

HB/TL/P07943
27 October 2022

London Borough of Wandsworth
C/O Banks Solutions
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FAO: Ms. Charlotte Glancy
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Dear Jameson Bridgwater and Graham Wyatt

Wandsworth Local Plan Examination (November 2022)
Hearing Statement submitted on behalf of Cory Group (Cory)

This Hearing Statement has been prepared by Rolfe Judd Planning on behalf of Cory Group (Cory). In accordance with the examination guidance from the Inspectors this statement is classified as a 'further statement' and follows previous representations from Cory on the Regulation 18 Consultation in February 2021 and Wandsworth' Pre-publication Regulation 19 Consultation Version (February 2022).

This Further Statement principally responds to Main Matter 3 – Wandsworth Town (Policies PM2, WT1 to WT22) which as set out in the Main Matters, Issues and Questions With Draft Hearings Programme is due to be heard on Day 2, Wednesday 16th November 2022.

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 (WRWTS)
- Cringle Dock Waste Transfer station in Battersea (HWRC)

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.

The Wandsworth Local Plan will directly influence and impact the surrounding area and the future development of the Western Riverside Waste Transfer Station, Materials Recycling Facility, Household Waste and Recycling Centre (in Wandsworth) and Cringle Dock Waste Transfer Station (in Battersea). Cory are therefore keen to ensure that the area strategy and site allocation policies are appropriate and do not curtail the future development of sites.

Statement of Common Ground

As set out above Cory submitted representations to the Publication Local Plan Consultation (January 2022). Following this LB Wandsworth issued a Statement of Common Ground establishing areas of agreement between the Council and the Western Riverside Waste Authority (WRWA) – it is recognised that this Statement of Common Ground includes the representations made by Cory.

Cory supports the established areas of agreement and proposed modifications set out in the Statement of Common Ground published by LB Wandsworth. For purposes of clarity the areas of agreement are summarised below:

- Modifications to paragraph 4.89 to ensure that the new requirements for waste management set out in the Environment Act 2021 are considered in the Wandsworth Local Plan
- Amend Map 4.1 Strategy Area Map: Wandsworth Town to remove Proposed New Public Open Space from WT9 Feather's Wharf
- Amend Map 3.2 Site Allocation Map; Map 4.1 Spatial Area Map Wandsworth Town; and Map 4.8 Western Riverside Waste Transfer Station to include the HWRC and WRWTS in Site Allocation WT11 (Western Riverside Waste Transfer Station)
- Modifications to paragraph 5.29 to consider the feasibility and comprehensive and combined development of both Kirtling Wharf and Cringle Dock
- Modifications to paragraph 5.30 to ensure that there is no conflict with Kirtling Wharf given its Safeguarded Wharf designation
- Minor modification to Policy PM3 Nine Elms to amend spelling mistake in 'safeguarded wharves'

It is recognised that all representations have been agreed with the exception of amending the Feather's Wharf Cluster (WT9) to include the Western Riverside Waste Transfer Station (Site Allocation WT11) and neighbouring Household Waste and Recycling Centre sites.

Main Matter 3: Wandsworth Town (Policies PM2, WT1 to WT22)

- **Question 1: Is the area strategy and are the site allocation policies for Wandsworth Town justified by appropriate available evidence, having regard to national guidance, local context, and are they in 'general conformity' with the LP?**

Western Riverside Waste Transfer Station relates to Site Allocation WT11 (Western Riverside Waste Transfer Station). Paragraph 4.101. of the Examination Local Plan defines Site Allocation WT11 as: 'Safeguarded wharf with potential for residential led mixed-use development above including commercial / business'. The Site Allocation itself notes that 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. On this basis it is therefore questioned why the Council do not agree that the Feathers Wharf Site Allocation (WT9), Western Riverside Waste Transfer Station Site Allocation (WT11) and Household Waste and Recycling Centre should not be combined under one joint site allocation given this would provide a combined area strategy for the neighbouring sites.

Amending the Site Allocation boundary would directly address paragraph 4.96 of the Examination Local Plan which states that design work will need to be undertaken to ensure that there is appropriate buffering and orientation of the residential units away from the recycling facility (WT11).

Combining the three sites would enable comprehensive redevelopment and would deliver 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 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. The wording of paragraph 4.84. itself states that landowners and developers of The Feathers Wharf / Smugglers Way Cluster will be expected to work together to prepare a Masterplan or Concept Framework, the Council therefore themselves recognise that the development of the sites are somewhat twinned.

Recommendation:

- **Site allocation WT9, WT11 and the Household Waste and Recycling Centre should be combined so all aspects can come forward for mixed use development in accordance with providing a holistic spatial framework for the area**

Summary

We look forward to the opportunity to discuss this matter further at the forthcoming hearing session on Matter 3 in November 2022. Cory seek to work collectively towards the formulation of a positive planning policy framework.

Should you have any questions, please do not hesitate to contact the undersigned.

Yours faithfully



For and on behalf of
Rolfe Judd Planning Limited

cc
Chris Girdham

Development Director. Cory Group (Cory)