



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 6th April 2010**

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

or

- By e-mail to 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 .

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 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 _____
(PAGE 32)

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 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:

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: *Bwey*

Date: 23/3/10

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 _____ 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 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

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

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 CORE 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 COUNCIL IS BROADLY SUPPORTIVE OF CORE STRATEGY 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 5.12 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.2P, 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: 23/3/10

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 _____

Policy _____

FIGURE 6.1
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)*

WHILST THE PLA IS PLEASED THAT THE COUNCIL HAS SHOWN CONVOYS WHARF ON THE KEY DIAGRAM IT IS CONSIDERED THAT IT NEEDS TO BE MORE ACCURATELY SHOWN WITH THE BOUNDARY PROPERLY PLOTTED AND THE SAFEGUARDED AND NON SAFEGUARDED AREAS SHOWN

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 KEY DIAGRAM TO SHOW THE PROPER BOUNDARY OF CONVOYS WHARF AND DIFFERENTIATE BETWEEN THE SAFEGUARDED AND NON SAFEGUARDED AREAS.

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: 23/3/10

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 _____ Policy SPATIAL POLICY 2 Proposals Map _____
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)

CONVOYS WHARF IS LOCATED WITHIN THE DEPTFORD REGENERATION AND GROWTH AREA. 9.13 HA OF THE WHARF IS SAFEGUARDED BY MINISTERIAL DIRECTION AND POLICY 4C.9 OF THE LONDON PLAN PROTECTS SAFEGUARDED WHARVES FOR CARGO HANDLING USES.

NONE OF THE ABOVE IS MENTIONED IN SPATIAL POLICY 2 OR THE SUPPORTING TEXT AND THE APPROACH SET OUT DOES NOT CONFORM WITH LONDON PLAN POLICY

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

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 MATERIALS TO AND WASTE MATERIALS FROM DEVELOPMENT SITES WHERE PRACTICABLE.

SUCH AN APPROACH WOULD ACCORD WITH THE OBJECTIVES OF PPG13 AND POLICES 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)

RE-WORD SPATIAL POLICY 2 AND THE SUPPORTING TEXT TO MAKE IT CLEAR THAT 9.13HA OF CONVOYS WHARF IS SAFEGUARDED BY MINISTERIAL DIRECTION AND POLICY 4C.9 OF THE LONDON PLAN PROTECTS THE SAFEGUARDED WHARF FOR CARGO HANDLING. ANY DEVELOPMENT ON THE NON SAFEGUARDED PART OF THE WHARF SHOULD BE DESIGNED TO MINIMISE THE POTENTIAL FOR CONFLICTS OF USE AND DISTURBANCE IN LINE WITH POLICY 4C.9 OF THE LONDON PLAN.
MAKE REFERENCE TO USING THE RIVER TO FUEL THE BIOMASS CHP 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 MATERIALS TO AND WASTE MATERIALS 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: Dave

Date: 23/3/10

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 _____ Policy CORE STRATEGY
POLICY 4 Proposals Map _____
(PAGE 83)

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 (SEE THE PLAIS COMMENTS ON THIS STRATEGIC SITE ALLOCATION) IT IS QUESTIONED WHETHER THE PROPER PLANNING APPROACH TO CONVOY'S WHARF IS REFLECTED IN CORE STRATEGY POLICY 4. - THERE WOULD APPEAR TO BE CONFLICT BETWEEN THE TWO.

9.13 HA OF THE WHARF IS SAFEGUARDED BY MINISTERIAL DIRECTION AND POLICY 4C.9 OF THE LONDON PLAN PROTECTS SAFEGUARDED WHARVES FOR CARGO HANDLING USES. THEREFORE THE HOUSING AND OTHER USES SOUGHT IN CORE STRATEGY POLICY 4 WOULD NOT BE APPROPRIATE ON THE SAFEGUARDED WHARF

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 8 Proposals Map _____
(PAGE 91)

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 SURPRISING THAT THERE IS NO REFERENCE IN CS POLICY 8 TO THE USE OF THE RIVER FOR THE TRANSPORT OF CONSTRUCTION MATERIALS TO AND WASTE MATERIALS FROM DEVELOPMENT SITES. SUCH AN APPROACH WOULD ACCORD WITH POLICIES 4A.28 AND 4C.8 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 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)

AROUND 45 MILLION TONNES OF CARGO WAS HANDLED ON THE TIDAL THAMES IN 2009 AND BETWEEN APRIL 2006 AND MARCH 2007 OVER 2.5 MILLION JOURNEYS OCCURRED ON BOATS USING TFL LONDON RIVER SERVICES PIERS AND THE THAMES CLIPPERS SAVOY TO WOOLWICH ARSENAL SERVICE. DESPITE THIS, THERE IS NO REFERENCE IN THE INTRODUCTORY TEXT TO THE IMPORTANCE OF THE RIVER FOR THE TRANSPORT OF PEOPLE AND FREIGHT
CORE STRATEGY POLICY 11 MAKES NO REFERENCE TO THE ROLE OF THE PLA OR TO WORKING WITH US.
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 SUCH AS CS POLICY 14 AND STRATEGIC SITE ALLOCATION 2.

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 CORE STRATEGY
POLICY 13 Proposals Map _____
(PAGE 106).

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)

THIS POLICY IS CONCERNED WITH LEWISHAM'S WASTE REQUIREMENTS. IT MAKES NO REFERENCE TO THE POTENTIAL ROLE OF THE SAFEGUARDED CONVOY'S 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:

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: 23/3/10

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 _____ 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)

THE PLA IS 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 WILL BE
SUPPORTED.

THE USE OF THE RIVER FOR THE TRANSPORT OF PEOPLE AND FREIGHT
IS A SUSTAINABLE METHOD OF TRANSPORT WHICH HAS POLICY SUPPORT
FROM THE NATIONAL LEVEL DOWNWARDS. HOWEVER IT IS CONSIDERED
THAT POLICY 14 COULD GO FURTHER AND SUPPORT 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 POLICIES IN THE LONDON
PLAN, WHICH INCLUDE POLICIES 4A.28 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)

INCLUDE A POINT 8 IN POLICY 14 WHICH READS:
8. THE USE OF THE RIVER THAMES FOR THE TRANSPORT OF CONSTRUCTION MATERIALS TO AND WASTE MATERIALS FROM DEVELOPMENT SITES WHERE PRACTICABLE WILL BE SUPPORTED
THIS APPROACH WOULD ACCORD WITH LONDON PLAN POLICY WHICH SEEKS TO MAXIMISE WATER TRANSPORT FOR BULK MATERIALS, PARTICULARLY DURING DEMOLITION AND CONSTRUCTION PHASES. IT ALSO SEEKS FOR WASTE TO BE REMOVED FROM SITES AND MATERIALS TO BE BROUGHT TO SITES BY WATER TRANSPORT WHEREVER THAT IS 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.

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- 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: Bwej

Date: 23/03/10

Part B – Please use a separate sheet for each representation

Name or Organisation :

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

Paragraph _____ Policy 18 Proposals Map _____
(PAGE 119)

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.

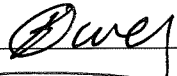
After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

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: 

Date: 23/3/10

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?
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)

CONVOYS WHARF CONSISTS OF 2 PARCELS OF LAND (1) A 9.13 HA SAFEGUARDED WHARF AND (2) 7.83 HA OF NON SAFEGUARDED WHARF. THERE IS 1 DIRECTION, NOT 2. POLICY 4C.9 OF THE LONDON PLAN PROTECTS SAFEGUARDED WHARVES FOR CARGO HANDLING USES. IT IS QUESTIONED WHY THIS IMPORTANT PART OF THE POLICY HAS BEEN OMITTED FROM THE SUPPORTING TEXT. IT NEEDS TO BE MADE CLEAR THAT THE SAFEGUARDING DIRECTION IS IN PLACE AND POLICY 4C.9 OF THE LONDON PLAN PROTECTS THE SAFEGUARDED PART OF THE CONVOYS WHARF SITE FOR CARGO HANDLING. AS SUCH IN ORDER TO BE IN GENERAL CONFORMITY WITH THE LONDON PLAN THE COUNCIL SHOULD BE SEEKING TO RE-ACTIVATE THE WHOLE OF THE SAFEGUARDED WHARF SITE FOR CARGO HANDLING USES AND FOR ANY DEVELOPMENT THAT IS PROPOSED ON THE NON SAFEGUARDED PART OF THE WHARF TO BE DESIGNED TO MINIMISE THE POTENTIAL FOR CONFLICTS OF USE AND DISTURBANCE. POLICY 4C.9 SETS OUT HOW THE RE-DEVELOPMENT OF A SAFEGUARDED WHARF SHOULD ONLY BE ACCEPTED IF THE WHARF IS NO LONGER VIABLE OR CAPABLE OF BEING MADE VIABLE FOR CARGO HANDLING - THIS NEEDS TO BE MADE CLEAR.

THE BOUNDARY OF THE SAFEGUARDED WHARF SHOULD BE SHOWN ON FIGURE 8.1

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)

SPLIT SSA2 INTO TWO PARTS:

PART 1 - WHICH SETS OUT THE APPROACH TO THE SAFEGUARDED PART OF THE WHARF: RE-ACTIVATION FOR CARGO HANDLING

PART 2 - WHICH SETS OUT THE APPROACH TO THE NON SAFEGUARDED PART OF THE WHARF AND HIGHLIGHTS HOW ANY DEVELOPMENT ON THIS PART OF THE WHARF NEEDS TO BE DESIGNED TO MINIMISE THE POTENTIAL FOR CONFLICTS OF USE AND DISTURBANCE IN LINE WITH POLICY 4C.8 OF THE LONDON PLAN.

UPDATE THE SUPPORTING TEXT ACCORDINGLY

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: Burey

Date: 23/3/10

Part B – Please use a separate sheet for each representation

Name or Organisation :

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 CSPI4 TO SUPPORT USE OF THE RIVER FOR THE TRANSPORT OF PEOPLE AND FREIGHT 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 5% 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: 

Date: 23/3/10