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Dear Sir/Madam

**DRAFT LONDON PLAN
CLAPHAM JUNCTION STATION
REPRESENTATIONS ON BEHALF OF INNOVA INVESTMENTS PARTNERSHIP**

1. This representation to the Draft London Plan is made by DP9 Limited, on behalf of Innova Investments Partnership ('Innova'), a public / private partnership between Network Rail and Capital & Counties Properties PLC ('Capco') in relation to the potential comprehensive redevelopment and regeneration of Clapham Junction Station and its environs.
2. The redevelopment promoted by Innova represents a once in a generation opportunity to comprehensively redevelop the Station to ensure it can meet existing passenger demands as well as the demand created by London's future growth; and to do so in a way that delivers significant urban regeneration. The redevelopment stands to form one of London's most important new Opportunity Areas, with the potential to unlock substantial new homes and jobs alongside critically needed rail infrastructure improvement. Redevelopment also presents the opportunity for wider Clapham Junction town centre improvements. It is in this context that the identification of Clapham Junction as a new Opportunity Area in the Draft London Plan is wholly supported and justified.
3. Network Rail has submitted a separate representation to the Draft London Plan that covers more strategic and general matters. Network Rail fully support the specific Clapham Junction Station comments raised in this representation.
4. This representation is structured as follows:
 - i. A summary of the representation as a whole;
 - ii. An overview of the critical need for rail and station improvements;
 - iii. An overview of the opportunity for a new integrated rail station and over station development; and
 - iv. The representations to the Draft London Plan policies.

(i) OVERVIEW OF THE REPRESENTATION

5. Clapham Junction Station is of strategic importance to the national rail network – it is Europe's busiest rail interchange facility and serves national, regional and local rail services leaving and entering Victoria and Waterloo.



However, the Station currently operates under severe pressure and improvements are critically needed – many of the services running through the Station are currently at full capacity during the AM/PM peaks, and the Station struggles to meet existing passenger demands. Furthermore, with the potential for the Station to become a future Crossrail 2 interchange, the pressure on the existing station infrastructure will only increase. Resolving these capacity problems at Clapham Junction Station has, therefore, been recognised by the National Infrastructure Commission as a key priority for London; with a critical need for significant investment to ensure the station can meet both current day demands as well as the increasing demand generated by London’s planned growth.

6. To deliver a new comprehensive and fit for purpose Clapham Junction Station there is a need to bring forward additional development on surrounding land and on a new development deck above the Station that can generate funding towards the cost of the new Station infrastructure. This over station development presents a unique opportunity to deliver a very significant number of new homes and jobs to contribute towards meeting London’s strategic growth targets and acting as a catalyst for wider town centre regeneration. With the value generated from the development critical funding will be contributed towards the cost of the new Station.
7. Innova has undertaken a significant amount of technical work to demonstrate the feasibility of creating a development deck over a new reconfigured station. The feasibility work demonstrates that redevelopment, including the deck and reconfigured station, can be constructed without materially effecting station capacity during the construction phase. Subject to wider design matters, it is possible to construct a development deck that creates around 16 hectares of new development land.
8. The Clapham Junction Station opportunity is substantial. Innova is fully supportive of the proposal to designate Clapham Junction as a new Opportunity Area in which to deliver a significant number of new homes and jobs. However, the draft text for the Clapham Junction Opportunity Area (2.1.26) does not fully recognise the opportunity presented by the proposed comprehensive redevelopment of the station and improvements to the rail network.
9. Innova requests a series of amendments to the wording of the draft Clapham Junction Opportunity Area text as set out below. These are consistent with changes sought by Network Rail in their separate representations:

Clapham Junction OA [paragraph 2.1.26]

Clapham Junction is Europe’s busiest rail interchange station, and a designated Major town centre serving key commuter routes from West London and Southern England, and is identified as one of London’s four strategic interchanges expected to accommodate rising levels of demand. However, the station is already operating at capacity in terms of rail services and passenger numbers and suffers from over-crowding at peak times. Reconfiguration of the existing rail infrastructure and the station is needed to increase capacity and substantially improve passengers public transport experience.

A comprehensive approach to the rail network station improvements along with the proposal for a Crossrail 2 station ~~this represents~~ presents a unique opportunity to make more efficient use of land above and surrounding the station for residential and commercial development, including new retail and offices as part of the designated Major town centre. ~~The station suffers from over-crowding at peak times, and requires significant investment to allow it to accommodate future growth in passenger numbers. The Planning Framework will need to fully explore and evaluate options~~ to comprehensively deliver a reconfigured station together with over-station development that reflects the role of Clapham Junction as a strategic transport interchange and growth corridor. ~~for comprehensive over-station development, which would be reliant on a reconfiguration of the station layout.~~ This will include the consideration of complex technical issues related to the operation of the



railway and the integration with other transport infrastructure and services, including Crossrail 2. Careful consideration will need to be given to the urban design and place-making of the development and its integration into the existing streets and functions surrounding the station. It will be important to consider integration of any development with surrounding residential areas, and the Housing Zone.

(ii) THE NEED AND CONTEXT FOR RAIL AND STATION IMPROVEMENTS

10. This section demonstrates the case for change at Clapham Junction Station. The need for comprehensive infrastructure improvements to the Station is critical and necessary in order to serve Londoners and commuters over the new London Plan period and beyond. The growth of London will be significantly hampered and challenged should comprehensive improvements not be realised.

Existing demand, overcrowding and safety

11. Demand for travel at Clapham Junction Station has grown rapidly over time. Based on figures published annually by the Office of Rail and Road, there has been over a 25% growth in passenger footfall at the station over the past four years. Consequently the station and surrounding transport network are operating under increasing pressure, a further 22% rise in the AM peak period and 25% rise in the PM peak period is predicted by 2031 (Ref: LTS-PT TfL models 2011 to 2031 without Crossrail). The National Infrastructure Commission has recognised operational station, platform and rail capacity issues at Clapham Junction as key priorities to ensure that the City's future growth is not hindered.
12. The station has 17 platforms and provides entry and exit to rail services running on the West London Lines, Windsor Lines, South West Main Lines and Brighton Main Lines. The existing layout of the railway infrastructure limits the number, frequency and reliability of the trains passing through or stopping at Clapham Junction, thereby acting as a constraint on the number of trains calling at the station to serve passenger demand.
13. Existing platforms are too short to accommodate future capacity enhancements specified by Network Rail. Due to selective door opening to cater for short platforms passengers are forced to concentrate boarding/alighting at central carriages resulting in severe overcrowding, an increase in 'dwell' time and delays to services.
14. Existing curved platforms result in unsatisfactory stepping distances between the trains and platforms limiting accessibility for persons with restricted mobility, increasing the safety risk for passengers, and increasing the 'dwell' time taken to dispatch the train from the platform.
15. Services travelling through the station are some of the most overcrowded on the rail network in the UK. The operation of the station relies on crowd control measures, which offer only some alleviation. Any disruption to the wider network associated with Clapham Junction has a negative impact on the station, leading to congestion on the staircases to the platforms, subway and footbridge.
16. The station has three entrances, namely Grant Road to the north, St. John's Hill to the south, and Brighton Yard to the southwest. The Grant Road and St. John's Hill accesses lead to a constrained subway, connected by inadequately sized staircases, to the eastern ends of all platforms. The subway is overcrowded during peak hours, and ticket barriers at both ends present pinch points. The Brighton Yard entrance leads to a wider covered footbridge, which joins the western ends of all platforms. Overcrowding is also a regular occurrence on the footbridge. The lack of capacity to accommodate pedestrian cross-flow throughout the station results in severe queuing onto the platforms.



Interchange and Severance

17. The position of the railway tracks at Clapham Junction Station present a significant physical division between the adjacent Latchmere Ward to the north and Northcote Ward to the south. Beyond the crowded subway and footbridge the current station design offers limited permeability for movement to and from the surrounding area.
18. Adjacent to the station boundary Falcon Road (A3207) provides a north to south connection; however, the link is of poor quality, has limited capacity and becomes congested during peak periods. The southern end of Falcon Road has benefited from some public realm improvements in recent years. Nevertheless, towards the north the pedestrian environment is considered generally unpleasant, particularly during times outside of daylight hours with a section of the route passing under railway tracks. The position and layout of the Winstanley and York Road residential estates adjacent to the north of the station causes further severance to movement. The area to the north of the station, which is subject to a masterplan being promoted by London Borough of Wandsworth council, will need to be carefully integrated into a comprehensive station redevelopment as part of a wider Planning Framework.
19. The continued demand for travel at Clapham Junction Station has resulted in many aspects of the adjacent transport network offering a low level of service, including:
 - Pedestrian access to/from the main entrances is congested during peak times due to inadequate widths and significant footpath clutter.
 - Cycle parking is underprovided with all existing cycle parking around the station completely utilised. The site does not connect directly with existing nor planned cycle infrastructure, and conditions for cycling are generally poor.
 - Clapham Junction is a major bus interchange, with 16 routes (including eight terminating/ starting at the station) accessed via 13 stops within a short radius of the station. However, bus operations in the area are disjointed, and bus stops interfere with pedestrian access to the station. The existing bus stops on St. John's Hill and Falcon Road become congested during peak times. Moreover, there is standing space for up to 11 buses in the surrounding area, with eight spaces located on Falcon Road and three on St John's Hill. These arrangements are informal and of a temporary nature and do not include formal driver facilities. TfL's Railplan outputs suggest that approximately 50% of all people using Clapham Junction arrive/ leave by bus, which highlights the importance of having bus stops within close proximity to the station entrance.
 - The road network surrounding the station has limited capacity and becomes congested during peak times, impacting upon bus services serving Clapham Junction. It also does not adequately provide for cycle provision.
 - Both taxi and delivery and servicing arrangements are informal and not efficient in serving a modern society, where efficiency and consolidation are key in maximising economic and environmental benefits, through new technology and good practice.

Future demand and constraints

20. Future rail improvements have been identified by Network Rail as part of its proposed Control Period 6 (CP6) enhancements. These would alleviate congestion, but would not provide a longer-term comprehensive solution for interchange with other services, nor would they fully address wider transport issues. Furthermore, this option



will likely limit any future opportunity for comprehensive redevelopment and the potential to unlock the level of investment needed to deliver a comprehensive transport solution addressing the range of issues which exist at the station.

21. It is also intended that the station will be served by Crossrail 2 from 2033, including a new interchange. The proposals aim to free capacity from rail services by diverting significant numbers of southwest London commuters to Crossrail 2 services. This would lead to significantly increased passenger interchange numbers at parts of the station.
22. Additionally, there are further planned and proposed enhancement works to deliver increased rail capacity across all existing services including London Overground, and the West London Line link to Old Oak Common for connection to High Speed 2 services.
23. The current station design is not fit for purpose for existing operations which will be further exacerbated by future demand, the possible introduction of Crossrail 2 and other network changes. To resolve capacity problems at Clapham Junction it is considered that fundamental investment and station re-modelling with an integrated approach is needed.

The Wider Policy Context

24. The draft Mayor's Transport Strategy ('MTS') that supports the London Plan recognises that rail is 'critical to securing London's economic growth and future prosperity', and the Mayor makes a commitment to work with Network Rail and TfL to transform London's rail-based services and stations to deliver an increase in capacity of at least 80% by 2041 to tackle over-crowding issues and facilitate mode shift to rail. It is recognised that the increased capacity of train services must be accompanied by improved station capacity for London's rail system to work as a whole, and Clapham Junction is identified as a 'priority station' to increase capacity and maximise public transport connectivity across inner and outer London. The station is also identified as one of four 'strategic interchanges' within London.
25. Recognising the role transport can play in helping to deliver London's housing and job growth requirements, the MTS promotes the creation of high-density, mixed-use developments around transport stations. It states that surplus and under-utilised land around stations can be used for increased housing delivery and high-density development, that can act as a catalyst for the regeneration of town centres and revitalising high streets.
26. Importantly, the MTS further states that creating such high-density, mixed-use places to meet London's growth needs will require transport investment to be fully aligned with the growth strategy to be set out in the new London Plan. This means 'maximising the capacity of the existing public transport network, optimising land use around stations and radically improving conditions for walking and cycling, supporting higher densities'.

(iii) THE OPPORTUNITY

27. There is a clear synergy between the policies and principles in the draft London Plan, the draft MTS and the opportunity that exists at Clapham Junction to provide a strategic interchange for London, supported by high density mixed use development. The opportunity is presented by a combination of; the need for change given the poor quality of the existing transport experience and the need to provide more capacity; the opportunity to deliver a significant number of new homes and jobs over the new station; and the profit delivered by the new



development to fund the station works. The model is similar to that which has been so successful at Vauxhall, Nine Elms, Battersea and Kings Cross.

28. Alongside the strategic growth and investment in the transport network, there is an opportunity to deliver ‘good growth’ and ‘healthy streets’ for local people and communities, including an enhanced passenger experience, improved safety and access for all.
29. Innova is exploring the potential to develop a new station facility at Clapham Junction that would deliver substantial increases in station and rail service capacity, whilst providing improved integration with both local and wider transport networks. The aim is to address longstanding station, platform and rail capacity issues whilst optimising passenger connectivity and experience. The approach is complementary to the draft MTS (2017), which sets the tone for new policies around transport and development in the new London Plan.
30. To deliver a new integrated station at Clapham Junction necessitates the need to bring forward development on surrounding land and on a new development deck above the station that can provide critical funding towards the cost of the new interchange facility. Essentially, it is considered that the Clapham Junction Station site has the potential to deliver a strategic interchange hub to Southwest London, which would help to relieve congestion and connect the city with a wider range of destinations and networks. Local redevelopment of the site would provide a gateway between new development and the surrounding areas, stimulating regeneration, delivering employment and housing opportunities, providing local amenities, as well as improving day-to-day experiences for local people.

The Transport Improvements

31. The Clapham Junction station opportunity could achieve the following transport aspirations through design, in accordance with the Mayor’s Healthy Streets indicators, to accelerate the rate of modal shift away from car use and to help achieve the 80 per cent mode share target as defined in the draft London Plan (Policy T1) and the draft MTS (2017):

- ***Increased rail capacity*** – any proposed redevelopment could transform the rail capacity and passenger experience at the Station. A new ‘future proofed’ layout of the railway combined with flexible infrastructure could help enable longer and more frequent trains stopping at Clapham Junction station providing significantly more capacity for passengers.

The new station would have step free access. Straight platforms will mean the stepping distance between the train and platform would be significantly reduced helping persons with restricted mobility, improving safety for passengers, and reducing the ‘dwell’ time taken to dispatch the train from the platform.

- ***Pedestrian improvements and onward accessibility*** – any proposals would be designed with an intention to ‘benefit’ the strategic interchange superhub status given to Clapham Junction in the draft MTS (2017). Specifically, in relation to new high quality station entrance points with step free access. There is the opportunity for straighter platforms to be wider and longer to provide increased capacity, and significantly improved passenger circulation with the ability to interchange.

There is the opportunity for a new station concourse which could provide a wide unpaid public route for significant interchange improvement between rail operators and surface transport modes on Grant



Road to the north and St John's Hill to the south, as well as providing permeability to the immediate area. Any link could, through careful design, offer high quality public realm for local people, workers, station passengers and other users.

Any proposals could consider full integration with future potential services including Crossrail 2, to allow for direct and convenient connection. Any station interchange would be guided by the highest quality of design delivering optimum customer experience.

The development and station interchange proposals should be fully integrated with surrounding streets including future regeneration plans within the Latchmere ward to the north including onward connections with existing and future pedestrian links for access across the River Thames to/ from central London, as well as provision to local amenities and facilities to the east, south and west of the site.

- **Cycle improvements and onward accessibility** - the development and station re-modelling presents a huge opportunity to maximise cycling potential and cycle use in the sub-region. Opportunity exists for proposals to connect with existing and any planned cycle routes, including Cycle Superhighways and Quietways as appropriate, to create a new cycle grid. Essentially, this could allow for better efficient and safer cycle journeys to be made to/ from the station to the wider area.

Existing and new residents would benefit from a substantial increase in cycle parking facilities at the new station development, to be delivered in accordance with policy requirements in place of the current poor level of provision. The site provides an opportunity to expand the Mayor's cycle hire scheme as well as deliver innovative cycle hub facilities.

- **Bus interchange improvements** - any proposals would incorporate the Mayor's intentions for 'Low Emissions Bus Zones' by re-providing and substantially enhancing existing major bus provision in the form of a new high quality bus interchange facility. Existing and potential future onward travel patterns would be considered across a wider catchment area, to improve overall interchange operations and efficiency. Proposals could consider passive provision for future express / rapid transit style bus services, as well as aspirations for zero carbon and electric charging facilities for the new fleet of buses.
- **Road network enhancements** - the current road network is constrained by the railway line and ability to cross it due to congestion in the area. There is also undulating topography that any design needs to consider. Nevertheless there is an opportunity to rethink the existing road network in line with Healthy Streets aspirations and modal shift aims away from private car use, to relieve congestion and improve air quality in the area. Any improvements should prioritise pedestrian and cycle activity, as well as bus users supported by a strategy that aims to provide the minimum amount of car parking necessary to support development and respect the Mayor's objectives.
- **Taxis and private hire** - the station currently has limited taxi facilities. Notwithstanding this, the future of taxi service via mobile phones and open data mean that provision is driven by the end user. As such there is an opportunity to seek to provide high quality pick up and drop off facilities, in a manner which does not result in a vehicle dominant environment.
- **Freight and deliveries** - any scheme design should include a comprehensive consolidation strategy, to coordinated waste and recycling collection, timetabled deliveries, flexible loading bays and a wide range of other measures, in response to the Mayor's aim to transform the design and layout of street space following the Healthy Street criterion.



The Development Deck Opportunity

- 32. Innova has undertaken detailed technical work to test the feasibility of creating a development deck above the station that could accommodate a high density mixed use development that can both assist with the funding strategy to deliver the station and rail enhancements but also deliver much needed housing and job growth for London.
- 33. A summary of the technical work undertaken to date is appended to this representation in the “*Clapham Junction Station: The Opportunity*” report. This demonstrates that it is feasible to create a development deck above the reconfigured Clapham Junction station on which high density development can be delivered whilst not limiting the future operational capacity and function of the station and its rail services.
- 34. The initial design work has shown that a development deck of around 16 hectares can be created of new development land that can accommodate a range of new housing, office, retail, leisure and community infrastructure uses.

(iv) THE REPRESENTATIONS

- 35. It is against the context set out in the above sections that Innova has reviewed the Draft London Plan. Set out below are Innova’s representations to policies in the Draft London Plan, on a chapter by chapter basis. The overriding concern of these representations is twofold: firstly, to ensure the opportunity at Clapham Junction is appropriately and accurately reflected in the Plan; and, secondly, to ensure that the approach to policies concerning spatial growth, transport, housing, viability, etc recognise both the challenging nature of projects, such as Clapham Junction, as well as the critical role they will play in London’s growth. Most of all, there will need to be a balance between: the critical need for station and rail infrastructure improvements; the nature and density of over station development; the contribution such development must make to infrastructure funding to ensure the feasibility of new infrastructure; and, the associated range of public benefits.

Spatial Development Patterns (Chapter 2)

Policy SD1 Opportunity Areas

- 36. Innova fully supports the principles of policy SD1 and the focus on development within London’s Opportunity Areas (‘OAs’), of which Clapham junction is identified as a new OA.

Policy SD1 Opportunity Areas - Crossrail 2 South Growth Corridor (2.1.19-2.1.21, Figure 2.5)

- 37. The Clapham Junction OA is identified as part of the wider ‘Crossrail 2 South’ growth corridor as shown in Figure 2.5, along with the Kingston OA and Wimbledon/Colliers Wood/South Wimbledon OA. At this stage delivery of Crossrail 2 is not certain, with funding yet to be secured. Whilst Innova is supportive of the Crossrail 2 project, it would be more appropriate for the name of the growth corridor to omit specific reference to Crossrail 2 given its uncertainty; otherwise the London Plan could reference a growth corridor focussed on an abortive infrastructure project. On this basis, it requested the Crossrail 2 South growth corridor be named the “*South West London Growth Corridor*”.



Policy SD1 Opportunity Areas – Clapham Junction OA (2.1.26)

38. As mentioned above, Innova fully supports the identification of Clapham Junction as a new OA. However, the opportunity to optimise development and regeneration at Clapham Junction extends beyond the influence of Crossrail 2; and indeed its designation and credentials as an OA is not dependent on the delivery of Crossrail 2. The station is identified as one of only four strategic interchanges in London that is expected to add considerably to London’s over ground rail capacity, but the current station is already operating at capacity and if the vision to increase rail capacity is to be realised there needs to be considerable investment and comprehensive improvements to both rail and station infrastructure.
39. Furthermore, through the proposed rail and station improvements identified in the [XXX feasibility Report], there is the potential to create around 16 hectares of new development land in the form of the over station development deck. This can help to deliver a greater quantum of new homes and jobs that exceeds the current minimum targets for the Clapham Junction OA outlined in Figure 2.5.
40. Recognising the wider influence of the rail and station improvements to be delivered at Clapham Junction and its consistency with other policy objectives in the draft London Plan and the draft Mayor’s Transport Strategy, Innova propose a number of amendments to the draft Clapham Junction OA text at paragraph 2.1.26 as follows:

Clapham Junction OA [paragraph 2.1.26]

Clapham Junction is Europe’s busiest rail interchange station, and a designated Major town centre serving key commuter routes from West London and Southern England, and is identified as one of London’s four strategic interchanges expected to accommodate rising levels of demand. However, the station is already operating at capacity in terms of rail services and passenger numbers and suffers from over-crowding at peak times. Reconfiguration of the existing rail infrastructure and the station is needed to increase capacity and substantially improve passengers public transport experience.

A comprehensive approach to the rail network station improvements along with the proposal for a Crossrail 2 station ~~this represents~~ presents a unique opportunity to make more efficient use of land above and surrounding the station for residential and commercial development, including new retail and offices as part of the designated Major town centre. ~~The station suffers from over-crowding at peak times, and requires significant investment to allow it to accommodate future growth in passenger numbers. The Planning Framework will need to fully explore and evaluate options~~ to comprehensively deliver a reconfigured station together with over-station development that reflects the role of Clapham Junction as a strategic transport interchange and growth corridor. ~~for comprehensive over-station development, which would be reliant on a reconfiguration of the station layout.~~ This will include the consideration of complex technical issues related to the operation of the railway and the integration with other transport infrastructure and services, including Crossrail 2. Careful consideration will need to be given to the urban design and place-making of the development and its integration into the existing streets and functions surrounding the station. It will be important to consider integration of any development with surrounding residential areas, and the Housing Zone.

Policy SD7 Town Centre Network

41. Innova fully supports the identification of Clapham Junction as a Major Town Centre with a ‘high’ residential growth potential as shown in Annex A1.1. Through the delivery of the new station and the associated development deck, there is the potential to create a substantial quantum of new development land on which to



accommodate high-density housing; as well as office, retail, leisure and other town centre uses that are consistent with a Major town centre designation.

Housing (Chapter 4)

Policy H6 Threshold Approach to Applications – Approach in relation to Opportunity Areas (4.6.13)

42. The supporting text to Policy H6, at paragraph 4.6.13, recognises that a different affordable housing threshold approach may be appropriate for Opportunity Areas. Innova considers this to be essential given the very challenging nature of most Opportunity Areas and the priority to be afforded to the funding of infrastructure necessary to enable development to come forward. However, Innova is concerned that the approach taken by paragraph 4.6.13, as currently drafted, only envisages a ‘flex’ upwards – above 35% (or 50% in respect of public land). This is concerning and Innova questions the logic of what is proposed. For Opportunity Areas there ought to be the ability for a bespoke threshold to be set that responds to the specific viability considerations of individual Opportunity Areas, where this can be appropriately and robustly evidenced. For some Opportunity Areas, significant funding from development may be necessary in order to unlock and deliver required infrastructure improvements – especially in respect of transport infrastructure.
43. Clapham Junction is a good example of this. Delivery of new and improved transport (principally rail) infrastructure is necessary in order for the real potential of this new Opportunity Area to be realised – both in terms of maximising much needed new homes as well as jobs. Development will play a critical role in realising necessary funds for this infrastructure to be delivered. The need and priority for affordable housing is wholly appreciated and supported by Innova. But, clearly, there are also other priorities that must to be balanced with this. At Clapham Junction there will be a need to balance the priorities between rail infrastructure funding and affordable housing. The ability for the threshold affordable housing level to be ‘flexed’ accordingly, to respond to such a balance, is considered important and necessary for the effectiveness of the Draft London Plan.

Transport (Chapter 10)

General

44. The draft Mayor’s Transport Strategy sets out many policy proposals that seek to promote modal shift towards more sustainable forms of transport and reduce the dependency on private motor vehicles; as well as encourage high density development around existing and planned transport nodes. Overall, Innova considers that the draft transport policies in Section 10 of the Draft London Plan fail to adequately reflect much of the detailed policy and guidance included in the MTS. The new London Plan provides the policy platform to enshrine the various proposals in the MTS into statutory development plan policy and afford the policies maximum weight in the planning decision-making process.

Policies T1 and T3

45. Good Growth and Healthy Streets are at the heart of this draft London Plan, beyond the specific strategic emphasis placed on Opportunity areas and growth corridors. Development at Clapham Junction would make a substantial contribution towards achieving the objective of Policy T1 of exceeding the 80% target for all trips to be made by foot, cycle or public transport. The scheme, by transforming the public realm in and around the station, would meet the requirements of Policy T2 by delivering a new network of Healthy Streets for London.



46. Policy T3 is particularly relevant as it seeks to support proposals that improve national and international public transport connections. Table 10.1 that supports Policy T3 includes a wide range of transport schemes that are necessary to contribute towards providing increased capacity and connectivity at Clapham Junction. Whilst a number of selective transport projects are mentioned in the sub text, at paragraphs 10.3.1-10.3.6 (e.g. Crossrail 2 and Bakerloo Line Extension), we would welcome more reference to the specific links between housing delivery and transport infrastructure and how this is related to the delivery of the overarching housing targets. In particular, we are of the opinion that there are other strategic rail projects, not just Crossrail 2 and the Bakerloo Line Extension, that are critical to achieving the delivery of Opportunity Areas and maximising housing numbers, that should also be specifically mentioned and explained. The need for comprehensive improvements at Clapham Junction, as one of London's strategic rail interchanges, is a good example.

Viability Assessment of the Draft London Plan

Innova is concerned about the cumulative impact of the draft policies on development viability – which make development, especially in Opportunity Areas and for complicated strategic projects such as Clapham Junction Station, more challenging to deliver. Innova urges the GLA to properly test the actual costs associated with meeting specific policy requirements on development viability.

Innova has reviewed the viability assessment of the Draft London Plan and is concerned that the effect of several new policies has not been tested. Policies associated with, for example, low cost business space, affordable workspace, air quality positive, urban greening, zero carbon etc all need to be fully taken into account. The cumulative impact of policies, such as these, could have a very significant bearing on the ability for strategic projects like Clapham Junction to be able to deliver other public benefits – namely critical transport infrastructure improvements and affordable housing. There is a need therefore for the London Plan to provide flexibility for developments, on a case by case basis and where evidenced and justified, to prioritise meeting certain policy objectives over others.

(v) CONCLUSION

47. Innova fully supports the recognition of Clapham Junction as an Opportunity Area, with a coordinated approach to rail and station improvements helping to strengthen its strategic role in increasing rail transport capacity for London and the wider south east of England and contribute significantly towards London's new homes and jobs growth requirements in a truly sustainable manner. But, explanation of the Clapham Junction Opportunity Area needs to be more appropriate and reflective of the nature of the opportunity (text changes have been proposed in respect and have also been separately submitted by Network Rail). Also, more general policies in the Plan must ensure important opportunities, like Clapham Junction Station, can be flexibly approached – enabling a balance between design, density, viability, infrastructure funding, affordable housing and other public benefits.
48. Innova is committed to working with the GLA and other stakeholders to participate in the development of the policy framework needed to optimise the development potential of the Clapham Junction Opportunity Area. Innova expects to supplement these representations with additional information as required as work progresses with the GLA and the London Borough of Wandsworth. Further submissions will be discussed with the authorities at the time and would be provided on the basis that it would assist the Inspector in considering the RLP at the EIP.
49. Innova would be keen to meet and discuss the various points raised in this representation and provide any further information deemed necessary to support changes to the Draft London Plan.



Yours faithfully

DP9 Ltd

DP9 LIMITED
On behalf of Innova Investments Partnership

Enc. Clapham Junction Station: The Opportunity Report