

**London Borough of Wandsworth – Local Plan Examination 2022
Statement of Common Ground – London Borough of Wandsworth and Thames Tideway**

Thames Tideway 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 Thames Tideway and proposes 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 ~~strikethrough~~

SoCG Ref #	Reps from Thames Tideway	Response Rep #	Prop. Main Mod #	Para/ Policy no.	Council Response	Proposed Change	Agreed
	General						
1.1	<p>4.2 However, we note that the following text from Policy LP23 (now LP22) Utilities and Digital Connectivity Infrastructure has been removed from the Regulation 19 plan;</p> <p><i>"The Council will work with Thames Water and Bazalgette Tunnel Limited to support the timely implementation of the Thames Tideway Tunnel project, including the connection of the combined sewer overflows in the borough in accordance with The Thames Water Utilities Limited (Thames Tideway Tunnel) Order 2014 as amended."</i></p> <p>4.3 Given the significance of the Thames Tideway Tunnel infrastructure and in accordance with paragraph 20(b) of the NPPF, Thames Water respectfully request that the above text be re-introduced to Policy LP22.</p>	533	PPAM/076	LP22 Utilities and Digital Connectivity Infrastructure	Comment agreed. Due to a publication error this paragraph was removed, and it is proposed to be reinserted into the Local Plan.	<p>Amend wording of policy LP22 Utilities and Digital Connectivity Infrastructure as follows:</p> <p><u><i>"D. The Council will work with Thames Water and Bazalgette Tunnel Limited to support the timely implementation of the Thames Tideway Tunnel project, including the connection of the combined sewer overflows in the borough in accordance with The Thames Water Utilities Limited (Thames Tideway Tunnel) Order 2014 as amended."</i></u></p>	Agreed

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1.2	4.5 We further note that in line with the public announcement made by Tideway on 24 August 2020, the handover date for the Thames Tideway Tunnel project is likely to be in the first half of 2025. We would therefore propose that all references contained in the Local Plan relating to completion of the Thames Tideway Tunnel project (including at paras 2.95, Spatial Strategy; 5.29 & 5.31, PM3 (Kirtling Street Cluster); paragraph 6.6, PM4 (Winstanley/York Road Regeneration Area) and para 11.8 and PM9 (Wandsworth Riverside)) should be amended to reflect the latest schedule and anticipated completion date of the Thames Tideway Tunnel project.	533	PPAM/003 PPAM/027 PPAM/028 PPAM/046 PPAM/054	Multiple	Agreed. It is proposed that all references to the timescales for the Thames Tideway Tunnel project in the Local Plan are updated to the correct date. However, this excludes suggested new references to PM3, PM4, PM9 as they do not contain reference to the completion dates.	<p>Amend wording in paragraph 2.95 as follows:</p> <p>‘2.95 ... The area that surrounds Kirtling Street and Cringle Street are among the least developed of the whole VNEB Opportunity Area; a result of the ongoing occupation of the area by the Thames Tideway Tunnel Kirtling Street works, which are estimated to be finished by 20254...’</p> <p>Amend wording in paragraph 5.21 as follows:</p> <p>‘5.21 ... Existing uses comprise a Thames Tideway Tunnel worksite (until 20254), a waste transfer station and commercial uses.’</p> <p>Amend wording in paragraph 5.29 (bullet point 2) as follows:</p> <p>‘5.29 ... 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. The construction of the Thames Tideway Tunnel site at Kirtling Street is estimated to be completed in early 20254 and the Council will continue to work with</p>	Agreed

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						<p>Tideway to ensure a positive lasting legacy.'</p> <p>Amend wording in paragraph 6.63 (bullet point 2) as follows:</p> <p>'The construction of the Thames Tideway Tunnel site to the north of the Site Allocation (at Falconbrook Pumping Station) is programmed for completion in early 2054 and the Council will continue to work with Tideway to ensure a positive lasting legacy'</p> <p>Amend wording in paragraph 11.8 as follows:</p> <p>'11.8 One of the largest sewer infrastructure projects in Europe, the Thames Tideway Tunnel, is currently being built with its main shaft site located in the riverside area of Kirtling Street, Nine Elms. Due for completion in 20254 the sewer will replace London's 150-year-old sewer network and prevent tens of millions of tonnes of sewage from polluting the River Thames every year.'</p>	
	Policy PM1 – Area Strategy and Site Allocations Compliance						
2.1	5.2 Thames Water have sites in both the Frogmore and Kirtling Street clusters and whilst they support	534	NA	Policy PM1 –	The expectation is that a masterplan or concept	No change considered necessary.	Agreed

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	<p>the idea of a masterplan or concept framework across clusters, we make reference to Paragraph 3.28 of Policy PM1, which rightly references “that some sites within clusters will be within different ownerships and may come forward as individual planning applications”. With this in mind, we would state that given the disparate and complex land ownerships which form these clusters, the expectation of landowners and developers to work together to prepare a Masterplan or Concept Framework is not always feasible or realistic, this is because timescales bringing forward complex brownfield sites vary significantly, as does the planning status of certain sites within clusters (i.e. some sites may already benefit from planning permissions and therefore will inevitably have a shorter timescale to delivery than a site without). We would therefore request that this expectation made more flexible to reflect the overarching policy aim which is to ensure development comes forward in a coherent manner across an area to create the optimum places. Therefore the policy should be softened and edited to read:</p> <p>“In order to ensure that a comprehensive and cohesive approach is taken to the planning and delivery of sites identified as a cluster within an Area Strategy <i>in the interest of good placemaking. If feasible and reasonable</i> the Council will expect site owners to <i>consider and have regard to the overall design, layout and character of an area, which could include jointly preparing</i> a masterplan or concept framework. Planning applications will need to</p>			Area Strategy and Site Allocation s Compliance & Para 3.28	framework is undertaken, and it is considered that the amendments drafted by Thames Water could undermine the expectation to seek to ensure a comprehensive approach is taken to area wide development.		

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	<p>demonstrate how they comply with the <u>overarching Area Strategy</u> and Masterplan or Concept Framework <u>(if applicable)</u>. On sites <u>within and</u> outside of clusters, planning applications should demonstrate how the proposal will not prejudice the development of <u>sites within the cluster</u> or adjoining sites.”</p> <p>5.3 Thames Water broadly support Policy PM1 but suggests the following changes:</p> <p>- Remove or amend the text which requires site owners to jointly prepare a masterplan or concept framework.</p>						
	Policy PM2 - Wandsworth Town Place Based Policy – Frogmore Cluster						
3.1	6.7. Thames Water would suggest that this proposed open space be moved to the west to coincide with the proposed Thames Tideway Tunnel access shaft (overlap blue and green areas on Plan 1) which could deliver an area of open land (except during occasional maintenance access) that we believe could function as public open space for the majority of the time	535	PPMM/010	Para 4.62	Comment noted. The position of the open space as shown on Map 4.1 Spatial Area Map: Wandsworth Town is considered appropriate as it connects with the proposed new bridge and existing green and blue infrastructure. The Wandle Delta Masterplan SPD (2021) sets out a requirement for open space at this site, however, it should be noted that it envisions an	<p>Amend wording of paragraph 4.66 as follows:</p> <p>"4.66 Movement: A riverside walk incorporating provision for cyclists will be required on both sides of Bell Lane Creek. The new walk should incorporate riverbank improvements to enhance biodiversity <u>but should not impact the maintenance access requirements for the Thames Tideway Tunnel infrastructure</u>. New connections to the riverside walk, in particular; access under the railway bridge and bridge crossing to Causeway Island will be sought".</p>	Agreed

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					<p>area of open space but not necessarily an area of green space as it would have to be suitable for the operational requirements of Thames Water regarding the access and maintenance of the shaft. This is additional space to that of the area above the shaft access point. It is considered that the wording of para 4.59 (Site Allocation) already identifies the importance of access and maintenance needs. However, to ensure greater clarity, it is proposed that para 4.66 could be amended to incorporate the maintenance access requirements.</p>		
3.2	6.8 the policy should state that the suggested/proposed new route or riverside walk should not impact the maintenance required for the Thames Tideway Tunnel infrastructure.	535	PPMM/010	Para 4.66	<p>Comment agreed. It is proposed that para 4.66 could be amended to incorporate the maintenance needs to ensure greater clarity.</p>	<p>Amend wording of paragraph 4.66 as follows:</p> <p>"4.66 Movement: A riverside walk incorporating provision for cyclists will be required on both sides of Bell Lane Creek. The new walk should incorporate riverbank</p>	Agreed

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						improvements to enhance biodiversity <i>but should not impact the maintenance required for the Thames Tideway Tunnel infrastructure</i> . New connections to the riverside walk, in particular access under the railway bridge and bridge crossing to Causeway Island will be sought".	
3.3	6.9 Thames Water have also advised that the area around the Thames Tideway Tunnel access shaft needs to be hard surfaced for maintenance purposes and clarification of this point should be included within Policy PM2.	535	PPMM/011	Policy PM2 Wandsworth Town Place Based Policy	Comment agreed, the site allocation is considered sound however greater clarification could be added and an amendment made to para 4.62 Open Space.	Amend wording of paragraph 4.62 as follows "4.62 Open Space...Another area of open space should be created at the northern end of Dormay Street adjoining Bell Lane Creek (WT5), with a new bridge linking this to the proposed open space on Causeway Island. <i>Hard landscaped open space is required around the Thames Tideway shaft. The use of soft landscaping should be used where it is possible</i> ".	Agreed
3.4	6.10 text should be added which states that financial contributions will be sought from developers (through CIL or S106 Obligations) to fund the public realm improvements, in line with emerging Policy LP20 (New Open Space) and LP62 (Planning Obligations)	535	NA	Frogmore Cluster	Comment noted. This inclusion would be a duplication of an existing policy LP62 Planning Obligations and would not be consistent with how site allocations have been prepared.	No change considered necessary.	Agreed
3.5	6.13 As noted with the previous Regulation 18 representation, there is currently a temporary pedestrian bridge connecting the site offices and the Tideway construction site. This could be left in situ	535	PPMM/012	Policy PM2 Wandsworth Town	Comment noted. As this temporary bridge has since been removed it is recommended that	Amend wording of paragraph 4.62 as follows	Agreed

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	<p>for a replacement bridge to be installed and would be an appropriate location for a new crossing to the Causeway Island. This approach is consistent with the Policy PM2.</p>			<p>Place Based Policy</p>	<p>reference to it be removed and that the Causeway be used as an active travel route between WT3 to WT5. Greater clarity could be added to this paragraph to ensure the locations of each bridge are understood.</p>	<p>"4.62 Open Space...Another area of open space should be created at the northern end of Dormay Street adjoining Bell Lane Creek (WT5) <u>which connects the riverside walk to the Causeway providing a link to Causeway Island</u> with a new bridge linking this to the proposed open space on Causeway Island"</p> <p>Amend wording to paragraph 4.66 bullet point 2 as follows:</p> <p>"Provision should be made for the installation of an active travel bridge to cross Bell Lane Creek from the northern end of Dormay Street to the Causeway Island site (WT3). Provision should be made for another <u>an</u> active travel bridge crossing Bell Lane Creek immediately south of the railway viaduct to Causeway Island (WT3) from the Frogmore <u>Depot</u> site (WT6) should also be provided. This active travel bridge will then lead <u>across Causeway Island to a second active travel bridge which connects to the Gasholder Cluster (WT4) as well as</u> to the riverside walk <u>which leads</u> north, under the viaduct, to the Thames Path. A final <u>third</u> footbridge should be added on the eastern edge of the proposed open space at the northern end of Dormay Street (WT5) which connects <u>eastwards</u> to the Gasholder cluster to the east (WT4)."</p>	

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3.6	6.17 Thames Water would request that text should be added to clarify that due to Thames Tideway Tunnel infrastructure and future maintenance, built form is most likely not applicable in these locations.	535	PPMM/013	Para 4.65	Comment agreed. The wording of the site allocation is considered sound but could be amended to provide greater clarity.	Amend wording of paragraph 4.65 as follows: "4.65 Built Form ... New development should consider the <u>setting of Wentworth House as well as</u> the Thames <u>Tideway Tunnel structures, and easements and space required for future maintenance where built form will likely not be appropriate</u> the setting of Wentworth House.	Agreed
3.7	6.18 we would also point out that the suggested location for new public open space (just above no.5 in the plan above) is in a similar location to the built form ('red dot') in the SPD above and there is inconsistency between the Local Plan and the SPD which should be rectified in the Local Plan.	535	NA	Map 4.1	Comment noted. Map 4.1 Spatial Area Map: Wandsworth Town identified a suggested location for new public open space which is in line with the SPD which in Figure 43 shows a matching proposed area of open space. The location of the built form will be subject to further detailed assessment as part of a planning application, and it would be expected that open space is accommodated as part of a proposal in accordance with the Area Strategy.	No change considered necessary.	Agreed

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3.8	6.20 paragraphs 4.56 and 4.57 describe the WT5/WT6 site allocations and state that Dormay Street infrastructure is located within them. In this respect, we would request that these paragraphs specifically reference the “Thames Tideway Tunnel infrastructure, where access will be required for ongoing operation and maintenance”.	535	NA	Para 4.56 and para 4.57	Comment noted. Those cluster descriptions are intended to be descriptive and not instructive. The requirement for access for ongoing operation and maintenance has been made in paragraph 4.63.	No change considered necessary.	Agreed
Policy PM3 - Nine Elms – Kirtling Street Cluster							
4.1	7.2 As noted in the Regulation 18 representation, Thames Water would welcome the discussion with the Council on the precise location for the suggested public open space that appears to be proposed within Kirtling Wharf	536	PPMM/034	Map 5.3	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. The wording in the site allocation is considered	Amend wording to paragraph 5.30 as follows: "5.30 Proposals to the north of the cluster in at 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 <u>subject to the operation and maintenance requirements of</u> and the open space above the Thames Tideway Tunnel access shaft."	Agreed

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					sound but could be amended to provide greater clarity as to the exact location of the open space.		
4.2	7.3 We request that text should be added to paragraph 5.12 to ensure that future development does not impact the operation and maintenance of the Thames Tideway Tunnel infrastructure	536	PPMM/034	Para 5.12	Comment noted. The wording in paragraph 5.12 is considered sound and other paragraphs, including 5.30, have been suggested for amendments to reinforce this requirement.	Amend wording of paragraph 5.30 as follows: "5.30 Proposals to the north of the cluster in at 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 <u>subject to the operation and maintenance requirements of</u> and the open space above the Thames Tideway Tunnel access shaft."	Agreed
4.3	7.4 As shown on the plan above, the Thames Tideway tunnel is located further eastwards than is currently shown on the draft Local Plan Map 5.3 Spatial Area Map: Kirtling Street Cluster. We therefore request that the location of the tunnel is correctly labelled on the map.	536	PPAM/025	Map 5.3 Spatial Area Map: Kirtling Street Cluster.	Comment agreed. The map is considered sound but could be amended to provide greater clarity as to the exact location of the open space.	Amend Map 5.3 Spatial Area Map: Kirtling Street Cluster as follows: <ul style="list-style-type: none"> Amend Map 5.3 to show the Thames Tideway Tunnel Shaft in the north east corner of NE9 Kirtling Wharf as correctly shown in Plan 5 of the Thames Water representation. See Appendix 1 of the Regulation 19 Response Table for illustration of proposed modification.	Agreed

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4.4	7.5 We would also reference the Thames Tideway Tunnel maintenance requirements as labelled above within Plan 5.	536	NA	Map 5.3 Spatial Area Map: Kirtling Street Cluster.	Comment noted. Including the notes shown in Plan 5 would be inconsistent with how the rest of the maps have been produced. The necessary information from the labels is captured elsewhere in the plan.	No change considered necessary.	Agreed
4.5	7.5 Thames Water would like to clarify that the surface of the shaft is within the safeguarded wharf area and therefore (given this designation and the physical operation and maintenance requirements of this infrastructure), it is unlikely that a landmark building/green public space will be entirely feasible on the northern section of the Kirtling Wharf (NE9) site without further detailed planning and engineering assessment to a greater level of detail than the Local Plan can undertake. Whilst built development could be achieved on southern area of the site, it would need to ensure operation and maintenance of the Thames Tideway Tunnel and protected wharf (shown in Plan 5 above)	536	PPMM/034 PPMM/036	Para 5.30 and 5.39	<p>Comment noted. Open space, not necessarily green space, is proposed to the north of the cluster. Para 5.39 sets out that a landmark building would be appropriate as it is near the foot of the proposed Nine Elms – Pimlico Bridge. This would be subject to the maintenance and access requirements as proposed elsewhere in the Allocation. . Protection of the safeguarded wharf uses is set out in para 5.27.</p> <p>The wording in the site allocation is considered sound but could be</p>	<p>Amend wording of paragraph 5.30 as follows:</p> <p>"5.30 Proposals to the north of the cluster in at 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 <u>subject to the operation and maintenance requirements of</u> and the open space above the Thames Tideway Tunnel access shaft."</p> <p>Amend wording of paragraph 5.39 as follows:</p> <p>"5.39 Identity and Architectural Expression ... It would be appropriate for a landmark building to be located here as a gateway into Wandsworth <u>subject to the ongoing maintenance and access requirements of</u></p>	Agreed

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					amended to provide greater clarity as to the operation and maintenance of the Thames Tideway Tunnel Infrastructure.	<i><u>the Thames Tideway Tunnel's infrastructure as well as the requirements of the safeguarded wharf designation.</u></i>	
4.6	7.6 Paragraphs 5.28 and 5.30 refer to the provision of open space in connection with the Nine Elms Pimlico Bridge ('the bridge'). As noted above, given the surface of the shaft will be designed for wharf usage, it is unlikely that soft-landscaped public space would be applicable in this area. However, Thames Water is able to engage with the Council regarding the delivery of open space, subject to the protection of operation and maintenance of the Thames Tideway Tunnel. We would also like to ensure that the policy is suitably flexible in the instance that the bridge does not come forward within the plan period, to avoid sterilising land unduly.	536	NA	Para 5.28 and 5.30	Comment noted. Para 5.30 sets out a requirement for open space which can be in the form of hard and/or soft landscaping. It would be preferable to include soft landscaping to maximise the amount of green space and biodiversity adjacent to the River Thames but the requirements of the wharf and the maintenance and access requirements of the Tideway Shaft would need to be considered. The Nine Elms-Pimlico Bridge is still considered to come forward, and any uncertainty about it coming forward should not restrict development as the open space above the shaft site is still	No change considered necessary.	Agreed

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					expected to integrate into the Thames Path and the NESB Cycling Strategy.		
4.7	7.7 We support the concept of business uses on the ground floor and residential use to upper floors. This area comprises brownfield land within a sustainable location and is therefore an appropriate location for development according to the NPPF (see above). However, we also note that a new planning permission (Ref: 2021/0414) has been approved for the Battersea Power Station site. This includes more flexibility to uses on the ground and upper floors within the future phases (4-7). The Kirtling Street Cluster includes three sites within these future consented phases and it is considered that it should be correctly referenced within Policy PM3 to align with other sites within the cluster.	536	PPMM/029	Para 5.27	Comment noted. It is proposed to amend the wording of the Local Plan to ensure consistency with the permitted application (2021/0414). This could include reference to the July 2021 Design Code.	Amend paragraph 5.27 as follows: "The cluster is appropriate for a mixed-use development with commercial uses on the ground floor, and residential uses. <u>Ground floor uses should have consideration of the upper floors due to</u> the proximity to heavily trafficked streets and flood zone parameters, <u>and should accord with the relevant Design Code (July 2021, or successor document)</u> . Proposals for mixed-use development should retain or enhance wharf capacity..."	Agreed
4.8	7.9 We would also like to point out a discrepancy with the Policy NE9 allocation boundary. In this respect, the bottom right hand corner of the site (currently not allocated), should be allocated to coincide with the Safeguarded Wharves Directions map from February 2021.	536	PPMM/002 PPMM/021 PPMM/023 PPMM/025 PPMM/037	Multiple	Comment agreed. The site allocation boundary could be amended to align with the Safeguarded Wharves Directions (February 2021).	Amend Map 3.2 Site Allocation Map as follows: <ul style="list-style-type: none"> Amend map and glossary to show updated boundary of NE9 Kirtling Wharf. Amend Map 5.1 Creative Clusters Map as follows: <ul style="list-style-type: none"> Amend map and glossary to show updated boundary of NE9 Kirtling Wharf. 	Agreed

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						<p>Amend Map 5.2 Nine Elms Spatial Area Map as follows:</p> <ul style="list-style-type: none"> Amend map and glossary to show updated boundary of NE9 Kirtling Wharf. <p>Amend Map 5.3 Kirtling Street Cluster. Spatial Area Map as follows:</p> <ul style="list-style-type: none"> Amend map and glossary to show updated boundary of NE9 Kirtling Wharf. <p>Amend Map 5.5 Kirtling Street Cluster Site Allocation Map as follows:</p> <ul style="list-style-type: none"> Amend map and glossary to show updated boundary of NE9 Kirtling Wharf. <p>See Appendix 1 of the Regulation 19 Response Table for illustration of proposed modification.</p>	
4.9	7.10 Furthermore, within the 'People First' point (C. 5.) of Policy PM3, there is specific reference to the Thames Path along the riverside. Whilst Thames Water support the continuity of the Thames Path, they request that text should be added which refers	536	PPMM/020	PM3 Nine Elms - People First (5)	Comment agreed. The wording in the policy is considered sound but could be amended to provide greater clarity as to the protection of	<p>Amend wording of PM3 Nine Elms - People First (5) as follow:</p> <p>"PM3 - People First 5. The continuity of the Thames Path along the riverside is key to enhancing active travel and ease of</p>	Agreed

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	<p>to the Thames Tideway Tunnel infrastructure. In this respect, the paragraph should be amended to read:</p> <p><i>"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 safe-guarded wharves and Thames Tideway Tunnel infrastructure. Continuity of the Thames Path should be complemented by the creation of high-quality and generous public realm, achieving a balance of open space and built form, and making provision for trees of an appropriate maturity and species."</i></p>				Thames Tideway Tunnel Infrastructure.	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 safe-guarded wharves <u>and Thames Tideway Tunnel infrastructure.</u> "	
4.10	7.11 Additionally, Paragraph 5.38 relates to context within the Kirtling Street Cluster and states that taking a place-based approach is necessary. In this respect, we would refer back to the comments on Policy PM1 and how due to the complex land use ownerships of the sites, it is unlikely that a site-wide masterplan or contextual framework approach will be feasible given the planning statuses of the land within the cluster	536	NA	Para 5.38	The expectation is that a masterplan or concept framework is undertaken, and it is considered that the amendments drafted by Thames Water could undermine the expectation to seek to ensure a comprehensive approach is taken to the delivery of adjacent sites.	No change considered necessary.	Agreed
4.11	7.12 Further to the Regulation 18 consultation, we would also like to reiterate the below sites and request an explanation on why they are no longer allocated for development: - Kirtling Street (88 Kirtling Street), Phase 7 (RS-WF)	536	NA	Multiple	Comment noted. These sites were removed as they have outline planning permission and the site owners explained	No change considered necessary.	Agreed

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	- SE corner of Kirtling and Cringle Street (Depot Site), Phase 5 (RS-6a) - Former petrol station site (2 Battersea Park Road), Phase 5 (RS-6b)				to the Council that they did not wish for the sites to be included as site allocation in this local plan.		
4.12	7.15 Thames Water also operates the Battersea Ring Main site at Cringle Street. As noted within the Regulation 18 Representation, there could be a future opportunity to rationalise land uses and as a result, part of the site could be suitable for development (subject to technical matters being resolved). It is previously developed land in a highly sustainable location and could make a positive contribution to the wider Nine Elms development. The site is also located within a tall buildings area (TB-B3-01) and could come forward as a windfall site during the plan period. We would welcome further discussions with the Council about whether this site might be included as an additional mixed-use allocation in the Local Plan. The potential allocation area is shown on Plan 2, below	536	PPMM/018 PPMM/027 PAMM/029 PAMM/030 PPMM/028 PPMM/030 PPMM/035 PPMM/003 PPMM/022 PPMM/024 PPMM/026 PPMM/038	Multiple	Comment agreed. This point was missed at the regulation 18 stage of consultation and would have met the necessary criteria to be included as a site allocation in line with the site allocation methodology paper. To ensure consistency with the rest of the Local Plan site allocations the Battersea Main Ring site could be included as a site allocation.	Amend Nine Elms Cover Page as follows: "NE11 Cringle Dock, Nine Elms <u>NE14 Battersea Ring Main Site, Cringle Street</u> " Amend wording of the site allocation titles as follows: "NE11 Cringle Dock, Nine Elms, SW8 <u>NE14 Battersea Ring Main Site, Cringle Street, SW8</u> " Amend wording of paragraph 5.20 as follows: 5.20 The Kirtling Street Cluster comprises five <u>six</u> sites Amend wording of paragraph 5.21 as follows: 5.21... Site Area: <u>6.13</u> ha	Agreed

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						<p>Insert new paragraph after paragraph 5.26 as follows:</p> <p><i><u>“NE14: This site is south of NE11 and Cringle Street and east of Battersea Power Station. It is west of Kirtling Street north of Pump House Lane.”</u></i></p> <p>Insert a new bullet point into paragraph 5.29 as follows:</p> <p>5.29 Uses – New Bullet Point: <i><u>Development on NE14 will need to account for and incorporate the existing Thames Water infrastructure within any mixed use development proposal.</u></i></p> <p>Amend wording of paragraph 5.31 as follows:</p> <p>5.31 Access - "... Additionally, <i><u>the Battersea Ring Main site includes access to the existing Thames Water infrastructure and the Kirtling Wharf site (NE9) includes access to a Thames Tideway shaft site and ongoing maintenance access will be required to both. The Thames Water infrastructure and the</u></i> shaft maintenance regime and associated necessary access should be considered as part of any development proposal <i><u>on either site</u></i>".</p>	

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						<p>Amend Map 3.2 Site Allocation Map as follows:</p> <ul style="list-style-type: none"> Amend map and glossary to show new allocation NE14 <p>Amend Map 5.1 Creative Clusters Map as follows:</p> <ul style="list-style-type: none"> Amend map and glossary to show new allocation NE14 <p>Amend Map 5.2 Nine Elms Spatial Area Map as follows:</p> <ul style="list-style-type: none"> Amend map and glossary to show new allocation NE14 <p>Amend Map 5.3 Kirtling Street Cluster. Spatial Area Map as follows:</p> <ul style="list-style-type: none"> Amend map and glossary to show new allocation NE14. <p>Amend Map 5.5 Kirtling Street Cluster Site Allocation Map as follows:</p> <ul style="list-style-type: none"> Amend map and glossary to show new allocation NE14 <p>See Appendix 1 of the Regulation 19 Response Table for illustration of proposed modification.</p>	

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4.13	7.16 With the above public realm and built form comments in mind, Thames Water would welcome further discussion with the Council on how best these can be reflected on the spatial area map, to ensure policy does not conflict with the Thames Tideway Tunnel operation and maintenance.	536	PPMM/034	Map 5.2 Nine Elms Spatial Area Map	<p>Comment noted. Map 5.3 Spatial Area Map: Kirtling Street Cluster identifies the access point of the Thames Tideway Tunnel shaft which ensures it is considered with any new development in the area.</p> <p>Paras 5.27 and 5.31 make reference to the importance of the shaft site but para 5.30 could be amended to ensure the policy does not conflict with the Thames Tideway Tunnel operation and maintenance.</p>	<p>Amend wording of 5.30 as follows:</p> <p>"5.30 Proposals to the north of the cluster in at 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 <u>subject to the operation and maintenance requirements of</u> and the open space above the Thames Tideway Tunnel access shaft."</p>	Agreed
	Policy PM4 – Clapham Junction and York Road/Winstanley Regeneration Area						
5.1	8.5 The only requested change to Policy PM4 relates to Paragraph 6.7 which relates to the description of the York Road / Winstanley Regeneration Area. In this respect, Thames Water request that the following text is added which relates to the Falconbrook Pumping Station: <i>"Thames Water's Falconbrook Pumping Station and associated Tideway Tunnel Infrastructure is located</i>	537	PPMM/044	Para 6.7	<p>Comment agreed. The wording in the site allocation is considered sound but could be amended to provide greater clarity as to the operation and maintenance of the</p>	<p>Include wording after para 6.7 as follows:</p> <p><i>"<u>Thames Water's Falconbrook Pumping Station and associated Tideway Tunnel Infrastructure is located within the regeneration area. Any development will need to consider the operation and maintenance of this infrastructure.</u>"</i></p>	Agreed

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	<i>within the regeneration area. Any development will need to consider the operation and maintenance of this infrastructure."</i>				Thames Tideway Tunnel Infrastructure.		
	Policy NE10 - Middle Wharf						
6.1	9.3 Given that the Middle Wharf site allocation and adjacent area to the west will be required for maintenance, it is not considered that built form development in this location would be feasible. In this respect, we reiterate that the site allocation could be expanded to include land to the west to allow potential development. Again, given the maintenance requirements for the Thames Tideway Tunnel infrastructure, an area which could be suitable for residential-led, mixed-use development would be around and above the pumping station. In this respect, the proposed extension has been shown below in Plan 9.	538	PPMM/042	Para 5.82	Comment agreed. The site allocation is considered sound but it is proposed that the wording of the Development Considerations could be amended to provide greater opportunity for mixed use development as part of a combined site approach if possible in light of the constraints of the safeguarded wharf site.	Amend wording to para 5.82 as follows: "5.82 Uses - Due to the heavily trafficked Nine Elms Lane, commercial uses are suitable on the ground floor. <u>Development of this site could extend westwards to include Heathwall Pumping Station, as part of a combined mixed-use proposal that didn't conflict with the wharf operations and the other land uses, nor constrain the long-term use and viability of the safeguarded wharf.</u> Maximising the potential for this site will require further discussions with relevant parties, in particular the PLA and the GLA, and a co-ordinated approach including with the adjacent sites".	Agreed
6.2	9.5 With the above in mind, Thames Water request that the NE10 site (with extension) should be reintroduced into the tall building zone. Given that the site is located in close proximity to tall buildings to the west and south, it is considered to be in a location which would be suitable for a tall building and we are not clear on why it has been omitted from the zone. The Urban Design Study (December 2021) which is part of the Local Plan evidence base shows the site as within area B3 in the Sensitivity	538	NA	Para 5.87	Comment noted. Site NE10 (Middle Wharf) and the Heathwall Pumping Station are located on part of the Nine Elms riverside frontage that is located outside an area suitable for mid-rise or Tall buildings in accordance with the	No change considered necessary.	Agreed

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	<p>Plan (Fig.212) which is noted as having a 'lower' sensitivity to change, and a 'higher' capacity for development (Fig.214). The specific removal of this small area from the tall buildings zone as listed in Appendix A to the study is 'analysis of existing and consented buildings'. Indeed, the descriptive text for this zone (TB-B3-01) sets out that <i>'The general form of development that will be supported in the Opportunity Area will be 8-10 storey high density development with tall buildings within the 10-25 storey height range on key sites such as along the riverside.'</i> (emphasis added).</p>				<p>Urban Design Study. This location is one which is predominantly low-rise in character. New buildings in the Nine Elms area are expected to generally step down towards the riverside with Nine Elms Lane in the north-eastern part (i.e. where Middle wharf and Heathwall Pumping Station are located) considered to be an appropriate point to discontinue the Tall Buildings zone. This approach is emphasised in the adjacent tall buildings zone TB-B3-01, which shows a gradual lighter shading towards the riverside indicating less potential for height.</p> <p>Figures 212 and 214 of the UDS are borough-wide maps that indicate an illustration of sensitivity and probability of change / development capacity at a level of detail expected from a map of the borough. This</p>		

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					<p>is clarified in section 4.2 of the UDS: 'It should be noted that the sensitivity assessment has been undertaken at a borough-wide scale and is therefore necessarily broad-brush in its application. Within each of the areas identified there may be specific sites with a higher or lower sensitivity than illustrated. Additionally, sensitivity has been assessed to a generic principle of a building that is approximately 50% higher than the existing average building height. Specific sites would need to consider sensitivity to specific development types including their land use and design quality. There may be smaller scale highly sensitive areas (including for example locally listed parks and gardens) which are not illustrated in the borough-wide map but</p>		

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					<p>would be sensitive to change. These are generally noted in the valued features descriptions in the character area profiles.'</p> <p>And in 4.3 (probability of change): 'This is not to suggest that all sites within this areas are acceptable for development; rather, that as a whole the likelihood of change is higher.'</p>		
6.3	<p>9.7 Finally, Paragraph 5.81 relates to the site allocation for the site, and Thames Water request that text should be added which refers to the maintenance of the Thames Tideway Tunnel infrastructure. In this respect, the paragraph should be amended to read:</p> <p><i>"Safeguarded wharf with potential for residential-led, mixed-use development above including commercial uses. Proposals for mixed-use development should retain or enhance wharf capacity and operability and maintain appropriate access arrangements. 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>Development should also</u></i></p>	538	PPMM/041	Para 5.81	<p>Comment agreed. The wording in the site allocation is considered sound but could be amended to provide greater clarity as to the operation and maintenance of the Thames Tideway Tunnel Infrastructure.</p>	<p>Amend wording to para 5.81 as follows:</p> <p>"5.81 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>Development should also consider the operation and maintenance of Thames Tideway Tunnel infrastructure.</u>"</p>	Agreed

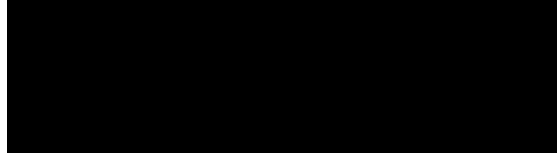
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	<i><u>consider the operation and maintenance of Thames Tideway Tunnel infrastructure.</u></i>						
	Policy PM9 – Wandsworth Riverside						
7.1	<p>10.1 Policy PM9 relates to the area of Wandsworth Riverside, where a number of Thames Water Tideway sites are located. Whilst Thames Water support the vision for the area, there are a couple of requested amendments which seek to correct dates and refer to maintenance requirements.</p> <p>10.2 With the above in mind, Paragraph 11.8 should be amended to read: “One of the largest sewer infrastructure projects in Europe, the Thames Tideway Tunnel, is currently being built with its main shaft site located in the riverside area of Kirtling Street, Nine Elms. Due for completion in 2025 the sewer will replace London’s 150-year-old sewer network and prevent tens of millions of tonnes of sewage from polluting the River Thames every year. The project, which has six large construction sites mainly located in the riverside area, will provide positive lasting legacy delivering environmental improvements, jobs, skills and economic investment. <u>Alongside operation and maintenance requirements</u>, the sites will be transformed into new public open spaces, including new promontories in the Thames at Putney embankment and Nine Elms (Heathwall Pumping Station), and opening up new areas of riverside walk in Nine Elms (<u>whilst maintaining safe access and operation of infrastructure</u>). The Council will continue to work</p>	539	PPMM/058	Para 11.8	Comment agreed. The wording in the site allocation is considered sound but could be amended to provide greater clarity as to the timeline, operation and maintenance of the Thames Tideway Tunnel Infrastructure.	Amend wording to para 11.8 as follows: "11.8 ... Due for completion in 2024 ⁵ the sewer will replace London’s 150-year-old sewer network and prevent tens of millions of tonnes of sewage from polluting the River Thames every year. The project, which has six large construction sites mainly located in the riverside area, will provide positive lasting legacy delivering environmental improvements, jobs, skills and economic investment. <u>Alongside operation and maintenance requirements</u> , the sites will be transformed into new public open spaces, including new promontories in the Thames at Putney embankment and Nine Elms (Heathwall Pumping Station), and opening up new areas of riverside walk in Nine Elms (<u>whilst maintaining safe access and operation of infrastructure</u>)".	Agreed


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	with Tideway to ensure its legacy is sustainable, ensuring that the relationship between the sites and their surroundings is developed in partnership with residents and community groups.”						
7.2	10.3 Point A.9. should be amended to read: “The Thames Tideway Tunnel project will be supported through to completion and beyond to create a sustainable and lasting legacy. For each site this will mean <u>ensuring ongoing operation and maintenance</u> ; the protection and enhancement of the setting and character of the surrounding area; improvement of the environment both on site and its wider setting; providing economic and social benefits such as jobs and skills; and opportunities for the creation of public art and event space to allow for inclusive and varied use”	539	PPMM/060	PM9 Wandsworth's Riverside	Comment agreed. The wording in the policy is considered sound but could be amended to provide greater clarity as to the operation and maintenance of the Thames Tideway Tunnel Infrastructure.	Amend wording to PM9 Wandsworth's Riverside - Placemaking 9 as follows: “9 ... For each site this will mean <u>ensuring ongoing operation and maintenance</u> ; the protection and enhancement of the setting and character of the surrounding area; improvement of the environment both on site and its wider setting; providing economic and social benefits such as jobs and skills; and opportunities for the creation of public art and event space to allow for inclusive and varied use”.	Agreed
	Policy LP35 – Mixed-Use Development on Economic Land						
8.1	11.3 Whilst Thames Water support the policy in re-providing economic floorspace, it should be noted that a number of sites have specific site allocations which include a mix of uses, (including residential) and reference should be made within the policy which states that the provision of economic floorspace as part of mixed use developments on economic land should be consistent with specific site allocations.	540	NA	Policy LP35 – Mixed-Use Development on Economic Land	The Council welcome the support for the re-provision of economic floorspace in locations covered by LP35 (Mixed-Use Development on Economic Land). It is noted, however, that the Local Plan no longer seeks to designate Battersea Power Station	No change considered necessary.	Agreed

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					<p>as a Focal Point of Activity; rather, in accordance with the London Plan this area is designated as an emerging CAZ retail cluster. Policy LP35.A.2 already includes, with respect to Economic Use Intensification Areas, reference to the relevant Site Allocations. It is expected that the development should be brought forward in accordance with the Plan's requirements both for the general policies and the Site Allocations, and that the approach is consistent between them.</p>		
	<p>Policy LP59 Riverside Uses, Including River-dependent, River-related and adjacent Uses</p>						
9.1	<p>12.1 Policy LP59 relates to riverside uses and new development on sites adjoining the River Thames, River Wandle, and Beverley Brook. In this respect, given the importance of the Thames Tideway Tunnel Infrastructure and its location along the riverside in Wandsworth, it is considered that text should be added below point E., which concerns protected</p>	541	NA	Policy LP59 Riverside Uses, Including River-dependen	<p>Comment noted. It is considered that LP59 E sufficiently covers this requirement and the responsibility for any impact will be on the new</p>	No change considered necessary.	Agreed

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	<p>wharves. Thames Water would therefore request that the below text is added as F.</p> <p><i>“On riverside Thames Tideway Tunnel sites, future development on or adjacent to these sites should not jeopardise the operation or maintenance of the infrastructure.”</i></p>			t, River-related and adjacent Uses	development as the Agent of Change.		

Both parties consider that these amendments address some of the concerns raised by Thames Tideway 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		19/10/22

Signed on Behalf of Thames Tideway		
Name and Position	Signature	Date
Nicola Forster Director		20/10/22

