

Battersea Arts Centre Lavender Hill London SW11 5TN

Planning Policy Environment and Community Services Town Hall Wandsworth High Street London SW18 2PU

23 February 2021

Dear Sir/Madam

'Pre-Publication' Draft Local Plan

The Clapham Junction Business Improvement District (BID) Ltd exists to provide services to sustain and enhance the environment for businesses and the community in the Clapham Junction area. Like our sister BIDs in Putney and Wandsworth, we would welcome the opportunity to work with the Council to help fulfil the aspirations set out in the Plan, and to make the improvements that are so desperately needed in the town centre. We trust that our role will be properly recognised in the next version of the Plan.

The new Local Plan comes at a critical time for businesses as they seek to recover from the Covid-19 crisis, and to respond to the changes in consumers' and visitors' behaviour that have been accelerated by the pandemic. In our area, these difficulties are exacerbated by the likelihood that any major re-development of Clapham Junction station will be deferred for many years. This deferment risks casting a blight on any significant developments in the core of the town centre, at a time when an entirely new town centre is about to be opened only a short distance away at Battersea Power Station.

Yet further threats arise from recent changes in Government policy, including the creation of the new Class E to cover the great majority of commercial and community uses, thus restricting the Council's ability to manage changes of use; restrictions on the use of Article 4 directions to protect specific uses; and the proposed extension of permitted development rights to allow any commercial property, anywhere, to be converted to residential use. In these circumstances, the Council's strategy must include realistic suggestions for the lifetime of this plan to ensure that Clapham Junction is sustained as a successful centre, and that it responds effectively to change.

With regard to the Clapham Junction town centre in particular, we would welcome opportunities to work with the Council and other stakeholders in business and the community to consider and explore how:

- To meet the Plan's aspirations to "protect and enhance Clapham Junction's existing retail provision", along with leisure and night-time uses, and new offices. Similarly, we would wish to help in considering how to guard against over-concentration of similar uses; to retain retail floorspace to maintain a strong retail core for the long term; to preserve continuity of active frontages, with shopfronts; and to restrict conversion to residential uses to rear and to the upper floors of premises used for commercial or community uses, as set out in the policies LP45.
- To improve the desperately poor access to the town centre from the north via Falcon Road, especially
 the tunnel under the railway; and to find ways to take forward the proposals to create a visually
 attractive, environment-friendly and safe route through Battersea from the River Thames to the far end
 of Northcote Road.
- To promote mixed-use development at the four sites identified in the Plan (CJ1-4) around the railway and the station.
- To improve public transport services and interchange, with more space for pedestrians and bus passengers, and to reduce the volume and impact of through traffic.
- To enhance the quality of the public realm, with the possibilities for new public spaces (with parklets, water fountains etc), and high-quality green features which connect with nearby green open spaces.

In dealing with these and other issues - imaginative responses, of the kind now being discussed by landowners and developers, community groups and policy makers across London and the country, will be essential. Appropriate measures might include developing structures for engagement and participation with local communities and other stakeholders; developing organisational resources and skills; promoting new community uses; experimenting and prototyping without fear of failure; innovations in asset management; and the development of arts and cultural uses such as a cinema. Action on these and other issues is urgent, and we cannot afford to wait upon major developments in and around the station that may not take place, if at all, for a



decade or more. We are eager to engage with the Council and others both to find practical measures in the short term and to re-imagine what the future of the town centre might be.

Finally, we should note that the area covered by the Junction BID extends further than the town centre as defined in this and previous Plans, along St John's Hill to the west and Northcote Road to the south. The limited degree of protection for premises in the town centre does not for the most part extend to the commercial premises in these locations. The Retail Needs Assessment commissioned by the Council suggests that it should review its town centre and other boundaries, and its strategic approach to designated frontages, which have not been reviewed for many years. There is no indication that the Council has done so, and we suggest that it should. We believe that there are many unexamined peculiarities relating to town and local centre boundaries, and to the distinctions between core, secondary and other frontages across the borough. The current designations are not fit for purpose, and this may lead to perverse decision-making. For similar reasons we urge that the placemaking policy PM4L (p.116) for the reinstatement of traditional shopfronts in St John's Road and Northcote Road should be extended to cover other parts of the town centre including those parts of St John's Hill, Lavender Hill and Battersea Rise that are in Conservation Areas.

Yours sincerely

Roz Lloyd-Williams (and, on behalf of The Directors of The Clapham Junction BID Board)

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