

WANDSWORTH LOCAL PLAN HEARING STATEMENT

INTRODUCTION

This statement has been prepared on behalf of our client, the Western Riverside Waste Authority (WRWA).

The WRWA was established in 1986 as an autonomous statutory local government body to undertake the waste disposal functions prescribed by the Local Government Act 1985 and the Waste Regulations and Disposal (Authorities) Order 1985. The WRWA is responsible for managing the waste collected in the London Boroughs of Hammersmith and Fulham, Lambeth, Wandsworth and the Royal Borough of Kensington and Chelsea.

The WRWA is responsible for the reuse, recycling and recovery of energy from around 400,000 tonnes per annum of municipal waste collected by its constituent councils. The WRWA minimises the impact of this essential public service by utilising its riparian transfer stations to transport the residual waste (that which cannot be reused or recycled) by river for treatment which removes around 100,000 HGV movements a year from London's congested roads.

The WRWA own two waste transfer stations, one at Cringle Dock, Battersea and the other at Smugglers Way, Wandsworth. The Smugglers Way site also incorporates an 84,000 tonne per year Materials Recycling Facility and a 20,000 tonne per year Household Waste and Recycling Centre (HWRC). Both sites are currently operated by Cory Environmental Ltd trading as Cory. Both of the sites are 'safeguarded wharves' within the current Wandsworth Development Plan. Cringle Dock is allocated for residential-led mixed use development above, within the Wandsworth Site Specific Allocations Document (adopted March 2016).

Representations have been submitted to Wandsworth Borough Council (the 'Council') by Carter Jonas, on behalf of the WRWA, at every consultation opportunity associated with the Local Plan. Since the submission of representations at Regulation 19 stage, the WRWA has been in discussions with the Council's planning policy team in relation to Policy LP13 'Circular Economy, Recycling and Waste Management', Site Allocation WT9 (Feather's Wharf), Site Allocation WT11 (Western Riverside Waste Transfer Station) (WRWTS), Site Allocation NE9 (Kirtling Wharf), Site Allocation NE11 (Cringle Dock) and Policy PM9 (Nine Elms).

A Statement of Common Ground (Examination Document Reference: WBC-004) has been agreed between the WRWA and the Council and this seeks to establish areas of agreement and also proposes minor changes to the Submission Local Plan prior to the public examination.

The WRWA will be attending hearing sessions in relation to the following matters:

- Main Matter 3 (Wandsworth Town)
- Main Matter 4 (Nine Elms)
- Main Matter 14 (Tackling Climate Change)

This statement outlines the WRWA comments in respect of Main Matter 4.

MAIN MATTER 4 – NINE ELMS (POLICIES PM3, NE1 TO NE13)

Is the area strategy and are the site allocation policies for Nine Elms justified by appropriate available evidence, having regard to national guidance, local context, and are they in ‘general conformity’ with the LP?

Site Allocation NE9 (Kirtling Wharf) and Site Allocation NE11 (Cringle Dock)

WRWA owns the Cringle Dock site that is identified as site allocation NE11 (Cringle Dock) and included within the Kirtling Street Cluster.

As set out in the representations made by Carter Jonas, on behalf of the WRWA, to the Local Plan Regulation 19 consultation, the WRWA consider that site allocation NE9 (Kirtling Wharf) and site allocation NE11 (Cringle Dock) should be combined in order for comprehensive approach to redevelopment to be realised. The aforementioned Regulation 19 representations set out planning history associated with Cringle Dock and provide details as to why the previously consented scheme did not progress.

The WRWA and Cory appointed a technical project team to assess the options to replace the Cringle Dock WTS and produce conditions that would support the completion of the Battersea Power Station Masterplan (Phases 5, 6 and 7). Wood plc have produced a Cringle Dock and Kirtling Street (CDKS) Masterplan which demonstrates how comprehensive redevelopment of the two sites could be achieved. With a comprehensive approach to redevelopment, the WRWA believe that a better arrangement of land uses can be achieved, and this would also allow for a more appropriate transition between the sites and the edge of the Battersea Power Station site.

There are a number of key drivers for the comprehensive redevelopment of the Cringle Dock and Kirtling Wharf sites including the urgent need to upgrade critical waste management infrastructure (already well beyond its end of life) while maintaining service continuity, meeting the WRWA’s ongoing statutory service obligations. The introduction of the Environment Act 2021 and the Borough-wide waste management capacity deficiency which provide further justification for the requirement for redevelopment.

Discussions have taken place with the Council’s planning policy team on this matter and the Council’s preferred approach is to keep these two sites separate within the Local Plan as they are two separate wharves with different function and their future development potential as one site is still somewhat uncertain. The Council, however, have considered the rewording of Paragraph 5.29 to identify the opportunity for the development of both sites as one. The following wording for inclusion has been agreed as part of the Statement of Common Ground between the WRWA and the Council: *“Proposals should consider the feasibility of the comprehensive and combined development of sites”*.

The WRWA are aware of the requirement to respect the statutory safeguarding protection for Cringle Dock and Kirtling wharves and therefore with any redevelopment of the sites it is imperative that the design process has full regard to the current and future operation of the safeguarded wharves, including maintaining appropriate access arrangements and hours of operation.

It is considered that Paragraph 5.30 of the Submission Local 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 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.

As part of the discussions that have taken place with the Council's planning policy team, officers have agreed to include additional detail so that new uses would not harm to safeguarded wharf designations and this has been included within the Statement of Common Ground.

In summary, whilst the WRWA considers that the site allocations as drafted in the Submission Local Plan are not justified, it considers that the amendments agreed as part of the Statement of Common Ground are sufficient to make the site allocations justified.

Policy PM3 (Nine Elms)

Submission Local Plan Policy PM3 has undergone substantial rewording since the Regulation. 18 Local Plan consultation in February 2021. The WRWA support the removal of the reference to "the creation of green / open space that the Tideway Tunnel access shaft presents" from this policy.

Part C 'People First', sub-part 5 of the policy 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 and protecting the safe-guarded wharves"*.

The WRWA supports the principle of the continuity of the Thames Path and supports the wording of the text relating to the protection of the safeguarded wharves and the service access to the waste transfer station. The WRWA considers the policy to be justified and in general conformity with the local plan.