

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

14th March 2023

By email: planningpolicy@wandsworth.gov.uk

TL/HB/P07943

Dear Sirs,

**London Borough of Wandsworth Local Plan – Representations by Cory Group (Cory)
Consultation on Main Modifications and Policy Map Changes**

We write to make representations to the London Borough of Wandsworth Local Plan List of Main Modifications and Policy Map Changes. These comments build on our previous representations on the Regulation 18 Consultation in February 2021, the Pre-Publication Regulation 19 Consultation Version in February 2022 and representations made in person at EiP in November 2022.

Background to Cory

As discussed in previous representations Cory Group (Cory) operates two facilities in the London Borough of Wandsworth on behalf of Western Riverside Waste Authority (WRWA):

- Western Riverside Waste Transfer Station, Materials Recycling Facility, Household Waste and Recycling Centre in Wandsworth; and
- Cringle Dock Waste Transfer station in Battersea.

Both facilities include and rely on designated safeguarded wharves and play a crucial role in ensuring that London's recyclable and non-recyclable waste is transported sustainably via the river Thames.

Cory has accelerated its decarbonisation strategy despite the challenges posed by Covid-19, with meaningful delivery across a range of areas. The waste industry plays a critical role in shaping a better future for our communities and the environment, and alongside this Cory is committed to making a material contribution to the UK's decarbonisation objectives.

Given the urgency required to address the climate crisis, Cory has committed to achieving net zero carbon emissions by 2040. We are currently:

- Increasing our carbon benefit to society by helping to develop one of UK's largest district heat networks with Vattenfall
- Reducing energy consumption across our sites
- Running our tug fleet on biofuel, reducing their net carbon emissions by 90%
- Undertaking research and development with BAE Systems into zero-carbon river transportation
- Advancing the world's largest waste sector carbon capture project. By 2030, this could prevent 1.4



million tonnes of CO₂ emissions per annum – providing a significant contribution to reducing the carbon emissions of the several million people Cory services in London and the South East.

Delivering in these areas will support sustainable growth and make a real difference to how we operate as a business.

Associated to this approach we are constantly striving to improve the operational and environmental performance of our existing facilities in Wandsworth and are actively considering a range of renewal, upgrade and redevelopment options at both locations. With this in mind, we set out our representations to the Consultation Document with safeguarded wharves and future mixed use development opportunities continuing to be at the forefront of these representations.

Representations On Proposed Main Modifications to the Plan

- **Main Modification Number: MM25 - WT11, Western Riverside Waste Transfer Station.**

As cited on page 20 of the Main Modifications Document, the proposed modification to amend paragraph 4.105 is follows:

Amend paragraph 4.105 as follows:

'4.105 Site Layout – Should the safeguarded wharf be ~~de-designated~~ decommissioned (in line with LP40 – Safeguarding Wharves) then a mixed-use residential scheme could come forward with built frontages on to the River Thames and The Causeway.'

Cory welcomes the introduction and reference to Policy LP40 (Safeguarding Wharves) however, the proposed re-wording from 'de-designated' to 'decommissioned' does not align with Policy LP40 which itself does not reference 'decommissioned'. This is also inconsistent with Paragraph 4.173 of the Publication Local Plan (Pier Wharf – Site Allocation WT22) which uses the word 'de-designated'. Cory requests the original use of 'de-designated' be retained to align with Policy LP40 and provide continuity with other Wharf Site Allocations in the Local Plan.

- **Main Modification Number: MM26 - WT11, Western Riverside Waste Transfer Station**

Amend paragraph 4.106 as follows:

'In accordance with the tall building maps in Appendix 2, part of the cluster is located in tall building zone TB-G1d-03. The maximum appropriate height range for the zone is 7 to 15 storeys, and the maximum appropriate height range for the cluster ~~must~~ should be in accordance with the tall building maps in Appendix 2. The height of developments within that zone should not exceed the heights of, and should be in accordance with, the tall building maps in Appendix 2, which set out the identified maximum appropriate heights in line with Policy LP4. Development proposals for tall buildings or mid-rise buildings will only be appropriate within the identified zone where they address the requirements of Policy LP4 (Tall and Mid-rise Buildings).'

Following representations and discussions at EiP Cory welcomes this change and its alignment with the direction of Policy LP4 (Tall and Mid-rise Buildings).

- **Main Modification Number: MM48 - Kirtling Street Cluster**

Amend wording to Para 5.29 (bullet point 2) as follows:

'Para 5.29 Uses ... Development proposals should maximise the development potential for the Kirtling Wharf and Cringle Dock sites (NE9, NE11), having regard to their safeguarded wharf status (in line with LP40 – ~~Protected-Safeguarding~~ Wharves) and their important function in the transshipment of freight, waterborne freight handling use and freight-related activities. Proposals should consider the feasibility of the comprehensive and combined development of both sites. Development of these or adjacent sites will require further discussions with relevant parties, ~~in particular~~ including the agreement of the Port of London Authority (PLA), the Greater London Authority (GLA) and Thames Water.'

Cory strongly welcomes these changes and the Council's recognition for the potential combined development of the Kirtling Wharf and Cringle Dock sites. As outlined in our previous representations we look forward to working with the Council, Battersea Power Station and other key stakeholders to help deliver our vision for the area.

- **Main Modification Number MM49 – Kirtling Street Cluster**

Amend wording to Para 5.30 as follows:

'5.30 ~~Open Space~~ Public Realm – Proposals to the north of the cluster ~~in at~~ the Kirtling Wharf and Cringle Dock sites (NE9, NE11) will be required to provide a publicly accessible landscaped area ~~open space~~ that connects to the proposed Nine Elms Pimlico Bridge, the Thames Path and subject to operation and maintenance requirements, the open space above 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. Proposals will be required to comply with the London Plan Policy SI15 Water transport and public realm landscaping should not conflict with the safeguarded wharf use.'

Cory retains significant concerns on the emphasis that is placed on the proposed publicly accessible landscaped area to the north of Kirtling Wharf (Site Allocation NE9). The amended wording of Paragraph 5.30 highlights that this area is to provide 'a welcoming gateway to the area'. Cory does not object to the principle of public realm connecting the proposed Nine Elms Pimlico Bridge, the Thames Path and the TTT access shaft however, we consider London Plan Policy SI15 (Water Transport) needs to be better considered and applied. Policy SI15 Part H itself states 'Development proposals adjacent to or opposite safeguarded wharves (including vacant wharves) should be designed to minimise the potential for conflicts of use and disturbance, in line with the Agent of Change Principle'. This policy direction is also entrenched in Policy LP13 (Circular Economy, Recycling and Waste Management) which at part G states 'Development on sites adjacent to existing waste sites that may prejudice use for waste management purposes will not be permitted unless satisfactory mitigation measures can be provided, in line with the Agent of Change principle.' Affording priority for a new publicly accessible area performing the role as a 'welcoming gateway', directly conflicts with London Plan Policy SI15 and LP13 and does not consider the Agent of Change Principle.

Further to the above, whilst Paragraph 5.30 ends citing Policy SI15, the text that comes before it seems to conflict with the preceding paragraph - Paragraph 5.29 (bullet point 2) – and the requirements of the LP Policy itself. The requirement 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” is nonsensical as it means that incoming operators of an existing safeguarded wharf and those currently responsible for the safe management of an existing tunnel shaft and who will shortly be restoring the slab above the shaft and making ready the wider site (as a consequence of the legal restoration requirements in the Thames Tideway Development Consent Order, obliging Thames Tideway to facilitate waterborne/marine operations in accordance with its safeguarded status) will have to take account of the following:

1. A bridge structure that has not been funded, nor designed and has no confirmed route, and therefore:
 - a. has no known future access and maintenance requirements;
 - b. no determined users of the bridge; and
 - c. no confirmed or river walk route to which it would connect.

Paragraph 5.30 should give primacy to the protection of safeguarded wharves and Thames Tideway Tunnel access shaft, as these are afforded significant protection via two Secretary of State Orders (the safeguarded wharf order from 2021 and the Thames Tideway Development Consent Order) as well as the London Plan Policies referred to above. Therefore, to make sense of Paragraph 5.30, the policy test should be clear that any proposals for the detailed arrangements of publicly accessible landscaped areas and bridge landing points will only be acceptable if they do not jeopardise the ongoing safe operation of and access to the tunnel access shaft, and access to and the safe and viable operations of the safeguarded wharves, including Cringle Dock to the west.


We would highlight that as a strategic waste operator within Wandsworth and wider London, the Local Plan (and evidence base) explicitly recognises the challenges that will arise because of new and emerging legislation, including the Environment Act 2021 which has placed new duties on waste collection authorities to collect additional recyclable materials, most notably food waste. The waste management facilities operated by Cory in the Borough may need to be adapted and expanded to meet these future requirements. It is therefore critical that the existing and future operational requirements of Cringle Dock and Kirtling Wharf are more strongly protected in the emerging masterplan for the Kirtling Street Cluster. We would welcome a meeting to discuss this with you.

Moving Forward

We trust the above representations from Cory will assist with your consideration of the emerging planning policy review. As highlighted above, we consider the proposed changes do not adequately address Cory’s concerns in respect of safeguarding the operational status and Safeguarded Wharf status of Cringle Dock and Kirtling Wharf. If you consider that it would be helpful to meet with Cory to discuss the representations made, then please do not hesitate to contact myself or our agent, Helena Burt (tel: 0207 556 1578) at Rolfe Judd Planning to arrange a meeting.

We look forward to hearing from you.

Yours faithfully



Chris Girdham
Development Director