

Our ref P&P/PLANS/PC15/LO03

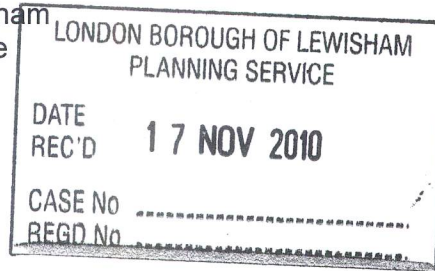
12 November 2010

London Borough of Lewisham  
FREEPOST RRZZ TLHU GKZS  
Planning Service  
London Borough of Lewisham  
5th Floor, Laurence House  
1 Catford Road  
London  
SE6 4RU

London River House  
Royal Pier Road  
Gravesend, Kent, DA12 2BG, UK

Tel: +44 (0) 1474 562200  
Fax: +44 (0) 1474 562281

Website: [www.pla.co.uk](http://www.pla.co.uk)  
DIRECT LINE: 01474 562384  
DIRECT FAX: 01474 562398  
MOBILE: 07738 028540  
E-MAIL: [lucy.owen@pla.co.uk](mailto:lucy.owen@pla.co.uk)



Dear Sir/Madam

**RE: LEWISHAM CORE STRATEGY SUBMISSION VERSION**

Thank you for your letter dated 29 October 2010 inviting comments on the submission version of the Lewisham Core Strategy. Please find enclosed the PLA's representations on the document.

For your information the approach taken of providing a submission version of the Core Strategy and then a separate schedule of recommended amendments could be found to be very misleading. When reading the submission version of a Core Strategy you would hope that you would be reading the most up to date version of the document and that it would have incorporated all proposed amendments into the text. It is therefore possible that some consultees may only read the submission document and will not read the proposed amendments.

Yours Faithfully

Lucy Owen  
Planning Officer



# London Borough of Lewisham Local Development Framework

## Core Strategy

Development Plan Document (DPD)

Publication Stage Representation Form

Ref:

For official use only

**Please return your completed form to the London Borough of Lewisham by 5pm  
Tuesday 6<sup>th</sup> April 2010**

- By post to  
FREEPOST RRZZ TLHU GKZS  
Planning Service  
London Borough of Lewisham  
5<sup>th</sup> Floor, Laurence House  
1 Catford Road  
London SE6 4RU

or

- By e-mail to [planning.policy@lewisham.gov.uk](mailto:planning.policy@lewisham.gov.uk)

**You may also make your representation online without the need to use this form.**

- Online at <http://consult.lewisham.gov.uk/portal>

For further information, or to request extra representation forms please phone  
020 8314 7400 or e-mail [planning.policy@lewisham.gov.uk](mailto:planning.policy@lewisham.gov.uk) .

This form has two parts  
Part A – Personal Details  
Part B – Your representation(s).

Please fill in a separate sheet for each representation you wish to make.

## Part A

### 1. Personal Details\*

### 2. Agent's Details (if applicable)

*\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title MISS

First Name LUCY

Last Name OWEN

Job Title  
(where relevant) PLANNING OFFICER

Organisation  
(where relevant) PORT OF LONDON AUTHORITY

Address Line 1 LONDON RIVER HOUSE

Line 2 ROYAL PIER ROAD

Line 3 GRAVESEND

Line 4 KENT

Post Code DA12 2BG

Telephone  
Number 01474 562384

E-mail Address  
(where relevant) LUCY.OWEN@PLA.CO.UK

---



---



---



---



---



---



---



---



---



---

## Part B – Please use a separate sheet for each representation

Name or Organisation : PORT OF LONDON AUTHORITY

3. To which part of the Core Strategy does this representation relate?

Paragraph 4.13 Policy \_\_\_\_\_ Proposals Map \_\_\_\_\_

4. Do you consider the Core Strategy is:

4.(1) Legally compliant Yes  No

4.(2) Sound\* Yes  No

*\*The considerations in relation to the DPD being 'Sound' are explained in the notes which accompany this form*

*If you have entered **No** to 4.(2), please continue to Q5.  
In all other circumstances, please go to Q6.*

5. Do you consider the Core Strategy is **unsound** because it is not:

(1) Justified

(2) Effective

(3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

CONVOYS WHARF CONSISTS OF TWO PARCELS OF LAND :

- (1) A 9.13 HA SAFEGUARDED WHARF AND
- (2) 7.83 HA OF NON SAFEGUARDED WHARF

WHILST THE PLA IS PLEASED TO SEE THE REFERENCE AT PARAGRAPH 4.13 TO THE RE-OPENING OF THE WHARF FOR THE RIVER TRANSPORT OF CARGO IT NEEDS TO BE MADE CLEAR IN PARAGRAPH 4.13 THAT THE MIXED USE DEVELOPMENT THAT IS REFERRED TO CAN ONLY BE LOCATED ON THE NON SAFEGUARDED PART OF THE WHARF AND THAT ANY MIXED USE DEVELOPMENT NEEDS TO BE DESIGNED TO MINIMISE THE POTENTIAL FOR CONFLICTS OF USE AND DISTURBANCE IN LINE WITH POLICY 4C.9 OF THE LONDON PLAN

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

MAKE IT CLEAR THAT THE CONVOYS WHARF SITE CONSISTS OF A SAFEGUARDED PART WHICH IS PROTECTED BY POLICY 4C.9 OF THE LONDON PLAN FOR CARGO HANDLING USES AND THAT THERE IS ALSO A NON SAFEGUARDED PART. ANY DEVELOPMENT ON THE NON SAFEGUARDED PART NEEDS TO BE DESIGNED TO MINIMISE THE POTENTIAL FOR CONFLICTS OF USE AND DISTURBANCE IN ACCORDANCE WITH POLICY 4C.9 OF THE LONDON PLAN

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

**No**, I do not wish to participate at the oral examination

**Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

THE STRATEGIC ISSUES RELATING TO THE SAFEGUARDED WHARF NEED TO BE DEBATED AT THE EXAMINATION

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature: 

Date: 9/11/2010

## Part B – Please use a separate sheet for each representation

Name or Organisation : *PORT OF LONDON AUTHORITY*

3. To which part of the Core Strategy does this representation relate?

Paragraph *5.8* Policy *CORE STRATEGY OBJECTIVE 5* Proposals Map \_\_\_\_\_  
( *PAGE 35* )

4. Do you consider the Core Strategy is:

4.(1) Legally compliant Yes  No

4.(2) Sound\* Yes  No

*\*The considerations in relation to the DPD being 'Sound' are explained in the notes which accompany this form*

*If you have entered **No** to 4.(2), please continue to Q5.*

*In all other circumstances, please go to Q6.*

5. Do you consider the Core Strategy is **unsound** because it is not:

(1) Justified

(2) Effective

(3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

*GIVEN THE RIPARIAN NATURE OF THE BOROUGH IT IS CONSIDERED THAT THE COUNCIL COULD GO FURTHER WITH CORE STRATEGY OBJECTIVE 5 BY PROMOTING THE USE OF THE RIVER FOR THE TRANSPORT OF PEOPLE AND FREIGHT. THIS SHOULD INCLUDE THE USE OF THE RIVER FOR THE TRANSPORT OF CONSTRUCTION AND WASTE MATERIALS TO AND FROM DEVELOPMENT SITES WHERE PRACTICABLE.*

*THIS APPROACH WOULD ACCORD WITH PPG13 WHICH PROMOTES MORE SUSTAINABLE TRANSPORT CHOICES FOR BOTH PEOPLE AND FREIGHT AND LONDON PLAN POLICIES INCLUDING POLICIES 4A.28, 4C.7 and 4C.8*

*IT SHOULD BE ENSURED THAT ANY RENEWABLE ENERGY DOES NOT HAVE A DETRIMENTAL IMPACT ON THE PLA'S NAVIGATIONAL AIDS WHICH ARE VITAL FOR THE SAFETY OF VESSELS NAVIGATING ON THE THAMES.*

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

AMEND 5.8 TO INCLUDE A REFERENCE TO SUPPORTING A SHIFT TO MORE SUSTAINABLE TRANSPORT CHOICES PARTICULARLY THE USE OF THE RIVER FOR THE TRANSPORT OF PEOPLE AND FREIGHT AND INCLUDING THE USE OF THE RIVER FOR THE TRANSPORT OF CONSTRUCTION MATERIALS TO AND WASTE MATERIALS FROM DEVELOPMENT SITES WHERE PRACTICABLE

INCLUDE A REFERENCE AT 5.8(B) TO MAXIMISING GENERATION AND USE OF RENEWABLE ENERGY IN APPROPRIATE LOCATIONS WHERE IT DOES NOT HAVE A DETRIMENTAL IMPACT ON THE PLA'S NAVIGATIONAID AIDS

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

- No**, I do not wish to participate at the oral examination
- Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature: 

Date: 9/11/10

## Part B – Please use a separate sheet for each representation

Name or Organisation : PORT OF LONDON AUTHORITY

3. To which part of the Core Strategy does this representation relate?

Paragraph 5.i2 Policy COLE STRATEGY OBJECTIVE 9 Proposals Map \_\_\_\_\_  
PAGE 36

4. Do you consider the Core Strategy is:

4.(1) Legally compliant Yes  No

4.(2) Sound\* Yes  No

\*The considerations in relation to the DPD being 'Sound' are explained in the notes which accompany this form

If you have entered **No** to 4.(2), please continue to Q5.  
In all other circumstances, please go to Q6.

5. Do you consider the Core Strategy is **unsound** because it is not:

(1) Justified

(2) Effective

(3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

WHILST THE PLA IS BROADLY SUPPORTIVE OF OBJECTIVE 9 IT IS CONSIDERED THAT THE COUNCIL COULD GO FURTHER AND MAKE SPECIFIC REFERENCE TO PROMOTING THE USE OF THE RIVER FOR THE TRANSPORT OF PEOPLE AND FREIGHT. THIS SHOULD INCLUDE A REFERENCE TO THE USE OF THE RIVER FOR THE TRANSPORT OF CONSTRUCTION MATERIALS TO AND WASTE MATERIALS FROM DEVELOPMENT SITES WHERE PRACTICABLE.

THIS APPROACH WOULD ACCORD WITH PPG13 WHICH PROMOTES MORE SUSTAINABLE TRANSPORT CHOICES FOR BOTH PEOPLE AND FREIGHT AND LONDON PLAN POLICIES INCLUDING POLICIES 4A.28, 4C.7 AND 4C.8



7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

AMEND S.12 TO INCLUDE A REFERENCE TO SUPPORTING A SHIFT TO MORE SUSTAINABLE TRANSPORT CHOICES PARTICULARLY THE USE OF THE RIVER FOR THE TRANSPORT OF PEOPLE AND FREIGHT AND INCLUDING THE USE OF THE RIVER FOR THE TRANSPORT OF CONSTRUCTION MATERIALS TO AND WASTE MATERIALS FROM DEVELOPMENT SITES WHERE PRACTICABLE.

SUCH AN APPROACH WOULD ACCORD WITH THE OBJECTIVES OF PPG13 AND POLICIES 4A.28, 4C.7 AND 4C.8 OF THE LONDON PLAN

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

- No**, I do not wish to participate at the oral examination
- Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature: 

Date: 9/11/2010

## Part B – Please use a separate sheet for each representation

Name or Organisation : *PORT OF LONDON AUTHORITY*

3. To which part of the Core Strategy does this representation relate?

Paragraph \_\_\_\_\_

Policy \_\_\_\_\_

*FIGURE E.1*  
Proposals Map PAGE 41

4. Do you consider the Core Strategy is:

4.(1) Legally compliant Yes  No

4.(2) Sound\* Yes  No

*\*The considerations in relation to the DPD being 'Sound' are explained in the notes which accompany this form*

*If you have entered **No** to 4.(2), please continue to Q5.*

*In all other circumstances, please go to Q6.*

5. Do you consider the Core Strategy is **unsound** because it is not:

(1) Justified

(2) Effective

(3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

*THE SCHEDULE OF RECOMMENDED AMENDMENTS ADVISES THAT FIGURE E.1 IS TO BE REPLACED WITH THAT SHOWN IN APPENDIX 1. HOWEVER, IT IS NOT CLEAR WHERE APPENDIX 1 IS! IT IS THEREFORE NOT POSSIBLE TO COMMENT ON THE PROPOSED AMENDMENTS.*

*IT SHOULD BE ENSURED THAT ANY REFERENCE TO CONVOY'S WHARF ON THE DIAGRAM SHOWS AN ACCURATELY DRAWN BOUNDARY WHICH CLEARLY HIGHLIGHTS THE SAFEGUARDED AND NON SAFEGUARDED PARTS OF THE WHARF.*

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.  
(Continue on a separate sheet /expand box if necessary)

RE-DRAW THE DIAGRAM TO SHOW THE ACCURATE BOUNDARY OF CONCRETE WHARF AND TO HIGHLIGHT THE SAFEGUARDED AND NON SAFEGUARDED PARTS OF THE WHARF

*Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.*

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

- No, I do not wish to participate at the oral examination  
 Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

THE STRATEGIC ISSUES RELATIVE TO THE SAFEGUARDED WHARF NEED TO BE DEBATED AT THE EXAMINATION

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

Signature: B. Jones

Date: 7/11/2010

## Part B – Please use a separate sheet for each representation

Name or Organisation : PORT OF LONDON AUTHORITY

3. To which part of the Core Strategy does this representation relate?

Paragraph \_\_\_\_\_ Policy SPATIAL POLICY 2  
AND SUPPORTING  
TEXT Proposals Map \_\_\_\_\_

4. Do you consider the Core Strategy is:

4.(1) Legally compliant Yes  No

4.(2) Sound\* Yes  No

\*The considerations in relation to the DPD being 'Sound' are explained in the notes which accompany this form

If you have entered **No** to 4.(2), please continue to Q5.  
In all other circumstances, please go to Q6.

5. Do you consider the Core Strategy is **unsound** because it is not:

(1) Justified

(2) Effective

(3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound.  
Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

CONVOYS WHARF IS LOCATED WITHIN THE DEPTFORD AREA. THE WHARF CONSISTS OF 2 PARCELS OF LAND. THIS INCLUDES 9.13 HA OF SAFEGUARDED WHARF WHICH POLICY 4C.9 OF THE LONDON PLAN PROTECTS FOR CARGO HANDLING USES. NONE OF THIS IS MENTIONED IN SPATIAL POLICY 2. ADDITIONALLY THERE IS NO REFERENCE IN SPATIAL POLICY 2 TO SUPPORTING THE RE-ACTIVATION OF THE SAFEGUARDED PART OF THE CONVOYS WHARF SITE FOR CARGO HANDLING.

FIGURE G.2 DESIGNATES CONVOYS WHARF AS A MIXED USE EMPLOYMENT LOCATION. IT IS CONTRARY TO LONDON PLAN POLICY FOR THE WHOLE OF THE CONVOYS WHARF SITE TO BE ALLOCATED IN THIS WAY. THE BOUNDARY OF CONVOYS WHARF NEEDS TO BE RE-DRAWN WITH THE MIXED USE EMPLOYMENT DESIGNATION ONLY BEING PROPOSED ON THE NON SAFEGUARDED PART OF THE WHARF

THE PLA WELCOMES THE INCLUSION OF PROPOSED CHANGE 43 HOWEVER THE WORDING IS CONFUSED. THE CONVOYS WHARF SITE INCLUDES 9.13HA OF SAFEGUARDED WHARF AND ALL OF THIS 9.13HA IS PROTECTED BY POLICY 4C.9 OF THE LONDON PLAN FOR CARGO HANDLING. THE USE OF THE RIVER FOR THE TRANSPORT OF PEOPLE WOULD ONLY BE APPROPRIATE ON THE NON SAFEGUARDED PART OF THE SITE AT THE SAFEGUARDED SITE IS PROTECTED FOR CARGO HANDLING.

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

MAKE IT CLEAR THAT THE CONVOYS WHARF SITE CONSISTS OF (1) A SAFEGUARDED PART WHICH IS PROTECTED BY POLICY 4C.9 OF THE LONDON PLAN FOR CARGO HANDLING AND WHICH THE COUNCIL WOULD LIKE TO SEE RE-ACTIVATED, FOR CARGO HANDLING AND (2) A NON SAFEGUARDED PART.

RE-DRAW FIGURE 6.2 SO THAT THE MIXED USE EMPLOYMENT DESIGNATION ONLY APPLIES TO THE NON SAFEGUARDED PART OF THE SITE

*Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.*

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

**No**, I do not wish to participate at the oral examination

**Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

THE STRATEGIC ISSUES RELATING TO THE SAFEGUARDED WHARF NEED TO BE DEBATED AT THE EXAMINATION

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

Signature: 

Date: 9/11/2020

## Part B – Please use a separate sheet for each representation

Name or Organisation : *PORT OF LONDON AUTHORITY*

3. To which part of the Core Strategy does this representation relate?

Paragraph \_\_\_\_\_ Policy *SPATIAL POLICY 2*  
*AND SUPPORTING*  
*TEXT* Proposals Map \_\_\_\_\_

4. Do you consider the Core Strategy is:

4.(1) Legally compliant Yes  No

4.(2) Sound\* Yes  No

*\*The considerations in relation to the DPD being 'Sound' are explained in the notes which accompany this form*

*If you have entered **No** to 4.(2), please continue to Q5.  
In all other circumstances, please go to Q6.*

5. Do you consider the Core Strategy is **unsound** because it is not:

(1) Justified

(2) Effective

(3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

*IN RELATION TO CLIMATE CHANGE THERE WOULD APPEAR TO BE THE OPPORTUNITY TO USE THE RIVER TO DELIVER THE MATERIALS TO FUEL ANY BIOMASS CHP PLANT.*

*IN RELATION TO SUSTAINABLE MOVEMENT THERE IS NO REFERENCE TO THE USE OF THE RIVER FOR THE TRANSPORT OF PEOPLE AND FREIGHT INCLUDING THE USE OF THE RIVER FOR THE TRANSPORT OF CONSTRUCTION AND WASTE MATERIALS TO AND FROM DEVELOPMENT SITES WHERE PRACTICABLE. SUCH AN APPROACH WOULD ACCORD WITH THE OBJECTIVES OF PPG13 AND POLICIES 4A.28, 4C.7 AND 4C.8 OF THE LONDON PLAN*

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

MAKE REFERENCE TO USING THE RIVER TO FUEL ANY BIOMASS CHP PLANT WHERE PRACTICABLE.

MAKE REFERENCE TO SUPPORTING MORE SUSTAINABLE TRANSPORT CHOICES PARTICULARLY THE USE OF THE RIVER FOR THE TRANSPORT OF PEOPLE AND FREIGHT INCLUDING THE USE OF THE RIVER FOR THE TRANSPORT OF CONSTRUCTION AND WASTE MATERIALS TO AND FROM DEVELOPMENT SITES WHERE PRACTICABLE

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.


**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

- No**, I do not wish to participate at the oral examination
- Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature: 

Date: 09/11/2010

## Part B – Please use a separate sheet for each representation

Name or Organisation : *PORT OF LONDON AUTHORITY*

3. To which part of the Core Strategy does this representation relate?

Paragraph \_\_\_\_\_ Policy *CORE STRATEGY*  
*POLICY 4* Proposals Map \_\_\_\_\_

4. Do you consider the Core Strategy is:

4.(1) Legally compliant Yes  No

4.(2) Sound\* Yes  No

*\*The considerations in relation to the DPD being 'Sound' are explained in the notes which accompany this form*

*If you have entered **No** to 4.(2), please continue to Q5.  
In all other circumstances, please go to Q6.*

5. Do you consider the Core Strategy is **unsound** because it is not:

(1) Justified

(2) Effective

(3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments. *(Continue on a separate sheet /expand box if necessary)*

WHILST IT IS NOTED THAT CONVOY'S WHARF IS DISCUSSED SEPARATELY IN SECTION 8 IT IS QUESTIONNED WHETHER THE PROPER PLANNING APPROACH TO CONVOY'S WHARF IS REFLECTED IN CORE STRATEGY POLICY 4

9.13 HA OF CONVOYS WHARF IS SAFEGUARDED BY MINISTERIAL DIRECTION AND POLICY 4C.9 OF THE LONDON PLAN PROTECTS SAFEGUARDED WHARVES FOR CARGO HANDLING USES. THEREFORE IT IS IN APPROPRIATE TO GENERICALLY REFER TO CONVOYS WHARF AS A MIXED USE EMPLOYMENT LOCATION.



7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.  
(Continue on a separate sheet /expand box if necessary)

MAKE IT CLEAR THAT THE CONVOY'S WHARF SITE CONSISTS OF A SAFEGUARDED PART WHICH IS PROTECTED BY POLICY 4C.9 OF THE LONDON PLAN FOR CARGO HANDLING USES AND WHICH THE COUNCIL WOULD LIKE TO SEE RE-ACTIVATED FOR CARGO HANDLING. THERE IS ALSO A NON SAFEGUARDED PART AND ANY DEVELOPMENT ON THE NON SAFEGUARDED PART NEEDS TO BE DESIGNED TO MINIMISE THE POTENTIAL FOR CONFLICTS OF USE AND DISTURBANCE IN ACCORDANCE WITH POLICY 4C.9 OF THE LONDON PLAN

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

- No**, I do not wish to participate at the oral examination  
 **Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

THE STRATEGIC ISSUES RELATING TO THE SAFEGUARDED WHARF NEED TO BE DEBATED AT THE EXAMINATION

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature: 

Date: 9/11/2010

**Part B – Please use a separate sheet for each representation**

Name or Organisation : *PORT OF LONDON AUTHORITY*

3. To which part of the Core Strategy does this representation relate?

Paragraph \_\_\_\_\_ Policy *CORE STRATEGY* *POLICY 11 AND* Proposals Map \_\_\_\_\_  
*SUPPORTING TEXT*

4. Do you consider the Core Strategy is:

- 4.(1) Legally compliant Yes  No   
4.(2) Sound\* Yes  No

*\*The considerations in relation to the DPD being 'Sound' are explained in the notes which accompany this form*

*If you have entered **No** to 4.(2), please continue to Q5.  
In all other circumstances, please go to Q6.*

5. Do you consider the Core Strategy is **unsound** because it is not:

- (1) Justified   
(2) Effective   
(3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

*PLEASED TO SEE THAT PROPOSED AMENDMENT 83 INCLUDES A REFERENCE TO THE POTENTIAL OF THE RIVER THAMES AS A TRANSPORT ROUTE HOWEVER THE THAMES DOES NOT JUST HAVE POTENTIAL AS A TRANSPORT ROUTE IT IS AN EXISTING TRANSPORT ROUTE THERE IS NO REFERENCE TO THE PLA OR TO WORKING WITH THE PLA . THERE IS CONCERN ABOUT THE REFERENCE TO IMPROVING ACCESS TO THE FORESHORE . THERE ARE HEALTH AND SAFETY ISSUES ASSOCIATED WITH PUBLIC ACCESS TO THE FORESHORE INCLUDING RAPIDLY RISING TIDES, SOFT MUD AND WASH FROM VESSELS. THERE ARE ALSO ENVIRONMENTAL ISSUES ASSOCIATED WITH PEOPLE ON THE FORESHORE . IT NEEDS TO BE MADE CLEAR THAT DEVELOPMENT ON THE BLUE RIBBON NETWORK NEEDS TO HAVE A RIVER RELATED USE AND THERE SHOULD BE CROSS REFERENCING TO OTHER POLICIES INCLUDING CORE STRATEGY POLICY 14.*

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.  
(Continue on a separate sheet /expand box if necessary)

RE-WORD SUPPORTING TEXT TO MORE CLOSELY REFLECT THE USES AND USERS OF THE WATERWAY NETWORK  
MAKE IT CLEAR THAT DEVELOPMENTS NEED TO HAVE A RIVER RELATED USE IN LINE WITH POLICY 4C.6 OF THE LONDON PLAN  
REMOVE THE REFERENCE TO IMPROVING ACCESS TO THE FORESHORE  
INCLUDE A REFERENCE TO THE ROLE OF THE PLA AND TO THE COUNCIL WORKING WITH THE PLA  
INCLUDE CROSS REFERENCES AS APPROPRIATE

*Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.*

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

- No**, I do not wish to participate at the oral examination  
 **Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

Signature: 

Date: 9/11/2010

## Part B – Please use a separate sheet for each representation

Name or Organisation : PORT OF LONDON AUTHORITY

3. To which part of the Core Strategy does this representation relate?

Paragraph \_\_\_\_\_ Policy CORE STRATEGY  
POLICY 13 Proposals Map \_\_\_\_\_

4. Do you consider the Core Strategy is:

4.(1) Legally compliant Yes  No

4.(2) Sound\* Yes  No

*\*The considerations in relation to the DPD being 'Sound' are explained in the notes which accompany this form*

*If you have entered **No** to 4.(2), please continue to Q5.*

*In all other circumstances, please go to Q6.*

5. Do you consider the Core Strategy is **unsound** because it is not:

(1) Justified

(2) Effective

(3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

THE POLICY IS CONCERNED WITH LEWISHAM'S WASTE REQUIREMENTS, IT MAKES NO REFERENCE TO THE POTENTIAL ROLE OF THE SAFEGUARDED CONDUYS WHARF AS A POTENTIAL WASTE MANAGEMENT SITE. THIS IS CONTRARY TO POLICY 4A.22 OF THE LONDON PLAN WHICH SEEKS FOR DEVELOPMENT PLAN POLICIES TO SAFEGUARD WASTE SITES, INCLUDING WHARVES WITH AN EXISTING OR FUTURE POTENTIAL FOR WASTE MANAGEMENT AND TO ENSURE THAT ADJACENT DEVELOPMENT IS DESIGNED ACCORDINGLY TO MINIMISE THE POTENTIAL FOR CONFLICTS OF USE AND DISTURBANCE

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

RE-WORD POLICY 13 TO INCLUDE A REFERENCE TO  
CONVOYS WHARF IN LINE WITH POLICY 4A.22 OF  
THE LONDON PLAN

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

- No**, I do not wish to participate at the oral examination
- Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

THE STRATEGIC ISSUES RELATING TO THE SAFEGUARDED  
WHARF NEED TO BE DEBATED AT THE EXAMINATION

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature: 

Date: 9/11/2010

## Part B – Please use a separate sheet for each representation

Name or Organisation : *PORT OF LONDON AUTHORITY*

3. To which part of the Core Strategy does this representation relate?

Paragraph \_\_\_\_\_ Policy *CORE STRATEGY* POLICY 14 Proposals Map \_\_\_\_\_

4. Do you consider the Core Strategy is:

4.(1) Legally compliant Yes  No

4.(2) Sound\* Yes  No

*\*The considerations in relation to the DPD being 'Sound' are explained in the notes which accompany this form*

*If you have entered **No** to 4.(2), please continue to Q5.*

*In all other circumstances, please go to Q6.*

5. Do you consider the Core Strategy is **unsound** because it is not:

(1) Justified

(2) Effective

(3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

*PLEASED TO SEE THE REFERENCES IN POLICY 14 TO*

*7. THE USE OF THE RIVER THAMES... WILL BE SUPPORTED AS FREIGHT TRANSPORT CORRIDORS.*

*8. USE OF THE RIVER THAMES FOR PASSENGER TRANSPORT AND FOR THE TRANSPORT OF CONSTRUCTION AND WASTE MATERIALS TO AND FROM DEVELOPMENT SITES, WHERE PRACTICABLE*

*IT IS QUESTIONNED WHETHER THE ADDITIONAL TEXT WHICH WAS ADDED TO POINT 8 WOULD BE BETTER ADDED TO POINT 7.*

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

*(Continue on a separate sheet /expand box if necessary)*

INCLUDE ADDITIONAL TEXT AFTER POINT 7 RATHER THAN POINT 8

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

- No**, I do not wish to participate at the oral examination
- Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature: 

Date: 9/11/2010

## Part B – Please use a separate sheet for each representation

Name or Organisation : *PORT OF LONDON AUTHORITY*

3. To which part of the Core Strategy does this representation relate?

Paragraph \_\_\_\_\_ *CORE STRATEGY POLICY*  
Policy 18 Proposals Map \_\_\_\_\_

4. Do you consider the Core Strategy is:

4.(1) Legally compliant Yes  No

4.(2) Sound\* Yes  No

*\*The considerations in relation to the DPD being 'Sound' are explained in the notes which accompany this form*

*If you have entered **No** to 4.(2), please continue to Q5.*

*In all other circumstances, please go to Q6.*

5. Do you consider the Core Strategy is **unsound** because it is not:

(1) Justified

(2) Effective

(3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments. *(Continue on a separate sheet /expand box if necessary)*

*PLEASED TO SEE THE REFERENCE TO TALL BUILDINGS CLOSE TO THE THAMES BEING ASSESSED IN CONSULTATION WITH THE PORT OF LONDON AUTHORITY TO GAUGE POSSIBLE INTERFERENCE WITH NAVIGATIONAL COMMUNICATIONS WHICH OPERATE ON A LINE OF SIGHT BASIS.*

*THE PLA FULLY SUPPORTS THIS APPROACH, AS THE COUNCIL IS AWARE TALL BUILDINGS HAVE THE POTENTIAL TO INTERFERE WITH THE PLA'S NAVIGATIONAL COMMUNICATIONS WHICH ARE ESSENTIAL TO THE SAFETY OF VESSELS NAVIGATING ON THE RIVER THAMES*



7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.  
(Continue on a separate sheet /expand box if necessary)

NO CHANGES NECESSARY

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

- No**, I do not wish to participate at the oral examination  
 **Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature: B. Wey

Date: 9/11/2010

**Part B – Please use a separate sheet for each representation**

Name or Organisation : *PORT OF LONDON AUTHORITY*

3. To which part of the Core Strategy does this representation relate?  
*STRATEGIC SITE ALLOCATION 2 AND SUPPORTING TEXT*

Paragraph \_\_\_\_\_ Policy \_\_\_\_\_ Proposals Map *FIGURE 8.1*

4. Do you consider the Core Strategy is:

4.(1) Legally compliant Yes  No

4.(2) Sound\* Yes  No

*\*The considerations in relation to the DPD being 'Sound' are explained in the notes which accompany this form*

*If you have entered **No** to 4.(2), please continue to Q5.  
In all other circumstances, please go to Q6.*

5. Do you consider the Core Strategy is **unsound** because it is not:

(1) Justified

(2) Effective

(3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound.  
Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments. *(Continue on a separate sheet /expand box if necessary)*

*SEE SEPARATE SHEET*

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.  
(Continue on a separate sheet /expand box if necessary)

REVIEW THE WORDING OF STRATEGIC SITE ALLOCATION 2 AND ITS SUPPORTING TEXT AND FIGURE 8.1 TO MAKE IT CLEAR THAT THERE IS A SAFEGUARDED AND A NON SAFEGUARDED PART TO THE WHARF WHICH REQUIRE DIFFERENT PLANNING APPROACHES.

THE SAFEGUARDED PART IS PROTECTED BY LONDON PLAN POLICY FOR CARGO HANDLING. REACTIVATION OF THE SAFEGUARDED PART OF THE WHARF FOR CARGO HANDLING IS ALSO ENCOURAGED.

THE NON SAFEGUARDED PART OF THE WHARF NEEDS TO BE DESIGNED TO MINIMISE THE POTENTIAL FOR CONFLICTS OF USE AND DISTURBANCE

*Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.*

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

- No, I do not wish to participate at the oral examination
- Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

THE STRATEGIC ISSUES RELATING TO THE SAFEGUARDED WHARF NEED TO BE DEBATED AT THE EXAMINATION

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

Signature: 

Date: 9/11/2019

Convoys Wharf consists of 2 parcels of land (1) a 9.13ha safeguarded wharf and (2) 7.83ha of non safeguarded wharf. The Council appears to get this confused in their approach to Convoys Wharf.

When referring to Convoys Wharf in Strategic Site Allocation 2 and in the supporting text the council needs to make it clear whether they are referring to the safeguarded or non safeguarded part of the wharf. For example, to allocate Convoys Wharf for mixed use development is contrary to *London Plan* policy. The safeguarded part of the site is protected for cargo handling and it is therefore only the non safeguarded part which can be allocated for mixed use development. To avoid confusion it might be better to set out the planning approach to the non safeguarded part of the wharf in Strategic Site Allocation 2 and then to deal with the safeguarded part of the wharf as a separate paragraph in Strategic Site Allocation 2. This approach to separating out text in relation to the safeguarded and non safeguarded part of the wharf would also be beneficial in the supporting text.

Figure 8.1 shows the “site boundaries for the Convoys Wharf strategic site allocation” however, this shows the whole of the Wharf and does not differentiate between the safeguarded and non safeguarded elements of the wharf. Figure 8.1 should therefore be amended in line with the strategic site allocation 2 and its supporting text to differentiate between the safeguarded and non safeguarded parts of the wharf.

For the non safeguarded part of the wharf it needs to be made clear that any development needs to be designed to minimise the potential for conflicts of use and disturbance.

For the safeguarded part of the wharf it needs to be made clear that planning policy protects it for cargo handling and that the Council would support the reactivation of the safeguarded wharf for cargo handling uses.

In relation to any reduction in the safeguarded wharf area, it is necessary in line with London plan policy to prove that the existing safeguarded wharf area is no longer viable or capable of being made viable and that the area retained is the maximum viable operational size.

The text should also be reviewed to refer to the wharf being a safeguarded wharf, rather than a protected wharf and to make it clear that the wharf is the subject of one safeguarding direction, not two.

The Schedule of Recommended Amendments proposes the insertion of a new paragraph after the Convoys Wharf Strategic Site Allocation box. Again this is generic to Convoys Wharf and does not differentiate between the safeguarded and non safeguarded parts of the site. For example, the school and open space would only be appropriate on the non safeguarded part of the site and this is not made clear. Furthermore, policy 4C.9 of the *London Plan* protects the safeguarded wharf for cargo handling and therefore the introduction of a river bus service on the safeguarded part of the site would not accord with London Plan policy. Any river bus service would need to be on the non safeguarded part of the site.

In relation to the Thames Path whilst this should be an aspiration across the whole site it should be recognised that it might not be possible across the safeguarded part of the site for health and safety reasons.

Finally, any highways works would need to make sure that appropriate highways access to the safeguarded wharf for commercial vehicles was maintained in line with the supporting text to policy 4C.9 of the *London Plan*.

**Part B – Please use a separate sheet for each representation**

Name or Organisation : *PORT OF LONDON AUTHORITY*

3. To which part of the Core Strategy does this representation relate?

Paragraph \_\_\_\_\_ Policy *APPENDIX 3 TABLE 3.2.* Proposals Map \_\_\_\_\_

4. Do you consider the Core Strategy is:

4.(1) Legally compliant Yes  No

4.(2) Sound\* Yes  No

*\*The considerations in relation to the DPD being 'Sound' are explained in the notes which accompany this form*

*If you have entered **No** to 4.(2), please continue to Q5.*

*In all other circumstances, please go to Q6.*

5. Do you consider the Core Strategy is **unsound** because it is not:

(1) Justified

(2) Effective

(3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments. *(Continue on a separate sheet /expand box if necessary)*

*IT IS CONTRARY TO PLANNING POLICY TO DESIGNATE CONVOYS WHARF AS A MIXED USE EMPLOYMENT LOCATION THE MIXED USE EMPLOYMENT DESIGNATION CAN ONLY BE PROPOSED ON THE NEW SAFEGUARDED PART OF THE WHARF*

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.  
(Continue on a separate sheet /expand box if necessary)

MAKE IT CLEAR THAT THE MIXED USE EMPLOYMENT DESIGNATION ONLY REFERS TO THE NON SAFEGUARDED PART OF THE CONVOIS WHARF SITE

*Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.*

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

- No, I do not wish to participate at the oral examination  
 Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

THE STRATEGIC ISSUES RELATING TO THE SAFEGUARDED WHARF NEED TO BE DEBATED AT THE EXAMINATION

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

Signature: 

Date: 24/11/2010

## Part B – Please use a separate sheet for each representation

Name or Organisation : PORT OF LONDON AUTHORITY

3. To which part of the Core Strategy does this representation relate?

Paragraph APPENDIX G Policy STRATEGIC OBJECTIVE MONITOR CS09 Proposals Map \_\_\_\_\_

4. Do you consider the Core Strategy is:

4.(1) Legally compliant Yes  No

4.(2) Sound\* Yes  No

*\*The considerations in relation to the DPD being 'Sound' are explained in the notes which accompany this form*

*If you have entered **No** to 4.(2), please continue to Q5.  
In all other circumstances, please go to Q6.*

5. Do you consider the Core Strategy is **unsound** because it is not:

(1) Justified

(2) Effective

(3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

GIVEN THE DESIRE IN CS014 TO SUPPORT USE OF THE RIVER FOR THE TRANSPORT OF PEOPLE AND FREIGHT (INCLUDING CONSTRUCTION AND DEMOLITION MATERIALS) IT IS SURPRISING THAT THERE IS NO INDICATOR TO MONITOR THE SUCCESS OF THIS PART OF THE POLICY

AS THE COUNCIL WILL BE AWARE THE LONDON PLAN SETS A TARGET FOR A 50% INCREASE IN PASSENGERS AND FREIGHT TRANSPORTED ON THE BLUE RIBBON NETWORK FROM 2001-2011



7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

*(Continue on a separate sheet /expand box if necessary)*

INCLUDE AN INDICATOR TO MONITOR USE OF THE RIVER
--

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

**No**, I do not wish to participate at the oral examination

**Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature: *Owey*

Date: 9/11/2010

## Part B – Please use a separate sheet for each representation

Name or Organisation : PORT OF LONDON AUTHORITY

3. To which part of the Core Strategy does this representation relate?

Paragraph \_\_\_\_\_ Policy APPENDIX B - ESSENTIAL INFRASTRUCTURE Proposals Map \_\_\_\_\_

4. Do you consider the Core Strategy is:

4.(1) Legally compliant Yes  No

4.(2) Sound\* Yes  No

\*The considerations in relation to the DPD being 'Sound' are explained in the notes which accompany this form

If you have entered **No** to 4.(2), please continue to Q5.  
In all other circumstances, please go to Q6.

5. Do you consider the Core Strategy is **unsound** because it is not:

(1) Justified

(2) Effective

(3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound.  
Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

PIE - EXTENSION OF THAMES PATH ACROSS CONVOYS WHARF SITE. WHILST THIS SHOULD BE AN ASPIRATION ACROSS THE WHOLE OF THE SITE IT SHOULD BE RECOGNISED THAT IT MIGHT NOT BE POSSIBLE ACROSS THE SAFEGUARDED PART OF THE SITE FOR HEALTH AND SAFETY REASONS.

PIP - CONVOY WHARF HIGHWAY WORKS - ANY HIGHWAYS WORKS WOULD NEED TO MAKE SURE THAT APPROPRIATE HIGHWAYS ACCESS TO THE SAFEGUARDED WHARF FOR COMMERCIAL VEHICLES WAS MAINTAINED IN LINE WITH THE SUPPORTING TEXT TO POLICY 4C.9 OF THE LONDON PLAN.

PIQ - CONVOYS WHARF RIVER INFRASTRUCTURE - IT WOULD BE CONTRARY TO LONDON PLAN POLICY FOR A RIVER BUS TO BE PROVIDED ON THE SAFEGUARDED PART OF THE SITE DUE TO ITS PROTECTION FOR CARGO HANDLING

SID - CONVOYS WHARF SCHOOL - IT SHOULD BE MADE CLEAR THAT THE SCHOOL WOULD ONLY BE APPROPRIATE ON THE NON SAFEGUARDED PART OF THE SITE

GII - CONVOYS WHARF OPEN SPACE - IT SHOULD BE MADE CLEAR THAT THE SCHOOL WOULD ONLY BE APPROPRIATE ON THE NON SAFEGUARDED PART OF THE SITE

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.  
(Continue on a separate sheet /expand box if necessary)

UPDATE WORDING TO MAKE IT CLEAR WHAT IS APPROPRIATE / NOT APPROPRIATE FOR THE SAFEGUARDED AND NON SAFEGUARDED PARTS OF THE SITE,

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**


8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

- No, I do not wish to participate at the oral examination  
 Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

THE STRATEGIC ISSUES RELATING TO THE SAFEGUARDED WHARF NEED TO BE DEBATED AT THE EXAMINATION

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature: 

Date: 9/11/2010

## Part B – Please use a separate sheet for each representation

Name or Organisation : PART OF LONDON AUTHORITY

3. To which part of the Core Strategy does this representation relate?

Paragraph \_\_\_\_\_

Policy \_\_\_\_\_

Proposals Map \_\_\_\_\_

MAP 2.1

UDP PROPOSALS MAP  
ADDITION

4. Do you consider the Core Strategy is:

4.(1) Legally compliant Yes  No

4.(2) Sound\* Yes  No

*\*The considerations in relation to the DPD being 'Sound' are explained in the notes which accompany this form*

*If you have entered **No** to 4.(2), please continue to Q5.  
In all other circumstances, please go to Q6.*

5. Do you consider the Core Strategy is **unsound** because it is not:

(1) Justified

(2) Effective

(3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

MAP 2.1 SHOWS THE WHOLE OF THE CONVOYS WHARF SITE AS A MIXED USE EMPLOYMENT LOCATION. THIS IS CONTRARY TO LONDON PLAN POLICY. THE MIXED USE EMPLOYMENT DESIGNATION CAN ONLY APPLY TO THE NON SAFEGUARDED PART OF THE WHARF AND MAP 2.1 SHOULD BE UPDATED TO REFLECT THIS.

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.  
(Continue on a separate sheet /expand box if necessary)

PUT ON THE BOUNDARIES OF THE SAFEGUARDED  
AND NON SAFEGUARDED PARTS OF THE WHARF AND  
SHOW THE MIXED USE EMPLOYMENT LOCATION DESIGNATION  
ONLY APPLYING TO THE NON SAFEGUARDED PART

*Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.*

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

THE STRATEGIC ISSUES RELATING TO THE SAFEGUARDED  
WHARF NEEDS TO BE DEBATED AT THE EXAMINATION

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

Signature: 

Date: 2/11/2010