supplementary Planning Guidance;
- Amend Part H to reduce the scope of the requirement for viability information on section 73 applications to just changes which alter the affordable housing proposals, and clarify that Part H is to be used only to assess the actual amendments proposed by a section 73 application to an existing planning permission, not to renegotiate the basis on which that planning permission was originally granted;
- Delete Part J; and
- Amend 4.6.13 to recognize that OA levels could be less than 35%.

#### *Policy H12 – Housing size mix*

We support part C of the policy, which states that boroughs should not set prescriptive dwelling size mix requirements for market and intermediate homes.

## **Chapter 6 – Economy**

#### *Policy E1 – Offices*

We support the promotion and development of London’s office stock, in particular where it creates or reinforces a unique agglomeration or dynamic cluster of economic activity. We also support a flexible approach to lower cost and affordable workspace, being a matter to be taken into account and applied where appropriate rather than all office development being required to provide such floorspace.

#### *Policy E3 – Affordable workspace*

As noted above for policy E1, we do not consider that all sites, locations or buildings are necessarily appropriate for affordable workspace, and this type of accommodation should not be prioritized at the expense or compromise of other types of office accommodation – especially in large-scale Grade A office buildings. We consequently support a criteria-based approach as set out in this policy. We have worked collaboratively with LB Wandsworth Council to deliver a range of workspace typologies at Battersea Power Station, including subsidized incubator floorspace where there was no policy requirement to do so, and believe that in the right locations it can contribute positively to commercial development and the economy. However, this is not always the case, and Boroughs should not apply blanket policies which seek this type of accommodation in all commercial office developments.





## *Policy E8 – Sector growth opportunities and clusters*

We support policy E8, in particular its requirement to maximise London’s global leadership in tech across all sectors, and the recognition in part C of the policy of the various different types of office accommodation that London requires.

## **Chapter 8 – Green Infrastructure and Natural Environment**

### *Policy G5 – Urban greening*

Whilst we support the ambition and principle of urban greening, we would question the practicality and implications of adopting something as prescriptive as the Urban Greening Factor. It will add yet another layer of complexity and doesn’t appear to take account of central urban sites where the likely development scenario is 100% site coverage.

RECOMMENDATION: Amend the policy to be less prescriptive in the ambition to encourage and increase urban greening.

## **Chapter 9 – Sustainable infrastructure**

### *Policy S11 – Improving air quality*

The Draft London Plan does not contain a definition of Air Quality Positive, and this should be provided so that developers can understand what this policy requires.

RECOMMENDATION: Add a definition of Air Quality Positive to the glossary.

### *Policy S16 – Digital connectivity infrastructure*

Whilst the ambition of this policy is supported, its introduction adds yet another requirement for developers to provide information on, and for Council’s to assess, as part of the planning process.

RECOMMENDATION: Delete policy.

### *Policy S17 – Reducing waste and supporting the circular economy*

As above, whilst the ambition of this policy is supported, it results in more cost and time required to prepare and assess planning applications, and will slow down the process. We would question whether this is information that is required at the planning submission stage, or once planning permission has been granted, when this level of detail will be better understood.

RECOMMENDATION: Amend Part D to remove the need to submit a Circular Economy Statement.

### *Policy S19 – Safeguarded waste sites*

We support this policy, and in particular part B. At Cringle Dock in LB Wandsworth, BPLC and Western Riverside Waste Authority have successfully demonstrated how non-wharf uses can be introduced alongside wharf uses to meet a range of planning policy objectives, including the protection of a wharf’s strategic function alongside the delivery of new homes and/or jobs within an Opportunity Area. We consider that this is a model that could be capable of being promoted elsewhere in London, as the pressure to optimize development on and around safeguarded wharves increases.



## Chapter 10 – Transport

Comments on Chapter 10 have been provided in a separate note by SDG, which is enclosed with these representations.

### *Policy T9 – Funding transport infrastructure through planning*

We would encourage recognition in this policy that many large-scale, long-term major regeneration schemes such as Battersea Power Station are already committed to funding strategic transport infrastructure projects, and cannot take the additional burden of MCIL2 on top of these commitments. If the Draft London Plan and the MCIL2 Draft Charging Schedule, also out for consultation, do maintain this stance and fail to acknowledge these pre-existing funding arrangements, then the only potential source of flexibility for these developments in order to continue delivery is their affordable housing contribution. Development cannot provide more of everything, and unless there is a willingness to acknowledge the different capabilities of each scheme to deliver different strategic objectives, our concern is that none of the objectives will be achieved and development will slow or stop.

**RECOMMENDATION:** Introduce an acknowledgement that the requirement for infrastructure funding will be given due weight in the viability of development schemes, and especially for large-scale long-term regeneration schemes where the infrastructure costs are significant.

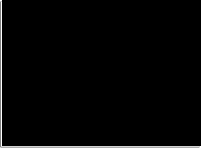
### **Summary**

We appreciate and support the ambition and vision of the Draft London Plan, and applaud many of its big ideas for our city. However, at a time when the development industry is uncertain over the impact of Brexit, and in the face of a housing crisis where delivery is key, we question the benefit of increasing the burden on planning applications. The Draft London Plan introduces the requirement for additional new documents to support planning applications, along with a large number of new factors to consider, and numerous further controls that will restrict the ability to adapt and develop designs in order to make them deliverable. We are mindful of the requirement within the Greater London Authority Act for the London plan to only deal with matters of strategic importance to London, and question whether a document of this length and detail can truly accord with this requirement. These additional documents and new considerations add cost for developers and require resources and expertise within Councils to assess. In combination, the Draft London Plan will make the planning process slower, more expensive and more difficult to navigate, at a time when the exact opposite is required. We would encourage greater flexibility and a clear distinction between planning and other regimes, such as Building Control, so that developers really can deliver the homes and jobs that London needs.

We respectfully request that our comments are taken into consideration. Should you require any further information, please contact Jonathan Smith of this office



Yours sincerely,



**DP9 Limited**

**Encs.**

To BPSDC / DP9  
Cc  
From Steer Davies Gleave (SDG)  
Date February 2018  
Project Battersea Power Station

Project No. Xxx

## **Draft 2017 London Plan – Transport Notes / Commentary**

### **Transport (General)**

1. BPS supports the aspiration that transport related impacts of new developments are fully mitigated at the earliest opportunity. BPS would highlight the Battersea Power Station development as a leading case study of transport planning mitigation where continued engagement with the Mayor and TfL has led to what will be a highly effective and influential measure of mitigating transport impact through the Northern Line Extension (NLE).

### **Healthy Streets**

2. BPS welcomes the emphasis on Healthy Streets particularly the need for permeable foot and cycle connections.
3. BPS also support the ten Healthy Streets indicators and fully recognise the benefits of walking, cycling and active travel in general in shaping the city.

### **Walking and Cycling**

4. BPS welcomes Policy T3, including the aspiration to protect and improve the Thames Path.

### **Public Transport**

#### *Buses*

5. Policy T3 states that development proposals should support capacity, connectivity and other improvements to the bus network to ensure it can operate efficiently. BPS welcome the emphasis on ensuring bus capacity and connectivity aligns with new development proposals and looks forward to discussions with TfL regarding bus access and service arrangements for the BPS development following completion of the NLE in 2020.

#### *London Overground*

6. Various London Overground extensions are noted in Table 10.1 as part of an indicative list of transport schemes. BPS would strongly support extensions and increased capacity on the London Overground network, and particularly on the South London Line.
7. BPS has previously presented TfL with an effective and low-cost option for extending London Overground services on the South London Line to a secondary terminating point (in addition to Clapham Junction) at Battersea Park Station. This is shown to deliver significant additional connectivity between Battersea and a range of South London destinations resulting in significant journey time improvements and is supported in principle by the London Borough of Wandsworth. BPS would welcome further discussion with the Mayor regarding this opportunity and the potential benefits it could bring. A summary of this proposal is provided in Appendix A.

*RECOMMENDATION: Adopt extension of the London Overground network to Battersea Park Station as a committed transport scheme.*

#### *Crossrail 2*

8. BPS welcome the Mayor's continued support for Crossrail 2 and see it as a critical piece of infrastructure for south-west London given its aim to reduce passenger and service congestion at Clapham Junction.
9. BPS would ask the Mayor to ensure that further opportunities for enhancing the existing rail corridor between London Victoria and Clapham Junction, particularly surrounding Battersea Park Station, are fully explored should Crossrail 2 be implemented given that it is likely that capacity on the existing rail corridor would be released.

*RECOMMENDATION: Provide support for further opportunities for enhancing the existing rail corridor between London Victoria and Clapham Junction.*

#### **Cycle Parking Standards**

10. Policy T5 provides updates to the cycle parking standards which are subject to increases beyond those currently required as part of the London Plan (2016).
11. Whilst BPS fully support the aspiration for increasing cycling, we do not believe that an arbitrary increase in standards is the optimum method of achieving greater cyclist mode share. We believe that cycle parking provision should be creative and flexible allowing for innovation and organic growth of cycling as a mode.
12. Experience from our first development phase (Circus West Village) has shown that provision of ample cycle parking is not the only means for encouraging cycle use. We believe that that a range of other factors, including quality and location of cycle parking provision, provide an equally important role in encouraging cycling and that the Mayor should prioritise quality over quantity when discussing cycle parking provision in the London Plan.

*RECOMMENDATION: Provide the ability for developers to be flexible in the provision of cycle parking allowing designs to meet forecast demand.*

#### **Car Parking Standards**

13. Policy T6.1 to T6.5 provides details on car parking standards for different land uses which in the Central Activity Zone (CAZ) results in the provision of car-free schemes.
14. BPS would urge the Mayor to not use the term 'car-free' development when the same policy requires an element of accessible (blue badge) parking regardless of the intention for the wider provision rendering no scheme truly car-free.

*RECOMMENDATION: Reconsider the use of the term 'car-free development' when policy specifically requires parking provision.*

15. BPS would ask the Mayor to fully consider the implications for such restrictive parking provision in the CAZ. Whilst BPS accept that car parking should be capped to discourage car use it is our experience that residents, and to a lesser extent, commercial tenants, sometimes require the use of vehicles. The ownership of car does not necessarily translate into regular use during peak hours and there are entirely reasonable means for residents to own a car even if for irregular use.
16. In terms of retail parking provision, through the preparation of several planning applications evidence has constantly shown BPS that car parking provision supports the viability of retail floorspace. Whilst many parts of the CAZ have excellent public transport links there remains areas where PTAL is low, particularly

in and around Battersea prior to the implementation of the Northern Line Extension (NLE). The ability to provide car parking to support retail tenants and the wider success of the development is essential to ensure this new town centre destination is a success. As such, we would urge to Mayor to consider parking standards on an individual site PTAL basis rather than a blanket approach to the CAZ which encompasses a varying range of public transport accessibility.

*RECOMMENDATION: Remove the blanket approach to car parking standards across the CAZ.*

17. We would also ask the Mayor to consider the implications for such restrictive parking provision at this moment in time, when within the next 10-20 years forecasts suggest that the majority of vehicles will be electric. BPS fully supports and encourages a growth in electric vehicles removing one of the most damaging aspects of car use on the environment. However, in consideration of the parking standards we would query whether the Mayor has considered the impact of restrictive parking provision in the CAZ in the medium to long term where the sustainability of cars is significantly improved?

*RECOMMENDATION: Be ambitious in planning for the next generation of vehicles and ensure that the spatial implications of the future are not compromised in the short term.*

18. BPS support the proposed reduction in accessible (blue badge) parking at 3% initial provision reflecting the fact that not all tenants of wheelchair accessible units either own a car or have a blue badge. However, we would ask the Mayor to also consider the implications on developers being required to demonstrate how a total of 10% provision could be provided in the future. It is considered likely that this could ultimately result in significant impacts to the public realm surrounding buildings risking the wider Healthy Streets agenda.

*RECOMMENDATION: Require developers to justify a reasonable accessible parking provision beyond 3% based upon local data and trends as opposed to a blanket approach of 10% provision.*

### **Freight and Servicing**

19. Policy T7 provides details of Freight and Servicing. BPS welcomes the Mayor's commitment to encourage and support out of peak deliveries but would emphasise this flexibility requires the ability for 24-hour operation and the removal of potentially time restricting planning conditions in developments where servicing takes place in basements (or equivalent private areas) where noise impacts are mitigated.
20. Policy T7 also suggests that large developments should enable micro-consolidation of goods delivered. Whilst we welcome exploration of efforts to explore micro-consolidation we would urge to Mayor to consider the implications for on-site consolidation on private estates where the responsibility for storing goods has implications for liability and insurances which can be of sufficient cause for concern to deter their operation.
21. *RECOMMENDATION: Ensure planning conditions do not place burdensome time restrictions on servicing activity when such activity is able to take place off the public highway in dedicated servicing areas.*