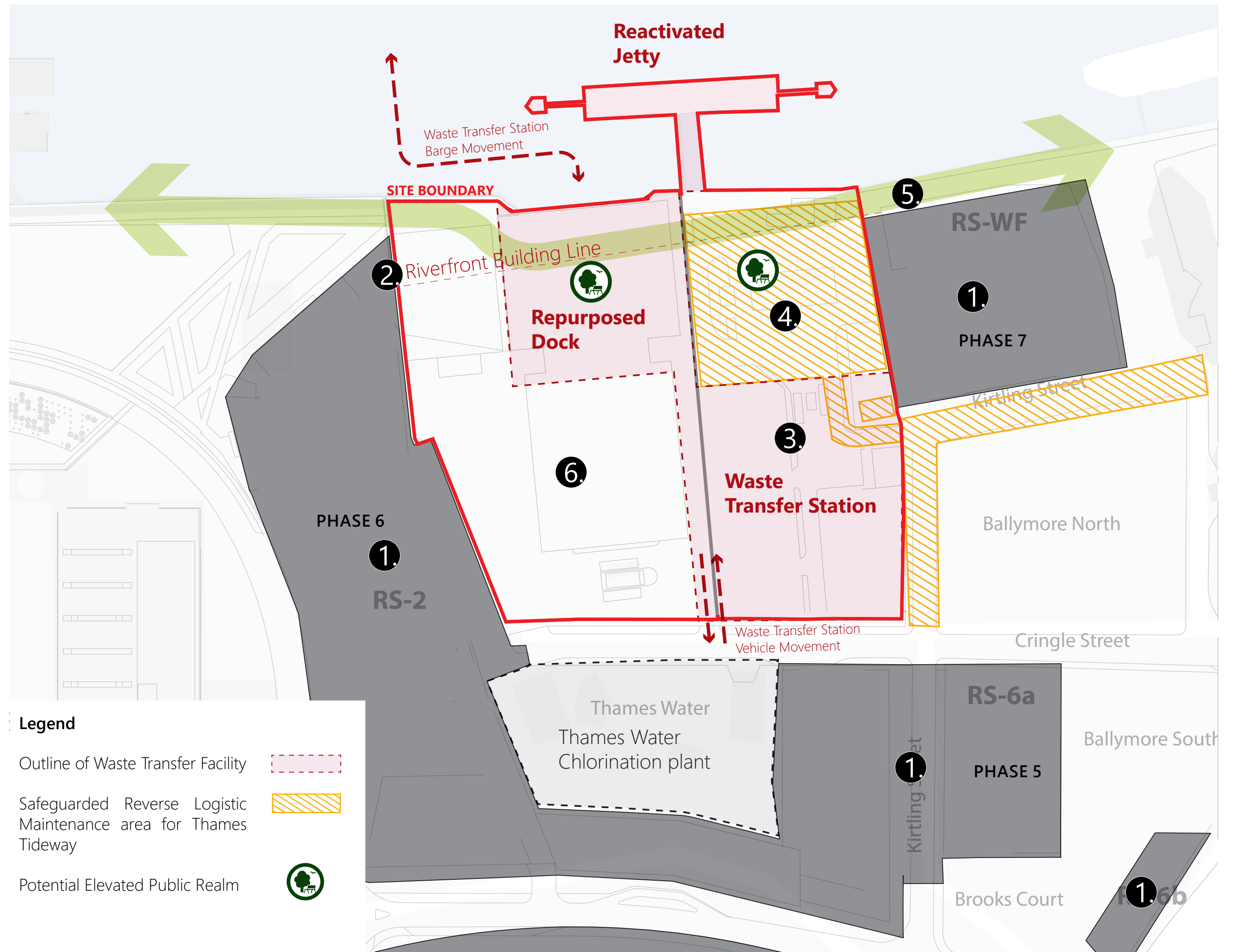


Key

- 1 Parameters of Development to be bought forward by others
- 2 River-front desired building line to ensure there is a uniform waterfront.
- 3 Waste Transfer Facility (WTF) at the lower level. Upper level can be used for commercial purposes.
- 4 Reverse Logistics Thames Tideway (TT) maintenance area with potential for development above.
- 5 Desired river-front walk
- 6 Indicative new residential-led mixed-use development area



TOWN AND COUNTRY PLANNING ACT 1990
THE TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT
PROCEDURE) (ENGLAND) ORDER 2015
DIRECTION UNDER ARTICLES 18 AND 45 RELATING TO CRINGLE
DOCK

The Secretary of State for Communities and Local Government, in exercise of the powers conferred on him by articles 18(4) and 45 of the Town and Country Planning (Development Management Procedure) (England) Order 2015¹, directs the Council of the London Borough of Wandsworth as follows—

1. In this Direction, “Council” means the Council of the London of Borough of Wandsworth.
2. (1) This Direction shall come into force on 1 December 2017 and subject to sub-paragraph (2) below, applies to any application for planning permission for development which is received by the Council on or after 1 December 2017 and which is for development wholly or partly within the area edged red on the attached plan.

(2) This Direction does not apply to any application for planning permission to which paragraph 1(2) of the Schedule to the Town and Country Planning (Mayor of London) Order 2008² applies.
3. Before granting planning permission on any application to which this Direction applies, the Council must consult the Mayor of London.
4. (1) Subject to sub-paragraph (2) below, the Directions given to the Council by the Secretary of State for Environment, Transport and the Regions on 3 July 2000 under articles 10(3) and 27 of the Town and Country Planning (General Development Procedure) Order 1995³ relating to Cringle Dock are cancelled.

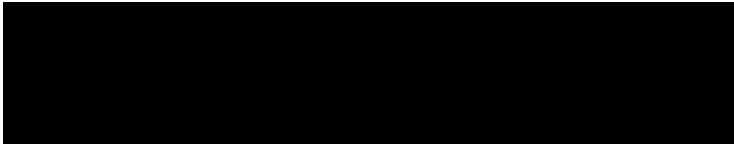
¹ S.I. 2015/595, amended by S.I. 2017/402. There are other amendments which are not relevant to this Direction.

² S.I. 2008/580.

³ S.I. 1995/419, which was revoked in relation to England by SI 2010/2184.

(2) Sub-paragraph (1) does not apply to any application for planning permission which is received by the Council on or before 30 November 2017

Signed by authority of the Secretary of State.

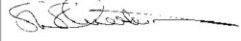


Chief Planner, Department for Communities and Local Government

24 November 2017

This is the plan referred to in paragraph 2 of the Direction dated 24 November 2017 and made under articles 15(4) and 45 of the Town and Country Planning (General Development Procedure) (England) Order 2015 relating to Cringle Dock.

Signed by authority of the Secretary of State.



Chief Planner, Department for Communities and Local Government
24 November 2017



TOWN AND COUNTRY PLANNING ACT 1990

THE TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (ENGLAND) ORDER 2015

DIRECTION UNDER ARTICLES 18 AND 45 RELATING TO THE WESTERN RIVERSIDE WASTE TRANSFER STATION (INCORPORATING THE SMUGGLERS WAY EXTENSION)

The Secretary of State for Communities and Local Government, in exercise of the powers conferred on him by articles 18(4) and 45 of the Town and Country Planning (Development Management Procedure) (England) Order 2015¹, directs the Council of the London Borough of Wandsworth as follows:

1. In this Direction, “Council” means the Council of the London of Borough of Wandsworth.

2. (1) This Direction shall come into force on 1 December 2017 and subject to sub-paragraph (2) below, applies to any application for planning permission for development which is received by the Council on or after 1 December 2017 and which is for development wholly or partly within the area edged red on the attached plan.

(2) This Direction does not apply to any application for planning permission to which paragraph 1(2) of the Schedule to the Town and Country Planning (Mayor of London) Order 2008 applies.

3. Before granting planning permission on any application to which this Direction applies, the Council must consult the Mayor of London.

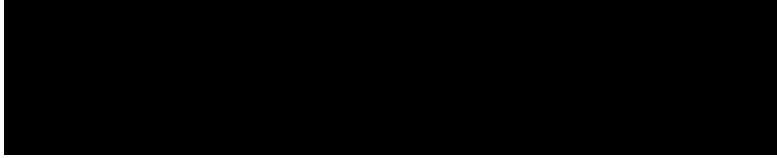
4. (1) Subject to sub-paragraph (2) below, the Directions given to the Council by the Secretary of State for Environment, Transport and the Regions on 3 July 2000 under articles 10(3) and 27 of the Town and Country Planning (General Development Procedure) Order 1995² relating to Western Riverside Waste Transfer Station are cancelled.

¹ S.I. 2015/595, amended by S.I. 2017/402. There are other amendments which are not relevant to this Direction.

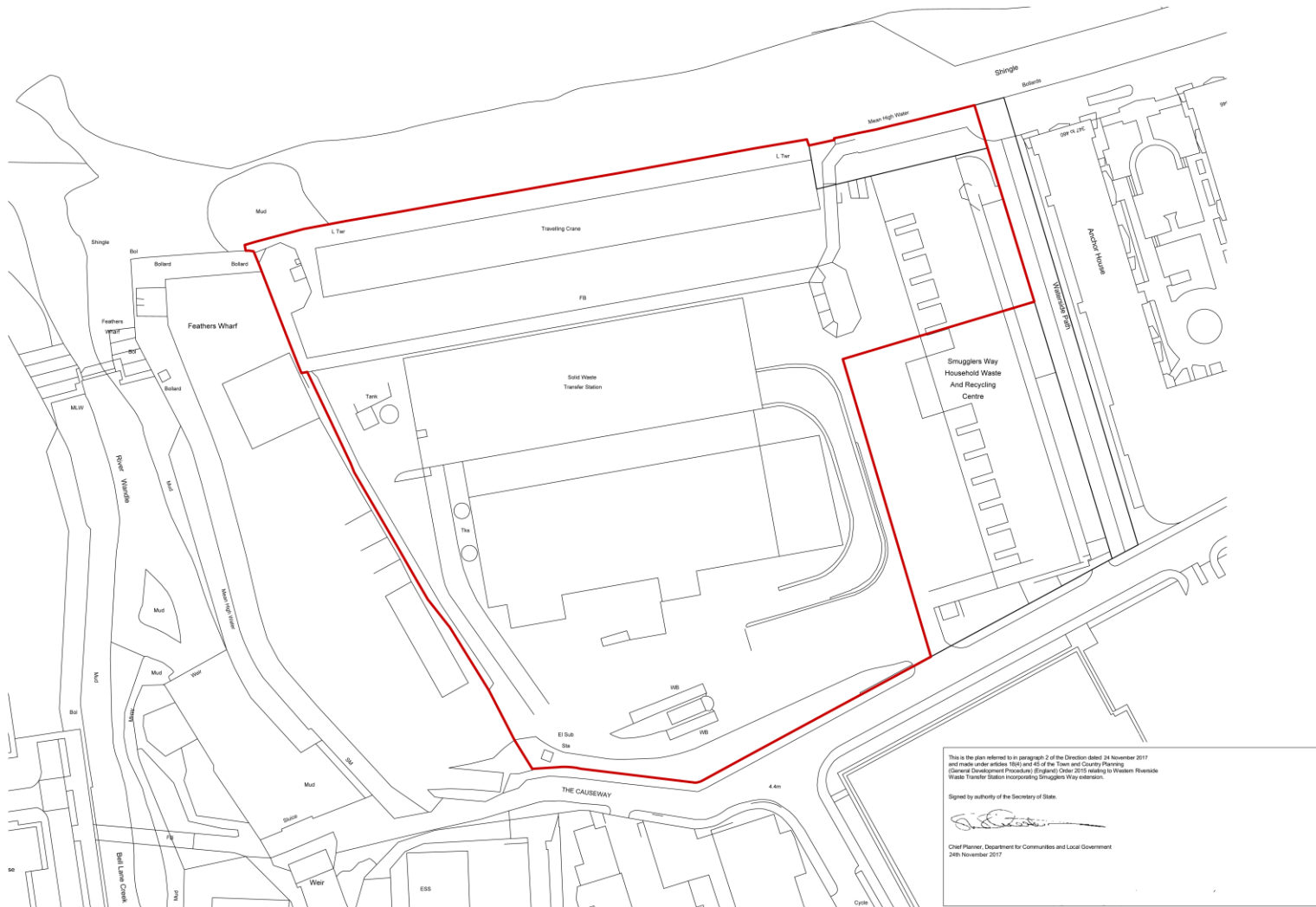
² S.I. 1995/419, which was revoked in relation to England by SI 2010/2184.

(2) Sub-paragraph (1) does not apply to any application for planning permission which is received by the Council on or before 30 November 2017

Signed by authority of the Secretary of State.

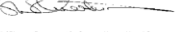


Chief Planner, Department for Communities and Local Government
24 November 2017



This is the plan referred to in paragraph 2 of the Direction dated 28 November 2017 and made under articles 18(2) and 45 of the Town and Country Planning (General Development Procedure) (England) Order 2015 relating to Western Riverside Waste Transfer Station incorporating Smugglers Way extension.

Signed by authority of the Secretary of State.



Chief Planner, Department for Communities and Local Government
24th November 2017

TOWN AND COUNTRY PLANNING ACT 1990

THE TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (ENGLAND) ORDER 2015

DIRECTION UNDER ARTICLES 18(4) AND 45 RELATING TO KIRTLING WHARF

The Secretary of State for Housing, Communities and Local Government, in exercise of the powers conferred on him by articles 18(4) and 45 of the Town and Country Planning (Development Management Procedure) (England) Order 2015¹, hereby directs the Council of the London Borough of Wandsworth as follows:

1. In this Direction, "Council" means the Council of the London Borough of Wandsworth.
2. This Direction shall come into force on **1st March 2021** and shall apply to any application for planning permission for development which is received by the Council on or after **1st March 2021** and which is for development wholly or partly within the area edged in red on the attached plan.
3. Before granting planning permission on any application to which this Direction applies, the Council shall consult the Mayor of London.
4. (1) Subject to sub-paragraph (2) below, the Directions given to the Council by the Secretary of State for Environment, Transport and the Regions on 16 June 2000 under articles 10(3) and 27 of the Town and Country Planning (General Development Procedure) Order 1995 relating to Metro Greenham are hereby cancelled.

(2) Sub-paragraph (1) does not apply to any application for planning permission which is received by the Council on or before **28th February 2021**.

Signed by authority of the Secretary of State.



Kevin Reid Team Leader, Ministry of Housing, Communities and Local Government
19th February 2021

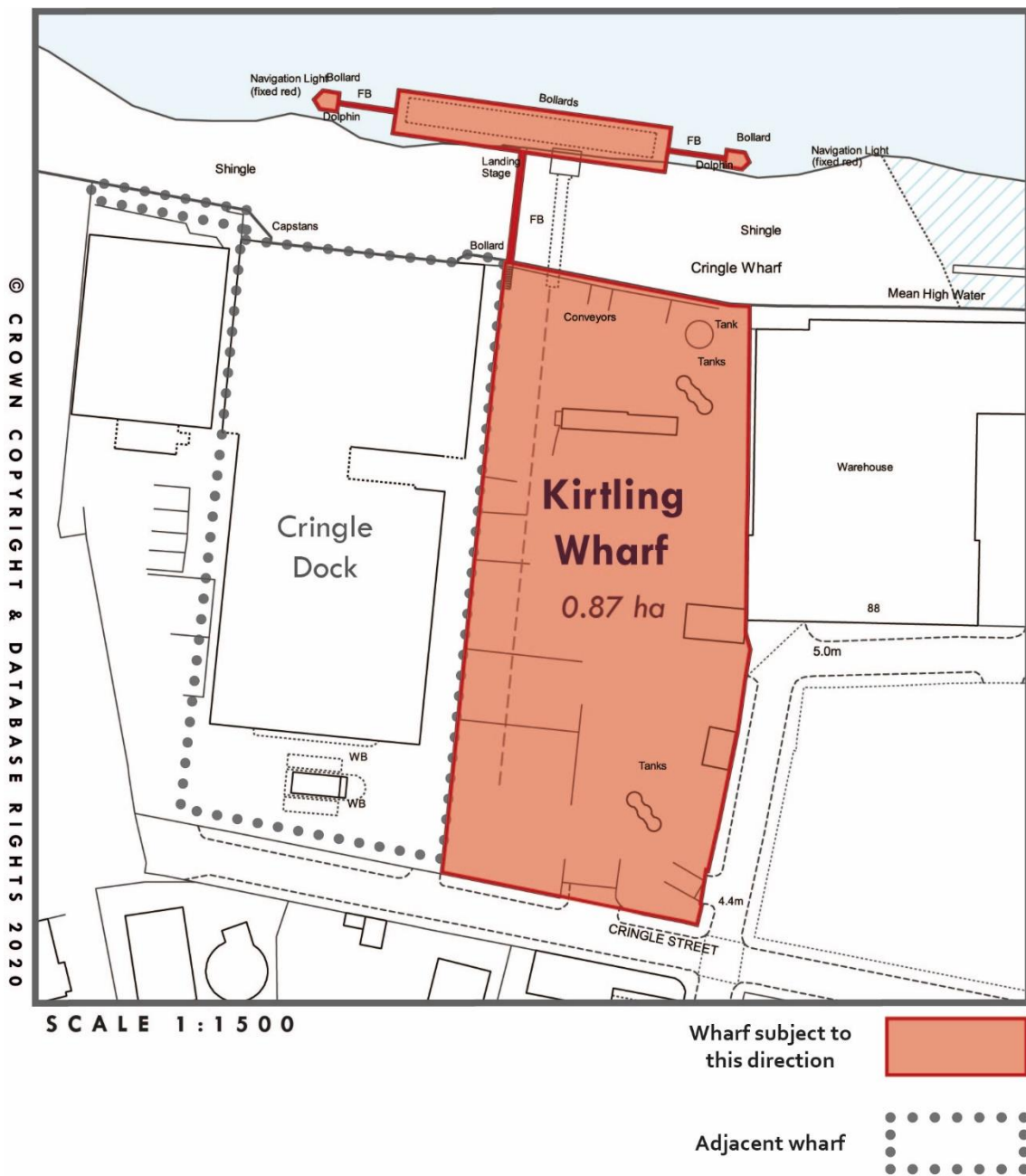
¹ S.I. 2015/595, amended by S.I. 2017/402. There are other amendments which are not relevant to this Direction.

This is the plan referred to in paragraph 2 of the Direction dated **19th February 2021** and made under articles 18(4) and 45 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 relating to Kirtling Wharf.

Signed by authority of the Secretary of State.



Kevin Reid Team Leader, Ministry of Housing, Communities and Local Government
19th February 2021



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

22nd February 2022

TL/P07943

Dear Sirs,

**London Borough of Wandsworth Local Plan – Representations by Cory Group (Cory)
Full Review - Publication Regulation 19 Consultation Version (February 2022)**

We write to make representations to the London Borough of Wandsworth Local Plan Publication Regulation 19 Consultation Version. These comments seek to build on our previous representations on the Regulation 18 Consultation in February 2021. This submission provides:

- Information relating to Cory, including our operations in Wandsworth and decarbonisation objectives
- Representations relating to the following Local Plan policies:
 - Policy LP13 Waste Capacity and Site Allocation: WT11 Western Riverside Waste Transfer Station, SW18
 - Feather's Wharf Cluster; Site Allocation WT9 (Feather's Wharf); and Site Allocation WT11 (Western Riverside Waste Transfer Station, SW12)
 - Policy LP40 Protected Wharves
 - Policy SS1 Spatial Development Strategy and Site Allocation: Kirtling Street Cluster
 - Policy LP13 Circular Economy, Recycling and Waste Management

Background to Cory

As discussed in the 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
- 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.



A series of images demonstrating Cory's ongoing commitment to sustainable waste management.

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.

Policy LP13 Waste Capacity and Site Allocation: WT11 Western Riverside Waste Transfer Station, SW18

Policy LP13 seeks to safeguard existing waste sites and identify new waste facilities in LB Wandsworth which contribute to London's recycling and waste capacity. The importance of this and the role of waste management within Local Plan Policy is heavily supported by Cory.

We strongly support LP13 which contemplates the consolidation of existing waste sites within the Borough and the role this could play in meeting future waste management strategies.

We note that through Part F of the Policy the Council is actively seeking to increase waste capacity overall at new sites, existing facilities, safeguarded wharves, and SIL and LSIAs. We support the objective set out in Consultation Statement Appendix 5 that states "*Wandsworth is planning to close the capacity gap by identifying suitable areas and waste management facilities to provide the capacity to manage the apportioned tonnages of waste by 2026*". However, we also note that the appendix also confirms that "*In Wandsworth, as in most other waste planning authority areas, no individual waste sites were put forward by operators during the plan-making process*" (in response to a call for sites). Nor are there any new waste sites situated on the river coming forward in London. Using the river for bulk haulage purposes makes an essential contribution to improving road safety and air quality.

From our perspective as a strategic waste operator within Wandsworth and wider London, it is also important that the Local Plan (and evidence base) explicitly recognises the challenges that will arise because of new and emerging legislation. For example, we do not consider that the Council have given appropriate consideration to the Environment Act 2021. The Act 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 future requirements.

In seeking to assist in meeting the capacity gap we would like to put forward the potential combined redevelopment of the Feather's Wharf Cluster; Site Allocation WT9 (Feather's Wharf); and Site Allocation WT11 (Western Riverside Waste Transfer Station, SW12) as a development opportunity which can deliver additional waste capacity.

The Western Riverside Waste Transfer Station, identified as site allocation WT11 in the draft plan, as well as the Household Waste and Recycling Centre (HWRC), both lie adjacent to the east boundary of the Feather's Wharf site. While the Feathers Wharf Cluster has been allocated for mixed use development, we consider that there is a strong case for combining this site allocation with the adjacent (WT11) allocation.

This approach would enable the comprehensive redevelopment of the site enabling the Council's ambitions for residential, commercial, and other key uses to be delivered alongside an increase in waste capacity, thus contributing to closing the demonstrable capacity gap. The comprehensive nature of the scheme will not jeopardise any key goals of the Local Plan and will instead create a coherent spatial planning framework that ensures that essential uses can co-exist alongside each other.

We strongly recommend that the draft allocations are reviewed considering the above and amended to ensure that the combined goals of the site allocations can be delivered. This approach has substantial benefits for Wandsworth in delivering new homes, new jobs, and an uplift of waste capacity and will therefore be compatible with the overarching objectives of the Local Plan.



Design Requirements - Tall Buildings.

We are pleased to see that the site allocations for both Feather's Wharf Cluster; Site Allocation WT9 (Feather's Wharf); and Site Allocation WT11 (Western Riverside Waste Transfer Station, SW12) have been amended to enable the delivery of buildings up to 15 storeys in height. This key change will increase the numbers of new jobs, homes and waste capacity within the Borough.

Policy LP40 Protected Wharves

We support the recognition within the Local Plan that there is the potential for consolidation of safeguarded wharves as identified within London Plan Policy SI15 and to ensure consistency between that policy and LP40. Again, it is critically important that sites are available to support bulk haulage on the river Thames given its role in improving air quality and road safety.

We also welcome the recognition that intensification and upgrade of the sites including amendments to access arrangements is supported where the operational capacity of the facility is not reduced. Associated to this we strongly support the delivery of mixed-use development on wharf sites provided that the long-term water freight use of the site is secured, and the operational capacity is either improved or retained.

Policy SS1 Spatial Development Strategy and Site Allocation: Kirtling Street Cluster

We support appropriately sited and designed development and the overall objectives of the Nine Elms Masterplan area, including the Kirtling Street Cluster.

The New London Plan sets out that new development should, through the Agent of Change Principle, respect key existing uses and infrastructure and not seek to introduce incompatible uses (through location or design). This is an approach we support and are pleased to see is identified in the Local Plan.

To meet future waste management requirements at Cringle Dock and to complement our commitment to sustainability, we have been exploring redevelopment options across our portfolio.

The Local Plan review presents an exciting opportunity to establish a clear planning and spatial framework for the Kirtling Street Cluster.

The Challenges and Opportunities

The Cringle Dock WTS facility is situated on the site of a Safeguarded Wharf and was originally built in the 1970s as a riparian waste transfer station that pulverised waste before sending it to landfill. In the 1990s it was modified to containerise waste for onward transportation initially to landfill but from 2011 via the river to the Cory owned Riverside Resource Recovery Energy from Waste Facility in Bexley.

In the intervening period, Battersea Power Station, supported by Wandsworth Council and Transport for London, have significantly transformed, improved access to and ultimately revitalised the local area, and in doing so secured a future for one of London's most recognisable and important cultural heritage assets.

This presents a challenge and an opportunity which we are seeking to build on. The overarching planning permission (and Section 106 legal agreement) for Battersea Power Station's masterplan recognised that Cringle Dock WTS:

- performs, and will continue to perform in perpetuity, an essential public service (supporting the needs of nearly 1 million people, across four London Boroughs) and enables WRWA to perform its statutory functions;
- has exceeded its intended design life and requires a substantial programme of redevelopment;
- has a demonstrable and immovable requirement to be situated on the river and that there are no other suitable sites in Wandsworth capable of meeting this need; and
- It would be difficult, if not impossible, to bring forward Phase 6 of the Battersea Power Station masterplan programme, which envisages over 1 million square feet of mixed used development, without the comprehensive, and sympathetic redevelopment of Cringle Dock.

Over a long period of time, WRWA, Battersea Power Station and Cory have engaged positively and extensively to address the challenges presented above. In 2016, the parties secured planning permission for the comprehensive redevelopment of Cringle Dock. The consented scheme comprised a major residential-led collocation scheme that included 422 new homes and mixed use development on top of a modern WTS, served by a refurbished dock.

Whilst innovative in certain respects, the consented scheme did not materialise for four key reasons:

1. The transitional arrangements needed to maintain service continuity during the construction period (including development of a temporary WTS) were found to be unworkable, and would have led to significant service disruption, expense and adverse impacts on local amenity (largely due to the need to divert substantial tonnes of waste by road to a transitional facility unconnected to the river);
2. The construction of a substantial residential scheme above a modern waste transfer station would be abnormally expensive, due in part to the need for complex civil and structural engineering and suboptimal or novel access, fire safety and amenity protection measures;
3. Preliminary market research by the parties indicated that there would be little appetite for market housing with suboptimal access arrangements and situated above an operating waste transfer station. Sharing a single building envelope in this way would potentially lead to more negative residents-operator interactions, and ultimately more amenity-related complaints. Without a clear route to market, the scheme would be unfundable and therefore undeliverable; and
4. Similarly, with increasing concerns relating to fire safety, the parties realised that funding and insurance options for prospective purchasers would be extremely limited, or unavailable.

It should be noted that the Section 106 legal agreement referenced above requires significant interventions to be installed within Cringle Dock and Kirtling Wharf prior to development zone RS2 (Phase 6) being delivered. The previous application at Cringle Dock sought to deliver these and it is simply not viable to do so in isolation on the site. These key issues could not be overcome on the isolated site and thus we sought to explore additional opportunities presented by the potential availability of surrounding land. Of note is the potential to amalgamate Cringle Dock and Kirtling Wharf.

The Solution

Kirtling Wharf, also on a Safeguarded Wharf site, is situated immediately to the east of the Cringle Dock WTS, on the northern side of Cringle Street at the junction with Kirtling Street. The site includes a permanent quay accessed by a jetty and was historically used for concrete batching.

In 2012-2013 Thames Tideway (TT) acquired Kirtling Wharf (and several adjoining sites) and secured development consent for another critical infrastructure project of essential benefit to London, the Thames Tideway Tunnel (TTT). The Development Consent Order (DCO) permitted the applicant to undertake certain works, including to establish a main tunnel drive site for use in constructing, connecting and operating the main sewer tunnel. DCO Requirements KRTST4 and KRTST23 set out the measures required to restore the site following the completion of the works to ensure that its permanent works maintain the viability of Kirtling Wharf for waterborne freight handling purposes. Following the anticipated completion of TTT related works in 2023, it is envisaged that the site will then revert to its long-term freight handling role as intended.

For the reasons expressed earlier, Cringle Dock WTS cannot be viably redeveloped on the existing site. However, following feasibility work undertaken by a multidisciplinary engineering, design, economics and planning team (Wood, Rolfe Judd and Carter Jonas), WRWA and Cory have concluded that the imminent completion of TTT's Kirtling Wharf works, site restoration and market disposal represents a once in a generation opportunity to both replace critical WTS infrastructure (whilst maintaining service continuity) and produce conditions that would support the completion of the Battersea Power Station Masterplan (Phases 5, 6 and 7). In addition, the site vacated by the existing WTS could be brought forward for a major mixed used development, new public realm and access improvements.

The Outcome

By securing a favourable Local Plan allocation, the subsequent amalgamation of the two adjoining estates and relocation of the WTS, would not only unlock the final Battersea Masterplan phases, it would also realise several other important socio-economic objectives; namely:

- Secure the future viability of both of the statutory protected Safeguarded Wharves at Cringle Dock and Kirtling Wharf, supporting the Mayor's transport and air quality strategies (requiring modal shift to the River Thames to reduce congestion, improve air quality and safety);
- Synergies secured by aggregating the estates will improve access arrangements, layout and building design quality and efficiencies, thereby producing viable operational areas for both waste management and logistics, and in doing so demonstrably reduce the Borough's overall waste management and logistics capacity deficiencies;
- Ensure that the WTS continues to comply with the Environmental Permitting (England and Wales) Regulations (including meeting stringent Fire Protection Plan obligations), and is better equipped to comply with the Environment Act 2021 (including emerging regulations requiring the separate management of food, green waste, packaging and recycling);
- Satisfy TTT's ongoing tunnel maintenance and emergency access safeguarding requirements at Kirtling Wharf;



- Contribute materially to meeting housing delivery targets in Wandsworth and London as a whole with circa 400 new homes; and
- Support the intensification of industrial, logistics and commercial uses in Wandsworth and London with circa 1,200 – 1,500 new jobs delivered.

To support the above aspirations, we have developed a Cringle Dock and Kirtling Wharf Masterplan Vision. This vision has been split into key zones detailed below and is supported by a Land Use Masterplan for the Kirtling Wharf Site which demonstrates the key benefits the approach can realise for the Council and the wider area. The Masterplan is appended to this representation.

The Waste Management, Logistics and Tideway Tunnel Zones

By 2026, the Cringle Dock and Kirtling Wharf masterplan area will have been comprehensively redeveloped and will accommodate a sympathetically designed, modern waste transfer station (WTS) capable of safely and efficiently meeting the statutory customer service obligations of WRWA.

Served by the river Thames with an upgraded internal dock, the fully enclosed WTS will be an exemplar facility, benefitting from off-street vehicle processing and holding areas, advanced waste handling and logistics infrastructure, and state of the art security, surveillance and control systems to manage emissions, energy and water consumption, ventilation, safety, pollution and fire.

The WTS will be the first purpose-built facility in the country capable of supporting fully decarbonised bulk handling and river and road haulage operations, progressively contributing to improved air quality in London. Furthermore, the new facility will also increase WRWA's overall service resilience by providing flexible operational space to respond to emerging regulations requiring the separate management of waste streams (including food and green waste).

Recognising that access to TTT's shaft access zone will need to be safeguarded in perpetuity, the dual-purpose logistics activity area will be fully utilised and support waste container handling and reverse logistics operations, the latter being served by both the existing jetty and local road network. To support these functions, and to enable TTT to comply with its obligations to ensure that its permanent works maintain the viability of Kirtling Wharf for waterborne freight handling, the airspace above the WTS zone will be available for a range of commercial uses, including distribution and warehousing.

The aggregation of Cringle Dock and Kirtling Wharf estates, and the resultant modernisation and intensification of operational floorspace and repurposing of the existing dock and jetty, will provide opportunities to increase the combined operational capacity of the waste and logistics area. In doing so, up to 200 new jobs will be created along with substantially improved public realm.

Mixed Use Zones

Following the commissioning of the new WTS, and the demolition of the former waste facility, a major new residential mixed-use development will be developed in its place. Physically segregated from the new waste and logistics areas to safeguard the security and amenity of its occupiers, the mixed-use zone will benefit from its own vehicle and pedestrian access arrangements. The new mixed-use development will provide approximately 400 new homes and a range of tenure options, including private market/owner-occupier housing, shared ownership and affordable rental properties. It is estimated that circa. 34,000 sqm of commercial office and light industrial floorspace could be developed which could support circa 1,200 – 1,500 jobs depending on the typology of commercial floorspace delivered.

The layout and distinct architectural design of the buildings in this zone will have a coherent and complementary relationship with Battersea Power Station's Phases 5 and 6 masterplan areas while respecting the unique and highly sensitive cultural heritage characteristics of the locality. At ground floor, the new development will include a range of new retail, leisure and food and beverage uses providing essential services while enhancing the vibrancy of the area.

If TTT could agree to permanent bridge cranes being used to service their shaft going forward (as provided for today), then the logistics zone encompassing the shaft access area could also become enclosed. The physical containment of this activity area within an insulated building would more readily enable the Cringle Dock and Kirtling Wharf masterplan area as a whole to integrate into the wider neighbourhood, and in particular significantly improve the prospects of viable residential development coming forward in Phases 5 and 7 of the Battersea Power Station Development.

Indeed, if the airspace above both the retained Cringle Dock and the Kirtling logistics zones became available, it may be possible to deliver an exciting new elevated urban public park, connected by a new east-west Thames footpath and providing onward connectivity to Phases 6 (to the west) and 7 (to the east) as well as access to the proposed Battersea to Pimlico bridge. The occupants of the new residential led development would be able to enjoy access to, and views of, the newly created public realm areas surrounding the development, including the elevated public park, benefits which would also be available to occupiers of Phase 7 and the existing Berkeley Group Riverlight development.

Proposed Changes to the Site Allocation.

In order to secure the above vision, we are proposing the above changes to the Kirtling Street Cluster Site Allocation.

The Kirtling Street Cluster currently contains five site allocations including Site Allocation NE11 (Cringle Dock) operated by Cory.

It is proposed that a new site allocation amalgamating NE9 and NE11 as well as the surrounding land encompassed in the appended masterplan would be created. This would set out the delivery aspirations of the combined waste facility alongside the principles associated with the accompanying mixed-use development. We would welcome the opportunity to work with the Council to develop an appropriate policy and development control framework for the site allocation.

This scope and the proposed change to the allocation change would ensure that the overall aspirations of the Kirtling Street Cluster continue to be delivered. Importantly the draft site allocation would continue to include mixed use development with circa 400 new homes and circa 1,200 – 1,500 new jobs provided to the cluster with business uses on the ground floor and residential use on the upper floors. The key urban design and public realm principles listed in the allocation would also be delivered, including:

- The masterplan will seek to improve the transport environment integrating public and private transport with active travel towards and reducing the impact of servicing to the site;
- Development proposals will enable walking and cycling connections to the bridge, the riverside walk and street frontages, as well as onward connections to Nine Elms Lane to enable the Pimlico bridge to be realised;
- A riverside walk will be provided;

- Recognition that NE9, being adjacent to the proposed Nine Elms Pimlico Bridge, the Thames Path and new public open space would be suitable for a landmark building;
- The scheme will improve frontages, streetscape, public realm and signage along Cringle Street and Kirtling Street with entrances directly onto those streets and towards the River Thames;
- Buildings will front on to Cringle Street and the River Thames above and alongside the waste transfer station;
- A high-quality public realm will be provided to the riverside walk drawing upon principles set out in the Nine Elms Public Realm Design Guide; and
- An open space that connects to the proposed Nine Elms Pimlico Bridge, the Thames Path and the open space above the TTT access shaft can be delivered.

These are substantial access and public realm benefits which when combined with the wider socio-economic benefits associated with the modernisation of the WTS, creation of new homes and jobs, clearly demonstrate the importance of this development.

Safeguarded Wharves re-configuration

Finally, it should also be noted that the indicative scheme would involve the loss of part of the safeguarded wharf area designated at Cringle Dock (i.e., loss of 0.355 ha). In line with Policy LP40 of the Local Plan and SI15 of the London Plan the scheme would ensure that the overall access to the riverside and the tonnage capacity of the wharves are retained. On this basis we consider the approach to be compliant and supported by policy aspirations to intensify industrial land and capacity for alternative uses.

In addition to the above through Cory's association with the WRWA can offer 0.420 ha 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 included in the safeguarded wharf designation. The safeguarded wharf designations for Cringle Dock and Smuggler's Way have been appended to these representations for reference purposes.

Kirtling Street Cluster: Concluding Comments

Overall, we consider that the potential amalgamation of the Cringle and Kirtling estates represents the only viable opportunity to secure essential improvements to critical infrastructure and deliver new housing and employment at a sensitive and important location next to the iconic Battersea Power Station, while unlocking the final phases of the Nine Elms Masterplan.

We look forward to working with the Council, Battersea Power Station and other key stakeholders to help deliver our vision for the area. To this end, the WRWA and Cory are preparing a formal pre-application submission to the Council which will progress the emerging proposals to the next stage of design evolution. It is anticipated that this pre-application meeting could take place in the next 3 months.

Policy LP13 Circular Economy, Recycling and Waste Management

As the owners and operators of the Pensbury Place Transfer Station we would like to reiterate our support for the protection of the site within the Local Plan.



Pensbury Place plays an important role as part of our operations within the Borough by performing a waste management contingency / reserve capacity role for our two main operations in Wandsworth.

Based on the above and given the wider waste management site capacity deficiency in Wandsworth, it is essential that the Local Plan continues to afford strong policy protection to prevent the loss of the site to other uses and to ensure its continued operational viability.

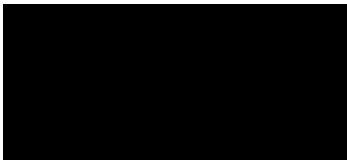
Moving Forward

We trust the above representations from Cory will assist with your consideration of emerging planning policy review and the exciting opportunity to provide the comprehensive redevelopment of the Cringle Dock and Kirtling Wharf site within the Borough and we look forward to working with you over the course of the Local Plan review and development control processes.

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, Tom Lawson [REDACTED] at Rolfe Judd Planning to arrange a meeting.

We look forward to hearing from you.

Yours faithfully



Chris Girdham
Development Director

Appendix 1 – Cringle Dock and Kirtling Street Masterplan prepared by Wood PLC.
Appendix 2 - Safeguarded wharf designations for Cringle Dock and Smuggler's Way