

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.

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 3.

MAIN MATTER 3 – WANDSWORTH TOWN (POLICIES PM2, WT1 TO WT22)

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?

The below statement is relevant to Site Allocations WT9 (Feather’s Wharf) and WT11 (Western Riverside Waste Transfer Station), and the Feather’s Wharf Cluster only.

Site Allocation WT9 (Feather’s Wharf)

In principle, the WRWA strongly supports the inclusion of the Feather’s Wharf site allocation (WT9) within the Feather’s Wharf Cluster and is fully committed to working with the other landowners within the cluster, to help bring forward the mixed-use redevelopment of the area.

Paragraph 4.90 of the Submission Local Plan states *“the area at the northern end of the site (WT9) by the Wandle mouth should be specifically designed to provide a generous open space and be a place with distinctive character and identity for the public to enjoy. Developments must include measures that contribute towards enhancement of the riverbanks”*. The adopted Wandle Delta Masterplan SPD goes further, identifying a proposed ‘major green space’ on the Feather’s Wharf site.

Whilst the importance of high-quality public realm and landscaping is recognised and supported, the WRWA considers that the full potential and quality of public realm cannot be realised without considering the full WRWA land ownership in the area (which the Council have failed to do in the Submission Local Plan). Furthermore, without the potential for mixed-use development on this site, it is unclear as to how a ‘major green space’ would be financially viable.

Discussions have taken place with the Council’s planning policy team in relation to Site Allocation WT9 and officers have acknowledged that whilst open space could come forward as part of the redevelopment of the Site, ultimately viability will be assessed at the application stage. The Statement of Common Ground between the WRWA and the Council confirms that both parties agree to Map 4.1 ‘Strategy Area Map: Wandsworth Town’ being amended to remove the ‘Proposed New Public Open Space’ from Feather’s Wharf.

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

Site Allocation WT11 (Western Riverside Waste Transfer Station) (WRWTS)

The WRWA supports the draft allocation of the WRWTS site as a safeguarded wharf with potential for residential led mixed-use development above including commercial / business (WT11). It is considered however that both the WRWTS and HWRC sites should be allocated for mixed use development. The HWRC site is immediately adjacent to the WRWTS, and both are owned by WRWA, and therefore should be treated as a whole. Both sites together offer an excellent opportunity to play a pivotal role in a more comprehensive redevelopment of the area, than that currently proposed.

Following discussions with the Council’s planning policy team, officers have agreed to amend the site allocation (including Map 3.2, 4.1, WT11 boundary, and Paragraphs 4.100 & 4.101 to include the remainder of the Safeguarded Wharf designation and the HWRC land within the site allocation to assist the comprehensive redevelopment of the area, should that be realised in the future. This is reflected in the Statement of Common Ground.

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

Area Strategy – Feather’s Wharf Cluster

The WRWA consider that the WRWTS and HWRC sites should also be included within the Feather’s Wharf Cluster.

Whilst this matter has been discussed with the Council’s planning policy team, agreement has not been reached. The Council’s position on the matter is as follows: *“the existing cluster sets out that the main principles of development are focussed around mixed use development, opening up of the River Wandle for its amenity use and providing new public open space. Including the WRWA site allocation (WT11) in the cluster is not considered to be coherent to this approach”*.

The WRWA do not consider that the Council have applied a consistent approach with regards to the inclusion of sites within the Feather’s Wharf cluster and do not agree with the Council’s justification for not including the sites.

The WRWA consider the Council to have overlooked the conclusions drawn from the Waste Technical Study (2020) which was produced as part of the Local Plan evidence base. The document explains that *“the Borough’s existing capacity is not enough to meet its need” and that “up to 2.1ha of land will be required by 2026”*.

In addition, the WRWA do not consider that the Council have given appropriate consideration to the Environment Act 2021 (the ‘Act’), which was introduced in November 2021. The Act has placed new duties on waste collection authorities for the separate management of food, green waste, packaging and recycling materials.

This operational change requires additional space and changes in operations. Therefore, the WRWA’s waste collection facilities in the Borough will need to expand to receive these materials for treatment or onward transportation. The only land currently available to the WRWA for this is that within draft allocation WT11.

It is clear that a comprehensive approach to redevelopment is required for this area and the inclusion of the WRWTS and HWRC in the Feather’s Wharf Cluster would assist with this. The WRWA do not consider the area strategy for the Feather’s Wharf cluster is justified and in conformity with the Local Plan as the Council has not considered all available evidence.