

From: Juliet Munn (EU) [mailto:Juliet.Munn@eu.kwm.com]
Sent: Monday, January 13, 2014 7:06 PM
To: Thames Tunnel
Cc: [REDACTED]
Subject: Thames Tideway Tunnel - Response to Questions - Unique Reference Number 10018138 [KWM-Live.B27458.0003-000]

Dear Sirs

Please find attached responses to the following questions on behalf of the Battersea Power Station Development Company:

- Question 28.03
- Question 28.05
- Question 28.06
- Question 28.07

Kind regards

Juliet

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BPS Owing Group
Responses to Examining Authority's Second Written Questions

Thames Tideway Tunnel

Question – PINS Reference Number Q28.7 (Kirtling Street)

The representation from the BPS Owing Group states that Phase 6 of the BPS development is due to start in 2019 and would contain a range of land uses. BPS Owing Group has expressed concern about amenity and traffic impacts. Part of Phase 6 would be close to the edge of the LLAU, including the locations of the proposed CEMEX plant and a site power plant.

The detailed design of Phase 6 would need to take account of the proximity of the adjoining Waste Transfer Station in any event. Can BPS Owing Group comment on the design measures that might be taken to ensure a satisfactory interface with the Waste Transfer Station and the extent to which such measures would assist in mitigating any potential impacts of the proposed project.

Response

1. There are a series of design mitigations provided for in the planning approval to address the adjacency of Phase 6 to the wharfs. These were discussed with existing operators and agreed with the local authority prior to the submission of the original BPS planning application. These measures included the orientation of RS2 and RSWF away from the wharf operations and the introduction of sealed facades in the most sensitive areas.
2. Such is the sensitivity of BPS site to the adjacent wharves that the BPS Owing Group submitted an updated Section 73 Amendment application in 2013 which sought to further mitigate the impact of the wharves through the introduction of a sealed office building in RS2 in lieu of the more sensitive hotel, residential and serviced apartment accommodation uses which was originally consented to be provided in that location.
3. The TTT proposal will further compromise the environment surrounding RS2 by reducing the quality of the noise, odour, traffic and views. The TTT works will compound an already disadvantaged area of the site to the extent that it may well serve to render the properties in RS2 unsellable or at best reduce the value of the properties thus compromising the deliverability of the Power Station.



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Thames Tideway Tunnel

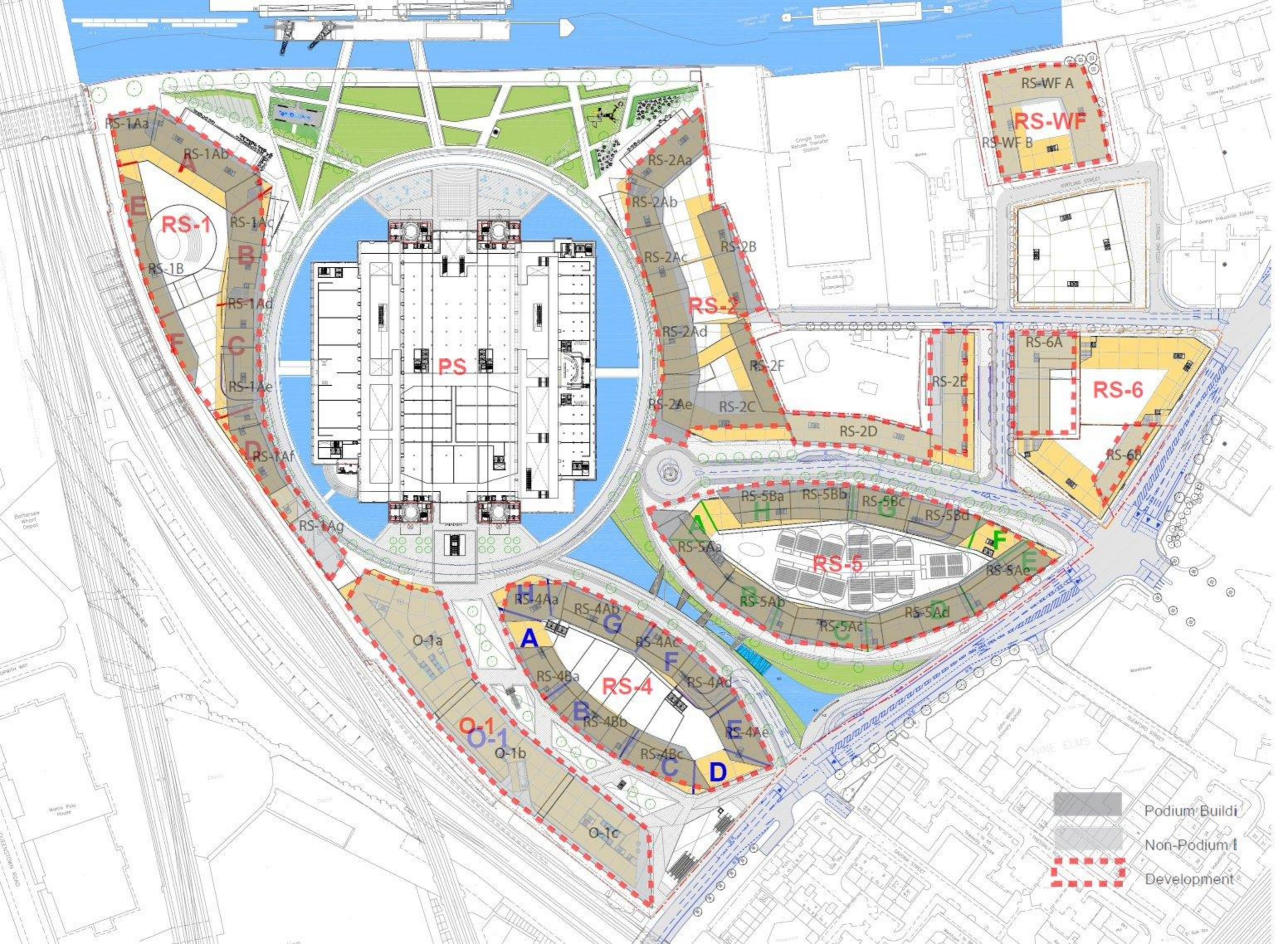
Question – PINS Reference Number Q28.6 (Kirtling Street)

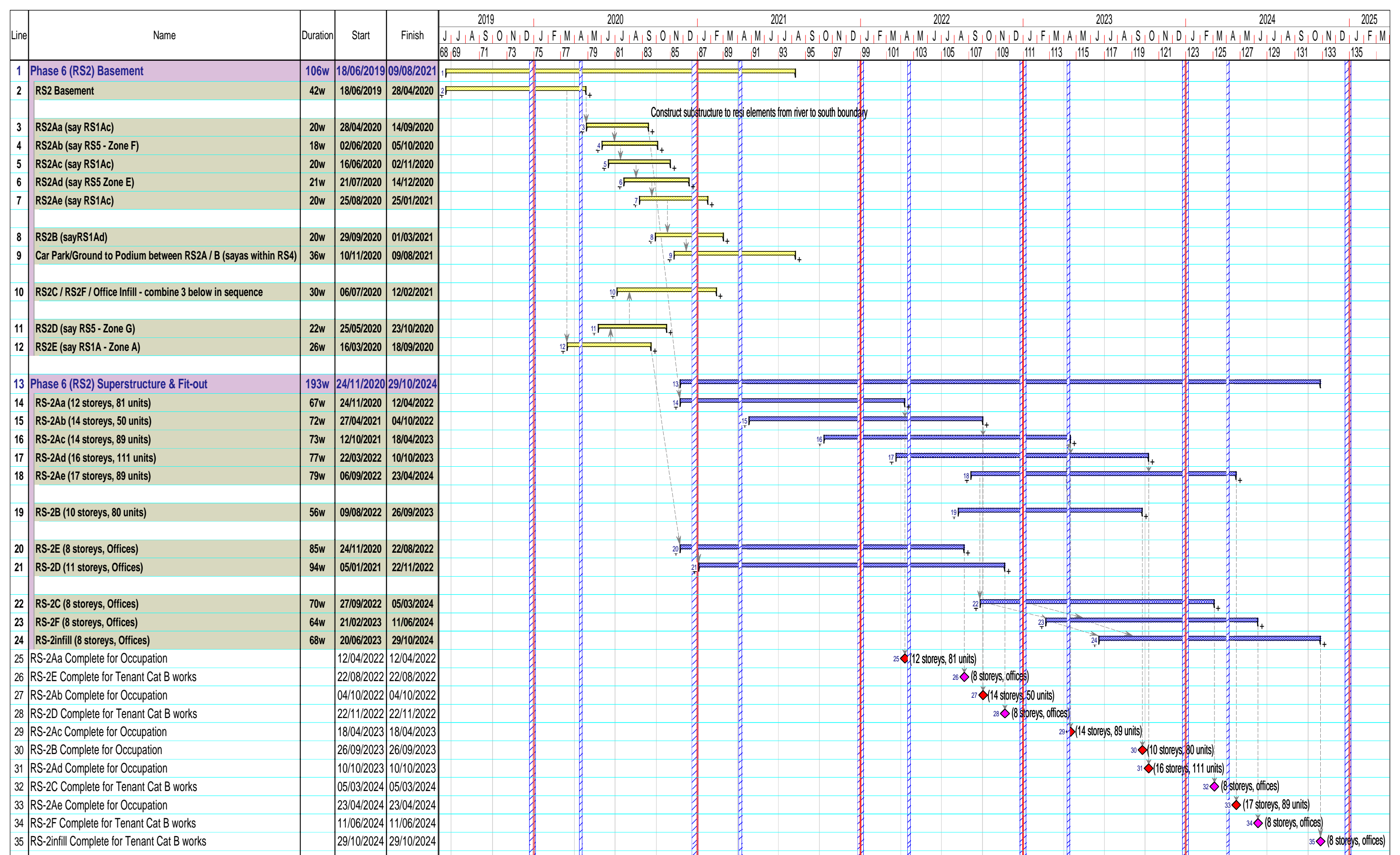
The representation from the BPS Owing Group states that Phase 6 of the BPS development is due to start in 2019 and would contain a range of land uses. BPS Owing Group has expressed concern about amenity and traffic impacts. Part of Phase 6 would be close to the edge of the LLAU, including the locations of the proposed CEMEX plant and a site power plant.

Can the BPS Owing Group provide further information on the likely distribution of land uses within Phase 6 and the sensitivity of such uses to any potential impacts of the proposed project.

Response

1. Building RS2 (Phase 6) consists of the following land uses: residential, serviced apartments, offices, community, culture and leisure, retail and food & beverage. All of this space will be compromised in some way by the proposed TTT works namely because RS2 is designed to benefit from the interaction with the river and strong public realm both of which will be severely impacted by the TTT works.
2. In particular BPS is seeking to create a new office location in South West London. The funding of the Northern Line Extension is predicated on the long term business rates generated by the office accommodation. The leasing of the office space in RS2 will occur at the height of the TTT works and will remain in place following the proposed occupation of the buildings. Providing a positive working environment is critical to the success of attracting occupiers to this new office location. The introduction of major infrastructure works that will compromise views towards the river as well as the impact of noise, odour and traffic on the public realm could render the offices unlettable, which compromises the deliverability of the Power Station and the funding of the Northern Line Extension.
3. In addition to the office accommodation, the western part of RS2 contains residential units that rise to 18 storeys. At this height, the units will have a clear view over the wharves at the TTT construction site and associated infrastructure. With the TTT due to commence in 2016, the works will be carried out when the BPS Owing Group is seeking to sell apartments and would provide a poor visual amenity which was not envisaged at the time of the original planning approval.





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**BPS Owing Group
Responses to Examining Authority's Second Written Questions**

Thames Tideway Tunnel

Question – PINS Reference Number Q28.5 (Kirtling Street)

The representation from the BPS Owing Group states that Phase 6 of the BPS development is due to start in 2019 and would contain a range of land uses. BPS Owing Group has expressed concern about amenity and traffic impacts. Part of Phase 6 would be close to the edge of the LLAU, including the locations of the proposed CEMEX plant and a site power plant.

Can BPS Owing Group provide further information on the likely sequence of works within Phase 6, in particular when that part of Phase 6 closest to the LLAU would be likely to be ready for occupation?

Response

1. Whilst a full phasing sequence plan is to be developed in detail for Phase 6 of the development in due course, it is currently anticipated that construction of this phase will commence at the northern end in June 2019 with construction work initially proceeding towards the south and then subsequently to the east towards Kirtling Street.
2. First occupations of this phase are expected to commence in April 2022 with final occupation from October 2024.
3. The number of and scale of these occupations both for the planned residential and commercial office space will ultimately depend on many issues including the detailed design of the individual buildings (which has not yet been developed).
4. The currently assumed detailed programme is attached to provide further information and to support the responses at 1 and 2 above.



BPS Owing Group
Responses to Examining Authority's Second Written Questions

Thames Tideway Tunnel

Question – PINS Reference Number Q28.3 (Kirtling Street)

The LLAU includes Phases 5 and 7 of the Battersea Power Station (BPS) redevelopment area. Phase 5 would include part of the affordable housing provision for BPS.

Can the BPS Owing Group, LB Wandsworth and the Applicant comment on the extent to which the impact of the project on the delivery of affordable housing within Phase 5 could be mitigated by varying the proportion of affordable housing in other phases of the BPS development? Responses should take into account the likely timelines for delivery of the project and the BPS development.

Response

1. Thames Water have submitted a response to Q28.3 which Wandsworth Council and the BPS Owing Group were invited to comment on. This response expands further on the BPS Owing Group's position.
2. Under the S106 Agreement (Schedule 8) dated 23 August 2011 relating to the Battersea Power Station development, affordable housing units must be provided in Development Zone RS5 (i.e. Phase 4) and/or Development Zone RS-6 (i.e. Phase 5) unless the BPS Owing Group and the London Borough of Wandsworth otherwise agree.
3. Within the Masterplan, the two sites within Phase 5 are the least valuable which was demonstrated in the financial appraisal submitted to the Council with the outline planning application. As such, the proposal for delivering affordable housing within Phase 5 was deliberately designed in order to provide the maximum quantum of affordable housing for the redeveloped site. Each phase of the masterplan has its own attributes and was carefully designed by Rafael Vinoly in a way to make best use of those attributes.
4. A key consideration in providing affordable housing on Phase 5 was quantum of delivery; given the land value was lower, BPS Owing Group are able to deliver a certain number of units on the site. If, however, the affordable housing was moved to other, more valuable phases within the development, the quantum of units would likely be significantly reduced. This would not be in the interests of the BPS Owing Group who are currently committed to delivering the policy requirement of 15%, nor in the interests of Wandsworth Council and the Mayor who are seeking to provide the maximum reasonable amount of affordable housing within new developments.
5. The triggers of 20% and 80% occupancy of private units were included in the Section 106 legal agreement following detailed interrogation of the financial appraisal of the Masterplan which enabled staged delivery of private units in order to fund not only the delivery of affordable housing, but also the £750m restoration and redevelopment of the Power Station itself. Any such unravelling of the framework established for the staged delivery of the affordable housing

units will have considerable financial implications for the Power Station's shareholders which have not been factored into funding structures in place to date.

6. From the above, it is clear that the main implications of varying the proportion of affordable housing in other phases of the development are financial and quantum. However, it is difficult to speculate definitively on the impacts as there are multiple factors affecting each phase of the development.
7. In terms of timing, the BPS Owning Group would prefer to deliver the first tranche of affordable housing on Phase 5 which would not be possible if the TTT is approved and progresses as proposed given the site would not be returned until 2022. If the triggers were to remain unchanged, and taking account of the financial implications referred to above, delivery of affordable housing would need to be carried out in Phase 3 which has a significantly higher land value. Delivery within Phase 4 is also compromised by the delivery of the NLE.
8. An alternative to the timing of Phase 5 affordable housing delivery could be to delay delivery of the units until after the site is returned to the BPS Owning Group.
9. However, regardless as to what was considered an appropriate alternative for a varied affordable housing offer, it would ultimately it would be down to the Council as Local Planning Authority to approve in conjunction with the BPS Owning Group. Given the challenging redevelopment history of the site over the past 30 years, any affordable housing alternative brought about by the TTT needs to be carefully managed.