

Draft Vauxhall Nine Elms Battersea Opportunity Area Planning Framework: consultation period December 2009 – March 2010

Summary of consultation responses

Context

The consultation responses summarised below were received prior to the end of March 2010, and as such do not take into account the results of the recent work that has been undertaken on the Development Infrastructure Funding Study (DIFS). Similarly, comments relating to the London Plan Examination in Public and Wandsworth and Lambeth Council's plan making processes are also likely to be out of date.

Landowners

1. Addition Land and Network Rail

- Support the overall land use strategy.
- High density is appropriate in appropriate in nodes of high public transport accessibility, including Patcham Terrace.
- OAPF should take into account wider viability issues when discussing affordable housing and social infrastructure.
- Public transport is likely to be required as a priority, which should be off-set against affordable housing provision.
- Support provision of amenity space and play, provision needs to be reasonable and flexible based on site circumstances.
- Planning obligations should comply with Circular 05/2005 tests.
- Support public realm strategy, including activating railway arches.
- Support over all tall building strategy but Patcham Terrace should be identified.
- Support creation of a centralised energy system, but energy strategies should be assessed on case by case basis and economic viability grounds.
- Generally support tariff based system, but should also acknowledge site specific circumstances and viability.
- Planning obligations need to relate to impact of a scheme and the off-set of other benefits being provided.

2. Anastasia Ltd.

- Broadly welcomed the objectives of the OAPF to guide the regeneration and development of the VNEB area.
- Support the aspiration to redevelop the area for high density residential, offices and retail.
- Critical that development is maximised to delivered the widest possible range of regeneration benefits to the area.
- The provision of public open space, transport improvements and public realm improvements can only be achieved through maximising densities, which also has the benefit of providing housing and employment floorspace.
- Therefore, preference for preferred Option 5.

- Welcome improvements to the Riverside Walk and pedestrian and cycle connections between Battersea Park and the rest of the OA which will improve permeability.
- Concerned about the inconsistencies in the OAPF about the role Marco Polo House could play in the development proposals for the area.
- In some diagrams the site is identified for high-density mix of uses whilst on others it is excluded from an area of proposed residential intensification.
- Consider the site should be identified within an area of residential intensification for high-density residential development.
- The site is not included in the tall building strategy on P141. Considers that it has the potential to act as a visual marker for the west end boundary of the OAPF.
- Concerned that the OAPF seeks to restrict heights of buildings to 8-10 storeys, which could deliver a uniform height across the OAPF.
- There is no justification for the 8-10 storey restriction and all references to it should be deleted from the OAPF.
- Accept the principle of the charging tariff but consider that the tariff should be the S106 priority for the purpose of negotiating planning applications, with the level of affordable housing adjusted accordingly.

3. Ballymore

- It should be clarified that diagrams and precedents included with the OAPF are not prescriptive, more like standards.
- The OAPF should not pre-empt the Development Infrastructure Funding Study.
- The lack of paragraph numbers makes it difficult to reference. Add.
- Support residential mixed use intensification on Nine Elms Lane.
- Support the general concept of a green link, but the park could compromise development.
- Support the consolidation of industrial uses at Stewart Road and the proposed relocation strategy.
- Support high-density housing.
- More retail in the area is needed.
- Development capacity: broadly support the preferred development option 5, in relation to capacity rather than mix of uses.
- 0.25 car parking is not justified in policy terms.
- Support 16,000 new homes.
- Affordable housing target should be set by DIFS not OAPF.
- References to social infrastructure are based on a coarse level analysis.
- It should be clear that the draft London Housing Design Guide is not applicable to market housing, the minimum unit sizes set out in the draft London Plan are acceptable.
- It should be clear that the reference to the private outdoor space requirement of the London Housing Design Guidelines is only applicable to market units.
- DIFS should establish the contribution to strategic open space which should be offset against other contributions.
- Joint working and the DIFS are crucial but it is important to ensure transport interventions support development ahead of the delivery of the Northern Line.
- OAPF should refer to the fact it is not the GLA's intention to restrict development prior to strategic transport infrastructure delivery.

- Oppose that works at Vauxhall LU Station are a low priority.
- Support the continuous riverside pathway and public realm improvements on Nine Elms Lane.
- Support the foot and cycle bridge.
- Support the principle of tall buildings, however, figures should not be prescriptive.
- Oppose references to maximum building heights of 60 - 70 metres within Nine Elms as there is no policy basis for this.
- Support the principle of a district-heating network, but there is no clear delivery strategy for the network and development should not be prejudiced in the interim.
- Oppose the retention of the RMC Vauxhall (Middle Wharf site). Its retention is not in keeping with aspirations to change the character/physical environment of area.
- Oppose relocating the wharf to the east as there is no planning policy justification. Oppose the proposed location of the Thames Tideway Tunnel Construction site. Using the site for the sewerage project until 2020 is not in keeping with the overarching vision for the Nine Elms area and will have detrimental impact on amenity and physical environment.
- Other sources of funding should also be urgently prioritised and identified, as development alone cannot meet the full costs.
- Wood Wharf is not an appropriate comparable tariff and information is inaccurate.
- Site by site contributions will depend on individual viability and other factors such as quantum and mix of affordable housing.
- Focus should shift from development contributions to the delivery of infrastructure.
- Concerns by the references to charges linked to expected increases in land values, as such charges must meet the tests of Circular 05/05 and would be challengeable.
- Consideration as to how costs will be apportioned between land uses should be made, and residential development should be charged according to habitable rooms.

4. BT (Keybridge House)

- The overall concept of the OA, which seeks two high-density growth nodes at BPS and Vauxhall is supported.
- Preferred development option 5 (the highest density option) is supported.
- Support the proposals to focus many of the OA's existing industrial uses at the Stewarts Road Industrial Area (or relocated elsewhere).
- Support the emerging cluster of tall buildings at Vauxhall.
- Support the proposed Northern Line Extension (NLE) and future station improvements at Vauxhall.
- Keybridge House should be recognised as having the potential for comprehensive redevelopment (of both the main tower and podium) to form a landmark tall building as part of this cluster. There should be a reference to Keybridge House in the main body of the report, and it should also specifically state that it could exceed the existing height.
- We support the proposal to make new office development within the OA exempt from the Crossrail charge.
- A flexible, transparent and equitable approach to planning obligation negotiations that considers viability is sought.

5. Cemex

- The protection of the safeguarded wharves should be identified in the vision on p23.
- Support the principle of wrapping wharf with non-residential uses, however, it is important that they are not noise sensitive uses.
- Would like to advocate a wider, more substantial area for the allocation of commercial development around the Cemex wharf.
- Concerned that Fig. TA6.5 (C) does not indicate the form of development lying above the waste transfer station. This development should be compatible with the safeguarded wharf use.

6. Covent Garden Market Authority

- In principle support for the production the OAPF.
- Support the concept of two growth nodes at Vauxhall and BPS.
- Support the general land use planning principles to secure higher density mixed use development.
- Major concerns about the soundness of OAPF and the identification of Option 5 as the preferred development scenario. Further justification of the option's feasibility and viability is required through the DIFS, before it can be judged to be the preferred development scenario for the area.
- Status of, and weight given to, the OAPF in determining planning applications should be further clarified.
- Concern that the OAPF will be adopted in advance of the revised London Plan policies, pre-empting its policies without any formal testing of the soundness.
- The OAPF states it will be adopted after rigorous consultation but there is no detail as to how the results of consultation will be assessed. The OAPF has not been "subject to a full sustainability appraisal".
- The selection of Option 5 is dependant upon major public transport intervention for which there has been no analysis on feasibility or viability. The publication of the OAPF, and in particular the selection of Option 5, is premature in advance of the completion of the DIFS.
- OAPF should recognise that there is a great variation in accessibility levels in OA.
- The levels of congestion at Vauxhall Underground and Mainline Station are overstated. CMGA have commissioned research on this.
- Greater recognition should be given the very high quality level of public transport provision at Vauxhall.
- The strategy to improve permeability in the area is supported. However, the proposed routes should be further analysed.
- For operational and health and safety reasons, a public route across market site is not possible.
- The OAPF should recognise the significant physical and legal constraints in opening up railway arches.
- Support the provision of high quality public realm and the concept of a strategic green link, but the OAPF should provide further clarity on the proposed function of this space.
- The Wood Wharf scheme is not relevant in determining the tariff.
- There are gaps in research supporting the OAPF, including the levels of retail, current employment levels, the necessary funding of infrastructure.

- There is not sound evidence or analysis of public transport capacity deficiencies.
- A Retail Capacity Assessment should be undertaken.
- It's unclear how the level of strategic open space has been calculated.
- DPDs should guide how SIL will be removed and protected.
- A second round of consultation will ensure a transparent, sound plan making process has been followed. It should be clarified how the Mayor's considerations/ amendments be made.
- The main market site should be extended to include all land to the south of the railway (including the apex), which is needed for the market.
- The optimum transport solutions need to be more strongly evidenced.
- Further evidence as to why the development capacity case studies are appropriate and relevant.
- The assumptions on affordable housing and family sized housing are unrealistic.
- Question whether the bridge has been subject to a cost benefit analysis.
- Delete the references to the linear park, it is not yet sufficiently justified as an optimal solution. There are no relevant comparisons of such parks.
- The OAPF makes no reference as to who is responsible for the on-going management and maintenance of the new public realm.
- A maximum building height is too prescriptive.
- Support the provision of an Anaerobic Digestion facility, but not at the expense of the market operation.
- The tariff approach is not sound.
- It is crucial the OAPF provides a framework for delivering a "robust and credible" evidence base. There is concern that there is an absence of any clear and unambiguous development plan policy in respect of the: tariff in the Nine Elms area; the level of growth envisaged; and thus introducing a tariff could be subject to legal challenge. Those concerns are multiplied because of the introduction of CIL.

7. European Metal Recycling

- The protection of the operation of Pensbury Place from inappropriate adjoining developments (particularly housing) should be provided. Recycling operation needs to be protected to help country meet its recycling targets.
- The waste sites need to be protected.
- Increasingly developers are applying for residential planning permission which includes or immediately adjoins our depot without making provision for alternative facilities; nor adequately mitigating to reduce conflicts. This is a threat to our business and the community could lose its recycling facilities.

8. Federal Express Europe Inc (FedEx)

- The FedEx (Tideway Estate facility) is crucial to FedEx's business and the operation of many Central London businesses/organisations that rely on the service.
- The location of the facility is fundamentally important because it allows FedEx to gain quick access to Central London.
- FedEx's staff is mostly local and skilled.
- Object to OAPF as the loss of employment land will have an adverse impact on existing businesses. Insufficient thought has been given to where existing B8 businesses can be relocated.

- The loss of the facility will impair FedEx's performance and harm London's continued economic success.
- We strongly object to the proposed land use strategy. The more intensive use of the Stewarts Road SIL will not deliver sufficient capacity for the relocated businesses.
- We welcome recognition in the OAPF that some businesses require proximity to the CAZ and therefore may be retained within the OA. Due to the nature of their business, FedEx requires facilities in close proximity to Central London and would welcome the opportunity to work with the GLA/LDA and the boroughs to retain and identify sites for such facilities.

9. Kish Six (Market Towers Site)

- Support the overall aim of achieving high-density intensification of the OA and introducing a mix of uses.
- It is not clear from the documents the extent to which each individual site is expected to deliver a range of uses.
- Kish supports a residential led development with ground floor retail for Market Towers.
- The expectation that the Market Towers site could deliver residential, commercial and retail is unrealistic because of the site-specific constraints.
- Request that the OAPF acknowledges that not all sites within the OA area will be able to deliver a full range of uses within a viable scheme.
- The overall strategy for the linear park is supported but the specific form it take will be dependent o the development that comes forward on each of the land parcels.
- Fig. 9.15 and 9.22 suggest that the linear park could take up to a third of the Market Towers site. The balance of open space to built form should be less prescriptive at this stage.
- Request that the OAPF stats that the linear park shown is aspiration and does not provide a firm position on the form of the park.
- Support the identification of the Market Towers site as suitable for development up to 150 metres.

10. Kylun Ltd

- Broadly support key principles and aspirations for intensification of the area.
- Welcome concentration of commercial/residential development at Vauxhall Cross.
- Agree with the broad thrust of the proposed public realm strategy.
- TfL's public realm and transport strategy for the area have not been prepared in conjunction with the drafting of the OAPF. There is a clear lack of a robust technical evidence base, which undermines the integrity of these aspirations.
- The aspirations of Lambeth (remove) and TfL regarding the future of the gyratory are not aligned. This should be resolved as part of OAPF.
- Support the identification of the area for a tall building cluster.
- Query the maximum threshold of 150m with the consented Vauxhall Tower forming the 'pinnacle'.
- Given the potential for tension between tall buildings and the effect on significant heritage assets, additional clarity on the assessment of proposals would be beneficial. OAPF should stress that visibility does not equate to harm
- The relevant WCC and Lambeth SPDs have not been adopted, the OAPF should not give these significant weight.

- The tariff proposals are premature as they were developed in advance of the S.106 infrastructure funding study. Insufficient weight attached to economic viability.

11. National Grid

- The Battersea Gas Holder site, should be allocated in OAPF and DPDs for residential-led mixed-use development, thus providing enough certainty for the site to be decommissioned.
- Support the removal SIL to allow mixed-use development.
- There are unhelpful emerging differences between the OAPF and other policy documents.
- The OAPF is not based on a sound evidence base as there is an absence of detailed financial modelling to support the preferred development option.
- The information regarding the overall employment capacity should be made available so as not to affect soundness of the document, particularly given it relies so heavily on these figures.
- The requirement for play space to be provided at grade should be deleted.
- Concern that OAPF consultation is taking place prior to the availability of the DIFS.
- Infrastructure provision must be affordable and contributions from development must be assessed in accordance with current legislation and guidance.
- Phasing of improvements is critical, deliverable short to medium term accessibility improvements must be introduced to allow development to proceed without being constrained by longer term initiatives such as the Northern Line Extension.
- Insufficient emphasis has been given to non-Northern Line improvements. Including the Nine Elms/Pimlico footbridge; a more targeted bus priority scheme; the light rail transit/bus rapid transit; Vauxhall Station improvements; Battersea Park Station improvements.
- It is not clear what studies have been made regarding car parking.
- Oppose that the OAPF concludes that the Northern Line Extension is the only intervention considered viable, as this option has not been demonstrated to be viable pending the forthcoming Infrastructure Funding Study and also alternative measures have not been properly assessed.
- The OAPF should acknowledge the difficulties of achieving new/improved pedestrian/cycle crossing points from BPS to Battersea Park.
- The amount of open space along the frontage of the National Grid site is overly prescriptive.
- The OAPF shows the wrong location for tall buildings on the National Grid site.
- The proposed maximum height threshold for Nine Elms differs from Wandsworth Council's urban design assessment.
- The proposed CCHP/CHP route should extend further along Prince of Wales Drive.
- The OAPF should made specific reference to viability and the Three Dragons Toolkits in relation to affordable housing.

12. Newlands Enterprises

- Development should, where viability allows, contribute an appropriate amount towards the delivery of services and infrastructure.
- Details of the S.106 funding tariff will frustrate, not promote development.
- The tariff should only be applied where viability allows.
- Wood Wharf is not representative of development of schemes in London or VNEB.

- The current tariff rate could significantly hamper delivery of housing and employment.
- The OAPF should acknowledge the tariff will be applied pragmatically for renewals of planning permission.
- Support tall buildings approach, including the tall building cluster at Vauxhall.
- There is an error relating to the building height of Hampton House.
- The OAPF should make it clear that actual heights will not be rigidly applied. Schemes should be judged on their own merits.

13. Real Estate Opportunities Ltd

- It is not appropriate to refer to the 60,000 sq.m. of CAZ Frontage unless it is made clear that this is a minimum quantum. This figure was not based on the proposed transport improvements and its outdated.
- Support the designation of CAZ Frontage at BPS. But, BPS will perform the role of a Major Centre and should be designated as such in the London Plan and the OAPF.
- Strongly support the delivery of the Northern Line Extension (NLE).
- OAPF should be updated on completion of the DFIS.
- Text should be inserted to clarify the role and status of the OAPF in relation to Borough level planning policies.
- Support identification of BPS as a growth pole and the maximisation of the development opportunity presented by the OA.
- The Draft OAPF should recognise the appropriate figures within the REO retail impact assessment.
- Support the stance on safeguarded wharves.
- Clarify status of Infrastructure Funding Study. Including the timing/programme.
- Support 'growth pole' at BPS.
- Reference to safeguarded wharves should be expanded and there may be potential for change.
- Greater clarity is required on the role of the density matrix, and that it should not be applied mechanistically. In VNEB areas may be capable of accommodating significantly greater levels of development density.
- The approach in the OAPF to car parking is inconsistent in approach to parking and there is no policy justification for level.
- Support revised option 5 as the preferred development scenario.
- References to required new schools should be removed. It has not been adequately assessed and should be left to the Infrastructure Funding Study.
- Should recognise site-specific circumstances to be taken into account in negotiation of affordable housing.
- The NLE is a priority, some schemes will be justified in seeking a reduction in affordable housing provision to prioritise the NLE.
- The Design Guide should only apply to LDA land. It would be a constraint elsewhere.
- The OAPF should explain that the pedestrian bridge is dependent on financial contributions and viability, and is a lower priority than more other important transport improvements.
- OAPF should acknowledge ownership constraints in delivering the improved and continuous riverside walk.

- Should recognise BPS as an existing tall building/landmark and allow for taller buildings at BPS.
- OAPF seeks an overly restrictive approach of commercial/non-residential uses wrapping around wharves, an approach not in accordance with the London Plan. Innovative design should be encouraged.
- Support the energy strategy, however, OAPF should acknowledge what can be achieved practicably, technically and viably.
- Support consideration of a new waste processing facility.
- Consultation is pre-mature in advance of DFIS.
- The views are difficult to interpret, terminology does not match the LVMF and there is no guidance as to what is desirable.

14. Native Land (8 Albert Embankment)

- Broadly supportive of the draft OAPF.
- Generally supportive of the principle of a tariff approach to S106 contributions but concerned that the tariff will be based on the Wood Wharf Scheme example set out in Chapter 12.
- The Wood Wharf contribution was inflated by Crossrail contributions and it is therefore an inappropriate model for the OA. The redevelopment of VNEB is not dependent on the introduction of Crossrail.
- It is not appropriate to consider a 'one size fits all tariff'. It is important that the OAPF reflects the guidance in Circular 05/05 and that planning obligations directly related to the proposed development and fairly and reasonably relate in scale and kind.
- The document should clearly state that the application of any tariff would be subject to the viability of each proposal. £250 per sq.m. for commercial floorspace and £17,500 per residential unit is too much, even as target figures.

15. Royal Mail

- Supports overall aims and principles of the OAPF.
- Object to the scale and location of the proposed linear park. The strategic open space network should enhance existing amenity areas along the River Thames and north south routes to and from the river through the area, rather than create an unnecessary additional 'parallel' route.
- Welcome the potential for intensification of development within the area but future developments should be carefully designed to minimise potential impacts on existing businesses.
- Support the recognition that some businesses require proximity to CAZ and therefore may be retained within the OA.
- OAPF should state that the provision and/or contribution of social infrastructure should be directly commensurate with the impact and viability of the proposed development in accordance with Circular 05/05.
- The 0.25 spaces/unit should be applicable to all residential developments in the OAPF and not applied as an average or overall ceiling.
- Support the retention of Nine Elms Lane as an important strategic highway route, and rationalising accesses onto Nine Elms Lane.
- TfL should develop the existing highways modelling for Nine Elms Lane.

- The OAPF should consider ways to safeguard links to the mixed-use areas shown south of this linear park ensuring access for road users and pedestrians. The location and form of these links under the railway viaducts should be afforded greater consideration to overcome severance and improve connectivity between Nine Elms Lane and Wandsworth Road.
- Support the proposed Northern Line extension, although its alignment will impact on the development potential and viability of effected sites.
- Support mixed uses for the Nine Elms area, however document is overly prescriptive in terms of the precise nature and layout of uses.
- The proposed linear park is not an appropriate for a dense, mixed-use urban townscape. There is a significant lack of precedents for the successful implementation of open space. We question usability, lack of 'ownership' of the space and the likely wind conditions. It will impact on 40% of the RMG's site.
- Support the provision of high-density development in Nine Elms area and the potential for tall buildings.
- The document should be revised in order to recognise that within parts of the Nine Elms area, buildings rising to 80-85m AOD (rather than 60-70m as proposed) are likely to have an acceptable impact on strategic views.
- Support principle of the creation of a centralised energy system. However, the sustainable design and energy strategy of each site should be examined on a case by case basis.
- Object to the location of the Strategic Sub Station within the OA and query why the facility cannot be located within Stewart Road Industrial Estate, thereby maximising the potential for development.
- Generally support the principle of a tariff based approach outlined in the OAPF, however Wood Wharf is not an appropriate example for the basis of the tariff. It seems especially inappropriate as the cost of the NLE is yet to be determined.
- The tariff should be subject to the viability of each proposal.

16. Ristoria

- Broadly support OAPF. But detailed objection to S. 106 approach.
- The OAPF promotes a standard tariff based on a permission called Wood Wharf, Canary Wharf. While Ristoria are generally supportive of the principle of a tariff approach, we question why Wood Wharf is used as a 'template' when it made a significant contribution to Cross Rail (which does not apply to VNEB). VNEB relies on 'a package of transport measures' for which the costs are yet to be determined. The approach taken therefore doesn't follow the approach of Circular 05/05.
- The tariff approach should be amended to make it clear it is subject to viability and is assessed on a site-by-site basis.

17. Rock (Wyvil Road)

- Generally supportive of the VNEB OAPF.
- Support the principle of growth pole at Vauxhall, delivering new development.
- Support the designation of the Wyvil Road site as 'high density mixed use focal point' and 'residential intensification.'
- Support the preferred capacity option and believe this would do the most to bring forward new jobs and homes and regenerate the area.
- Support the NLE extension and its proposed location.

- Support the principle of activating the railway arches and improving north-south connections through the arches.
- Support the inclusion of Wyvil Road within the Vauxhall tall building cluster zone.
- Vauxhall sky gardens should be shown as having permission and the Wyvil Road site should be shown as at the pre-application stage on Fig. 10.2
- The S106 tariff needs to be reasonable and related to economic viability. The approach taken by the LTGDC could be used, where the standard charge has been discounted, and further discussion are possible, based on open book assessments.

18. Sainsbury's

- Support overall objectives of the OAPF, Sainsbury's is concerned that the proposals are predicated on the Northern Line Extension which has substantial uncertainties; both in regards to implementation and funding. Indeed, these uncertainties are so significant that they may undermine the entire OAPF.
- The NLE proposals should not delay regeneration, doing so would sterilise our site.
- OAPF has been developed with insufficient consultation amongst all key stakeholders, particularly Sainsbury's whose land is shown as accommodating a new tube station, a proposal that was not discussed prior to the publication of the draft.
- Insufficient weight is attached to the established retail benefits of the Sainsbury's Nine Elms store. The retail use should be intensified along with the introduction of other uses such as high density residential.
- Given the huge importance of continuity of trade, redevelopment the site is only likely to come about if there is significant benefit to Sainsbury's as a retailer.
- Given the importance of car borne trade to the existing store, the OAPF should make appropriate allowance for all modes of transport.
- OAPF must change to reflect the practicalities of Sainsbury's trading position and a need to allow development to come forward in advance of the NLE.
- Support the identification of Sainsbury's Nine Elms as a principal location for tall buildings.
- Question the viability of the NLE and the impact that it will be privately funded on the private sector. It is hard to see how any meaningful decisions can be taken on the OAPF until the Funding Study is available and has been subject to stakeholder and public consultation. Sainsbury's wishes to participate in the study as a key stakeholder.
- Planning obligations should recognise the wide variation in existing accessibility levels across the OA. Specifically, those developing in areas of low accessibility clearly benefit more from the improvement delivered by NLE.
- Support the desire to achieve improvements in the quality of the area and increase the density of development.
- The current NLE scheme is not deliverable. We are fundamentally opposed to the only scheme option presented for the NLE.
- An option for the proposed Nine Elms Station is Sainsbury's Nine Elms store, but there is no consideration of the profound operational impact this would have. Sainsbury's will be seeking substantial financial compensation for the impact on its business should this progress.
- The proposals are not supported by Sainsbury's and the company will resist this route, which it considers is provocative and unworkable.

19. St James's Group

- Confirmation of the area of the OA is required, its inconsistent.
- Support these key principles and welcome high density mixed use development in Nine Elms and Battersea.
- Suggest inclusion of a reference to transport being given the highest priority when negotiating S106 contributions.
- Support growth poles at Battersea Power Station and Vauxhall.
- Support growth targets and proposed quantum of development.
- Support the need for improved transport infrastructure. However, the NLE should be seen as part of a package of transport interventions to support the regeneration of this area. The transport improvements should be implemented in phases so that transport benefits come forward as the OA develops.
- The proposed relocation of Cringle Dock needs further consideration in light of the detrimental impact it would have on surrounding sites.
- Support the designation of the land use areas.
- Figures in the OAPF do not reflect the removal of the SIL designation of CGMA's site in the London Plan 2008.
- Object to the assumed 0.25 car parking ratio in Option 4 and 5. Standards should not be prescriptive and should allow sufficient flexibility for each development based on its own merits, public transport accessibility, size and mix of units, commercial aspects of development. Car ownership does not always directly relate to high vehicle trip generation during peak periods.
- Support a less prescriptive approach to affordable housing targets and recognition that affordable housing provision is subject to viability. Affordable housing should be the lowest priority, because there is a greater need for transport and social infrastructure.
- Question the methodology used to calculate child yield.
- On site provision of community facilities should reduce the requirement for a financial contribution.
- There is no clear guidance on affordable housing, there is simply a list of policies from other documents.
- Object to the prescriptive proportion of family accommodation. High density development is generally not suitable for family accommodation.
- A package of strategic transport measures, supported by a series of more local transport improvements will be required.
- OAPF should give transport contributions being given the highest priority when negotiating S106 contributions. Phasing and delivery of transport interventions will ensure adequate accessibility for earlier developments.
- Support the principle of the new pedestrian/cycle link. However, more work is required to assess the likely demand and cost/benefit.
- Support the proposed locations of tall buildings along green links.
- Object to the approach of prescriptive building heights, as the suitability of building heights should be subject to visual assessment.
- Support the principle of an energy master plan; however this must be approached flexibly. Issues of ownership of the network and heat pricing structures need to be decided early. Developments which come forward before the District Heating Network should be given guidance as to compatible systems to ensure low cost and straightforward connection in the future.
- Support the suggestion of a Steering Group of key stakeholders

- Object to wharf relocation option.
- Object to Thames Tideway Tunnel construction site. This should be a significant regeneration site.
- Support greater certainty for developers regarding likely contributions. However, the tariff for residential should not be on a per unit basis instead it should be applied on habitable rooms or floor space basis.
- A hierarchy of contributions should also be established. Public transport should be given the highest priority followed by social infrastructure; public realm; employment/training; affordable housing.
- On site provision of community benefits should allow for a reduced financial contribution.
- Support the acknowledgment of the principles of Circular 05/05.
- Object to the reference of the CIL.
- Support that VNEB exempt from Crossrail, but OAPF needs to be updated to clearly reflect this.
- Suggest Steering Group gives guidance as soon as possible on a timetable for the degree of carbon reduction associated with heat coming from the VNEB (and area wide) network.

20. Treasury Holdings

- Ownership of the NLE project is required. There needs to be a much clearer and more transparent ownership structure in place for progressing the initiative.
- Management of the process/project is required.
- Funding options should be progressed and a formal framework set up to allow options to be debated and importantly to allow decisions to be made
- The alignment needs to be looked at in more detail, urgently, to allow the Transportation Works Order Act Application to be made.

Local residents/Businesses & others

1. Alan Palmer and Sue Miller

- Oppose the proposed density within already a very dense borough with a deficiency in public open space.
- Oppose high-density development on the riverfront as views will be lost.
- The document proposes no changes to existing communities but an increase in traffic and pressure on local services.
- The American Embassy is not a 'New Quarter' as it has no public realm.
- Oppose inadequate provision for public transport. The Northern Line is overcrowded and the OAPF proposes no expansion to the Vauxhall Underground/mainline Station.
- No more development should be allowed until more services (schools/health) are available.
- Oppose the tall buildings in Vauxhall. People don't want to live in a forest of tall buildings.
- There are few sustainability proposal within the document.
- Support new development but not within a new town with overstretched services.

2. Amanda Clarke

- Oppose tall residential buildings. These will worsen the traffic clogged, polluted, grim area by overshadowing and bringing in a large amount of new people.
- There is no money in place for the tube stations, which will be worsened given the large number of new people.
- Concerns regarding the affordability of the new flats, which will result in many being bought by investors.

3. Andrea Hofling

- The plans don't take account of the interests local residents and community needs.
- It will result in a forest of tall slabs with gated communities or offices.
- The lack of affordable housing/local jobs has not been addressed.
- There will be problems of overburdened transport, schools, green spaces.
- The small linear park will be like Grand Canyon with the large buildings alongside it.
- S.106 will barely cover the transport, so where is funding coming from for the social infrastructure?
- The new jobs will not provide for local people and blue collar jobs will be lost.
- Transport should be improved first, then development can come later.
- Lambeth is deprived and needs all sort of amenities and infrastructure, the OAPF is vague and inadequate in this respect.
- There is a lack of open spaces.
- Pollution levels within the OA are high. This has not been addressed.
- Some of the strategy is not clear and at odds with Lambeth policies.
- The OAPF will result in an unmitigated disaster.

4. Andrei Guthalo

- As a local business, I fully support this development.

5. Anna Martin

- Most of the OAPF is acceptable.
- Strongly oppose the approach to tall buildings. The tall buildings proposed will be totally out of proportion to the surrounding area.
- The increased pressure on the already stretched public transport infrastructure at Vauxhall is also strongly opposed.

6. Annabel Stein

- The area should not become swamped with social housing.
- Will there be enough employment for all these people?
- Potentially this exciting development could become a housing estate. There needs to be tennis courts, private schools and pools.
- Fully support the Northern Line extension, although not to Clapham Junction.

7. April Hilling

- Oppose the proposed high-density and high rises. This hasn't been properly planned.

8. Astrid Reiner

- Object to the New Covent Garden Market and Flower Market redevelopment plans.
- The area is already very densely populated and there is no provision of schools, playgrounds, GP surgeries etc.
- No commitment to transport improvements, there is no funding for the Northern Line extension.
- There are no confirmed 'green measures' or cycle paths.
- There are no plans to counter-act the risk of flooding.
- No confirmed new accesses to the river.
- Local businesses will suffer, as big development projects are prohibitively expensive.
- There's no need for high-rise offices in Vauxhall.
- High rise residential housing struggles to be high quality.
- There will be a negative impact on the iconic Battersea Power Station.

9. Boyd E Mandall

- Regarding the new pedestrian/cycle linking Nine Elms and Pimlico, does this refer to a link to Victoria Station?
- Consider a skywalk linking Battersea Park station and Victoria Station.
- Consider at least accessible links by foot/cycle from Pimlico to Victoria Station and Nine Elms to Battersea/Queenstown Road Station.

10. Chan Badrinath

- A waste site on the River is a blot on the landscape and should not be kept.
- Parking around Battersea Park is difficult, this should be reviewed as a priority.

11. Chris Cossey

- The underlying assumptions on population growth are deeply flawed.
- The proposals for high-density, high-rise clusters and other large buildings with very little public open space will be creating slums.
- The sort of housing and environment envisaged in the OAPF will create a squalid and blighted area.
- Provision of green links and open space is tokenistic, small and mean. There is no certainty they will be green spaces.
- Too many tall buildings impacting on views and creating an oppressive ground level environment, unsuitable for residential and for families.
- Increases in road capacity will worsen the dire street environment at Vauxhall Cross.
- The removal of the gyratory is necessary.
- The OAPF covers a large area where nothing makes sense. There is no clear street pattern and the defined maximum building heights will lead to dull uniformity of scale and design.

- There is too little space between buildings.
- The future development would blight the River Thames, limiting access and aggressively changing the river front.

12. Diane Lawley

- Object to the proposals.
- Tall buildings will create shade; no open space is provided; there is a lack of family accommodation; inadequate infrastructure; a lack of recreational space; overcrowding; traffic and air pollution.

13. Ghislaine Stewart

- The road infrastructure of Battersea Park Road and Nine Elms Lane is already choked at peak times. Given the proposed scale of the development, the road infrastructure locally will only get worse.
- Therefore there is a need for an improved road layout, as well as better overall transport infrastructure such as train services, buses and a river service.
- Support the OA's regeneration objectives.

14. Ian Beaver

- Controlling and reducing the volume of traffic in Vauxhall Cross should be addressed. This will enable real improvements to the environment for the people using the public transport facilities.
- Support the move of US Embassy to Nine Elms.
- Tall buildings around the embassy must however be a concern due to terrorism.
- The culture/economy of Vauxhall is associated with the gay community, and the increased security and surveillance (associated with the Embassy) could undermine this culture. The OAPF should address this.
- The OAPF does not demonstrate any clear vision for the types of business and job creation it seeks to attract. An inwards investment strategy is needed.
- There should be greater emphasis on NCGM and the food economy as this could create a real landmark for London (like Borough).
- There's no consideration of the knock-on impacts for Lambeth. There are plans to develop a food market on Wilcox Road with a walkway to NCGM, which could be expanded to create a strategic link to Little Portugal (on South Lambeth Road).
- A new strategic partnership between Lambeth and Wandsworth is needed. A Multi Area Agreement, would utilise the recently introduced legislation.
- Support desire to ensure jobs are retained and created in the area and the designation of the SILs.
- There is a real need for affordable meeting and office space in the area.
- There's no coherent strategy for community engagement.
- Support the emphasis given to social housing in the strategy. There needs to be mixed scale developments and not just flats and tall buildings. Homes with gardens should be provided.
- The OAPF should have a stronger emphasis on creating family focused neighbourhoods with new school, health and community facilities.
- The Northern Line extension is essential.
- All roads in the OA should have designated cycle paths.

- Developments in the area should pay a more local levy for the NLE, not for Crossrail.
- Support the five principle public realm interventions.
- The provision of allotments in the area would be of real community benefit.
- The OA should be characterised by an outstanding world-class approach to energy generation and preservation.

15. Katie Ainslie Williams

- Support the principle of redevelopment of the area.
- Concerned about the very high towers proposed near Vauxhall Gardens. Impact on views from within Vauxhall gardens has not been considered.
- Proposed blocks are too close and will overshadow Vauxhall Gardens.
- High tower blocks should be near the river not low-level housing.

16. James Fraser

- Strong objection. If implemented, it will condemn the neighbourhood to hell.
- The area will be in the shadow and wind tunnels of tall buildings and the added pressure of an extra 40 000 residents on already stretched public services with very little provision for more open spaces.
- The plan seeks to override the local democratic process.

17. Dr. James Thonger

- Unlikely that a District Heating Network that is substantially based on fossil fuel will save any carbon dioxide emissions and will counter future efforts to reduce emissions.
- Any heat network or decentralised energy needs to be zero carbon not 'low carbon' to meet government emissions targets.
- The proposed heating network is not low carbon and is an inefficient way to provide heat in comparison with a standard locally installed condensing gas boiler.
- District heating networks have large heat losses and damage air quality.
- Anaerobic digestion should be encouraged and the gasses produced should be scrubbed and reintroduced into the gas network.

18. John Mullineaux

- Strong objection.
- The population is too high, for such a small area.
- There is need for 'upfront' infrastructure for the huge population increase.
- The green strip is not a park, and is too small for the population increase.
- Vauxhall is highly polluted, there are no plans to improve this instead it will be worsened.
- The proposals ignore the context and community.

19. Lorna Chetwynd

- The proposals seem excellent.
- Query, what is a Strategic Linear Park?

20. MA Francis

- Reiterates the objections raised by the Kennington Association Planning Forum.
- If built, it threatens human standards of living.
- A less aggressive, more sustainable and constructive development should be considered.

21. Malcom Brady

- Broadly supportive of the OAPF.
- However, concern about the impact from traffic on Kennington Cross.
- While improved bus routes in Vauxhall are proposed, here is no reference to the impact on existing traffic problems at Kennington Cross.
- The Vauxhall Gyratory is currently full and should be redesigned.
- Kennington Cross is used to pass through from Vauxhall to Elephant & Castle/Walworth Road and from Kennington Park Road to Westminster Bridge Road. These journeys could currently be easily re-routed to avoid Kennington Cross by directing traffic along Albert Embankment and Kennington Park Road via Oval. Such traffic management would allow Kennington Cross to be used by pedestrians, allow local amenities to be improved and generally enhance the use and appeal of the area.

22. Maria Nugent

- Support the regeneration of the area and believe that this should be used as an opportunity to make a massive green statement for the future of London as a leading eco-city of the world.
- Vital that developers are bound by 'green' principles in building. Green Roofs, green walls and a high degree of green landscaping- green energy systems should all be highly visible and showcased in the OA.

23. Marmi e Granito

- Marmi e Granito Ltd, a heavy manufacturing and contracting business, employ approximately 30 staff in five railway arches in Miles Street.
- Concern that the OAPF will require businesses to move.
- Would like to make a case that this business needs to be located near CAZ, and seeks further information on how to prove this. They are also concerned about further investing in the site, in case they have to move.
- Seeks assurances that occupation of the arches will be a priority.
- One of the illustrated strategic green links bisects a private road which is the sole service road for Marmi premises. Further detail on this is sought as it could affect access.

24. Newton Prep School

- The school could provide the children of residents and workers, access to independent education.
- We request the GLA re-balance some of the school capacity on site against an increase in the housing stock.

- The need for an improved layout, as well as better overall transport infrastructure are imperative.
- Local and new businesses will undoubtedly benefit from the economic opportunity provided by regeneration.

25. Optima Projects

- Supports the new foot and cycle bridge over the River Thames.
- It should be a useful and beautiful transport link and could be used to demonstrate unique engineering and innovation.

26. Patricia Holland

- Concerns about the effects of such a massive redevelopment on the quality of the community but for the desirability for London as a whole.
- No justification for a dense building project of tall towers, which will disfigure a stretch of river.
- No justification for a population increase in an area already densely populated. Benefits will go to developers, not the local community.
- Support the comments of the Kennington Association.

27. SAB. SGT Ltd

- The proposed regeneration is long overdue. The area has been neglected and this is a positive step in the right direction.
- Can see the benefits for both individuals and business.
- Businesses require this boost in the economy, especially during the recession.

28. Scott Lindsay

- Generally support proposals.
- However, the Northern Line extension is an absolute must for the people of South West London and it will improve the viability of the proposals.

29. Sleaford Street Management Committee

- Concern about the lack of consultation with smaller site owners.
- Clarification required on the role and future of the OAPF in relation to the borough's LDF's.
- The higher density development should be pursued.
- Clear guidance is required on phasing and delivery of infrastructure.
- Tall buildings should be illustrated on the land adjacent to the railway line between Sleaford and Thessaly Streets.
- The location of a tall building on the abovementioned site will help provide a strategic link between existing residential properties and the riverside, new jobs, open space and infrastructure.

30. Travel Joy Hostels

- The proposed location of the pedestrian bridge is incorrect. An iconic and modernist bridge should be located perpendicular to the centre point of the front of Battersea Power Station and linking Grosvenor Road/the No. 24 bus terminal/new Westminster 29 bay cycle area and Churchill Gardens Estate.
- Various justification for the proposed OAPF bridge being in the wrong location are provided, including: that it is too far from the bulk of the residential accommodation; it does link with existing bus and cycle facilities; it misses the opportunity to be iconic.
- Various reasons for the suggested location for the bridge are provided, including: its in the area of greatest need and will link employment areas to Chelsea; cycle/bus routes; access to Victoria stations; a link to Churchill Gardens Estate. area with planned for dedicated cycle ways into and around Westminster.
- Pedestrian traffic lights may be required over Grosvenor Road and the bridge should be lit up at night.

Stakeholders

1. Albert Square and St Stephens Association

- The development will increase burden on local services and infrastructure. There should be investment in social infrastructure.
- Development will impact the appearance of views from our neighbourhood.
- Density and tall buildings at Vauxhall will place an excessive burden on transport, leisure and social infrastructure. There are insufficient mitigating measures. Lower density buildings with a focus on lowered heights and less new buildings.
- There is no room for green areas, allotments and sports facilities. There should be commitments to such facilities.
- The new jobs might not match the skills of the local residents. Small and Medium Enterprise job will be forced out. Also no training for local residents is proposed. There should be a greater emphasis on diversified mix of businesses.
- The proposals will create a ghetto of flats with little linkage to surrounding areas.
- Support the plans for the New Covent Garden Market, and believe this will create tourism, training and hospitality sector in area.
- There is no vision for the area that is self sufficient in energy use and waste management. Measures to encourage the maximum level of energy efficiency and decentralised energy within residential and commercial uses and minimal waste should be included.

2. Art in the Open

- The OAPF underplays the important role that art in the public realm can play in making better public space.
- The OAPF should reference the potential for embedding high quality art in the public realm, at this early stge. It should be integral to a scheme, not an add-on.
- The riverside walkway should include high quality public art programmes to enhance the character and richness of the local area.
- Welcome the key target for 'unified street lighting'.

- The area boasts a range of high quality art organisations and artists studios. These not only have art expertise, but knowledge and understanding of the local area and its communities, which may be a valuable resource when developing projects.

3. Battersea Society x2

- Welcome OAPF but unhappy with the delay, lack of publicity and limited distribution and consultation.
- Further studies/discussions are required particularly on governance.
- Expanded boundary of the OAPF is supported.
- Stewarts Road area needs improved access and circulation and should be more targeted in the OAPF. This area should not be part of the CAZ and new jobs should be for local people within rationalised premises.
- Disappointed there is no reference to improving Wandsworth Road Station.
- Disappointing that no changes to areas of public housing are proposed.
- The objectives of redevelopment should be making better use of the area, co-ordinating development, preserving and using BPS, consolidation of the NCGM, remedying deprivation in housing estates.
- The focus of the OAPF need not be tall buildings.
- The use of Tabard Square in the methodology is questioned. This is very dense and makes no contribution to strategic open space.
- A 'vicious cycle' will be created, whereby high-density development requires a new tube, but the new tube requires high-density development to fund it.
- The issue of family housing is unclear. Requiring 3-bed + market units will go further towards creating a balanced community.
- There is no justification for retail space at BPS, it will harm existing centres and there is no demand for it. Even with transport improvements its unlikely to be a shopping destination.
- Support most of the public realm strategy, except the linear park which appears an ingenious attempt to meet all or part of the open space requirement in a way that causes minimal disruption to other proposed land uses.
- The OAPF should return open space to Battersea Park by moving the exhibition and hospitality uses from the park to Battersea Power Station.
- Within the document, 'tall buildings' are interpreted as being 8 -10 storeys, assurances should be added that no buildings taller than that will be allowed.
- Strongly oppose tall buildings on the river frontage as it will detract from BPS.
- Disappointment that there were no plans for a non-technical summary, and no wider public presentation of the framework.
- Want the GLA and Council's to produce non-technical summary with urgency, demonstrate that constituents matter and are at the forefront of decision making.

4. The Chelsea Society

- Oppose the large-scale broad-brush approach to land use.
- Please consider layouts based on streets and squares lined by houses as planned by Michael Squires/Dixon Jones for the Chelsea Barracks.
- Taller buildings near the River will create wind turbulence and disturbance.
- Lateral connections to a riverside route are supported.

- Please require houses with gardens and houses surrounding private garden squares. Long narrow squares such as Bryanston Square, W1 and Wellington Square off the King's Road are economical of space.
- Tall buildings are opposed. They detach people from their surroundings and are not conducive to communities. They create wind turbulence and anti-social behaviour.

5. Covent Garden Tenants Association Ltd.

- Representation largely concerned with tenant-landowner issues.
- Disagree with the CGMA 'rationalisation' plan, which will undermine the future of the market.
- Supportive of the main objectives and principles of the OAPF.
- Concerned the draft framework is based on a proposed reduction in the footprint currently occupied by the Market the would result in seriously undermining the future of the market as an effective centre of distribution, increase traffic bottlenecks, fail to recognise the opportunity that exists to build on the Market as a centre of excellence and miss a unique opportunity to integrate the Market and its potential in to an iconic mixed development for the benefit of the tenants, their customers, London and the wider community.
- Concerned that the draft framework includes several proposals in regard to the market that are likely to exacerbate transport problems, fail to deliver public realm improvements and damage employment opportunities.
- Draft framework illustrates the absence of an understanding of both the reality of the market and the opportunity for it to be integrated in to the mainstream of the proposed framework.
- Fails to recognise the opportunity for genuine integration of the market in to the draft framework.

6. Diamond Conservation Area and Heathbrook Park Residents

- Oppose consolidating industrial use and waste management in the Silverthorne Road area of Stewarts Lane, given the detrimental impact on existing residential areas in the south west corner of the OA, in particular the Diamond Conservation Area and Heathbrook Park.
- The industrial area is served by residential roads. Further intensification is opposed without alternative access.
- Silverthorne Road is not a 4-lane road, it's a narrow 2-lane road. Correction required as it is unsuitable for heavy goods vehicles.
- The proposed rail freight interchange at Gatwick Express is unsuitable given its access through residential areas.
- A northern access road to Battersea Park Road should be pursued as a priority.
- S.106 agreements from any new development on Stewarts Lane could contribute funding to this new access road.
- New development in the Silverthorne Road area should be business, not waste or heavy industry.

7. English Heritage

- While the OAPF recognises the OA's historic evolution and contribution to London's development, it is essential that this information be used to inform and frame the development principles and policies.
- The OAPF should set out heritage assets and historic elements to be protected and enhanced and character areas.
- The linear park and perimeter block concept could appear monotonous and lacks the diversity to reflect the surrounding area.
- Concern that the approach to tall buildings, could lead to an impenetrable wall of development along the River Thames which would obstruct visual links with the river and create a characterless frontage. The approach could also compete with the landmark status of Battersea Power Station.
- OAPF should involve conservation staff from Wandsworth and Lambeth Councils.
- The OAPF does not differentiate between designated assets and historic context and does not ensure contemporary design will respond to its historic context. See the Historic Environment Practice Guide.
- The Westminster World Heritage Site designation should be marked on the maps.
- Oppose the lack of a sustainability appraisal.
- It is important to ensure that the level and form of development is supported by robust evidence, including that it will not harm to heritage assets and their settings.
- The OAPF should recognise that new development should respect the historic environment. The existing wording gives the impression that the historic environment is only a barrier to change.
- A key challenge should be to establish a distinctive and locally appropriate new urban character for the Nine Elms area.
- Battersea Power Station should be identified as it is a significant historic landmark.
- The design led approach to growth should be applied to the whole area, not just Battersea and Vauxhall.
- The approach of using the adopted London Plan policy on 'maximising' density is questioned as this is now out of date.
- The methodology of development capacity pays no attention to the local character and context of the OA. This raises concerns about the robustness of the capacity figures suggested by this study.
- Welcome the opportunities to activate the railway arches.
- There needs to be a clear transition between the residential scale of Wandsworth Road and the high density Nine Elms and surviving elements of Victorian urban grain should be reflected in new developments.
- The proposed pedestrian bridge between Nine Elms and Pimlico should be shown on maps.
- The OAPF should recognise elements of the public realm that are of heritage value, e.g. some of the spaces in the 'Tangle' area contain cobbled surfaces that provide heritage and contribute to the distinctiveness of the area.

8. Environment Agency

- Support planning framework and the significant opportunities for environmental enhancements, high standards of flood risk management and delivering sustainable development.

- The OAPF should be informed by wider flood risk management strategies such as the London Flood Risk Appraisal, Wandsworth and Lambeth SFRA, Thames Estuary 2100 (TE2100) and the Thames Estuary and River Basin Management Plan.
- The borough's SFRA's have assessed areas which are particularly vulnerable to flooding from all sources, including breach or overtopping of the flood defences (links to documents provided).
- The regeneration provides an excellent opportunity to renew and restore flood defences. Remediation and improvements to the flood defence walls should be required when riparian sites are redeveloped.
- The framework should identify potential areas for set back from the River Thames and maximise opportunities to make space for water.
- Support the proposed riverside walk as it will improve access to the flood defences.
- The approach to Development Capacity appears to ignore major constraints like the residual flood risk and provision of additional environmental infrastructure.
- Funding is required for such infrastructure and early investment and careful planning is required to ensure that improved infrastructure will have the capacity to cope with additional demands, in particular climate change.
- Support references to Thames Tideway Tunnel.
- OAPF should place more emphasis on water supply and standards of water efficiency applied to new development.
- The OAPF should seek to maintain and create opportunities to enhance the setting of and increase space for the River Thames.
- Support the proposed strategic green link from Battersea Park to Lambeth Palace.
- Proposals should be designed sensitively to the river environment and increase habitat value. There is potential to remove the old jetty structure which reverses encroachment into the Thames and creates new foreshore habitat.
- Developments should have features such as inter-tidal terracing as part of a buffer zone along the Thames.
- OAPF should resist allowing encroachment onto the Thames by residential boats.
- Development should not allow development that encroaches into the River Thames (like Vauxhall Cross does).
- Light pollution and overspill onto the Thames should be avoided.
- The Nine Elm aquifer is in a Source Protection Zone 2 (abstraction sources intended for human consumption) and as such is in an area of high pollution risk to groundwater. The impact that constructing works will have on the ground water pollution should be taken into account.
- Green roofs in the OA will create amenity and habitat. There is also the potential for zero carbon homes, renewable energy and exemplar levels of the code of sustainable homes.
- Welcome the OAPF's principles of sustainable development. The OAPF should consider whether new development and existing buildings remain fit for purpose under new climatic conditions.
- Welcome the OAPF's approach to maximising the use of green and open space to meet recreational, sport and nature conservation objectives.
- Living walls will enhance biodiversity, reduce the risk of flooding and improve a buildings thermal performance.
- The volume of waste should be minimised wherever possible; by re-use, recycling and use of river barges.

9. Friends of Larkhall Park, Larkhall Triangle Residents Association & Oasis Children's Venture

- Support the scale and ambition of the framework.
- Mechanisms should be put in place to ensure effective and ongoing consultation and dialogue between all stakeholders. An exemplar model is the South Bank Partnership.
- The OA should be extended to include the adjacent area of social deprivation so that benefits can be spread, i.e. Stockwell.
- Support the proposed strategic green links that connect Larkhall Park to the River. Given the new population in the area, there will inevitable increased usage of the park that will require S.106 contributions for increased maintenance.
- Views from Larkhall Park (including that of BPS) should be protected.
- Provision for young people does not even get a mention in the OAPF. This is a serious omission as facilities and amenities for young people are desperately needed. We suggest S. 016 monies be made available for Oasis and similar organisations.
- The education map has errors and deprived estates are not adequately shown.
- Improvements around Stockwell Underground Station should be funded by S.106.
- The idea of pooling S. 106 obligations is welcomed. Stockwell should benefit.

10. Greening the UK

- Support the proposed improvements to the Thames Path, the creation of the green link and park, the emphasis on open space as a means of flood risk management and highlighting accessibility.
- However, a more detailed plan for how planting and green space will be used. The document does not outline the specification the plants and green spaces will be.
- Clarity should be provided as to whether 'open space' means open green space.
- Recommendations as to how planting can be delivered in high density areas should be made.
- In high-density areas there is a strong importance for green space and planting as this absorbs water and helps reduce surface flooding.
- The document should recognise the importance of planting as a means of increasing accessibility and promoting public use of open spaces and local amenities.
- Support the strong emphasis placed on improving the quality of public areas, and in particular the green link from Lambeth Palace to Battersea Park. This will benefit local health and biodiversity.
- Increased usage of green spaces also helps reduce crime, stress, can increase visitor numbers; health benefits, reducing pollution.
- Planting and green space must be incorporated into the wider street scene surrounding these sites, as this will encourage walking and cycling.

11. Kennington Association Planning Forum

- Support the preparation of a framework, particularly to govern an area straddling the border of two planning authorities.
- Welcome the green initiatives of the riverside path and the attempts to overcome the barrier effect of the railway embankment.

- Proposals are much too dense, approaching the highest known urban densities in the world, and exceeding those of Mumbai, Delhi and Calcutta.
- There is not enough open space proposed.
- There is no civic heart to the proposed new town of 40,000.
- The proposals do not measure up to the challenge and expectations of the CAZ, particularly as regards the lack of any cultural component.
- It appears that supporting services like schools and doctors will be provided by, and at the expense of, the neighbouring communities.
- The transport study is not fit for purpose, because it is based on flawed "zero sum" and other assumptions, which undermines integrity of whole OAPF.
- The proposals do not deliver enough affordable housing, downgrading the normal 'target' to an 'aspiration'.
- Transport requirements will mean social infrastructure won't be secured. The £200m of costs will be put onto neighbouring communities.
- Strong, diverse and long term economic growth is not delivered, as the gain of 27,000 financial services style jobs is offset by the loss of many of the 26,000 existing mixed skills jobs, mostly from Lambeth.
- It does not promote social inclusion or tackle deprivation/discrimination. There is no assessment of actual needs for jobs and housing for the existing communities.
- It does not provide a joined up approach to planning and transport, as it forgets to include the impact of the Elephant development, or changes in freight traffic and it assumes developers will build crucial transport links for free.
- It doesn't make London a more attractive, well designed, green city with its slab gated developments, tower block and inadequate green space.
- It doesn't improve the public realm.
- It doesn't provide a strategic and co-ordinated tall building strategy, as it doesn't have clear planning rules, instead it is a free-for-all for tall buildings.
- While the document recognises that neighbouring communities, like Lambeth, are extremely deprived, there are no clear ways in which these surrounding communities will benefit from proposals. Particularly jobs and education.
- The Vauxhall Gyrotory is hell. Is anything in the OAPF that will mitigate its impact? Or does Vauxhall need to develop another heart south of the railway?
- The permanent effects in our areas on traffic and public transport from 40,000 additional residents and tube users are unclear. The committed developments at Elephant and Castle have not been taken into account.
- The impact on public services in neighbouring parts of Lambeth is unclear. Does the OAPF set aside land for such services and if so, how much?
- Question whether will be cut off from the river by a palisade of tall buildings?
- Neighbouring communities would appear to suffer 20 years of construction traffic, but the river lies unused and not considered for a construction highway.
- The document lacks an adequate before and after scenario of land use and employment. It does not address the historic problem of sharing between boroughs.
- High-density housing is best provided in wholly residential developments, whereby residential space and gardens can be provided at ground floor level.
- Strongly oppose the expulsion of employment from the eastern end of the VNEB area, particularly given the railway embankment spine and the railway arch workspaces which can only have employment uses. White van men can work in such spaces, which is more sustainable than such services coming from outside the area.
- The transport study is elaborate and complicated but not fit for purpose as it has been based on flawed assumptions.

- The use of PTAL as a measure of accessibility is flawed as it does not take into account congestion and lack of capacity.
- The “borough balancing” assumption, i.e. that given growth here, growth and transport demand will be less elsewhere, is flawed.
- The transport modelling takes no account of the development at Elephant & Castle.
- The bulk of benefit from the Northern Line Extension appears to accrue out of area and such extensions are notoriously difficult to cost, timetable and budget (e.g. Jubilee Line).
- The transport modelling takes no account of the displacement of freight traffic caused by concentration at Stewarts Road.
- The cost of tunnelling for the Northern Line extension, based on 1994 London Underground costings, suggests a cost of between £770m - £1.1bn. We note that the transport study estimates a cost as low as £670m. The cost of this, if borne by developers will mean other benefits are not delivered and the developers will be looking to push up densities to fund the works.
- We note there is a list of other studies that could be undertaken, such as interaction with growth in other OAs; review of the Vauxhall gyratory; station design and capacity works at Vauxhall, Battersea Park Road, Queenstown Road and Wandsworth Road stations. These should have been starting points.
- A study should also be undertaken as to the impact of the Northern Line extension on the Grade II listed Kennington Underground Station.
- Lambeth is the fifth densest populated borough in the country. A small linear park is thoroughly unacceptable.
- Planning authorities have opened a Pandora's box and planning applications for tall buildings are coming in thick and fast, with high densities, inadequate amenity space. Such development will create a sea of tall residential buildings and the employment objective will be lost.
- A rule is needed to that will limit the proportion of the 16,000 dwellings which can be built at very high density (i.e. 3%).
- The OAPF expresses concern of the impact of tall buildings on views from London bridges, but does not take into account residents views of Big Ben from Imperial Court or Lambeth Walk Gardens or the Ethelred Estate.
- The indicative £400m for S.106 yield sketched in the OAPF is inadequate to pay for the Northern Line extension.
- Social infrastructure should be the first items funded, not the last.
- The charges could be tiered the charges, so that floor space above 30 metres from the ground pays at an escalating rate, given the extra demands it makes on public amenity and services (e.g. fire rescue).
- S.106 promises must be bound to the land through land obligations, so successors in title to the land are equally bound by the promises accepted by their predecessors.

12. Kennington Oval and Vauxhall Forum

- Tall buildings would cast Vauxhall Park and existing homes into shade.
- Oppose the lack of blue-collar jobs and training opportunities for local people.
- Development is too dense, not enough open space and overcrowding.
- There are no plans to tackle the current high level of air pollution around Vauxhall Cross, which will only increase.

- Extension of Northern Line will not serve those currently using it and will add to overcrowding. It is already difficult to get on trains at Oval and Kennington.
- The OAPF makes no apparent attempt to integrate the area with land to the East especially Vauxhall Park.
- Concerns that there will be traffic restrictions because of the location of the American Embassy and heavy handed policing. There are also concerns that access to the river will be denied especially around the Embassy.
- Oppose the lack of basic green recreational space, gardens on roof tops are not good for families with small children.
- There's not cultural hub and there is no plan for extending cultural activities from the South Bank.
- There is a real need for a swimming pool in the area.
- The OAPF concentrates more on the workforce than the family.
- Not enough affordable housing proposed in good locations.
- No regard for biodiversity and ecology.
- Support Green corridor, in principle, but it must be public space rather than private gardens, and of sufficient size for recreational purposes.
- Support the renewed look at the Vauxhall gyratory system, which is unfriendly to pedestrians, residents and cyclists alike.
- Support the redevelopment of Vauxhall Station.
- Support the renewed look at the bus station.
- Support the redevelopment of Covent Garden Market.

13. Lambeth Cyclists

- Want the redevelopment to fast-track a cycling culture from the outset. This will ease public transport pressures and have health and environmental benefits.
- Lambeth Cyclists require the Cycling Superhighway 8 from Battersea Park to go along Nine Elms to Westminster.
- Cycling infrastructure is cheap relative to other transport infrastructure and it will allow construction workforce to commute by bike, thus the need for this to be fast-tracked.
- The Mayor's Cycle Hire scheme should be fast tracked into VNEB.
- A 20 mph speed limit should be put in place at the outset of construction work, to encourage and make cycling safer.
- S.106 agreements should include cycle training including for primary schools.
- A maximum of 1 car parking space per residential unit and the inclusion of car free zones is sought.
- High quality cycle parking within the curtilage of residential units and large lift access and short-term visitor cycle parking is sought.
- There should not be any gated communities.
- The River 'Walk' and 'pedestrian bridge' should also mention cycling.
- Cycle routes should be wide enough for two cyclists each way, with no conflict at bus stops.
- Welcome the pedestrian and cycle crossings.

14. London Development Agency and Design for London

- The proposed growth in housing and mixed use should be accompanied by a fuller understanding of the economic issues of the area and a strategy to successfully manage the transfer, relocation and modernisation of local businesses and industry.
- An audit of existing industrial uses in the OA would provide important baseline. Study should go beyond SIL.
- The opportunity for intensification of the hospitality sector should be promoted. It will build on cultural identity in terms of sustainable food delivery.
- LB Lambeth are keen to promote and intensify the existing cluster of businesses at Vauxhall with a “business quarter”, the OAPF should do further work on this and focus on the importance of joining up Waterloo and Vauxhall.
- Greater emphasis is needed on the future of Stewarts Road, focussing on the intensification of employment uses and environmental improvements.
- It is essential that the type of land use at Tideway compliments port related facilities.
- In relation to the wharves, the land use strategy should remain more flexible to ensure that any additional land and infrastructure requirements can be accommodated to enable a more localised and sustainable approach to cargo and waste processing and energy generation.
- The potential for synergies between the remaining industrial uses, the consolidated wholesale market, the wharves and future localised energy infrastructure should be explored more fully, to take better account of the economic and environmental potential of these land uses.
- Modern and well designed industrial and/or port related facilities can serve as local landmarks and have the potential to make a unique contribution to the local character of the OA.
- Overall, the economic and environmental potential of the industrial uses should be fully taken into account and not be constrained through office and residential development.
- The notion of creating a new, denser, better quality green open space network is fully supported.
- There might be potential to complete the river walk at the wharves, but the feasibility of this should be worked up in greater detail.
- Improving the quality of the river walk and improving access to the river from the predominantly residential areas further inland are opportunities which a public realm strategy should seek to focus on.
- There are many benefits in rethinking the current layout of Nine Elms Lane, and before discarding them, their positives, drawbacks and ways to address the drawbacks should be understood more fully.
- The local movement and public space strategy should tie in with proposals for public infrastructure.
- The “strategic” green link, is not entirely convincing. There is scope for further links inland, but the monumental gesture in which the linear park is set out appears somewhat formulaic.
- The proposed park’s north eastern edge at Vauxhall Cross and at the current market entrance appears unresolved, and the proposed road layout is unlikely to help to overcome the current poor environment. The western end of the linear park abutting the junction of Nine Elms Lane and the second market entrance appears difficult to solve in detail.

- Investigate whether the required open space could be delivered in a more intimate, localised approach. The public realm strategy should place greater significance on the existing assets, such as the river front.
- Support new bridge is supported but a suitable location should be fully explored and justified.
- The aspirations to activate and open up the viaduct are supported. But the technical constraints need to be established in a much clearer way.
- The proposals for the public space strategy should either be more thoroughly analysed OR could remain more strategic and aspirational, and link in with more detailed new masterplans.
- Further baseline work on existing built assets and the townscape should be added including land to the east of Battersea Power Station and the gas holders, the tallest of which constitutes a local landmark. The outcome of this analysis should feed into a strategy for the massing and volumetric development of proposed new development.
- Some of the existing tall buildings in Vauxhall Cross contribute to the poor quality of the environment, and further intensification should demonstrate how this can help to overcome such difficulties.
- A more detailed 3-dimensional massing study for the second draft OAPF is welcomed.
- The site specific spatial requirements for energy and waste should be set out.
- The use of either the LDA's or DfL's logos must be agreed with each organisation prior to publication. Prior to sign off of any draft, the role of both organisations should be acknowledged in the text only. The Df London logo is out of date.

15. Manor of Kennington Residents Association

- The confidence with which the projections and forecasts are made, and the assumption that they are correct, is dangerous.
- The fundamental flaw is the emphasis on the workforce almost to the exclusion of the family. Families are required to ensure a stable neighbourhood.
- The area does require redevelopment.
- Already too much high density, tall development on the riverfront between Lambeth and Vauxhall Bridges, which will overcrowd Vauxhall when completed.
- Adding additional high-rise buildings to this already congested area would be an act of aesthetic and social folly.
- The assumption the high-density development is an unqualified must is debatable.
- Serious concerns regarding the number and height of the mixed use block which are planned.
- Blocks are too close together and will create dark, windy spaces between them.
- The green spaces are internal, small in relation to the number of residents and not visible to the public.
- Concerns that developers will maximise heights and therefore there will be an almost solid roofline at the 12-storey level.
- High-rise flats are not conducive to developing communities.
- Exercise and playspace is at a premium and is remote geographically and in terms of supervision.
- The high-rise blocks are likely to become centre of deprivation and unrest as has occurred in other parts of London.

- The proposed linear park is little more than an avenue and not a park in any real sense. The proposed greening is tokenistic.
- Really significant open space is needed in all parts of the OA.
- Transport will be one of the most difficult things and the Vauxhall gyratory system will need to be amended and other routes considered to respond to the increase in population.
- There should be more open debate about whether the NLE is preferable to an extension from Vauxhall.
- The consultation document is seriously deficient in its attention to purely human and social/cultural considerations.

16. Metropolitan Police Authority and Metropolitan Police Service

- Growth will require additional policing.
- Policing should be added to the lists of community/social facilities, which should be planned for, as per PPS1.
- MPA require a Safer Neighbourhood Base for Wandsworth or a joint facility for Wandsworth/Lambeth.
- The provision for Safer Transport Hub Team the Northern Line is required.
- Policing facilities should be added to S.106 obligations.
- The redevelopment of the opportunity area will result in the loss of policing storage and warehousing and will need to be accommodated elsewhere.

17. NHS London Healthy Urban Development Unit

- A joint response from NHS Lambeth and NHS Wandsworth, supported by NHS London Healthy Urban Development Unit.
- Both PCTs are supportive of the regeneration of the VNEB area. However, in the absence of an infrastructure funding study a full response is not possible.
- The OAPF does not specifically address health impact and inequalities. A comprehensive approach is needed to ensure that design of the buildings/private and public spaces provides opportunities for physical activity and offers a safe and inclusive environment.
- The OAPF should benefit and provide improved amenities and services to the adjoining and existing communities.
- A health impact assessment should be carried out and funding for a longer-term study is secured to address the cumulative impacts of the individual developments.
- The lack of information on health infrastructure is a concern and it is hoped that the infrastructure funding study identifies future health service requirements and the options for the provision of facilities and funding.
- Support general conclusion of OA for high density residential with new CAZ frontage development at Vauxhall and office use at Nine Elms.

18. Port of London Authority

- Supports the key principle to continue the long-term protection of the three safeguarded wharves within the OA.
- In accordance with the London Plan, the PLA has no in-principle objection to the relocation, consolidation and possible expansion of the wharves.

- Supports the approach of excluding the wharves from the development capacity study.
- Supports the recognition of issues associated with marine and cargo-handing operations at the safeguarded wharves and that housing and other sensitive uses nearby will need to mitigate any noise impacts.
- Recognises benefits of a pedestrian and cycle bridge in OA but the PLA must properly assess any proposal that comes forward in terms of its impacts on navigation and conservancy of the River Thames.
- Supports the OA transport recommendations as they relate to the use of the River Thames for the transport of passengers and freight.
- Notes and support the recognition that an alternative inland route for the Thames Path is required around the safeguarded wharves in the medium term.
- Questions whether the suggested approach of providing a walkway over the river could actually be implemented, bearing in mind the current alignment and configuration of the wharves.
- Recommends that the potential to import the necessary feedstock for any localised energy network by water be investigated.
- Notes the proposed relocation of Cringle Dock Waste Transfer Station. This would need to be thoroughly assessed to ensure that the wharf's capacity and foreseeable operational requirements could be maintained, or preferably, increased.
- No in-principle objections to wrapping wharves in commercial or other non-residential development or other shielding approaches, provided that these measures have no adverse impacts on the operational viability.
- Supports the protection of the three wharves for long-term river borne freight uses.
- Notes that a reference is made to the delivery of biomass fuel by river to the proposed energy centre within the BPS scheme and the recommendation to assess this is supported.

19. South London Freight Partnership

- Supports reference to freight transport.
- Provision of detailed construction logistics planning is important. This will help decrease vehicle movements, exploit best vehicle technologies and increase bulk freight movement on water/rail transport.
- While the document recognises the opportunities for off-road servicing, it should specifically seek design measures within building/layouts to accommodate the benefits provided by off-road and out of hours servicing.
- There is the potential for a 'consolidation centre' to provide more controlled freight distribution into Central London.

20. Sports Action Zone

- SAZ is extremely concerned and disappointed that there is no reference to sports facilities and sports participation.
- Appropriate recognition of the need for facilities is should be added, together with recognition of the benefit of sport participation to health, community cohesion, educational attainment and confidence and employability.
- Such facilities are also not mentioned within the potential S.106 benefits. This should be amended.

21. Stockwell Partnership

- All of the local community forums and stakeholder groups need to be engaged and supported to be involved in the changes to their neighbourhood.
- There is no co-ordinated approach to community engagement relating to the OA. Recommend that this is addressed soon to ensure local people and businesses are given the best chance to feed into the process.
- Support the strategy to ensure jobs are retained and created in the area.
- Recognise the need to remove the SIL status from Nine Elms and NCGM site but concerned that all employment opportunities will be focussed in Battersea.
- Employment opportunities should be located on the border of two boroughs and not just residential concentration.
- If the current flower market site were designated as SIL, this would ensure Lambeth residents could also see the creation of more accessible employment opportunities.
- Agree that the area is poorly served with accessible retail opportunities. The focus of retail development on the BPS site does not address this problem for residents of Vauxhall without improved transport links.
- It would be advantageous to see retail development split between Battersea and Vauxhall to ensure accessibility for residents at both ends of the OA.
- 60,000sq.m. of retail space is ambitious and concerned that part of the OA will become a retail park to facilitate this target.
- Commend the emphasis on social housing in the strategy.
- There needs to be a mixed scale of development, not just flats, tall buildings and one and two bedroom accommodation. Some homes with gardens would add merit to the strategy.
- The OA provides an excellent opportunity to meet the demand for larger family dwellings that Wandsworth and Lambeth are facing.
- Allocations for social housing should be shared equally between Wandsworth and Lambeth and there should be a focus on three, four and five bed units. This will also help build communities.
- To increase diversity, the provision of at least one development of student accommodation should be included.
- To help create stable, cohesive communities, there should be an emphasis on co-ops and other small housing schemes.
- Strongly oppose any focus within the OA of further one and two bed units.
- Support Mayors policy to ensure place space is allocated for all housing developments but this needs to be useable space, not glorified public realm.
- The strategy does not address the cost of managing, maintain and security for playspace and without more detail in the OA, developers may overlook this.
- Support the proposal for a pedestrian and cycle bridge.
- Would like designated cycle paths on all roads, including residential and site streets across the whole OA.
- The NLE is an essential requirement not a luxury.
- Victoria Line capacity from Vauxhall needs further planning. Strategy concentrates on the footfall at Vauxhall station but fails to recognise the Victoria line is at capacity at peak times.
- The Northern line interchange at Stockwell is also at capacity at peak times.
- Accessibility to platforms at both the tub and the overground station at Vauxhall needs to be addressed in the strategy.

- Support the principle of the linear park but want to ensure it is of sufficient width and not just a green walkway. It should offer a range of green spaces to allow the public to use it for a range of purposes.
- Inclusion of allotments and community growing area is essential.
- Improving access from Wandsworth Road into the OA is a high priority for residents of Lambeth.
- Very concerned about the proposal to include more tall building in the OA. The framework should restrict the number of tall buildings.
- Does not address the leisure and culture needs of the existing or new residents. The strategy should recognise the need for leisure and culture facilities such as cinemas and arts venues.

22. Sustrans

- Support the OA status of the area.
- Support the recommendations relating to provision for walking and cycling.
- Support the need to improve the TLRN environment and public realm.
- Support the provision of cycle facilities along Albert Embankment and Nine Elms Lane.
- Support linear park and strategic green walking and cycling links.
- Supports proposals to improve and complete the riverside path, on the basis that it is shared and pedestrian and cycle access and part of the National Cycle Network.
- Sustrans recommends that specification and designs for development of the riverside path are consistent with best practice in shared use greenways.
- High quality motor traffic free paths along the proposed linear park would complement other walking and cycling infrastructure in the area.
- Support cycle parking in new developments.
- A car parking policy should be used proactively to encourage a greater uptake of sustainable modes. Plans should aim for significantly less than 1 space per unit and should promote the provision of car-free developments.

23. Thames Water

- Generally support the water strategy but it should also cover the provision of water supply and wastewater treatment/sewerage infrastructure in line with London Plan policy.
- The framework should include a policy covering the key issue of the provision of water and sewerage infrastructure because it is not possible to identify the entire water/sewerage infrastructure required over the plan period at this point.
- Thames Water have strategic water network infrastructure within the OA and it must be protected and only appropriate development should be permitted in its proximity.
- Close attention must be paid to construction methodologies to ensure that this infrastructure is not put at risk.
- Thames Water require three to five years lead in time for provision of extra capacity. Where a complete new water or sewerage treatment works is required the lead in time can be between five and ten years, therefore the new development must be phased to allow the prior completion of the necessary infrastructure.
- Welcome the way the Thames Tunnel has been integrated into the document.

24. Vauxhall Society

- The plan for the area cannot succeed without getting the infrastructure in place first. Public transport and proper attention to good travel connections, getting rid of the Vauxhall Cross gyratory should be the focus.
- The redesign of the current road layout should be the starting point of any plans.
- High density can be achieved with medium rise. Tall buildings create canyons/overshadowing.
- The tallest buildings should be in the centre of the opportunity area. Beside the river and on the eastern boundary tall buildings would create barriers between the development and its environment and would overshadow and overwhelm important green and blue open spaces.
- The proposed plan recognises that increased public transport provision is necessary, but does not make adequate provision for it.
- The Northern Line is seriously overcrowded at present. At the Oval it is often impossible to get on the train, how it could be made to cope with increased use.
- An expansion of Vauxhall tube station is needed including better access, especially for disabled people. The OAPF should include these requirements.
- The proposal for a through service public transport coach stop is welcome. Draught proofing the bus station is also necessary.
- Tourist coach parking and layover should be prohibited. This is a big problem in the area. Local people should not suffer the pollution, noise and danger.
- Why is high rise necessary to achieve high density (Mayfair and Bath have very high density).
- Tall buildings should not be on the riverside as this creates shading of the river and cuts rest of area off from it.
- Tall buildings on the riverside also increases flood risk. It will also block our important views of the Houses of Parliament and beyond.
- New pier and river buses are needed.
- Public access to and along the riverside needs to be continuous and be wide enough for walkers, cyclists and those stopped enjoying the view. It should not be walled off by buildings that look continuous even if they are not (like the St George development).
- Welcome new green spaces, linear park and pedestrian and cycle bridge. The railway viaduct should act as a spine, with many connections through its arches, not a barrier.

25. Waterloo Community Development Group

- The OAPF raises too many issues and concerns to warrant clear support.
- The OAPF has insufficient detail to be effectively promoting a new town as large as Welwyn Garden City. There are many critical details missing and options not considered.
- Oppose the lack of a sustainability appraisal.
- As the document is proposing new policy, in relation to the number of jobs and homes which varies significantly from the London Plan, an examination in public is therefore required to meet the requirements of GOL circular 1/2008.
- The consultation has been weak. The GLA should consult on a second draft, prior to the examination in public.

- Various relevant and necessary studies are missing, in particular a retail strategy and retail impact assessment, funding strategy/S.106 infrastructure study; implementation strategy and a character study of appropriate quality and detail.
- The level of funding required, is not nearly being achieved for other recent planning permissions and therefore an unreasonable quantum of development is being proposed that will not deliver the necessary infrastructure.
- Concern that funding for community infrastructure is from the same pot as transport and affordable housing.
- Question as to why Albert Embankment is included in the OAPF, it has a different character and should be promoted for different uses than the rest of the OAPF. The Albert Embankment is far too significant and public stretch of river front to turn over to housing, it should be used for large civic or commercial buildings such as offices, hotels or other attractions.
- The problem with Vauxhall is the absence of a sense of place, which, although addressed by the Lambeth SPD, is not addressed in the OAPF.
- Calling it a 'growth node' does not give a sense of what it might be like. There needs to be a clear identity, such as a major office or major visitor destination, including considerable retail or town centre.
- The LRT proposals would be beneficial in creating a visible identity.
- Far too much private car use is proposed.
- It is not clear why the boundaries are set as they are. To the south it seems arbitrary; to the north they exacerbate the division between the sites along the river and those hidden behind the railway viaduct.
- Various maps are factually wrong.
- The use of Iroko housing is inappropriate, as this was purpose built family housing. Tabard Square is also a bad example, as it has a 22-storey tower. Lillington Gardens is a good example.
- The linear park is not ideal for meeting open space targets and providing civic function.
- While we welcome the ambitious redevelopment of the area, the OAPF unfortunately omits to tackle the problems by which the area is characterised, namely poor public infrastructure and accessibility.
- The OAPF and transport studies are premised upon securing capital infrastructural investment and the marketability of the area.
- The design relies upon a highly specialised and impenetrable evidence base (3D model) and the consideration of narrow and finite design and delivery options.
- The OA should be split up - why are Vauxhall, Nine Elms, Albert Embankment and Battersea all grouped together?
- In such an already deprived area, the social and community infrastructure chapter should be expanded to be at a par with other key themes.
- The OA should address local employment options and ensure availability of small-scale office and industrial space, which is convenient and financially accessible.
- The phasing of development ensures an optional approach, to give the OA flexibility for sustainable development in low market confident and minimal investment from the treasury.
- Objection to the promotion of tall buildings.
- None of the capacity options require tall buildings to deliver the amount of development proposed. The use of Tabard Square as an exemplary high-density mixed use development is unfortunate as the tower is not successful and if towers

such as this cropped up around the OA, it would undermine the 'emerging cluster' at Vauxhall Cross'.

- The policy since 2002 of promoting tall buildings has resulted in vacant blighted sites that have not been developed. Of the 20 sites that have been subject to planning applications for tall buildings in the past 10 years in Lambeth and Southwark, only Strata and the Shard are being built. Planning permissions have lapsed as developers pursue even taller buildings, then economic circumstances have changed and nothing has happened.
- Tall buildings are also far less likely to deliver community infrastructure or funds for strategic transport improvements, since most dwell on the margins of viability.
- The replacement London Plan has moved away from promoting tall buildings and instead requires their careful management.
- Oppose the key principle that tall buildings at Vauxhall will not be detrimental to the setting of the Westminster World Heritage Site, as even in the Vauxhall Tower decision, the SoS and the Inspector agreed the proposal harmed the heritage site, but the SoS determined this harm was outweighed by other factors.
- It is inappropriate to promote tall buildings on the riverside, as the riverside location emphasises height, such as St George's (72 m) which looks gargantuan. Also the riverside is the windiest part of our city, which combined with the hostile microclimate created by tall buildings will create an unpleasant environment.
- There is no such 'emerging cluster' of tall buildings at Vauxhall. Vauxhall Tower has not been implemented and Vauxhall Sky Gardens viability has decreased.
- No appropriate analysis for the appropriate locations for tall buildings has taken place as sought by CABE/EH Guidance on Tall Buildings. Locations for tall buildings should be identified through a detailed urban design study which includes a character appraisal of the immediate context. Until that appraisal is done it is not clear which sites are appropriate for tall buildings.
- The tall building strategy is unsatisfactory. There is a real danger that a new barrier is created which further severs the deprived residential neighbourhoods.

Local Authorities/Assembly Members

1. Lambeth Council

- Regeneration and transformation of OAPF is generally supported.
- The new town centre at Battersea Power Station needs careful consideration to its impacts on the wider area and benefits, including services and job opportunities.
- Retail provision at Vauxhall, improved connections and improved public realm are needed and are in line with the SPD for Vauxhall.
- Job opportunities welcomed but local job opportunities might be lost.
- An agreed Economic Development Strategy is required to support existing businesses and attract appropriate new business. This should be supported through S.106 obligations.
- Securing long-term retention and use of employment uses in new and existing buildings and employment training and access is required.
- Affordable housing should be a % of total units and must reflect local need.
- Appropriate mix of housing type should include well-designed family housing with adequate amenity space.
- Development should provide a truly accessible environment and infrastructure for people with disabilities.

- Northern Line extension is supported in principle, but contingent on inclusion of an intermediate station at Nine Elms and that it not adversely affecting capacity on the rest of the Northern Line.
- Measures are required to relieve capacity issues at Vauxhall, e.g. more bus services, more intensive use of Battersea Park Station.
- The draft OAPF should support the need for improved public transport infrastructure in the short, medium and long term, and not rely solely on the extension of the Northern Line.
- Contributions should not solely be directed to the Northern Line extension.
- Phased delivery of transport infrastructure is required, and an alternative strategy should be developed should the Northern Line extension not proceed.
- In its SPD for Vauxhall the Council advocates a change in the Vauxhall gyratory to two-way working, as there are many benefits of this including better pedestrian and cycling. This should be part of a wider sustainable travel strategy to restrict and reduce traffic in the area.
- Public realm improvements along the river will be vital to ensure existing residential communities benefit from new facilities and jobs.
- Linear park is supported.
- Aspirations for a new open space between the viaduct and the Thames, as outlined in the Council's SPD should be included.
- The OAPF should reflect the detailed SPD approach to tall buildings at Vauxhall which requires a step down towards the residential areas. The current approach is too broad could result in a wall of tall buildings.
- A proper consideration of 'inland views' is required.
- Major concern that S.106 contributions could be over dominated by public transport infrastructure, in particular the proposed Northern Line Extension. This will divert short and medium improvements at Vauxhall.
- The proposed pooling of S.106 contributions will entail loss of control over management of the funds which should be left to the boroughs. An agreed approach is required.
- Further work is required to set out how and where new schools and community facilities should be provided.
- The Council dispute the number of necessary schools. They have used the S.106 Toolkit calculator. There is no capacity in Lambeth Schools to take on additional pupils or to expand.
- The OAPF does not identify new school sites. Further work is required, also involving Wandsworth. Such work will need to be done as part of the Development Infrastructure Study, it is necessary there is an effective mechanism for the co-ordination and delivery of required schools and school places.
- The costs of providing these schools exceed current expansion budgets, therefore full costs should be borne by development through S.106 or the Community Infrastructure Levy, and the development must provide for the amount of new students that would be created.
- Other facilities for children and young people will also come under pressure, such as clubs, play and youth centres, these should also be delivered by development.
- A need for a simple, clear accountable governance structure to progress and implement the OAPF. This should include Lambeth, Wandsworth, Mayor, local community, stakeholders and ward councillors.

2. Richard Tracey AM

- Welcomes the OAPF and the potential to create jobs and homes as part of one of the largest regeneration projects in London.
- Support the vision contained in the OAPF, including use of the BPS site and initial NLE.
- However, concern at the lack of detail in the document and it is surprising there has been little testing of the plan included in the document.
- The expansion of the Northern Line will have a major impact on public transport and will result in a clear need for increased transport capacity. As well as the Northern Line spur, the existing public transport in the area including at the Vauxhall, Battersea Park Station and Queenstown Road Stations also need to be upgraded. A realistic funding plan should be in place.
- Increasing the number of trains between Clapham Junction and Waterloo via Queenstown Road, Battersea and Vauxhall should be explored. The availability of extra platforms (ex-Eurostar) at Waterloo may make this possible.
- Concern that the OAPF barely mentions river transport.
- The OAPF should also make more mention of requirements to move construction materials to the area via river transport and the possibility to use piers at BPS and a new pier at Vauxhall.
- Increased capacity on the road network is also required.
- The tram is not justified.
- It is important that sufficient bus services are available - the frequency of buses on existing routes should be increased and new services are required. There may be a case for asking developers to fund a shuttle bus to mainline stations in order that commuters can get to and from work easily.
- The OAPF appears to indicate that a 'high density development model' will be adopted. The importance of high density housing in funding regeneration is understood, however, it is important that the area contains larger homes that are suitable for families. The Mayor should require that all new social rented homes within the OAPF hit the 42% family sized target.
- Private housing should also include a significant proportion of family homes.
- Green corridors are welcomed, but there must be significant private green spaces for families and for play.
- The further funding study should help clarify the sustainable/viable level of developer contributions towards affordable housing and the NLE. If there is insufficient money for both, it might be necessary to consider limiting the amount of affordable housing to ensure the Northern Line extension proceeds.
- A common S.106 approach across the area including pooled contributions is welcomed. However, there is a worrying level of detail about the forthcoming funding study. There are 20 possible funding streams for S.106 monies, so it is difficult to see how these can all be serviced by S.106 receipts.
- The OAPF offers little information about increasing provision for health and education.
- There is no section in the OAPF specifically dealing with the provision of jobs, or the type of businesses that are expected to relocate to the area.
- More analysis should also be provided as to who the new jobs will benefit, whether it be existing residents or newcomers.

3. Royal Borough of Chelsea and Kensington

- The level of development in the OA needs to be closely aligned, and dependent on the level of transport infrastructure provided.
- The OAPF is expected to provide guidance on how this may be delivered, but does not currently provide sufficient reassurance that these matters will be progressed together.
- Given the scale of the development, there may be an appreciable increase in volumes on Chelsea Bridge (Queenstown Road). This may have an impact on the Chelsea Bridge Road/Chelsea Embankment/Grosvenor Road junction.
- BPS site has a low PTAL, so development on the scale proposed should not proceed without significant improvements to public transport services. The Battersea Power Station site has a PTAL of 2-3 (poor to moderate).
- Careful consideration of the phasing of the development will be required to ensure that the demand for the area's public transport services does not exceed available capacity.
- If improvements to public transport/ the local highway network are not made in advance of substantive development on the site the proposal would be contrary to RBKC policies.
- Significant changes to the road layout in the vicinity of the site are necessary to satisfactorily accommodate the traffic that would be generated by the development.
- The Transport Assessment does not estimate the increases in traffic flows on Chelsea Bridge Road/ Chelsea Bridge/Queenstown Road.
- The proposed level of development in the OA will be visible from the Embankment and Chelsea Bridge, and other RBKC conservation areas. The draft OAPF does not fully address concerns in respect of building heights.
- Careful consideration will have to be given to the location and design of tall buildings to ensure that they do not have a harmful effect on the character and appearance of the Thames, Cheyne and Royal Hospital Conservation Areas.
- A proper assessment of a zone of visual influence of a proposed tall buildings should be undertaken, to demonstrate that it has a wholly positive visual impact on the quality and character of a neighbouring Borough's townscape.
- In major development areas education, health, and community infrastructure requirements will be sought in accordance with identified need. The infrastructure needs are not yet clearly established and need to be clarified.
- The proposals will greatly increase demand for bus services 452 and 137, and slightly increased journey times on these routes. This impact and others, require satisfactory mitigation. The required funding for these enhancements should be secured through a S.106 agreement.
- All flood risk advice for each site should be read in accordance with the Wandsworth Strategic Flood Risk Assessment, and in consultation with the Environment Agency.

4. Wandsworth Council (Arts Team)

- The OAPF should be amended to change references from community centres/facilities to include 'cultural and community facilities'.
- Funding such cultural facilities and partnerships should be explored in the forthcoming 106 funding infrastructure study.
- We support concept of a cohesive Public Realm Strategy.

- Should strengthen the Public Realm Strategy by including identified opportunities for high quality public art and for these to be embedded in plans at an early stage.
- An Arts and Cultural Strategy for the OA should be developed, this would include a widespread cultural audit, cultural partnerships, community aspirations and Art in the Public Realm embedded within wider design schemes. This is particularly relevant for BPS as it plans to become a cultural quarter.

5. Wandsworth Council (Planning)

- The OAPF overestimates the likely population and child yield that can be achieved in the area. Wandsworth's detailed studies estimated that population in area will be 31,000 with 4,400 children (compared with 39,000 and 10,000 estimated by the OAPF).
- There is a concern regarding the amount of retail proposed at BPS which will take trade from Clapham Junction, Putney and Wandsworth.
- While the concept of the linear park is supported, the various landowners involved may mean that it is likely to vary in scale and nature along its length.
- Concerns about the when and if the NLE will be provided. TfL and LUL are working with Treasury to take forward proposals for the extension but it is likely that a number of major planning applications will be received using OAPF densities, prior to either the Transport and Works Act Powers or any confirmation of funding mechanisms.
- Concern at the lack of detail on the transport interventions and there is a need for improvements at both Battersea Park and Queenstown Road stations, which are currently in a poor state of repair with poor accessibility.
- It is likely the area will have approximately 12,000 additional parking spaces, which will have a considerable impact over the wider highway network. This issue has not been addressed and there are a number of outstanding concerns, contrary to the statement in the Executive Summary of the OAPF that states Wandsworth officers have agreed the Transport Study.
- The proposal to relocate Cringle Dock needs further consideration in light of its potential impact. Its relocation is not supported at this time.
- At present, there is no estimate of what funding will be required for infrastructure. The estimated total of S.106 could £385 million, which although optimistic would still be well short of funding the NLE, let alone any other interventions.
- The scale of the development will require significant improvements to infrastructure, not just transport but education, social, medical retail and leisure.
- As Nine Elms is not within the primary shopping catchment of any of Wandsworth's town centres, therefore the impact of the proposals on Clapham Junction will need to be assessed.
- The creation of retail and leisure at Nine Elms, might, however, help reduce the leakage of retail spend to centres outside the borough and will draw custom away from central London.
- Mechanisms should be in place to ensure that the Borough's existing people and businesses are able to take advantage of the new opportunities to be created.
- A business relocation study should be carried out, in order to minimise the disruption to existing businesses in the area.
- The OAPF is largely silent on the Stewarts Road area, other than it will remain SIL. The EDO with funding from the LDA is undertaking a study into the future of the area, which should be taken into account.

- The proposals should look carefully at the balance of housing and employment space. It should make provision for small businesses. If there is a policy for a high proportion of affordable housing, then this is likely to be at the expense of workspace for small businesses.
- It is important that key partners agree and champion a realistic vision and delivery mechanism.
- Further studies are required to ensure that the proposals are viable and funding can be attracted to deliver the OAPF.
- Wandsworth Council estimate the potential costs of transport, open space and other community benefits exceeds £1.1 billion, excluding any community benefit from affordable housing. The estimated S.106 monies will therefore lead to a funding deficit in excess of £700 million, which will not be funded by private development. Either the scaling back of the community/public/transport improvements or a reduction in the level of affordable housing is required to make the proposals viable.
- The proposal to fund the NLE through tax incremental financing would require legislation and the Treasury forgoing increased revenue. There are significant timing and practical issues involved in this.
- Consideration should be given to reducing the level of affordable housing, on viability grounds and given the high existing level of social housing in the area.
- Further consideration of governance is required.
- Governance of the NLE should also be a priority.
- The regeneration of the area must be controlled and not allowed to progress piecemeal on individual site ownerships in a way that would conflict with the Council's overall vision.
- Affordable housing level must be decided in light of the infrastructure requirements that are identified to facilitate regeneration.
- High-density development is accepted, but it should achieve a high standard of design and townscape throughout the area.
- Low carbon technologies and green construction techniques, world-class designs and architecture will be required in the area.
- Permeability from east to west and north to south, must be addressed.
- There must be access through the New Covent Garden Market site which is a major obstacle to movement around the area.
- Nine Elms Lane will remain the key artery, but it should have a human face, and improved streetscape.
- The fact the area is in the backdrop of the Westminster World Heritage site, helps ensure that Nine Elms will not be another Canary Wharf, in terms of tall buildings, although a cluster of taller buildings at Vauxhall could be appropriate.
- Nine Elms should not have the dormitory flavour of some of the riverside sites.
- Every effort must be made to provide a high quality river bus service from this area.
- Developer contributions for transport infrastructure must be the top priority.