

## London Borough of Wandsworth – Local Plan Review Examination November 2022

### The Port of London Authority Hearing Statement

#### Main Matter 4: Nine Elms (Policies PM3, NE1 to NE13)

1. This hearing statement from the Port of London Authority (PLA) specifically addresses the first bullet point of Main Matter 4 – Nine Elms (Policies PM3, NE1 to NE13) which states:

*“Is the area strategy and are the site allocation policies for Nine Elms justified by appropriate available evidence, having regard to national guidance, local context, and are they in ‘general conformity’ with the LP?”*

2. This statement sets out the PLA’s position with regard to the proposed Nine Elms Pimlico Bridge crossing over the River Thames between the London Boroughs of Wandsworth and Westminster.
3. With the level of detail currently available on the proposed crossing the PLA, as the owner of the riverbed and given its role as the statutory harbour authority for the Tidal Thames would object to a crossing located in an area that could negatively affect the long term viability and safe navigation of one of the boroughs key safeguarded wharves at Kirtling wharf.
4. The safeguarding of London’s wharves for water borne freight cargo handling was recently confirmed through 2021 Ministerial Direction by the Secretary of State which provides a strong, up-to-date evidence base for the continued support and promotion of London’s safeguarded wharves and this position is supported by associated London Plan (2021) policy SI15 (Water Transport). At this time there is not enough evidence to ensure that adjacent safeguarded wharf operations at Kirtling Wharf would not be negatively affected by the proposed crossing, which would be contrary to policy SI15 which in part D states that boroughs should protect existing safeguarded wharves; and within Opportunity Areas specifically ensure that the existing and potential capacity and operability of safeguarded wharves is retained and where possible expanded which this proposal potentially puts at risk.
5. In addition the Nine Elms Pimlico Bridge (NEPB) Stage 2 report (2019) recommends that a detailed navigational risk assessment is completed following final site selection and outline design stages to fully validate the design with regard to vessel impact risk. The ‘Marine Navigation Assessment

Summary' section of the report also states that the safeguarded Kirtling Wharf will be impacted by the landing (Location 4C) at the south and that this landing will need careful design with stakeholders including the PLA to ensure any impacts are minimised. This work still needs to be undertaken so therefore at this time it cannot be confirmed if the proposed crossing will have a negative effect on the safeguarded Kirtling Wharf and its current/future operations.

6. It must therefore be made clear within the Local Plan that the proposed location and landing points are indicative, and that further studies are required to ensure nearby safeguarded wharf operations are protected, and that the freight-handling capacity of the wharf is not reduced in line with London Plan policy SI15. The following amendments are therefore considered essential to ensure the Local Plan is found sound and in general conformity with the London Plan:

**6.1 Map 5.2** (Spatial Area Map: Nine Elms) and **Map 5.3** (Spatial Area Map: Kirtling Street Cluster) must be amended to stress that the location of the proposed Nine Elms Pimlico bridge crossing is highly indicative, and subject to further analysis and technical work to ensure adjacent safeguarded wharf operations are protected.

**6.2 Paragraph 5.12** should be amended as follows:

*"...A key component in the realisation of this objective is that the location has been identified, subject to further detailed design, as the ~~preferred~~ indicative landing site for the proposed Nine Elms Pimlico pedestrian and cycle bridge"*

**6.3 Paragraph 5.30** should be amended as follows:

*"Proposals to the north of the cluster at the Kirtling Wharf site (NE9) will be required to provide appropriate public open space that connects to the proposed Nine Elms Pimlico Bridge and the Thames Path subject to the operation and maintenance requirements of the Thames Tideway Tunnel access shaft. Proposals 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 London Plan Policy SI15 Water transport and open space ~~should~~ must not conflict with the safeguarded wharf use."*

**6.4** In addition it is recommended that **part C6 of policy PM3** is amended to the following:

*“The Council will seek to improve connectivity and permeability for pedestrians and cyclists by delivering additional cycle routes in line with the NESB Cycling Strategy, in particular the viaduct route crossing the Covent Garden Market Authority (CGMA) access road and will work with partners to bring forward the proposals for the Nine Elms Pimlico Bridge at the ~~preferred~~ current indicative location.”*

7. The PLA considers that this approach would be supported by the National Planning Policy Framework (NPPF) which within section 9 on promoting sustainable transport and paragraph 106(e) states that planning policies should provide for any large scale transport facilities that need to be located in the area (including port services), as well as the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. This highlights the need to ensure that the adjacent safeguarded wharf designation is fully taken into account as part of the Nine Elms Pimlico Bridge crossing project.
8. Furthermore, within the schedule of regulation 19 consultation reps and council responses (comment order) document (ref: **WBC-007**) the councils response to representation comment ID 157 (page 190) confirms that the proposed Nine Elms Pimlico Bridge crossing as shown in the Local Plan is indicative and the final version of the bridge is yet to be confirmed. This must be clearly expressed in the Local Plan itself.
9. Finally to note there is a slight spelling mistake in policy PM3 part C5 which should be amended as follows:  
*“The continuity of the Thames Path along the riverside is key to enhancing active travel and ease of movement in the area, and will be a requirement of development proposals around Kirtling St and Cringle St, whilst retaining service access to the Power Station and waste transfer station, and protecting the ~~safe-guarded~~ safeguarded wharves.”*