



TL/P08051
21st February 2022

Planning Policy Department
Wandsworth Council
The Town Hall
Wandsworth High Street
London
SW18 2PU

Dear Sirs,

**London Borough of Wandsworth Local Plan – Representations on Behalf of the Ballymore Group
Full Review – Regulation 19 Version (February 2022)**

We write to make representations on the London Borough of Wandsworth's Local Plan Review – Regulation 19 Version. The representation has been prepared both on a Borough wide review as well as in relation to site-specific comments and build on our comments in the previous consultation.

As you will be aware, Ballymore has significant development landholdings within the Borough. Ballymore is nearing completion of the Embassy Garden Scheme in Nine Elms which once completed will deliver up to 1,750 residential units and circa 45,000 sqm of commercial and retail space. Ballymore also has other land holdings and options within the area with the potential future development. They are therefore intrinsically interested in the policy direction for this area and the Wider Borough.

Below we have provided a response to the details within the Regulation 19 Version we consider are the most important concerning development within the Borough.

In summary, we strongly support the continuing emphasis on housing delivery within the Borough especially given the emerging need to deliver substantially more homes. We are also pleased to see that the Council has worked proactively with stakeholders to amend and improve the plan following the initial consultation. We are especially pleased to see the resolution of many areas of conflict with the New London Plan.

On this basis we write to confirm our support of the following changes:

- Nine Elms Area Strategy – We support the amended approach to ground floor retail uses noting that flexibility should now be applied at ground floors. We are also pleased to see meanwhile uses are now actively supported in retail units so long as they meet the cultural strategy for the area.
- Policy LP3 Historic Environment – We are pleased to see the Council have agreed with our proposed revisions to the demolition in conservation areas policy.
- Policy LP4 Tall Buildings – We support the Council in adopting the London Plan approach to height which would support this area for tall buildings subject to detailed design. We also appreciate the clear definition of tall buildings within the Borough.
- Policy LP29 Dual Aspect – We support the policy amendments to remove reference to main roads.
- Policy LP43 Safeguarded Wharf – We strongly support the updates to reflect the London Plan Approach and allow consolidation of wharves subject to capacity retention.

Within this positive context our comments relate solely to the proposed site allocation for the Kirtling Wharf Cluster. Our comments on this topic are set out below:

Kirtling Street Cluster Site Allocation

As set out in our previous representations we strongly support the proposed allocation of the Kirtling Street Cluster in seeking to bring forward development following the completion of the Thames Tideway Tunnel.

The cluster is a key location joining the Battersea Power Station development with the wider masterplan for the area. The proposed cluster will unlock the connection of the sites and has the potential to contribute to a key part of the Nine Elms Masterplan delivering high quality public realm adjacent to key buildings.

In order to support the delivery of the key benefits associated with this space we have the following observations to make regarding the site allocation requirements. These comments build on our previous representations and while officers chose not to update the Local Plan originally, we feel that the amended policy context will be key to development coming forward on the site.

- Site Allocations Boundary – It is unclear why the site to the north of allocation NE9 and west of NE3 is not specifically allocated within the cluster. The delivery of development on this site offers clear benefits to the wider masterplan allowing the hard edges of the Cringle Dock waste transfer station to the south to be mitigated and new public realm including access to the Riverside Walk be delivered.

We consider that an appropriately designed building including buffer uses to be entirely appropriate and in accordance with the wider objective of the local plan. The proposed allocation will continue the key public benefits such as public open space associated with the Thames Tideway Tunnel access to the proposed Pimlico Bridge and new active streetscapes.

- Safeguarded Wharf – As set out previously we support the potential consolidation of Safeguarded Wharf sites to release land for other uses and are pleased to see Policy LP43 has been updated to reflect this approach.

In the case of Kirtling Wharf, we consider it a prime example of a constrained site that could be released for other uses. The wharf will be impacted by both the Thames Tideway Tunnel and the emerging proposals for the River Thames Bridge; we would therefore be supportive of its proposed relocation / consolidation with other wharfs.

The approach would enable a mixed-use development to be delivered on site securing an important buffer against the harder more industrial use of Cringle Dock and the surrounding residential development.

Notwithstanding this comment we also consider the potential retention of the wharf to be further justification for a consolidated approach to the site as credence will need to be given under the Agent of Change principles.

- Proposed Uses – We strongly support the proposed identification of the site as a mixed-use area in which residential and other commercial uses are deemed as appropriate.

To support the comments above regarding the application boundary; we would request that the new allocation for the site be designated for both residential and / or commercial (Class E).

- Massing Envelope – We support the Council in identifying that the wider cluster is capable of accommodating buildings up to 25 storeys. There is established principle for tall buildings within the area with the recent improvements in accessibility clearly justifying developments of higher densities.

In conclusion, we continue to support the principle of the site allocation on site. We are concerned that the optimal development may not come forward if it is done through fragmented site allocations. We look forward to working with officers to realise the necessary changes to ensure that the site can be delivered as a comprehensive masterplan.

Ballymore strongly supports the recognition within the new Wandsworth Local Plan of the need for additional homes across London. We welcome the amendments to the plan and collaborative nature of the process from the Council. We would like to be clear in our support of many changes made and especially those referenced in this letter.

We believe further work is required to provide certainty to the Kirtling Wharf Cluster Site allocation and look forward to working with the Council to realise these changes.

We trust the above response is of assistance in relation to the Regulation 19 Version of the emerging Local Plan. We look forward to reviewing the outcome of the round of consultation and making further comments on any future change to the Local Plan.

Should you have any questions or wish to discuss, please do not hesitate to contact the undersigned.

Yours faithfully,

John Turner

The Ballymore Group