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From: May Hale

Subject: Consultation on the Pre-Publication Draft Local Plan - Objections to the Draft Local Plan

Date: March 1, 2021 at 9:32:14 PM GMT

To: planningpolicy@wandsworth.gov.uk

Cc: Mark Hale

Dear Sir/Madam

This submission represents two objections; one from May Hale and one from Mark Hale.

We object to Nine Elms Pimlico Bridge (NEPB) and reference to the preferred location (option 4c at Kirtling Street) forming part of the Draft Local Plan. We submit there should be a non-Bridge eventuality added to the Draft Local Plan and NEPB deleted.

We submit our evidence as below.

Please note the following references in our submission:

- **Nine Elms Pimlico Bridge (NEPB)** means the project itself and/or the relevant appropriate party/parties involved in the project such as London Borough of Wandsworth (LBW) , the Nine Elms Vauxhall Partnership (NEVP) (as promoters) and/or any part of the NEPB consultancy team as appropriate or relevant.
- **TFL study** means the Nine Elms - Pimlico Bridge Feasibility Study Summary Report December 2013 (minor revisions November 2014)
- **Stage 1 report** means the NEPB Stage 1 report dated April 2018
- **Stage 2 report** means the NEPB Stage 2 report dated January 2019

General Objections to Nine Elms Pimlico Bridge

We assert there is no compelling case or requirement for the NEPB in itself or in its preferred location. There is already good connectivity in the area and there has been no business case study or consultation to show the comparison of the 'Bridge option' to the 'non-Bridge option' to demonstrate need or value for money to the residents and stakeholders of both Wandsworth and Pimlico. The viability of NEPB has therefore not been proven prior to its inclusion in the Draft Local Plan and demonstrates a potential lack of duty of care and legal duties from NEPB to residents and stakeholders of both Wandsworth and Pimlico.

We note:

- The TFL study was based on *theoretical* demand and moreover states: '***It should be noted that in practice the number users is not expected to match the theoretical demand***'.
- Demand for the bridge in the Stage 2 report is based on AECOM's in-house Urban Space Strategic Pedestrian Tool (USSPT) to estimate pedestrian demand and TFL's Cynemon model for the cycle demand on the new bridge and noted of up to 6,400 - 10600 combined pedestrian and cyclists for the preferred location per 12 hour day.
- April 2018: Stage 1 report - ***option 4c is expected to have approx 40% less demand than either option 2 and 3*** yet both the November 2018 exhibition boards and the Stage 2 report showed option 2 and 4c having similar forecast demand of up to 10600

combined pedestrians and cyclists per 12 hour day. We note the figures from Nov 2018 exhibition and Stage 2 report as below:

- Option 2 2,500 - 4,400 pedestrians, 4,500 - 6,200 cyclists, 7,000 -10,600 combined pedestrian and cyclists per 12 hour day
- Option 3 3,000 - 5,500 pedestrians, 4,800 - 6,900 cyclists, 7,800 -12,400 combined pedestrian and cyclists per 12 hour day
- Option 4c 3,200 - 5,700 pedestrians, 3,200 - 4,900 cyclists, 6,400 -10,600 combined pedestrian and cyclists per 12 hour day
- Based on the figures above given by NEPB - approx 40% less demand would mean option 4c would have an estimated 4,200-6,360 combined pedestrian and cyclists compared to option 2 and an estimated 4,680 - 7,440 combined pedestrian and cyclists compared to option 3. Yet the forecast is predicted at 6,400-10,600 combined pedestrian and cyclists per 12 hour day. Such disparity in the reporting of usage needs to be investigated and verified before the preferred location is progressed.
- The Stage 2 report assessment however confirms *'The assessment to date has sought to make best use of the data currently available. In order to refine the pedestrian and cycle demand forecasts at Stage 3 additional and updated data and information will be required. **This is expected to include undertaking a new questionnaire survey on Vauxhall and Chelsea bridges and travel surveys of various Nine Elms developments which have recently been completed in order to provide updated information on existing desire lines and travel patterns in the local area. Additional pedestrian and cycle counts will also be undertaken in order to provide a better indication of current pedestrian and cycle demand in the local area.'***

It would seem that until the actual surveys noted in the Stage 2 report (the 4th bullet point above) are carried out to determine and refine actual pedestrian and cycle demand in particular for the preferred location that NEPB should not be progressed nor included and promoted in the Draft Local Plan. Otherwise expenditure and resources are wasted as the transport assessment has been based on outdated modelling which NEPB themselves confess to needing additional up to date surveys. These actual studies should be carried out **prior to Stage 3** as it is fundamental to evidencing the need for NEPB.

Furthermore, such additional surveys and data may well prove that preferred location option 4c is **NOT** viable and should not have been chosen as the preferred option.

Rather than being a bridge to serve public need, there is evidence to suggest the NEPB bridge is more of a '**vanity bridge**', that is being supported and promoted by LBW and local developers involved in the NEVP to raise the profile of the Nine Elms area.

Following a meeting of Wandsworth Council's Finance, Resources and Climate Sustainability Overview and Scrutiny Committee held on 3 December 2020, the following extract below from Wandsworth's Council Paper 20-383 states:

'15. Following agreement at February's FCR OSC meeting (Paper. 20-94), the Design Team for the Nine Elms Pimlico Bridge were instructed to scope and programme the additional packages of works that would be required if the Council was to instruct the team to proceed to RIBA Stage 3 and develop and submit a consents application. This work has now been completed and no further design work will be instructed at this time, pending further discussion with Westminster City Council and the GLA on their support for this project. Work has also progressed with defining the area around the Southern Landing area in master planning and place-making terms, to ensure that a coordinated approach is taken to the

way people and traffic move around and between buildings in the area in both the Bridge and non-Bridge eventualities. This has included incorporating the proposals for the Bridge into the emerging Draft Local Plan, and the Design Team feeding into a number of studies being carried out in the area that are considering scenarios that both include and exclude the Bridge coming forward. The Council's own public realm study for the area around Kirtling Street (also approved in paper 20-94) will now be carried out over the winter to ensure that it incorporates these findings and is able to meaningfully contribute to the evidence base of the emerging Local Plan.'

The extract above from Wandsworth's Council Paper 20-383 states that masterplanning and place making will allow for a **'Bridge or non-Bridge eventualities'** and that **..'a number of studies being carried out in the area that are considering scenarios that both include and exclude the Bridge coming forward'** and yet the Draft Local Plan prescribes and promotes NEPB as a certainty and provides no alternative for the non-Bridge eventuality. It proves the point precisely that even LBW are not confident of its delivery which once again brings questions into focus - ***why is NEPB being adopted into the Draft Local Plan before certainty on its delivery and suitability can be demonstrated? Why is the non-Bridge eventuality not included in the Draft Local Plan?***

In addition, Westminster's draft City Plan 2019-2040 does not support NEPB; extract as follows *.....' 32.8 This approach means that as a matter of principle we do not favour proposals for new river crossings in Westminster. Any proposals for new or replacement crossings that do come forward will be required to demonstrate that they meet a robustly evidenced strategic transport need on a scale sufficient to outweigh the importance of protecting our waterways' open character...'*

Further provisions in Westminster's draft City Plan 2019-2040 provide further restraint on the NEPB - extract from the Stage 2 report *"Furthermore draft policy 7, addressing neighbourly development may also present constraints in terms of impacts on neighbouring amenity...'*

Therefore the critical questions are

- *How many actual users will there be as opposed to theoretical/modelled users of the NEPB and what are we to rely on to evidence the actual user need or demand for a pedestrian and cycle bridge between Nine Elms and Pimlico versus a non-Bridge option? If the actual user demand is likely to be relatively low and there is little or no support from Westminster City Council and the NEPB conflicts with Westminster's City Plan 2019 - 2040, what justification is there in including, adopting and progressing the NEPB in the Draft Local Plan?*
- *Why is there no business and viability study and consultation on a Bridge versus non-Bridge option - where is LBW's legal duty of care in such matters? We conclude a business and viability study and consultation is required on a Bridge versus non-Bridge option*
- *Why is the 'non-Bridge' eventuality not included in the Draft Local Plan when LBW themselves are planning for a non-Bridge eventuality? We conclude a non-Bridge eventuality should be included in the Draft Local Plan*

REASONS WHY THE PREFERRED LOCATION (OPTION 4C) SHOULD NOT BE CHOSEN (GROSVENOR ROAD TO KIRTLING STREET)

Background

We own houseboat Kasamaja, one of the 5 houseboats located to the west of Nine Elms Pier, which have been temporarily relocated due to Thames Tideway Tunnel (TTT). It is a legal statutory

requirement of the TTT Order 2014 (as amended) to reinstate all 5 houseboats back onto their moorings at the end of TTT marine works.

Preferred location - option 4c would permanently detrimentally impact all 5 moorings and houseboats located at the west of Nine Elms Pier with harms arising from; restricted navigation, construction, disruption, light and noise pollution, security problems, reduced amenity and outlook and market value.

We also own houseboat Rockland, our home, located on the outer north side of Nine Elms Pier, one the other 15 houseboats moored at Nine Elms Pier. Option 4c would also permanently detrimentally impact the amenity of Rockland and the other houseboats with harms arising from; construction, disruption, light and noise pollution, security problems, reduced amenity, outlook and market value.

We have lived at Nine Elms Pier for over 30 years and the long standing community and valued diversity at Nine Elms Pier is being ignored in order for the preferred location for NEPB to be progressed. This is contrary to the mantra in the Draft Local Plan of ...'People First'. The devastating and detrimental impact on the residents and owners at Nine Elms Pier has been mainly ignored in order to promote the preferred location of NEPB. The community at Nine Elms Pier has existed since 1985 - before the community at Riverlight and Battersea Power Station and many of the other new communities at Nine Elms and yet we at Nine Elms Pier seem to matter less to the NEPB promoters.

More specific reasons **why the NEPB should not be located at the preferred location - option 4c:**

- **Design and Navigation Impact**
 - **The design impact on the river has been ignored - a longer curved bridge for location option 4C provides more visual obstruction of the River Thames**
 - The navigational impact relating to houseboats moored at the west of Nine Elms Pier shows one boat is shown permanently relocated and the four remaining houseboats would have restricted access. There is insufficient space between Cemex Pier and Nine Elms Pier for the spiral incline and associated impact protection piles to coexist with the five houseboats insitu. Although the houseboats are generally static, they need regular maintenance and servicing in addition to emergency access, which all requires sufficient space for safe navigation. We contend that the spiral design at the Kirtling Street landing will not fit in the space between the houseboats and mooring infrastructure at Nine Elms Pier and the Cemex Pier structure without compromising navigational safety or displacing houseboats.
 - Given the known inconsistencies and early stage design, the impacts at Nine Elms Pier may be even greater, requiring more of the houseboats to be permanently relocated to make way for the NEPB.
 - At the November 2018 exhibitions, the NEPB Project advised us that the spiral will be in the order of 30m diameter at the Kirtling Street landing based on initial concept design and that the spiral incline had a gradient of 1:21 or maximum 1:20 measured 900mm in from the outer edge of the 8m wide spiral. In addition to the spiral there would also be a series of permanent impact piles located outside of the spiral, which would further reduce the navigable space by, in our opinion, another \pm 5-10m. Based on the 30m diameter spiral, and leaving space to clear Cemex Pier and the impact piles, this would leave approx \pm 5m to navigate through which would be inadequate space for the houseboats to safely navigate, and it would restrict emergency services access. Furthermore, NEPB may have under-

calculated the diameter of the spiral incline landing shown at Kirtling Street, in order to try to make it fit within already tight site constraints. Our understanding is that the gradient should be measured from the inside of the spiral **not** the outside. Otherwise, the inside gradient of the spiral would be much steeper than the permitted maximum 1:20 gradient - making it unsafe for users, particularly disabled and ambulant disabled people. It is a fundamental design principle to address the worse case scenario in any spiral, be it a ramp, slope or staircase. It is unacceptable for the main spiral gradient to be steeper than 1:20 - it should not be the case that the NEPB Project looks for ways to increase the gradient at the Kirtling Street spiral landing to make the design fit the tight site constraints as there should be equal treatment at both sides of the river. Additionally, there does not appear to be any landings on the spiral incline - landings required within the gradient of 1:21/1:20 would also have the impact of making the spiral bigger. A ramp steeper than 1:20 would also necessitate more landings to ensure user safety. If design regulation is met, whereby the spiral gradient of 1:21 (preferably less) or maximum 1:20 is measured 900mm **from the inside** of the spiral, the spiral would have to be much larger than indicated by the NEPB Project and, by way of example, in our estimation, would be of the order of ±43m diameter excluding landings (extrapolated from NEPB project's figures of 30m diameter, 8m wide ramp split into 2m, 4m, 2m lanes for pedestrian-cycles-pedestrian and 1:20 gradient). On top of this measurement, you would need to add the impact piles set outside of the spiral as shown on the Nov 18 exhibition boards. Therefore, the spiral design of ±43m diameter will not fit into the site constraint of approx ±45m once necessary ramp landings, impact piles and navigational space for the houseboats and clearance around Cemex jetty have been taken into account. These points were raised by ourselves in our

previous consultation response to Stage 1 but we have had no response on these matters from NEPB. At the 13 February 2019 Finance and Corporate Resources Overview and Scrutiny Committee Ref paper 19-79 clause 34b (page 9 of 16) *... 'a small package of work is commissioned from the Design Team to further refine the case for the recommended location and further development of the design proposals to demonstrate buildability and address stakeholder concerns ...'*. We understand the conclusion of the studies has not been shared with residents and stakeholders adding concern that the consultation process is flawed and not inclusive as residents and stakeholders should be kept informed during all stages. Residents and stakeholders have not had the opportunity to comment on the further findings. LBW presumably assume there is no need to consult on the further work prior to NEPB's inclusion into the Draft Local Plan leading to an unfair undemocratic process.

- Attempting to squeeze a spiral incline between Cemex Pier and Nine Elms Pier and its house boats creates an undesirable congested urban townscape at the south landing of option 4c - not something which was envisioned for the competition winning bridge design and not befitting a 'landmark'.
- ***We conclude there is inadequate space at the river side of the Kirtling Street landing for the NEPB. The townscape and urban landscape becomes congested and maximises the impact at the Kirtling Street landing. This is contrary to the design concept which aims to provide minimal impact on each bank.***
- **Light pollution**
 - Detrimental impact on residents at Nine Elms Pier particularly for those living at the western and northern sides of Nine Elms Pier
 - Detrimental impact on residents at Riverlight and the proposed Phase 7 residential buildings at Battersea Power Station

- More impact on the aquatic environment than any other option due to unnecessary elongated curved length of the bridge due to the unsuitable preferred location
- **Noise Pollution**
 - Significant increase in number of people in the area will add to noise pollution and harm the amenity of local residents
- **Loss of privacy/overlooking**
 - **Significant increase in pedestrian/cycle traffic is expected both on the bridge and Tideway Walk. Loss of privacy and overlooking onto Nine Elms Pier and its residents and** harm the amenity of local residents
- **Security**
 - Significant increase in number of people in the area could bring security and crime issues.
- **Loss of amenity**
 - NEPB blocks river views and river aspect from the river walk. Not everyone will want to cross NEPB.
- **Heritage And Townscape Assessment**
 - The Streetscape image shown in the Stage 2 report reveals the preferred option to be a poor choice because of the tight site constraints of Nine Elms Pier and its houseboats and Cemex Pier. In reality, the NEPB on the south side at option 4c is crammed in between Nine Elms Pier and its houseboats and Cemex Pier, if the spiral design can even fit into the space.
- **Planning Assessment**
 - The Mayor of London, Sadiq Khan, has stated the NEPB requires ***'the support from all affected authorities'*** and Westminster Council remain strongly opposed to the NEPB.
 - According to Churchill Ward labour councillors, the Deputy Mayor from Transport has issued the following statements to provide clarity on the Mayor's position;
 - *'This scheme is being developed by the London Borough of Wandsworth and the Nine Elms Vauxhall Partnership. It will require the support of the London Borough of Westminster and residents on both sides of the river if it is to be taken forward.'*
 - *'This is not a TFL or City Hall scheme and TFL is not currently undertaking any work on the project. Any scheme would require support from all affected local residents and authorities before being progressed.'*
 - *'Also, just to add further clarity, there is currently no money assigned in the TFL budget for this project, nor are there any plans to provide financial support from TFL or the GLA.'*
- **Deliverability and Maintenance**
 - The extensive list of exclusions demonstrates that the total cost of the bridge is not known at this stage, and neither has an estimate of total cost been given.
 - Who pays for the bridge? Option 4c is the most expensive option - it being curved and the longest bridge. It is very likely to remain expensive when technical constraints, substantive land acquisition and compensation costs are factored in, alongside planning costs.
 - There is no information on how NEPB would be fully funded and who will manage and pay for ongoing maintenance.
 - The Garden Bridge spent over £40 million before it was aborted due to escalating costs and trustees may be subject to legal challenge due to a lack of duty of care. We also understand the Diamond Jubilee bridge was started some while ago but has not yet found sufficient finance to progress to complete.

- It is reported that Hammersmith Council may have to contribute £64 million towards the estimated ±£140 million repair bill of Hammersmith Bridge, which could cost residents an extra £800 each in council tax to meet costs. It highlights where the cost burden is placed on bridge repairs. This evidences the need for more robust cost benefit analysis studies before Wandsworth and Pimlico residents are subjected to unfair repair costs.
- It would be a travesty to waste public funds and a similar fate of the Garden Bridge to befall NEPB because of spiralling complexity and costs, particularly in the face of fierce opposition to NEPB from many parties.
- **Detrimental impacts suffered during construction**
 - There is no mention of detrimental impacts suffered during construction, which would almost certainly mean temporarily relocating at least 5 houseboats and its residents during construction works. Furthermore, the preferred option is likely to be subject to high mitigation costs for residents at Nine Elms Pier, both during and after construction due to the proximity and impact of construction and completed works - as has been the case for Thames Tideway Tunnel works close to Nine Elms Pier.
- **COVID**
 - Covid and the prospect of future pandemics has changed the working dynamics and dependency on working in and commuting to Central London. The consequences of COVID will undoubtedly require new modeling to be undertaken to reassess NEPB viability.

We conclude that a non-Bridge eventuality should be included in the Draft Local Plan and request the NEPB is deleted from the Draft Local Plan.

NEPB should not be progressed because there is no evidence of the following:

- Evidence of a business viability plan for a 'bridge' versus a 'non Bridge' eventuality
- Evidence from actual surveys that a NEPB is needed in the preferred location (option 4c from the Stage 2 study)
- Evidence that Westminster Council will support NEPB in the preferred location
- Evidence of the total costs involved including maintenance and who pays
- Evidence of the changing demands due to COVID

The following references to NEPB in the Draft Local Plan should be deleted and are as follows:

- People **First - clause 2.88 (p29)**
- People First - clause 2.93 (p30)
- Place performance (page 92) last bullet point and PM3 Nine Elms Placemaking - B (page 92) and People First - E (page 95)
- Objection to the inclusion of NEPB on diagram entitled 'Nine Elms' (page 96)
- Objection to the inclusion of NEPB on diagram entitled ' Kirtling Street Cluster' (page 97)
- Site allocations Development considerations - Open Space (page 99)
- Site allocations Development considerations - Relevant Management Plans (page 100)
- Design Requirements - Movement (p100)
- Design Requirements -Identity and Architectural Expression (p101)
- Map of cycling Routes Map 20.1 (p353)

- Any other reference to the Nine Elms Pimlico Bridge or footbridge in the Draft Local Plan

Kind regards

May Hale and Mark Hale

Residents and Houseboat Owners at Nine Elms Pier Houseboats