

London Borough of Wandsworth – Local Plan Examination 2022
Statement of Common Ground – London Borough of Wandsworth and Western riverside Waste Authority

The WRWA submitted a number of representations to the Publication Local Plan Consultation (January 2022). This Statement of Common Ground seeks to establish areas of agreement between the London Borough of Wandsworth and the WRWA and also proposes resulting minor changes to the Submission Local Plan prior to public examination. This Inspector is asked to consider these changes, which are acceptable to both parties. The Statement also identifies those areas where further discussion and agreement may be required during the examination itself.

Text proposed to be inserted in *italicised and underlined*

Text proposed to be removed in ~~striketrough~~

Reps from Western Riverside Waste Authority / Cory Group	Para/ Policy no.	Council Response	Proposed Modification	WRWA Response	Agreed?
Policy LP13 Circular Economy, Recycling and Waste Management					
The WRWA has two points to make on this. First, it is not clear that the supporting evidence base has given sufficient consideration to the requirements of the	Para 4.89	Comment noted. Given the future implications of the Environment Act it is recommended that wording is added to para 4.89 to say that the Council will work with the WRWA to consider any potential opportunity to plan for waste	Amend wording to para 4.89 bullet point 3 as follows: '4.89 Uses - ... There are appropriate temporary uses for the short to medium term including potential use of the southern part of the site for waste	The WRWA agree with proposed modification to Para 4.89.	Agreed.

<p>Environment Act 2021, with the inevitable consequence that the quantitative and qualitative shortfall in current facilities to meet the identified need is underestimated, let alone the ability of these facilities to meet future needs.</p> <p>Second, there are clear opportunities to improve and enhance existing facilities within the borough that can help meet this need, however this is going to require changes to draft allocations WT9, NE9 and NE11, and the Council will have to play a lead role in facilitating the delivery of the facilities through the plan-making and decision making process on applications. The WRWA's comments on</p>		<p>management on WT9 Feather's Wharf in accordance with any future expansion plans for the WRWA. This supplements the agreed response regarding including the HWRC site within the Site Allocation boundary of WT 11 (See Rep 361) which is considered to assist with any future improvements or enhancements to existing facilities.</p>	<p>management purposes that do not compromise the long-term development of the site. <u>Due to the new requirements for waste management set out in the Environment Act 2021, the Council will work with the WRWA and consider any potential opportunity to plan for waste management on WT9 Feather's Wharf in accordance with any future expansion plan for the WRWA.</u> Temporary use of the site should also include the safeguarding of, and extension to, the riverside walk adjoining the Thames and the River Wandle.'</p>		
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<p>the draft allocations is set out under separate headings in this submission.</p>					
<p>Feather's Wharf Cluster - Site Allocation WT9 (Feather's Wharf); and Site Allocation WT11 (Western Riverside Waste Transfer Station, SW12)</p>					
<p>As set out in the response to Question 6, the WRWA propose that Paragraph 4.90 of the draft Plan, which states "the area at the northern end of the site (WT9) by the Wandle mouth should be specifically designed to provide a generous open space and be a place with distinctive character and identity for the public to enjoy. Developments must include measures that</p>	<p>Map 4.1 Strategy Area Map: Wandsworth Town</p>	<p>Comment noted. The emphasis of the WT9 Feathers Wharf site allocation and the Wandle Delta SPD is on the provision of mixed-use development and open space. It is considered that an open space could come forward as part of the redevelopment of the site for mixed use in some form and ultimately viability will be assessed at the application stage. The Council consider that in terms of locating open space on the site there should be an emphasis that this is appropriate at the very north of the site and</p>	<p>Amend Map 4.1 Strategy Area Map: Wandsworth Town as follows:</p> <p>Remove 'Proposed New Public Open Space' (Green shape) from WT9 Feather's Wharf.</p> <p>See Appendix 1 of the Regulation 19 Response Table for illustration of proposed modification.</p>	<p>The WRWA agree to the proposed modification to Map 4.1.</p>	<p>Agreed.</p>

contribute towards enhancement of the riverbanks", is deleted.		that the plan could be amended to clarify this.			
The WRWA propose that site allocation WT11 should be extended to include the HWRC as well as the WRWTS which is currently included in the allocation.	Map 3.2 Site Allocation Map ; Map 4.1 Strategy Area Map; Map 4.8 Western Riverside Waste Transfer Station Para 4.100 & 4.101	Comment agreed. The area of Site Allocation WT11 is considered to be sound. However, it is recognised that there is merit in extending the boundary to the east to include the remainder of the Safeguarded Wharf designation and the HWRC land to assist the comprehensive redevelopment of the area should that be realised in the future.	Amend Map 3.2 Site Allocation Map; Map 4.1 Spatial Area Map Wandsworth Town; and Map 4.8 Western Riverside Waste Transfer Station as follows: Updated boundary for WT11 Western Riverside Waste Transfer Station which includes the Household Waste and Recycling Centre See Appendix 1 of the Regulation 19 Response Table for illustration of proposed modification. Amend wording of para 4.100 as follows: 'The site lies to the north of Smugglers Way adjacent to the bank of the River Thames. To the west of the site is Feathers Wharf and to the east <i>is the Waterside Path and Riverside East apartments</i> a Household Waste Recycling Centre. The site is used as a Waste Transfer Station <i>and as</i>	The WRWA agree with the proposed modifications to Map 3.2, Map 4.1 and Map 4.8, as well as proposed modifications to Para 4.100 and 4.101.	Agreed.

			<p><i>a household waste recycling centre.</i> The site is operated by the Western Riverside Waste Authority (WRWA) which is the statutory body responsible for the management of the waste delivered to it by the London boroughs of Wandsworth, Lambeth, Kensington and Chelsea and Hammersmith & Fulham. The site is used as a Waste Transfer Station <i>and as a household waste recycling centre</i> which utilises its riverside position and wharf facilities for bulk transportation of waste to an Energy from Waste Facility at Belvedere in the London Borough of Bexley. The current use of the site provides an important strategic role. Site Area <u>3.22.49ha.</u></p> <p>Amend wording to para 4.101 as follows:</p> <p><i>'The majority of the site is designated as a <u>Ssafeguarded wharf, except for south-east corner,</u> with potential for residential led mixed-use development above including commercial/ business ...</i></p>		
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			Development must not result in conflicts of use between wharf operations and the other land uses, nor constrain the long-term use and viability of the safeguarded wharf <u>area.</u>		
Furthermore, it is proposed that the Feather's Wharf cluster be amended by the Council to include the WRWTS and HWRC sites.	Para 4.84	Comment noted. The existing cluster sets out that the main principles of development are focussed around mixed use development, opening up of the River Wandle for its amenity use and providing new public open space. Including the WRWA site allocation (WT11) in the cluster is considered not to be coherent to this approach. Also, any potential redevelopment opportunity is still uncertain at this stage. However, it is considered that the proposed approach would not prevent a comprehensive redevelopment of WT11 Western Riverside Waste Transfer Station and the Feather's Wharf Cluster if that opportunity were to arise in accordance with the site allocations.	No change considered necessary.	The WRWA do not agree with the Council's view and still consider that the Feather's Wharf cluster should be amended to include the WRWTS and HWRC sites. Draft allocation WT11 is for residential-led mixed-use development above including commercial / business which would be entirely coherent with the mixed used development principles of the Feather's Wharf cluster. The WRWA consider that comprehensive approach to development should be taken by the Council, and it remains unclear as to why the WRWTS and HWRC site have been excluded from the cluster.	Not agreed.

<p>In addition, the WRWA do not consider that the Council have given appropriate consideration to the Environment Act 2021 (the 'Act'), which was introduced in November 2021. The Act has placed new duties on waste collection authorities for the separate management of food, green waste, packaging and recycling materials.</p>	<p>N.A</p>	<p>Comment noted. Given the future implications of the Environment Act it is recommended that wording is added to para 4.89 to say that the Council will work with the WRWA to consider any potential opportunity to plan for waste management on WT9 Feather's Wharf in accordance with any future expansion plans for the WRWA.</p>	<p>Amend wording to para 4.89 bullet point 3 as follows:</p> <p><i>"4.89 Uses - ... There are appropriate temporary uses for the short to medium term including potential use of the southern part of the site for waste management purposes that do not compromise the long-term development of the site. <u>Due to the new requirements for waste management set out in the Environment Act 2021, the Council will work with the WRWA and consider any potential opportunity to plan for waste management on WT9 Feather's Wharf in accordance with any future expansion plan for the WRWA.</u></i></p> <p>Temporary use of the site should also include the safeguarding of, and extension to, the riverside walk adjoining the Thames and the River Wandle.</p>	<p>As above, the WRWA agree with proposed modification to Para 4.89.</p>	<p>Agreed.</p>
<p>Kirtling Street Cluster; Site Allocation NE9 (Kirtling Wharf); and Site Allocation NE11 (Cringle Dock)</p>					

<p>As set out in the response to Question 6, the WRWA propose that draft Site Allocation NE9 and draft Site Allocation NE11 should be combined in order for a comprehensive approach to be taken for their redevelopment to create a scheme which is both viable and deliverable and is in line with the attached CDKS Masterplan.</p>	<p>Para 5.20</p>	<p>Comment noted. We consider that the cluster approach would allow for the potential comprehensive redevelopment of the two sites including mixed-use development accounting for the continued operations of both wharves. The preferred approach is to keep these two sites separate as they are two separate wharves with different functions and their future development potential as one site is still somewhat uncertain. Para 5.29 of the Reg 19 Plan emphasises the development potential of both sites having regard to their safeguarded wharf status. However, it is acknowledged that the wording of the development considerations section could be strengthened to identify the opportunity for the redevelopment of both sites as one including additional waste capacity which could be addressed in para 5.29.</p>	<p>Amend wording to Para 5.29 (bullet point 2) as follows:</p> <p>"Para 5.29 Uses ... Development proposals should maximise the <u>development</u> potential for the Kirtling Wharf and Cringle Dock sites (NE9, NE11), having regard to their safeguarded wharf status (in line with LP40 – Protected Wharves) and their important function in the transhipment of freight, waterborne freight handling use and freight-related activities. <u>Proposals should consider the feasibility of the comprehensive and combined development of both sites.</u> Development of these or adjacent sites will require further discussions with relevant parties, in particular the Port of London Authority (PLA), the Greater London Authority (GLA) and Thames Water."</p>	<p>The WRWA understands the Council's preference to keeping the two sites separate, however considers that due to the challenges of the two sites, comprehensive development in this case does mean combined development.</p> <p>As such, the WRWA proposes amended working to Para 5.29 as follows (addition in bold below):</p> <p>"Para 5.29 Uses ... Development proposals should maximise the <u>development</u> potential for the Kirtling Wharf and Cringle Dock sites (NE9, NE11), having regard to their safeguarded wharf status (in line with LP40 – Protected Wharves) and their important function in the transhipment of freight, waterborne freight handling use and freight-related activities. <u>Proposals should consider the feasibility of the comprehensive and combined development of both sites.</u> Development of these or adjacent sites will require further discussions with relevant parties, in particular the Port of London</p>	<p>Agreed.</p>
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				Authority (PLA), the Greater London Authority (GLA) and Thames Water."	
<p>With regards to Open Space, the draft policy currently reads as follows: "Proposals to the north of the cluster in the Kirtling Wharf and Cringle Dock sites (NE9, NE11) will be required to provide open space that connects to the proposed Nine Elms Pimlico Footbridge, the Thames Path and the open space above the Thames Tideway Tunnel access shaft".</p> <p>This wording should be revised to the following: "Development proposals should incorporate appropriate open space and connectivity to the proposed Nine Elms Pimlico</p>	Para 5.30	<p>Comment noted. A continuation of the Thames Path is sought to the northern part of Cringle Dock which will include public realm enhancements where possible. The northern side of Kirtling Wharf will require appropriate public open space as part of the Thames Tideway access shaft, the continuation of the Thames Path, and the landing point for the proposed Nine Elms Pimlico Bridge. It is proposed that wording be amended to clarify the exact location of the open space.</p>	<p>Amend wording to Para 5.30 as follows:</p> <p>'5.30 Open Space - Proposals to the north of the cluster <u>at</u> the Kirtling Wharf and Cringle Dock sites (NE9, NE11) will be required to provide <u>appropriate public</u> open space that connects to the proposed Nine Elms Pimlico Bridge <u>and</u> the Thames Path and <u>subject to the operation and maintenance requirements of</u> the Thames Tideway Tunnel access shaft . <u>Proposals</u> will need to consider the Nine Elms Pimlico Bridge structure, its future access and maintenance requirements, the users of the bridge, the river walk as well as providing a welcoming gateway to the area that takes into account views to and from the bridge.'</p>	<p>The WRWA appreciates the amendment to the wording of Para 5.30 to remove the reference to Cringle Dock.</p> <p>The proposed wording at Para 5.30 however presumes that the land above the Thames Tideway Tunnel access shaft will be publicly accessible. The safeguarded wharf requirements and requirements to access the Thames Tideway Tunnel are vital and therefore determine what 'appropriate open space' might look like.</p> <p>We consider an appropriate rewording of Para 5.30 is as follows:</p> <p>'5.30 Open Space - Proposals to the north of the cluster in the Kirtling Wharf and Cringle Dock sites-(NE9, NE11) will be required to provide <u>appropriate</u> open space that connects to the proposed Nine Elms Pimlico Bridge,<u>and</u> the</p>	<p>The amendments to Paragraph 5.30 are agreed to subject to the below text also being included at the end of the paragraph as per the proposed text in the box below.</p> <p><u>'Proposals will be required to comply with London Plan Policy S115 Water transport and open space should not conflict with the safeguarded wharf use.'</u></p>

Footbridge and the Thames Path".				Thames Path and the Thames Tideway Tunnel access shaft.'	
Paragraph 5.30 of the draft Plan does not acknowledge the fact that the WRWA has a statutory duty to provide waste disposal services to four London Boroughs and Cringle Dock is an operational waste transfer station. Located at the eastern end of Cringle Street, it has frontage onto the River Thames to the north, adjoins the Battersea Power Station site to the west and industrial land to the west. There are no opportunities for riverside access at this point. Whilst the WRWA appreciate that a redevelopment solution must satisfy the Thames Tideway Kirtling Wharf maintenance and emergency access safeguarding	Para 5.30	Comment agreed. It is considered that the site allocation is sound, however, additional detail could be included to clarify that new uses do not harm the safeguarded wharf designations.	Amend wording to Para 5.30 as follows: '5.30 Open Space - Proposals to the north of the cluster <u>at</u> the Kirtling Wharf and Cringle Dock sites (NE9, NE11) will be required to provide <u>appropriate public</u> open space that connects to the proposed Nine Elms Pimlico Bridge <u>and</u> the Thames <u>Path and subject to the operation and maintenance requirements of</u> the Thames Tideway Tunnel access shaft. <u>Proposals</u> will need to consider the Nine Elms Pimlico Bridge structure, its future access and maintenance requirements, the users of the bridge, the river walk as well as providing a welcoming gateway to the area that takes into account views to and from the bridge. <u>Proposals will be required to comply with London Plan Policy S115 Water transport and open space should not conflict with the safeguarded wharf use.</u>	As above, we consider an appropriate rewording of Para 5.30 is as follows: '5.30 Open Space - Proposals to the north of the cluster in the Kirtling Wharf and Cringle Dock sites (NE9, NE11) will be required to provide <u>appropriate</u> open space that connects to the proposed Nine Elms Pimlico Bridge, <u>and</u> the Thames Path and the Thames Tideway Tunnel access shaft . It will need to consider the Nine Elms Pimlico Bridge structure, its future access and maintenance requirements, the users of the bridge, the river walk as well as providing a welcoming gateway to the area that takes into account views to and from the bridge. <u>Proposals will be required to comply with London Plan Policy S115 Water transport and open space should not conflict with the safeguarded wharf use.</u>	Agreed.

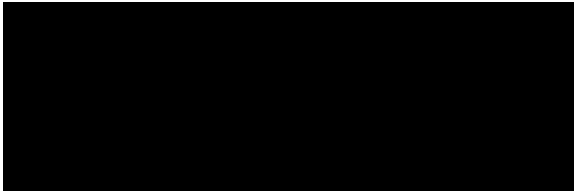
<p>requirements, it considers that the provision of open space in this location, as suggested by the draft policy, would result in a conflict of use with the safeguarded wharf and is therefore considered to be inconsistent with London Plan Policy SI 15.</p>					
<p>This indicative scheme would involve the loss of part of the safeguarded wharf area designated at Cringle Dock (i.e. loss of 0.355ha), however the WRWA is able to offer 0.420ha of land at Smuggler's Way to compensate for this loss should be it be required because the land to the south-east of the Smuggler's Way site is not currently including in the safeguarded wharf designation. The</p>		<p>Comment noted. Although this could potentially be supported in principle, the Council are not the arbiters of changing the boundaries of safeguarded wharves and so any agreement would need to be sought between WRWA, the Secretary of State for DLUHC / the Mayor of London.</p>	<p>No change considered necessary.</p>	<p>Commented noted by the WRWA.</p>	<p>Agreed.</p>

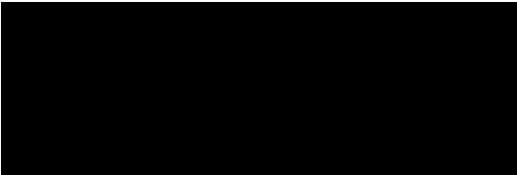
<p>safeguarded wharf designations for Cringle Dock and Smuggler's Way have been appended to these representations for reference purposes.</p>					
<p>The wording in paragraph 5.30 of the draft Plan is directly contradicted by the following wording at paragraph 5.36 "at Cringle Dock (NE11), buildings should front on to Cringle Street and the River Thames above the waste transfer station". The WRWA are unclear as to how both open space and buildings fronting the river can be achieved in the same location.</p>	<p>Para 5.30</p>	<p>Comment noted. To clarify, the buildings that front the river would be expected to be set back from the river in accordance with para 5.37 Movement (bullet point 3).</p> <p>Agree that Paragraph 5.30 could be amended to remove reference to open space north of Cringle Dock (NE11).</p>	<p>Amend wording to Para 5.30 as follows:</p> <p>'5.30 Open Space - Proposals to the north of the cluster <u>at</u> the Kirtling Wharf and Cringle Dock sites (NE9, NE11) will be required to provide <u>appropriate public</u> open space that connects to the proposed Nine Elms Pimlico Bridge <u>and</u> the Thames Path and subject to the operation and maintenance requirements of the Thames Tideway Tunnel access shaft. <u>Proposals</u> will need to consider the Nine Elms Pimlico Bridge structure, its future access and maintenance requirements, the users of the bridge, the river walk as well as providing a welcoming gateway to the area that takes into account views to and from the bridge.'</p>	<p>As above, we consider an appropriate rewording of Para 5.30 is as follows:</p> <p>'5.30 Open Space - Proposals to the north of the cluster in the Kirtling Wharf and Cringle Dock sites-(NE9, NE11) will be required to provide <u>appropriate</u> open space that connects to the proposed Nine Elms Pimlico Bridge, and the Thames Path and the Thames Tideway Tunnel access shaft.'</p>	<p>The amendments to Paragraph 5.30 are agreed to subject to the below text also being included at the end of the paragraph as per the proposed text in the box above.</p> <p><u>'Proposals will be required to comply with London Plan Policy S115 Water transport and open space should not</u></p>

					<u>conflict with the safeguarded wharf use.'</u>
PM3 Nine Elms					
<p>We note there is a spelling mistake in 'safeguarded wharves' and therefore suggests this is corrected as set out below:</p> <p>As mentioned in the response to Question 6, Part 5. of Policy PM3 states that "the continuity of the Thames Path along the riverside is key to enhancing active travel and ease of movement in the area and will be a requirement of development proposals around Kirtling St and Cringle St, whilst retaining service access to the Power Station and waste transfer station</p>	PM3 Nine Elms	Comment agreed.	<p>Amend the wording of PM3 People First (5) as follows:</p> <p>'PM3 People First (5): the continuity of the Thames Path along the riverside is key to enhancing active travel and ease of movement in the area and will be a requirement of development proposals around Kirtling St and Cringle St, whilst retaining service access to the Power Station and waste transfer station and protecting the safeguarded-safeguarded wharves.'</p>	The WRWA agree with the proposed amendments to PM3 People First (5).	Agreed.

and protecting the safeguarded wharves".					
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Both parties consider that these amendments address some of the concerns raised by Western Riverside Waste Authority in their representations on the London Borough of Wandsworth – Local Plan Examination 2022.

Signed on Behalf of the London Borough of Wandsworth		
Name and Position	Signature	Date
Andrea Kitzberger-Smith Spatial Planning and Design Team Manager		

Signed on Behalf of the Western Riverside Waste Authority		
Name and Position	Signature	Date
LACHEL ESPINOSA DEPUTY GENERAL MANAGER WRWA		15/8/2022