

Northern Line Extension public inquiry

Pestana Hotel, Queenstown Road, Battersea



Proof of Evidence

presented by

Battersea Power Station Community Group

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1.0.0 Battersea Power Station Community Group

1.1.0 **Foundation and & objectives**

1.1.1 Battersea Power Station Community Group (BPSCG) was founded in November 1983, shortly after Battersea 'B' was decommissioned and prior to the CEGB development competition to dispose of the building which took place in the winter of 1983-84.

1.1.2 The primary objective of BPSCG was - and remains - to see that the building is preserved for the benefit of local people and visitors, and to see that the building is given a productive and socially useful new lease of life, in particular with a significant affordable and social housing component.

1.2.0 **Key Achievements**

1.2.1 Since 1983 we have drawn attention to the neglect of the building by a succession of owners. We have criticised inappropriate and harmful development proposals and proposed our own alternatives, such as the People's Plan, which was drawn up following a series of public meetings.

1.2.2 We have organised demonstrations and called public meetings and events. In 1995 we organised the "Battersea Power Station Forum" a series of meetings with distinguished speakers such as the architect Will Alsop and Anita Pollack, MEP for London SW.

1.2.3 In 1998 we launched our web site www.batterseapowerstation.org.uk our newsletter "Battersea Bulletin" has been in production from 1983 to 2013 to keep the public informed of the unsatisfactory and unresolved situation at Battersea Power Station.

1.2.4 In 2002 we founded the Battersea Power Station Company Ltd, a development trust with charitable status, which has as one of its key objectives the conservation of Battersea Power Station and Battersea Water Pumping Station. The patron of the Company is Lord Alf Dubs, who was MP for Battersea from 1978 to 1987. (www.batterseapowerstation.com)

1.2.5 In 2007 we succeed, after a four year campaign, in the face of considerable opposition of previous owner Parvkiew, we succeeded in having the listing grade of Battersea Power Station increased to Grade II*. The upgrade placed Battersea Power Station in the top ten percent of listed buildings. (Had the building not had its roof and plant removed, it would almost certainly be listed Grade I.)

1.2.6 In 2013 we succeeded in having Battersea Power Station returned to the World Monuments Fund's "World Monuments Watch", its list of international heritage in danger, on the tenth anniversary of its first listing in 2004. The 2014 list Battersea Power Station is alongside other endangered international heritage such as cultural heritage sites of Syria. See www.wmf.org/watch for the full list.

Battersea Power Station Community Group

1.3.0 Previous and current proposals for Battersea Power Station

- 1.3.1 Battersea Power Station should never have been privatised. All of the problems and difficulties associated with the development in the last thirty years derive from uncaring private owners neglecting the building and advancing harmful proposals to maximise profit from the site, combined with poor planning by Wandsworth Council and weak and ineffective protection of the listed building by English Heritage.
- 1.3.2 Previous owners have advanced the idea of a train shuttle from Victoria to a new station on the Battersea Power Station site. John Broome of Battersea Leisure (1984-1990) proposed a train service called the “Battersea Bullet”, not realised. Parkview International (1993-2006) proposed a new station adjacent to the railway viaduct (requiring the relocation of the existing combined heat and power plant) which was ultimately blocked by Railtrack who said that there was no surplus capacity for the dedicated line. In our view a dedicated rail line into Victoria is not necessary for the redevelopment of the site, and was in any case a tactic by Parkview to delay commencement of the refurbishment of Battersea Power Station.
- 1.3.3 The proposal for an extension to the Northern Line from Kennington to Battersea Power Station was first proposed by Treasury Holdings (2006-2011). The current scheme for a shopping mall in Battersea Power Station surrounded by 3,500 apartments in blocks up to 18 stories high was also first proposed by Treasury Holdings. The proposal by Treasury Holdings has been taken on unchanged by the Malaysian consortium, employing the same development team and consultants.
- 1.3.4 The current proposal by the Battersea Power Station Development Company on behalf of a Malaysian consortium is by far the most damaging put forward for Battersea Power Station since 1983. It will cause severe harm to almost every aspect of Battersea Power Station that makes it special. Battersea Power Station’s status as an urban landmark would be severely compromised by the 18 storey blocks adjacent which will block key views, in particular from the railway viaduct. Its distinctive silhouette will be obscured by new “pavilion” roofs on the boiler house and switch houses. Its aesthetic of plain, uninterrupted brick surfaces spoiled by new windows punched into the boiler house walls and the walls of the switch houses. The dignity of its interiors compromised by its proposed use as a shopping mall.
- 1.3.5 We ask the Inspector to visit Battersea Power Station during his site inspection, in particular the ‘A’ Station turbine hall and control room.

1.4.0 BPSCG witnesses

1.4.1 Brian Barnes MBE

Artist and mural painter. Educated at Ravensbourne College and Royal College of Art. Living and working in Battersea since 1967. Painted many mural in London and surrounding area such as “The Good, the Bad and The Ugly” by Battersea Bridge (1976) Founder member of Battersea Power Station Community Group in 1983. A founder member of Battersea Power Station Company Ltd in 2002. Awarded MBE in 2005 for services to the community in Battersea.

1.4.2 Keith Garner RIBA

Architect living and working in Battersea since 1986. Own practice specialising in the conservation of historic buildings and the historic environment. Also provides consultancy advice on access improvements to new and existing buildings, including listed buildings. Has acted as a consultant to Historic Royal Palaces, the National Trust Wessex Region, the Heritage Lottery Fund and the Royal Botanic Gardens Kew. First visited Battersea Power Station in 1980 as a student when the ‘B’ Station was still in operation. Carried out research on the recent history of Battersea Power Station in 1992-93 as part of an MA course in Building Conservation at York University. Produced a dissertation on Battersea Power Station; “*A Well-Known Power Station*”, 1993. A member of Battersea Power Station Community Group since 1993. A founder member of Battersea Power Station Company Ltd in 2002.

1.4.3 Mark Saunders

A resident of Battersea of over 30 years and owner of local business for 20 years. Producer / Director Mark Saunders is an award winning independent documentary filmmaker and writer. He trained at the London College of Printing in MA Screenwriting and BA Film, TV & Photography. His career in documentaries, film making and journalism spans over 25 years. He has been a visiting lecturer at the Royal College of Art, Bournemouth University, Coventry University, London School of Economics and internationally at Hamburg City, Florence , Concordia, Wayne State Universities. Currently a visiting lecturer at Birkbeck University of London and the London College of Communications MA Documentary.

2.0.0 Existing railway infrastructure

2.1.0 **Railways in Battersea & Nine Elms**

2.1.1 The Battersea volumes of the *Survey of London* (volumes 49 and 50) published by English Heritage (2013) describe how the railways are one of the principal characteristics of C19th and C20th century Battersea. Battersea is defined by the flat plain to the north and the higher ground to the south. The Railways run at the foot of the higher ground, with the lines interweaving at east Battersea where lines in to Victoria and to Waterloo cross.

2.1.2 Battersea and Nine Elms are defined by railways. The railways are part of the essential characteristic of the area. Most current development sites in east Battersea are very close to railway stations. (The hotel in which this public inquiry is taking place is close to Battersea Park Station, with Sloane Square underground slightly further away.) Compared to most other parts of London, these sites are very well served by this mode of transport.

2.2.0 **Battersea Park and Queenstown Road stations**

2.2.1 The immediate area is well served by railway stations to an extent that calls in to question statements that east Battersea is “ill served” by public transport.

2.2.2 Battersea Park Station connects to London Victoria, Clapham Junction and to stations on the South London Line. It is an attractive Italianate building, listed Grade II. The exterior of the building was recently cleaned but requires further investment.

2.2.3 Queenstown Road connects to London Waterloo and to Clapham Junction with connections to stations to the south west of London including Brighton, Portsmouth and Southampton.

2.2.4 The Inspector is asked to visit these stations during his walkabout and to note in particular their current condition and the distances in minutes walking time from them to the Battersea Power Station site. We estimate the walking time from Battersea Park and Queenstown Road stations to the Battersea Power Station to be about five and eight minutes respectively.

2.2.5 Both stations require investment to upgrade facilities. Battersea Park Station needs lift access to the platforms. The platforms themselves should be lengthened. Similarly Queenstown Road requires lift access and general refurbishment.

2.2.6 The current £ multi-billion “regeneration” of east Battersea and Nine Elms does not envisage new investment to upgrade these two stations. This is a significant omission. In particular there is no attempt to provide a direct elevated walkway from these stations to the Battersea Power Station site, which was proposed at one time by Parkview.

2.2.0 Battersea Park and Queenstown Road stations (cont'd)

- 2.2.7 It is also notable that the “Battersea” stop on the NLE does not connect with Battersea Park and Queenstown Road stations. In part this is because the proposed location of the new station is in the wrong place. It should be 200m further to the west so that it can connect below ground with a Battersea Park and Queenstown Road stations. Indeed it should be the underground component of Battersea Park station, similar to Balham station in Wandsworth, which the Inspector is urged to visit.
- 2.2.8 The apparent lack of a “joined up” approach to transport planning suggests a lack of communication and teamwork between TfL, Network Rail and Train Operating Companies to provide a fully integrated transport system to serve east Battersea.

2.3.0 Existing transport links / London Open House 2013

- 2.3.1 38,000 people visited Battersea Power Station during London Open House weekend in September 2013, using existing public transport. This appears to cast doubt on the necessity for the NLE to support development in the western part of the WNEB “opportunity area”. More people would be able to visit during weekdays given more frequent transport services.
- 2.3.2 A film of London Open House 2013, showing queues tailing back from Battersea Power Station almost as far as Albert Bridge (some ¾ mile) was made by Quebecois architect Nicole Millette and can be seen here:
<http://www.youtube.com/watch?v=Qo8ESdoPxZ0>
- 2.3.3 Bus services are excellent, with frequent services to Vauxhall and Sloane Square. Particular mention should be made of bus P5 which serves the Savona, Patmore and Carey Gardens estates, connecting to Stockwell station on the Northern and Victoria Lines and to Brixton station.
- 2.3.4 “Barclays” bikes have been installed in Battersea as part of the south west London expansion of the service, which is going live today. Hundreds of bike racks have been installed in the area.
- 2.3.5 Taking all factors in to consideration, it is clear that the current lack of a tube connection is no bar to the commencement of development in east Battersea. New buildings on the “Riverlight” site are already topped out, and will be occupied in 2014, years before the completion of NLE. The development of the new American Embassy site has recently commenced. Phase 1 of the Battersea Power Station site also appears to be showing some signs of activity.

2.4.0 Ability of existing transport network to support new development

- 2.4.1 It was strange to hear on the opening morning of this inquiry, despite all empirical evidence to the contrary, that Battersea is ill-served by public transport connections. This is patently not the case, as we hope will be clear when the Inspector makes his site visit.
- 2.4.2 The existing transport network is more than adequate to support the refurbishment of Battersea Power Station in a series of phases. Battersea Power Station was built in phases, It should be refurbished in phases, with new transport services introduced to support new development as it is completed.
- 2.4.3 The tube connection appears to be a requirement of funding bodies, necessary to reassure foreign investors, with their expectations of excessive financial returns resulting from over-scaled development, inappropriate in the context of the Thames riverside and in the immediate vicinity of an important listed building.

3.0.0 NLE: options and consultation procedures

3.1.0 Our view of the having the tube in Battersea

3.1.1 We very much support the principle of connecting Battersea to the tube network, provided it is publicly funded and serves the whole of north Battersea, including areas such as Battersea Park, Latchmere and Clapham Junction. We think that this view would be supported by the overwhelming majority of Battersea residents.

3.1.2 We have various concerns about the particular proposal which is the subject of this inquiry. The full range of transport options have not been considered in an integrated way. There has been no meaningful consultation. The proposal lacks civic purpose. There is no long term vision. Our concerns are explored in the following sections.

3.2.0 Full range of options not considered.

3.2.1 The full range of options to enhance public transport in this area - tube, overground, light rail, tram, monorail, riverbus etc. - have not been considered. Significant improvements to transport services can be achieved more quickly and at lower cost without the massive investment required to build a new tube line.

3.2.2 The proposal seems to offer exceptionally poor value for money, working out at approximately £400 million for each of the two new stations. This is extravagant expenditure in a time of austerity. More stations on a longer line to Clapham Junction (see below) would lower unit costs per station and should be explored.

3.2.3 Representatives of the State Department attending a presentation of the new American Embassy to a meeting of the Battersea Society in 2011 at All Saints Church, Prince of Wales Drive stated that they did not require a new tube line and that Embassy staff would make use of existing transport infrastructure.

3.2.4 The tube station proposed at Nine Elms adjacent to Sainsburys seems to have no particular purpose or logic in its location.

3.2.4 If the tube is a preferred option, the question becomes which tube line should it be? We do not feel that this question has been sufficiently well explored. Recent press reports of significant problems of overcrowding on Northern Line - with TfL advising passengers south of Kennington to walk - call in to question the desirability of using the Northern Line, given the likely deterioration in the service on the Morden line south of Kennington following the introduction of a direct service from Battersea to the City.

3.2.5 A branch of the Victoria or Jubilee lines to Battersea would seem preferable, offering more direct connections to the West End, City and Canary Wharf.

3.3.0 Lack of meaningful consultation

- 3.3.1 The NLE project is notable for a lack of any meaningful consultation or engagement with the public. It is clear that the key decisions have been made by TfL in collaboration with private land owners, prior to consultation with the public. The public are being “shown in advance” what is going to happen, rather than being consulted in a sincere and meaningful way.
- 3.3.2 The consultation was initially organised by Treasury Holdings before they lost control of Battersea Power Station in 2011. Since that time the consultation has been taken over by TfL who appear to be acting primarily on behalf of the new owners.
- 3.3.3 The consultation on the four alternative routes was of very limited value in that all four options accepted the NLE from Kennington to Battersea as a given.

3.4.0 No civic purpose

- 3.4.1 In a recent “*open letter to Londoners*” on the TfL web site, Boris Johnson, Mayor of London, says: “*People – our customers and staff – are at the heart of our plans.*” <http://www.tfl.gov.uk/corporate/projectsandschemes/28868.aspx>
- 3.4.2 The evidence presented to this inquiry by TfL is contrary to this aspiration. It was stated several times on the opening morning of the inquiry by the witness for TfL that the purpose of the NLE was to “increase land values” on the Battersea Power Station site. There was no mention of people. There has been no attempt to locate stations where they could serve existing communities e.g. those areas of housing to the south of Battersea Park Road such as Savona, Patmore or Carey Gardens. Indeed we have heard nothing from TfL at this inquiry to suggest that they see the NLE as a civic project and contribution to the public realm.

3.5.0 No long term vision

- 3.5.1 The TfL witness stated on the first day of the inquiry that there are no plans to extend the NLE to Clapham Junction until at least 2031, the end date of the London Plan.
- 3.5.2 The fact that there are no plans to extend the NLE to Clapham Junction is a key failing. A short branch line is significantly less attractive than a line with stations offering destinations in two directions. The absence of any plan to connect to Clapham Junction supports our contention that the project lacks civic purpose.
- 3.5.3 The NLE has been justified at this inquiry as “... *servicing the central zone in accordance with London Plan policies*”. But this objective can equally be achieved in ways that would have wider benefits to the people of London.
- 3.5.4 Crossrail 2 has been referred to at the inquiry. This is at an early stage with completion in in the 2030's. It would connect Clapham Junction to Chelsea rather than the City and so is not an alternative to NLE. <http://www.tfl.gov.uk/corporate/projectsandschemes/27405.aspx>

4.0.0 NLE: “innovative” funding method

4.1.0 In our view, the two principal public goods deriving from the redevelopment of the Battersea Power Station site are:

- i) The preservation of the Grade II* listed Battersea Power Station and the Grade II listed Battersea Water Pumping Station and presenting these buildings to the public.
- ii) The provision of a significant component of affordable & social housing in accordance with London Plan policies; i.e. at least 40%.

4.2.0 Connecting Battersea to the tube network (NLE or some other line) is a wider public good. The developer of the Battersea Power Station site, and other sites in the “opportunity area” should not be asked to pay for this.

4.3.0 The adverse consequences of asking the developer to pay for the NLE by the “innovative” funding method currently proposed are:

- i) Taller buildings necessary to generate additional revenue to pay for NLE, compromising the setting of the Grade II* listed Battersea Power Station contrary to NPPF, London Plan and EH conservation guidance.
- ii) A reduced component of affordable and social housing on the site, also contrary to the London Plan and Wandsworth’s UDP; as little as 15%.

4.4.0 The NLE cannot be funded by the “innovative” funding method currently proposed without compromising other objectives of the London Plan. This is its fatal flaw.

4.5.0 NLE is not necessary to support redevelopment in the “opportunity area” as this is already proceeding and will be complete long before the NLE is even begun. TfL concedes this and advances the further justification that the NLE is that it would support development at higher densities than the existing transport infrastructure can support. However this is a circular argument because the sole purpose of the larger buildings is to pay for a tube line that is otherwise not needed to serve these sites.

4.6.0 The NLE should be publicly funded by issuing bonds. This is a tried-and-trusted, cost-effective method, used for instance of the refurbishment of the subway system in New York City. In this way the developer contribution via Section 106 or the Community Infrastructure Levy could be devoted to the two principal public goods stated above. The over-scaled buildings compromising Battersea Power Station’s landmark presence will not be required.

5.0.0 NLE: heritage issues

5.1.0 Impact of “innovative” funding scheme on the scale of development

5.1.1 The vast scale of development proposed surrounding Battersea Power Station has been justified by owners of Battersea Power Station as being necessary to fund their contribution (of some £200m) to the NLE. For instance by Jeremy Castle of Treasury Holdings in a series of meetings with BPSCG in 2009-2010.

5.1.2 This scale of development will do immense harm to one of the key characteristics of Battersea Power Station: its status as an “icon” and urban landmark. EH’s listing description includes the following on Battersea’s significance as a landmark:

Since first built, Battersea has held iconic status as one of London's most prominent riverside landmarks and has remained in popular culture ever since, appearing on the cover of Pink Floyd 1977 album 'Animals' and in countless images of London...

Battersea Power Station is of outstanding interest on architectural grounds as a monumental example of an inter-war utilities building, designed by a leading architect of his day.

5.1.3 The architectural historian Gavin Stamp has described Battersea Power Station as “... one of the supreme monuments of twentieth century Britain”. (WMF 2004)

5.1.4 A model of Battersea Power Station featured in the closing ceremony of the 2012 Olympics alongside other “icons” of London as Tower Bridge and the Gherkin. This model is now on display on the Battersea Power Station site.

5.1.5 Surrounding Battersea Power Station with 18 storey elongated blocks, closely spaced and without gaps will mean that it will not be visible from most directions where currently it is in plain view. If built, Battersea Power Station’s status as an “icon” and urban landmark will be gravely harmed contrary to planning policies on the protection of settings of listed buildings.

5.1.6 The blocks planned for Phase 1 between the railway viaduct and Battersea Power Station are particularly regrettable. Gavin Stamp wrote in *Temples of Power* (1979) about the thrill of seeing Battersea Power Station from the passing train. Commuters and visitor to London enjoy this view to the present day. The Inspector is invited to see this view of Battersea Power Station from the passing train as part of his site visit, not least because it is likely that this view will soon be lost.

5.1.7 (The view from the 12th floor lift lobby of the Pestana Hotel is also instructive, showing Battersea Power Station in relation to the railway viaduct.)

5.1.0 Impact of “innovative” funding scheme (cont’d)

5.1.8 The Inspector is also invited to see Battersea Power Station from the southern end of Queenstown Road, which offers another dramatic view of the building. All but the tops of the chimneys will be invisible if the mega-blocks proposed to surround the building - necessary to fund NLE under the “innovative” scheme - are built.

5.1.9 NB: The other reason deployed by the owners to justify the vast scale of the development is to raise finance necessary to pay for the repair of the listed building. We believe this justification to be fallacious also. In our view the repairs to the building should be financed primarily by the Heritage Lottery Fund, with a “quid pro quo” of a reduction in the scale of surrounding blocks and free public access to the listed interiors.

5.2.0 Restrictions on occupation of Battersea Power Station

5.2.1 Two conditions in the outline planning permission 2009/3575 dated 23rd August 2011 (paras 16 and 17) state that Battersea Power Station and later phases should not be occupied until the NLE is operational. The reason given for these conditions are that the NLE is considered as “transport mitigation” for the development. This despite the fact that plainly existing transport infrastructure can support substantial levels of new development.

5.2.2 These conditions are contrary to best heritage practice guidance which encourages keeping historic buildings in continual use as being the best way to preserve them. With this occupancy restriction in place, the NLE effectively becomes an obstacle to the refurbishment of Battersea Power Station and bringing it back in to use in achievable phases supported by existing transport infrastructure.

5.2.3 In our experience, refurbishment of a historic building in small phases is a more successful approach. For example, Dean Clough Mills - formerly Crossleys carpet factory - was converted by Sir Ernest Hall in small phases from 1982 onwards into a business and cultural centre accommodating hundreds of companies and cultural bodies. BPSCG visited Dean Clough at the invitation of Sir Ernest Hall in 1995.

5.2.4 At Battersea however, if an investor approached the current owners BPSDC with a proposal to convert the ‘A’ Station turbine hall into a new gallery or to convert the ‘A’ Station switch house into the London headquarters of a company that would employ local people: that person would be sent away because his proposal was contrary to clause 17 of the planning agreement which requires the NLE to be in place at a cost approaching £1 billion. This condition is harmful to the objective of preserving Battersea Power Station and contrary to NPPF paras 126 and 131.

5.3.0 Cranes and jetty

5.3.1 The cranes and jetty are both part of the listed building mentioned in the listing description:

SUBSIDIARY FEATURES: To the N on a jetty parallel to the river wall there are 2 cranes which were used to unload coal from collier boats. While of lesser significance, they were integral parts of the original complex and are now rare riverside features.

5.3.2 The cranes and jetty complement Battersea Power Station and help to explain its purpose and function. Other industrial archaeology has already been lost; notably the travelling coal conveyor (dismantled by Parkview 1995) and the raking conveyors into the building.

5.3.3 The cranes and jetty should receive extra protection given these other losses. They should not be used for the utilitarian purpose of facilitating the removal of “excavated materials” from the tunnelling for a civil engineering project as proposed by listed building consent application 2013/3009.

5.3.4 It is likely that the cranes must be dismantled to some extent in order to repair them. We would prefer dismantling to be kept to a minimum and for conservation of individual components to be repaired on site, rather than taken away and, to be reassembled on the jetty as soon as possible. This approach of “conservative repair” is enshrined in British conservation practice from the time of Ruskin and Morris to EH’s current guidance.

5.3.5 The proposed use of the jetty to facilitate the NLE project runs entirely counter to the objective of achieving a “conservative repair” of the industrial archaeology. It necessarily requires the cranes to be entirely removed. Further, the timescale for construction of NLE means that the cranes are likely to be away from site longer than would otherwise be the case if the jetty was not included as a part of the NLE project. The extended period during which the cranes will be away from site increases the risk of them coming to further harm.

5.3.6 This project appears to be conforming to the “scorched earth” approach towards Battersea Power Station employed by successive owners, whereby important features are removed, damaged or destroyed, but never reinstated.

5.3.7 English Heritage should not have entertained this proposal. We have expressed our concerns to English Heritage, which we feel has failed - yet again - to protect Battersea Power Station and its curtilage structures.

5.4.0 “Battersea” station

- 5.4.1 The proposed name “Battersea” for the new tube station on the Battersea Power Station site is a misnomer. The area known as “Battersea” is the entire area of the former Metropolitan Borough of Battersea, extending from Nine Elms in the east to Wandsworth roundabout in the west, and from the river as far south as Clapham and Wandsworth Commons. (See Battersea volumes of Survey of London.) To have a new tube station in one corner of that large tract of land called “Battersea” is highly misleading.
- 5.4.2 Further confusion is given by the close proximity of the new “Battersea” tube station to Battersea Park overground station. As previously mentioned any new tube station in east Battersea should be integral with Battersea Park station (in the manner of Balham station) with the same name.

6.0.0 Conclusion

- 6.1.0 We support the principle of connecting the tube to Battersea Power Station, provided it was publicly funded and serves the whole of north Battersea, including Battersea Park, Latchmere and Clapham Junction, reducing unit costs. We also feel that transportation improvements could be achieved more quickly and at lower cost if other transport modes had also been considered. The current proposal represents poor value for money.
- 6.2.0 We do not consider that having a tube station in east Battersea to be a condition precedent for the successful redevelopment of the Battersea Power Station site or indeed other sites in the VNEB "Opportunity Area". The development of these sites has gone ahead on the basis of existing transport infrastructure. The justification that the NLE would support development at higher densities necessary to pay for it is circular and illogical.
- 6.3.0 We fear that, despite the arguments advanced at this inquiry, the decision to build NLE has already been made. The NLE appears in government budgets and announcements where it is talked about by politicians as if already agreed. Implementation of planning permission 2009/3575 is impossible without the NLE being built. Nevertheless we hope that - in the light of the evidence presented - the outcome of this inquiry will confound the expectations of TfL and Wandsworth Council, and will cause transport provision in east Battersea to be reconsidered.

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