

Safeguarded Wharves Review 2011/12			
Statement of Consultation			
			Amendment to original consultation document
Respondent	Headline issue	Comment summary	GLA Response
1 Aggregate Industries	Scenarios	Wholly supports demand assessment level for aggregates which adopts medium scenario for future aggregate demand.	Noted
	Orchard Wharf	Support safeguarding in line with Firstplan represenation for London Concrete.	Noted
	Angerstein Wharf - land use context	Coupled with Murphy's Wharf, this site forms 'Aggregates Zone' for LB Greenwich. Vital that large capacity facilities are safeguarded to continue aggregates supply and protect from other development, such as Greenwich Millenium Village which could limit future operation.	Noted
	Standard Wharf - implementation	Site has potential to handle river-borne cargoes to replace road-borne imports. Important for Govt to continue Freight Facilities Grants to support reactivation of vacant sites mentioned in report.	There is no Grant on infrastructure but on revenue. Amended Market Interest section of site assessment accordingly.
2 Ballymore Properties - Sellwood Planning	Consolidation	Supports both local and strategic policy for the consolidation of wharves	Noted
	Sunshine Wharf	Agrees with review proposal to release Sunshine Wharf also to allow the redevelopment potential of land to the west of Lyle Park to be considered on a more comprehensive basis, including the creation of an enhanced setting for the park itself and public access to the river's edge.	Noted
	Thameside West consolidation	Ballymore as land owners could facilitate the consolidation of 4 wharves in Thameside West and suggest that the review is the correct vehicle to for an acceptable way forward which could assisting in meeting London Plan and LB Newham objectives.	See paragraph 8.2.4 and Implementation sections - also amended Planning section of site assessment - however, proposals have not progressed far enough to go further than this
	Manhattan Wharf - future relocation	Agrees with current safeguarding but could be lifted if a relocation site came forward that met specified criteria - equivalent area, regular shaped, 50m frontage to river, suitable access capable of accommodating HGVs. Whilst it is accepted that a number of sites could meet these criteria, Ballymore and the PLA have discussed site options and have jointly agreed that the most appropriate, and hence the preferred, site option is adjoining the eastern edge of Peruvian Wharf. If this is the selected relocation site, Ballymore will (if requested by the occupier) provide a wayleave for a conveyor link connecting the new wharf to the Tarmac site in Knights Road; the wayleave to be located adjacent to the boundary with Peruvian Wharf and be up to 5 metres wide.	Specific criteria not appropriate as consolidation has to be considered on case by case basis (London Plan policy sets out general principles through viability test), but recognition in amended Planning section of site assessment - however, proposals have not progressed far enough to go further than this
	Manhattan Wharf - future relocation	Advantages of this include: Flexibility of operation in the long term, making the protection of the wharf more robust, reducing the potential for negative impacts on other land uses, allowing for a higher capacity operation (by reducing the number of isolated safeguarded wharves along the river front, each with its own buffering issues such as noise, air quality and lighting) and allowing a more comprehensive approach to be taken to the longer term redevelopment of the land to the west of Lyle Park as indicated in the emerging Newham Core Strategy.	Specific criteria not appropriate as consolidation has to be considered on case by case basis (London Plan policy sets out general principles through viability test), but recognition in amended Planning section of site assessment - however, proposals have not progressed far enough to go further than this
3 Barking & Dagenham	Alexander Wharf	Supports safeguarding of Wharf	Noted
	DePass Wharf	Supports release of wharf	Noted
	Welbeck Wharf	Supports release of wharf, but requires confirmation that current occupiers have been notified.	Occupier has been notified by the GLA on 6 January 2012
4 Bennett's Barges	Implementation - Directions	Paragraph 0.1: Does Article 10(3) need reviewing? Can it ensure safeguarded wharves will return to freight handling after certain period of time.	New Implementation section as part of the site assessments to address this.
	Canals	Paragraph 0.5: Has any consideration been given to how canals may be adapted or re-designed to accommodate large volumes of freight? Are wharves and creeks included in this statement?	Chapter 4 explores opportunities but in many cases significant investment would be required and there are other challenges - see paragraph 4.4.1.. Waterworks River and Prescott Channel have been improved to accommodate larger volumes of freight through the construction of a new lock and water control structures. - Several wharves in particular in Barking Creek are included.
	London Plan policy	Paragraph 1.2.9: No real pressure on strategic planning to allow safeguarded wharves to be re-activated and to enable Thames to accommodate significant volumes of freight, access to the river via suitable infrastructure must be maintained or created.	London Plan policy provides robust strategic framework to facilitate waterbourne freight.
	Implementation - Common User Berths	Should establish Common User Berths (CUB) in West and East London to act as hub wharves for freight in and out. Should be made compulsory for PLA, GLA, Government or borough to purchase chosen feasible sites, prepare them for waterborne freight handling. Then freight shipping via CUB to be offered to the market on a commercial basis. - Currently potential to increase use of Thames to facilitate major engineering projects. Projects such as Blackfriars Bridge, Canary Wharf and Limehouse Link Tunnel demonstrate the benefits of such marine assets and infrastructure. CUBs can encourage this use, as it is a concern that contractors are not being challenged sufficiently on the case of using the Thames. Action at a strategic level should be taken to ensure this option is thoroughly tested.	There is a reference to common user berths - see paragraphs 4.2.6 - 4.2.8. There are currently no specific examples on the Thames and there are implementation questions over who would establish them and pay for the necessary work.
	Waste management	Paragraph 1.2. 19: Please expand on this "opportunity" - re: utilising transport opportunities along River Thames.	See further in this paragraph.
	Implementation - released wharves	Paragraph 8.2.3: Please clarify "and river related uses"	For example boatyards or other infrastructure to support the use of the river.
	Mulberry Wharf	Should not be released - floating concrete pumping plant in the river with access to the wharf?	Release of wharves with least favourable conditions proposed in areas where capacity surplus has been identified
	Town Wharf - opportunity	Should not be released - approaches to berth can be modified and its relation to Standard Wharf allows commercial use in harmony with outlying area	Release of wharves with least favourable conditions proposed in areas where capacity surplus has been identified
	Priors and Mayer Parry Wharf - opportunity	If Bow Creek is regenerated then these wharves should be maintained	Release of wharves with least favourable conditions proposed in areas where capacity surplus has been identified
5 Bexley	General	Overall support for the release of the three safeguarded wharves in Bexley and the general content.	Noted
	Railway Wharf, Town Wharf and Standard Wharf - land use context	Report mentions that Railway Wharf, Town Wharf and Standard Wharf are all adjacent the recent Belvedere Links Regneration project. This incorrect. The Belvedere Links project only took place within the industrial area and affects only those wharves located in the area.	Amended site assessments accordingly
	Railway Wharf - operation	Correct operational status: last cargo handled should be changed to 2005.	Amended site assessment accordingly

		Standard Wharf - implementation	With regards to 'recommendations' section stating "GLA/PLA will work with relevant stakeholders..." are LB Bexley considered to be one of the stakeholders?	Yes. Amended site assessment accordingly
6	Brett Group	Aggregates demand forecast	Object to comments that PLA forecasts for 2005 wharves document were subject to optimism bias by wharf operators who expressed interest in reactivating wharves and who subsequently did not fulfil those intentions. - Their expectations and business projections at that time were realistic and have remained largely unchanged.	Noted
		Aggregates demand forecast	Report makes assumptions on influence of major projects on aggregates demand. Regard should be given to concentrated peaks in demand that may occur during construction phases over plan period	A precautionary approach has been taken and this should give due regard to peaks in demand
		Aggregates demand forecast - West sub-region	Concerns forecast deficit in document for construction materials capacity in West London sub-region may be underestimated as significant proportion of supply comes from borough outside GLA boundaries. Is anticipated that these reserves will deplete and not replaced over period to 2031 and West London will become more dependant on supplies from further afield. Can be replaced by marine dredged or processed aggregates imported by water - report is not clear whether URS/Scott Wilson have adequately considered this in their assessments.	This has been considered - see particularly paragraphs 3.4.1 and 3.4.5. This is a London wide but not west sub region specific issue.
		Aggregates demand forecast - North East sub-region	Believe NE sub-region construction material deficit over estimated in report due to gretaer terrestrial sand and gravel reserves in East London that are likely to be realised in London Plan period. Shortfall may be less than 'medium' demand scenario forecast estimated.	The review deals with wharves and marine dredged/transported material not terrestrial reserves. - There is likely to be an increasing reliance on sea dredged and water imported aggregates
		Scenarios	Use of 'higher' scenario forecast of aggregates demand over plan period to assess safeguarded wharves is supported - use of 'flat' demand in period 2020-2031 too cautious, but difficult to predict at present.	See paragraph 7.2.1 for justification of medium scenario
		Capacity retention	Supports statement clause 2.6 of 2005 Safeguarded Wharves London Plan Implementation Report - re: retaining capacity. However, robustness and efficacy of safeguarding questioned where capacity and availability may be compromised in favour of larger developer led schemes	Current safeguarding policies and processes are robust
		Thameside West consolidation	Concept of consolidation is supported providing it does not result in similar businesses competing for the same geographic market from a shared location which will negatively impact on the viability of wharf use.	The review should not stifle competition. There are many advantages to clustering. Any released land will need to comply with London Plan requirements if it is opposite/adjacent to a safeguarded wharf i.e. be designed to minimise potential conflicts of use and disturbance
		Peruvian Wharf	Support reactivation of Peruvian Wharf	Noted
		Peruvian Wharf - planning and land use context	Strongly support view that the re-development of the land to the immediate north of the site will need to ensure that it does not compromise the operation of the wharf and that it provides a suitable HGV access to the wharf. - It is noted that such restrictive conditions as those secured by planning permissions at Peruvian Wharf can introduce additional costs and efficiency elements that can negatively impact on viability of water-borne freight uses - such issues should also be considered by LPA's	See Implementation section of site assessment (2nd bullet point) to address this
		Convoys Wharf - land use context	Recognises reconfigured safeguarded area of 2.3 ha compared to 2005 draft of 9.13 ha. Concerned that wharf uses/operators will be impacted on by new residential/mixed uses as part of the larger development and stongly support the Consultation Draft view that LPA's should not grant permisissions for sensitive land uses near to existing operational wharves or safeguarded wharves - incremental growth of such uses can have accumulative impact on operators in future.	See Implementation section of site assessment (2nd bullet point) to address this
		Hurlingham and Swedish Wharf	Supports reactivation of Hurlingham and Swedish Wharves. Hurlingham Wharf should be returned to water freight use for aggregates (acknowledging this may not be possible until after Thames Tunnel) - important that no capacity lost in West London and wharf capacity should be increased over life of the plan.	Re Hurlingham - see Implementation section of site assessment (4nd bullet point) to address this
		Implementation - re-activation	Review needs to be supported by political will, commitment and appropriate resourcing by the London Authorities to deliver the aims of safeguarding. Otherwise the safeguarding is likely to perpetuate the sterilisation of wharf sites.Safeguarding has not been successful in the delivery of reactivated wharves. It does not itself increase the use of currently non-operational wharves. This has not been adequately addressed.	This review facilitates this - and particularly addressed through Implementation section of site assessments. Wharves have been reactivated and steps are being taken to reactivate others
		Implementation - CPO	The reactivation may require the use of a CPO (subject to resources) if a negotiated release/sale cannot be achieved.' - Generally welcome, but 'may' should be replaced with 'will' and 'subject to resources' deleted to add robustness and prevent that unwilling landowner is left with 'hope value'.	Wording in consultation draft appropriate in the light of complexity of issues involved
7	Cathedral Group - nlp	General	Unwillingness of GLA to release detailed material upon which the extent of future safeguarding is based - a flaw in the document and consultation process.	Reject suggestion that process is flawed. URS report includes commercial sensitive information, but in e-mail of 23rd Dec 2012 specific additional information was offered.
		Historic demand	Whilst para. 3.1.4 notes a later increase in handling of construction materials (2010-11) and Table 3.2 notes an increase in intra-port movement, the reason(s) for this are not stated.	Amended to include further details in paragraph 3.4.1
		Justification of release and retention	No clarity or reasoned balancing in 'site selection' between wharves where safeguarding is to be retained or released. - For Erith wharves credence has been given to the planning/regeneration objectives expressed by LB Bexley, leading to other wider social and economic objectives being given weight.	Included in justification of each site assessment
		Scenarios	There has been no justification of this selection of the medium growth scenario – merely exhorting the precautionary principle against the effects of historic trend line projections even where they are supported by other GLA projections.	See paragraph 7.2.1 for justification of medium scenario
		Scenarios	The High Growth scenario is suggested as being based on identical assumptions but nevertheless records a range of increase of some 4.6 million tonnes per annum without any clarification of the differences (e.g. paras 3.7.4-5).	Different scenarios are based on different assumptions as set out throughout chapter 3
		Capacity estimates	No breakdown is given of capacity for different types of goods or of the land areas actively and/or necessarily used for freight handling.	See Tables 6.3 - 6.5 and paragraph 7.2.6 on land areas
		Sub-regional distribution	The prospective split of demand going forward has then been projected for the three sub areas of London by merely projecting historic apportionment of activity 2001-2010 and without any analysis of the changing mix of goods types – e.g. increase in petroleum and other liquids.	No strong evidence through research or consultation that the past sub-regional demand patterns would radically alter in the future. However, some assumptions were made based on consultation comments as shown in paragraph 6.2.2.

		Tunnel Wharf - boundary and land use context	Welcomes the proposed boundary change of the safeguarded wharf with particular reference to Enderby Wharf Cruise Terminal. These two uses would not be considered compatible, therefore revisions to boundary are appropriate. Substantial building to the north of 1995 safeguarded wharf (to south of proposed 2011 relocation) could provide a range of non-residential uses that could act as a buffer between wharf and nearby residential opportunities.	Noted
		Tunnel Wharf - demand forecast	Question whether there is genuine need for continued safeguarding of second wharf on Greenwich Peninsula - as figures generalised and counter identified trends in usage, also lack clarity in converting usage level to amounts of land area required.	Safeguarding based on robust forecasting methodology - and paragraph 7.2.6 addresses land requirements
		Tunnel Wharf - planning and land use context	The retention of any second safeguarded wharf on Greenwich Peninsula would be contrary to local and London-wide objectives for the important regeneration of this strategic area for leisure, tourism and housing purposes. Further development on the Tunnel Wharf, which would complement existing leisure facilities on the Peninsula and enhance the areas distinct identity as an entertainment district, should be considered acceptable and a preferred use.	Comment does not in itself raise grounds for de-designation in terms of London Plan policy, which focuses on a test of wharf viability. Proposed relocation indicates recognition of local ambitions whilst retaining a strategically important wharf for safeguarding. The London Plan (Table A1.1) provide further strategic direction for specific areas.
		Tunnel Wharf - implementation	The retention of a safeguarded wharf would not be viable – leading to unnecessary (and harmful) sterilisation of a key opportunity. There is no financial evidence suggested for the prospect of creating the new wharf from a vacant site a) by the existing owners, b) by any future owners or c) by the public sector through CPO.	Assessment demonstrates that wharf is viable and implementation section of site assessments indicates ways to achieve reactivation
9	Cemex	Conflicting landuse context	Any new residential or amenity uses developed in close proximity to existing safeguarded wharves should be permitted with care. Future policy should ensure that any neighbouring residential or redevelopment schemes should be adequately mitigated against the effects of these industrial sites.	Issue addressed in London Plan policy 7.26, clause Bc
8	City of London	Waste management	Paragraphs 1.2.14 - 1.2.21: No mention of City as an independent waste planning authority - is committed to retention of river transport via Walbrook Wharf.	Amended accordingly in Walbrook Wharf site assessment
		Walbrook Wharf - planning	Sec 4 - Clarify that City of London Core Strategy was adopted in Sept 2011.	Amended site assessment accordingly
		Walbrook Wharf - justification	Sec 7 - minor typo should be changed to "Site is in active use, with infrastructure designed to meet its current use."	Amended site assessment accordingly
10	Commercial Boat Operators Association	General	Replace "mt" with 'Mt' for a megatonne - a million tonnes, as 'm' usually refers to 'milli'.	Amended accordingly - but not as tracked changes to ensure readability of consultation document
		Canals - historic demand	4.1.3, Table 4.1: Clarification required on year boundary in 'year' column of table - year-end to year-end, or fiscal year?	Fiscal year
		Canals - West Drayton	Paragraphs 4.1.5 and 4.2.2: Denham traffic stopped when contract ended in July 2010 and was not stopped prematurely. Questions whether an 'opinion' on viability is necessary to mention in both paragraphs.	Amended accordingly
		Canals - Leeds example	Paragraph 4.2.9: "some existing flow of aggregates" on A&CN, statement undermines the Lafarge operation. Equates to 200,000 tonnes of aggregate each year, also oil cargoes, rice and other loads carried. Barge is 600 tonne capacity, not 500 tonne as quoted.	Amended accordingly - barge capacity changed and quote deleted
		Canals - barriers	Paragraph 4.4.1: This is rather negatively written. Perhaps some changes could be made to highlight what could/needs to be done, i.e "investment is required for craft and handling facilities"; "new operators would start up if there was an opportunity". State the possibility of grant opportunities available (also in 4.5.2). The promotion of a change in perception of viability is required. Change main heading 4.1 "Barriers to viability" to "Challenges and Opportunities to viability".	Some amendments made but text considered otherwise appropriate given the identified challenges
		Canals - conclusion	Paragraph 4.5.1: Need to promote change so that demand is stimulated. One of the changes could be incentives for new industry to be sited alongside waterways, so that the opportunity for water transport is always possible. Industry sited away from waterways makes water transport almost impossible.	London Plan policy promotes water freight across the Blue Ribbon Network. However, see challenges set out within paragraph 4.4.1.
11	Cory Environmental	Smugglers Way, Cringle Dock, Walbrook Wharf and Middleton Wharf	Support retention of Smugglers Way, Cringle Dock, Walbrook Wharf and Middleton Wharf as Safeguarded Wharves.	Noted
		Smugglers Way - operation	Smugglers Way site also consists of MRF and upgraded Civic Amenity Site (under construction). Suggested alternative wording for processing activities - "Waste Transfer Station - Residual waste is fed into a compactor which compresses the waste into individual containers. Containers are then transferred by two cranes onto barges." Material Recycling Facility - "Mixed recyclable material is brought in by road and sorted then taken by road for onward reprocessing." Civic Amenity Site - "Members of the public bring household waste and recycling for disposal by private vehicle, recyclable material is removed by road and residual waste goes into the compactors of the Waste Transfer Station."	Amended site assessment accordingly
		Smugglers Way - Environmental Impacts	New upgraded Civic Amenity Site - operate in new split level format and expected to have significant local environmental benefits for neighbours, help boost recycling rates and improve customer experience.	Amended site assessment accordingly
		Cringle Dock - operation	Also used as a Civic Amenity Site for public disposal of household waste.	Amended site assessment accordingly
		Middleton Wharf - planning	Planning reference for stated condition is 11/01387/FULL	Amended site assessment accordingly
		Middleton Wharf - operation	Middleton Wharf now reactivated and operational and uses a jetty to load and unload waste containers for use at Riverside Energy from Waste Facility.	Amended site assessment accordingly
		Waste demand forecast	Table 3.11: Riverside Energy from Waste Facility has planning permission (condition 4 of planning consent 07/11615/FULL) to treat 670,000 tonnes of waste per year, not 620,000 tonnes per annum as stated in report.	Amended accordingly
12	Crossrail	Crossrail	Suggested revised text in paragraph 1.3.3: "Crossrail is planning that 85% of the transport for excavated material is by rail or water. Crossrail are exploring further opportunities to use water transport to support construction."	Amended accordingly
		Crossrail	Paragraph 3.4.7: Currently predict that 4.5 M tonnes of excavated material to be moved by water from 2012-2016, with over 1M tonnes moved each year from 2012-2014. Total volume may be larger, considering tunnel segments, aggregates and other material, but difficult to put a figure on amount at present.	Amended accordingly
		Crossrail	Paragraph 4.2.2: Excavated material from Westbourne Park will be moved by train.	Amended accordingly
13	Crown Estate	General	Supports top-down and bottom-up methodology of the review and agree with wharf descriptions	Noted

		Aggregates demand forecast	CE's licensees of marine aggregate discharged at Thames Wharves in variance to figures in the review - result of incorrect sources used to compile review and has major effect on short term forecasting (3.4.1) and future demand scenario (3.21). Actually aggregate discharge figures 2006 - 2010 was 6.1, 6.7, 6.6, 5.4 and 4.9 (million tonnes) which are substantially higher than review figures.	These figures do not correspond to the data received from the PLA for the GLA area of the River Thames. The PLA data are higher than CE approach and revisions made provide appropriate justification for the approach taken
		Aggregates demand forecast	The future demand scenario, table 3.21 requires some clarification as The Crown Estate's long term forecast for marine aggregate alone indicates a return to 6.5 million tonnes per annum. This is supported by a provisional estimate of marine aggregate tonnage delivered to the Thames wharves in 2011 to be around 6.0 million tonnes, opposing the overall trend in reduction of primary aggregate production. It is noted that the LAWP, clause 3.4.11, consider that the demand would recover to some 5 million tonnes per annum but this figure, although nearer the 6.5 million tonnes, requires clarification of the overall figure which relates to the various sources of the aggregates used and whether the aggregate is used within local haulage distances from the London wharves or transhipped by rail or barge to other regions.	Not clear whether this is referring to volumes in the wider PLA area as opposed to the GLA portion. The Crown Estates were consulted and did not raise this point at that time.
		Scenarios	Forecast considered to be low by information held by Crown Estate - high forecast considered to be more realistic. Higher tonnage scenarios supported by wider aggregate supply policy which indicate an increasing volume of marine aggregates being dredged and delivered.	See paragraph 7.2.1 for justification of medium scenario and paragraph 3.4.5 on increasing role of marine aggregates
		Implementation - working hours	Supports safeguarding of wharves as detailed in review, however highlights the need for planning permission to allow 24/7 working at wharves to accommodate tidal access working - permission for residential uses must take into account the industrial nature of the wharves to avoid current conflict between uses.	Issue addressed in London Plan policy 7.26, clause Bc - and See identification as constraint in paragraph 5.1.10
		Hurlingham, Convoys, Orchard and Peruvian wharves - implementation	Strongly supports safeguarding and reactivation of Hurlingham, Convoys, Orchard and Peruvian wharves in addition to the ongoing safeguarding of Angerstein and Murphy's wharves.	Noted
		Implementation - planning	5 year review should be followed up by The Mayor's Office undertaking consultation regarding safeguarded wharves that are not in active operation to clarify planning position and avoid confusion between Industry and Local Authorities over what can be undertaken on the site.	New Implementation section as part of the site assessments to address this
		Canals	An extension of safeguarded wharves could be considered for appropriate canal wharves that have direct connection with the River Thames.	Paragraph 4.5.4 highlights need for difference in approach
14	Day Group - First Plan	Murphy's Wharf	Fully support retention of Murphy's Wharf safeguarding.	Noted
		Murphy's Wharf - operation	Activities and volumes mentioned are restricted to UMA (Tarmac). Inner berth is of such a size that economic volumes are limited and possibly included in the 'recent average tonnage' figure, however the activities listed above are an important part of the Aggregates Zone's contribution towards meeting London's recycled material and waste recycling requirements.	Figures provided by the PLA data are considered appropriate
		Murphy's Wharf - land use context	Concerned that further mixed-use development planned in the area will bring conflicting uses closer to the wharf. In the long term, it should be ensured that such uses are not located close to the wharf as to not prejudice effective use of the safeguarded wharfs. New Developments should also ensure HGV access.	Issue addressed in London Plan policy 7.26, clause Bc
		Murphy's Wharf - road access	Concerns over local traffic conditions with regards to the proposed use of land in close proximity to the south of the wharf as a car park to serve the Olympic Games.	The Olympic Games will be over by the time of the final publication of this review
15	Environment Agency	Waste demand forecast and onsite processing	Recommended that excavated site materials transported for remediation should be identified clearly within section 3.3 as a demand category. Hub approach should also be referenced in the sections that refer to onsite processing needs for wharves such as 5.1.5-5.1.8	While it is noted that excavated materials for remediation is an appropriate sub-section of the overall waste category it is not clear what it would add to overall analysis to define it separately, also as not all development sites are located in close proximity to the Blue Ribbon Network. The London Plan seeks for developments close to navigable waterways to maximise water transport for bulk materials, particularly during demolition and construction phases. The hub approach could be of benefit but would depend on available space at a wharf and the development sites being near the waterways. - The need for London Plan policy to address remediation following release may be considered in the future
		Thames Tunnel	Are providing advice to the Thames Tideway Tunnel project team with regards to spoil transport proposals that include the reactivation of Hurlingham Wharf. Support aim to reduce lorry movements of spoil and use wharves close to proposed tunnelling shafts.	Noted
		Implementation - released wharves	Where wharfs are released we would like to see improvements to the riverside, as well-planned estuary edges can protect and enhance the local environment.	Amended accordingly
16	Grafton Group - Montagu Evans	Implementation - re-activation	It became clear at the London Plan EIP that the approach to safeguarding wharves had failed with the majority of vacant safeguarded wharves not re-activated.	Comment factually incorrect. There was no substantial challenge to Policy 7.26 at the London Plan EIP, and it was upheld by the independent panel. Mere fact of current vacancy of a wharf is not in itself good grounds for de-designation.
		Orchard Wharf - planning and land use context	Conflict between the historic safeguarding and more recent regeneration objectives and allocations for the Leamouth Peninsula, the adverse impact of a wharf operation on the new uses in the vicinity would be unacceptable, also demonstrated by level of objection to Aggregate Industry planning application, the general compatibility of wharf with surrounding land uses as set out in assessment sheet is questioned. The wharf is not in a SIL.	Comment does not in itself raise grounds for de-designation in terms of London Plan policy, which focuses on a test of wharf viability. - Safeguarding of Orchard Wharf is recognised in LBTH Core Strategy and OAPF
		Orchard Wharf - navigation	Navigational constraints due to pier/jetty facilities adjacent to the site mean that a jetty structure is needed to activate the wharf, the capital investment required affects the viability	Noted. This does not affect the designation. Potential operator is seeking planning permission for jetty.
		Orchard Wharf - environmental impact	Conflict of wharf operation with East India Dock Basin SNCI to the west	Mitigation measures would be required in accordance with national, London and local planning policy. This is not in itself a reason for de-designation

		Orchard Wharf - construction material demand	Demand generated by Crossrail and Thames Tunnel for this wharf is speculative. In any case, both projects are relatively short term in nature and will not create long-term demand post 2021 as the review appears to suggest.	Although the construction phases of these projects are temporary their scale is significant and it is also not clear at this stage when they will be completed and there could be slippage. They are also indicative of major future projects that could create increased demand. The safeguarding does not hinge upon use of the wharf in connection with particular projects
		Orchard Wharf - justification	There is the potential to release the wharf on the same basis of oversupply as Priors, Meyer Parry and Sunshine Wharves. For the latter the availability of alternative wharves is part of the justification. The Thameside West area is likely to remain predominately industrial in nature.	Released wharves considered least favourable in their site assessments. The review specifically states that there is a construction materials deficit in the north east sub-region and seeks to facilitate the implementation of the reactivation of Orchard Wharf
		Orchard Wharf - consolidation / alternatives	Capable of being released if its capacity can be replicated on an alternative 'donor' site. Alternatively, seriously consider the merits of including Orchard Wharf as part of any consolidated wharf arrangements on land at Thameside West.	No in principle objection to consolidation, however there are a number of substantial issues that would have to be resolved before this could be considered as a serious proposition, and continued designation is appropriate - particularly as there is operator interest in using the wharf.
		Consolidation criteria	Criteria based approach for consolidation: 'Proposals for the de-safeguarding of a wharf/wharves and reprovision of a consolidated wharf would be subject to there being no net loss of functionality or wharf capacity. Proposals will need to demonstrate that the location of the existing safeguarded wharf/wharves is inappropriate and that the consolidated wharf is in suitable location in accordance with the locational criteria set out in Paragraph 7.77 of the London Plan.'	Specific criteria not appropriate as consolidation has to be considered on case by case basis
17	Greenwich	Brewery, Angerstein and Murphy Wharves and Victoria Deep Water Terminal	Endorses continued safeguarding and minor boundary changes to Angerstein and Murphy Wharves.	Noted
		Tunnel Wharf and Riverside Wharf - construction material	Council seeking release of both wharfs. Review shows 45% reduction in trade volumes in construction materials across Greater London between 2001 and 2010 (Table 3.1) and excess in construction materials capacity in the South East sub-region of 1.3 million tonnes per year.	Review does not show a 45% reduction. The demand forecast is based on robust methodology. Consideration has been given to the need for release in this sub region which is reflected in the assessment sheets for the sub region as a whole i.e. there is very high capacity of wharves to handle aggregates which needs to be considered in the context of high demand for construction materials. Release of wharves with least favourable conditions is proposed.
		Tunnel Wharf and Riverside Wharf - consolidation	Review states that no release is required in the sub-region in light of large capacity at Angerstein and Murphy's wharves - although this is large, it is wrong to suggest that it is sufficient to justify or deny the release of other wharves. Large capacity at these wharves could compensate and justify the release of other nearby wharves and has been used in Annex 5 of the Review as a reason for release of Mulberry and Railway wharves in Bexley.	Allowance made due to supra regional role of Angerstein and Murphy's wharves. They have no capacity to accommodate Tunnel and Riverside wharves capacity and the operational requirements of the latter, and no specific alternative sites identified.
		Tunnel Wharf and Riverside Wharf - boundaries	Proposed safeguarding boundaries of the wharves are larger than the land area specifically used for wharfage and often contains other commercial activities that could be accommodated in alternative locations in the Borough.	Boundaries have been updated to reflect operational requirements. On-site processing considered beneficial in terms of wharf viability (see paragraph 5.1.7)
		Capacity in South East sub-region	Excess of aggregates capacity in subregion which has justified release of several wharves in Bexley - recognised in Review.	Consideration has been given to the need for release in this sub region which is reflected in the assessment sheets for the sub region as a whole i.e. there is very high capacity of wharves to handle aggregates which needs to be considered in the context of high demand for construction materials. Release of wharves with least favourable conditions is proposed.
		Scenarios	2011 figure for forecasting scenarios displays significant variation between low growth and high growth models - this figure should be accurate, without such a large variation, to act as a consistent starting point for each forecast, irrespective of growth scenario.	See footnotes 22 and 24
		Tunnel Wharf - implementation	Location can no longer be considered viable as site has been vacant and unused in cargo handling since 1996. Moreover, there is no wharf infrastructure.	Assessment demonstrates that wharf is viable and implementation section of site assessments indicates ways to achieve reactivation
		Tunnel Wharf - market interest	No lease interest in recent years in using safeguarded wharf for wharf activities and no suggestion boundary change will be any more viable.	Assessment demonstrates that wharf is viable and implementation section of site assessments indicates ways to achieve reactivation
		Tunnel Wharf - alternative use	Land at Greenwich Peninsula West is ideally located for more valuable uses which could complement leisure led development at the O2 arena and proposed district centre at North Greenwich. The residual land value for other uses is much higher.	Comment does not in itself raise grounds for de-designation in terms of London Plan policy, which focuses on a test of wharf viability
		Riverside Wharf - operation	Wharf has relatively low use compared to other larger wharves in the subregion. Manufacture of asphalt is not a wharf use and there may be alternative locations for an asphalt plant that may be more appropriate - White Hart Triangle.	Wharf is operational. Different wharves have different characteristics and uses
		Riverside Wharf - planning	Represents part of the Charlton Riverside Opportunity Area which is identified for housing growth in the London Plan.	Strategically important active wharf. Opportunity Area status as such not a conflict with wharf safeguarding
18	Greenwich Peninsula Regeneration - Quintain	Victoria Deep Water Terminal - road access, land use context and environmental impact	There are also a number of significant regeneration proposals coming forward on and around the Peninsula. Traffic and operational/environmental issues (noise, dust etc.) associated with VDWT have always raised compatibility issues with the regeneration proposals on the Peninsula. These issues will be tested even further as a direct result of TfL's recent proposals to close the slipway from Tunnel Avenue on to the A102 as part of the Blackwall Tunnel over height restriction works.	Comment does not in itself raise grounds for de-designation in terms of London Plan policy, which focuses on a test of wharf viability. Wharf uses can sit alongside other uses quite satisfactorily, and that it is part of the function of the planning system to identify and help resolve any potential conflicts. This wharf remains a strategically important wharf for the purposes of London Plan policy.

		Victoria Deep Water Terminal - road access, land use context and environmental impact	There are incomplete details within the wharf assessment sheet for Victoria Deep Water Terminal (VDWT) in particular the commentary on the Road/Rail Access and the Planning Status and Surrounding Land Use Context of the site. - See amended assessment sheet provided. Suggested additional wording for justification section of assessment sheet: 'In view of the changing surrounding land use context to the site together with the new traffic arrangements, future cargo activities should incorporate the use of appropriate available means to mitigate the environmental impacts of freight handling.'	Some amendments made accordingly to Planning and Road Access sections of site assessment, but in terms of the Justification section no change as it is a London Plan requirement for wharf operators to use appropriate available means to mitigate the environmental impacts of freight handling. - See also London Plan policy 7.26, clause Bc regarding minimising potential conflicts.
		Victoria Deep Water Terminal	The long term safeguarded status of VDWT should reviewed and reconsidered as part of the current assessment process and potentially removed if found not to be compatible with the surrounding land uses and regeneration of the Peninsula.	Any change to the current situation can only be pick up in future reviews
19	Hammersmith & Fulham	Capacity estimates	The capacity of the currently inactive wharves is not clearly assessed, nor is the potential increase in capacity of currently active wharves.	Disagree. See paragraph 5.1.11 regarding vacant wharves. The potential capacity and not recent operational tonnage has been used
		Waste demand forecast - West sub-region	The justification in the review for retention of all the vacant and non-operational wharves in the west sub-region relies on there being a shortfall of 300,000 tonnes p.a. to meet a projected shortfall for transshipment associated with waste activities. This is not considered to be correct and, supported by the WRWA, it is considered that there is a surplus of capacity. The council considers that capacity is available elsewhere in LBH&F and in the wider west sub-region. No other wharves than Smugglers Way and Cringle Dock in Wandsworth are required for the transshipment of locally generated municipal waste. Other waste sites are identified in the Strategic Industrial Location in the north of LBH&F that adequately deal with this council's requirement in the London Plan to provide for waste management. This area also makes a significant regional contribution to the sustainable management of construction waste.	Whilst the waste demand forecast is quite broad in spatial terms it has to be considered moderate as it does only cover municipal waste and construction waste but not commercial and industrial waste. The scale of the latter is significant but the proportion that could be transported by water is very difficult to predict. This has to be taken into account. Also, wharves are not necessarily safeguarded for waste - its safeguarded for waterborne freight handling.
		Canals - Powerday	In the north of the borough there are two major waste management sites of strategic nature with combined commercial/industrial/municipal solid waste capacity exceeding the waste apportionment requirement for H & F until 2031 (London Plan 2011, Table 5.3) by an estimated 200,000 tonnes p.a. At one of these sites, the Powerday Waste Management Facility, there is also substantial capacity for the processing of construction waste, in excess of 1 million tonnes. These sites are situated within a preferred location for waste activities, and both have the benefit of railheads for the onward transshipment of processed material to all parts of the country. Powerday, as acknowledged in the Review, also has wharfage on the canal where construction waste can be received for processing at the site. The combined licensed capacity of these two sites is in excess of 2 million tonnes per annum. (N.B There is an error on page 59 of the Review Powerday has a licence for 1,600,000 tonnes pa, not 600,000 tonnes.) A planning condition controls the tonnages transported by road, rail and canal to approx. one-third by each mode.	Figure on page 59 refers to the proportion of waste by canal. Amendment made accordingly
		Rail alternative - West sub-region	There is no consideration of alternatives to water transport that may be equally sustainable and more cost effective. This includes alongside increase in on-site processing and use of canals also rail. The council would point out that all the Opportunity Areas within H & F have rail services close by, in particular the West London Line. The council will encourage developers to use rail, where feasible, for the transportation of construction materials and the removal of spoil.	This is a review of safeguarded wharves not for rail capacity, and aggregates forecast is primarily based on the marine dredged, which by definition are not arriving by rail. Both modes serve separate markets and are generally not in competition. - Paragraph 3.4.5 confirms the increasing reliance on marine dredge aggregates.
		Crossrail - West sub-region	Crossrail when constructed will cross the north of H & F close to the Grand Union Canal and rail lines. The transshipment of construction waste associated with this project in this part of London should utilise both these sustainable means of transport in preference to the river which is much further away. This is acknowledged in the Review, as is the fact that Crossrail considers that rail transportation of spoil is more cost-effective.	Noted
		Hurlingham Wharf - planning and land use context	Re-activation would be incompatible with the majority of the proposed surrounding land uses and is not supported. It is likely to bring substantial additional daily lorry movements. The Review does not adequately justify the re-introduction of an industrial use where such an activity ceased more than 10 years ago. It would introduce an industrial use that would conflict with the regeneration proposals for the South Fulham Riverside Area and which would cause demonstrable harm to the achievement of considerably increasing local housing targets.	Comment does not in itself raise grounds for de-designation in terms of London Plan policy, which focuses on a test of wharf viability. - A planning application would assess impacts and mitigation would be put forward where required. If the site is being used for waterborne freight handling there would not be substantial additional daily lorry movement. The wharf is safeguarded and reactivation would be in line with this safeguarding.
		Hurlingham Wharf - planning	This needs to be updated including that the area is no longer a designated employment zone in the Council's adopted Core Strategy but is identified for predominantly residential use. Council objects to the comments in this section regarding the conclusion of the H&F Core Strategy EIP Inspector. He considered that the issues would be "appropriately, comprehensively and independently considered by the GLA's review in the near future". We request that the statement in the consultation document be amended to more accurately reflect his conclusions.	Amended with wording taken from the adopted Cores Strategy
		Hurlingham Wharf - road access	The comment on the proposed junction improvement scheme is out of context. This improvement is only possible using funding from significant housing regeneration in the area. This funding will be considerably reduced if Hurlingham Wharf is not released for alternative use. The wording should be changed accordingly. - The delivery and service plan referred to is likely to severely limit the potential to use the site for a viable wharf operation.	Site assessment amended
		Hurlingham Wharf - market interest	Market interest – LBH&F disputes that "the west sub-region is characterised by a greater demand than supply of wharfage resulting in a lack of available alternative sites" since there is no need for any capacity for waste transshipment. Furthermore this section does not include whether these uses for which there is "an interest" are capable of being implemented, compatible with the area or would make the best use of the potential of this riverside site or could not be achieved in another sustainable manner.	Site assessment demonstrates that wharf is viable and the demand forecast has identified a capacity shortfall for waste and construction material within the sub region

		Hurlingham Wharf - consolidation / alternatives	Although the council dispute the need for additional capacity, if this is considered necessary the council consider that there is the potential to expand the use of the river for freight transport by building on what has already been achieved at Comley's Wharf and reactivating Swedish Wharf, rather than to reactivate Hurlingham Wharf. Consolidation of capacity to the east of Wandsworth Bridge would enable increased capacity for cargo handling whilst limiting at one location the environmental impacts of wharf use, including traffic, on residential dwellings within proximity of the wharves. It would provide for better access to the London Distributor Road reducing disturbance to local residents. This aspiration is embodied in H&F's adopted Core Strategy, paragraphs 7.140 and 7.141. The promised consideration of the consolidation of wharf capacity has not materialised and sites are likely to continue to remain inactive, at considerable cost to the local areas concerned in terms of new housing. It is the Council's view that a more thorough review of the use of the river is urgently needed.	No in principle objection to consolidation, however there are a number of substantial issues that would have to be resolved before this could be considered as a serious proposition and no specific alternatives to meet the capacity shortfall have been identified. Continued designation is therefore appropriate.
		Swedish and Comley's Wharf - consolidation	Need to explore the possibility of consolidation with adjoining wharf. - The Review does not address the possibility of mixed use intensification and optimising the potential of sites.	Amended Planning section of site assessment to reflect specific consolidation possibility - however, proposals have not progressed far enough to go further than this
		Smugglers Way - operation	This wharf now includes a MRF serving WRWA boroughs and has the potential to ship recyclates by barge. "Smart sacks" are processed for onward transportation. However, this is considered by the WRWA as unlikely to be economic due to the cost of river transport and the diverse market places. The residual waste is transported from this site by barge to the new "energy from waste" plant at Belvedere. This arrangement will exist until at least 2032 and ensures the use of the Thames for the onward transhipment of residual waste.	Amended to include reference to MRF
		Cremorne Wharf - planning	Delete the sentence regarding post 2031 waste management. This is inaccurate. The LBH&F Core Strategy identifies spare waste management capacity to 2031 that could assist RBK&C in meeting their current shortfall of 200,000 tonnes.	Agreement between two councils confirming the described waste management arrangements not formally in place yet.
20	Hanson UK	Scenarios	Medium demand scenario is reasonable in the light of the evidence. Additional spare capacity has also been built in by taking a precautionary approach (Para 6.3) and this is probably wise, because once wharves have been redeveloped for other uses they are unlikely to be readily reinstated as wharves if future demands increase.	Noted
		Justification of release	The wharves selected for release from safeguarding seem to be logically selected; in many cases, they have limited navigable water depths.	Noted
		Implementation - re-activation	Freight Facilities Grant has now been withdrawn, for any new projects, which will almost certainly make re-activation of some of the vacant wharves less likely to be financially viable, unless perhaps the GLA has some alternative funding available.	Noted
		Pier Wharf - planning	Thames Water are no longer considering Pier Wharf for the Thames Tideway Tunnel. This should be reflected in the final Review version.	Amended accordingly
21	Havering - Officer	Halfway Wharf - implementation	Welcome that Halfway Wharf has the potential to be used more in the future for freight cargo and supports the safeguarding being retained. Council would like to be involved in any future discussions on this.	Amended accordingly
		Phoenix Wharf	Havering agrees with the conclusion set out within the review document that there is no suitable infrastructure in place for a jetty at this time. Therefore support for release.	Noted
22	Hutchison Whampoa Properties - URS	Convoys Wharf - boundary	Consultants consider that their extensive and robust research undertaken as set out in the Convoys Wharf Marine Terminal Assessment provides sufficient justification to reduce the size to 2.6 hectares.	Boundaries (location) of potentially reduced area have not been fixed. Therefore, a reduction of the area would be premature at this stage.
23	J J Prior	Brewery Wharf - future review	Continued operation of Wharf for aggregates delivery is no longer economically sustainable due to operational restraints - whilst the retention of safeguarded status is not challenged it is sought that the Mayor and PLA recognise and accept when the Company is no longer able to supply aggregates from its operation in Fingerhoe, it would be appropriate for Wharf to be released of safeguarded status. Operational status of Deptford Creek, size of wharf and growing pressures of residential development and regeneration only highlight the sensibility of this approach.	The comment is about future but not this review.
24	Kensington & Chelsea	Historic demand	No provision of data from the University of Westminster is made available, though this source was highlighted in the Mayor of London's Brief. This may represent a missed opportunity to gain valuable information.	The London Freight Data Report 2009 (University of Westminster) was assessed but excluded as considered not be particularly relevant as dealing with wider PLA area not the specific GLA region.
		Correlation to historic demand	Initial analysis on identifying major commodity groupings and key macro-economic drivers being an appropriate method for traffic forecasting. However, the 2011 Report appears to have deviated from its proposed approach, following the identification of poor historic correlation between river freight and the identified Gross Value Added (GVA) projections. The reasons for this deviation, as with much of the presented analysis being unexplained and non transparent.	See paragraph 2.2.18 for approach to forecasting - combination of top down (macro economic) and bottom up (market intelligence) led factors
		Aggregates demand forecast	The Report's analysis of the construction material data appears to have a significant flaw, incorrectly estimating annual future average volumes from the cumulative volumes of data to be handled in the specified range of years. Deriving prospective growth rates from historic actual annual volumes and these average projections. This is mathematically incorrect, and leads to an invalid projection.	It is not clear what specific element of the forecast methodology it is suggested is incorrect. The method is based on MPS1 forecast assumptions for London (top down approach) adjusted through assumptions based on specific market intelligence (bottom up approach).
		Major projects	The determination of percentages of the Crossrail and Thames Tunnel projects that may use waterborne transport, and their subsequent application to the MPS1 secondary aggregate volumes for all London, is a major distortion. As London Boroughs away from the River Thames are unlikely to consider river transport.	Boroughs not bordering waterways may to some extent still get aggregates from suppliers that use the water as part of the overall transport chain. The Market will determine this. - Moreover, it can be assumed that Crossrail and the Thames Tunnel form an elements of the demand estimates contained in MPS1's secondary aggregate forecasts.

		Waste demand forecast	Inadequate presentation of assumptions and analysis within the 2011 Report hinders the understanding of what it identifies as the percentage of DMWS data that will move by water. In particular, assumptions of increases in barge traffic for waste to incineration and prospective waste to energy plants appear to take insufficient account of the likely lack of direct maritime access to these plants. Relying upon road shuttle movements, with consequential negative impacts and double handling costs, to reach river side wharves.	Disagree that there is any inadequacy in presentation. Recognition of policy drivers and stakeholder consultation has informed assumptions in a clear and transparent way
		Demand forecast - other commodities	The 2011 Report combines non aggregate and waste movements as "Other Commodities". There is no analysis of the underlying components of these commodities, with the projections being based upon trend assumptions or in the case of petroleum products, related to GVA 2.5 percent standard annual growth. The purported link to trends is difficult to quantify, and the application of standard growth rates for all three growth scenarios takes no account of their supposed characteristics.	This would not make any material difference to the outcome of the forecast. Paragraph 2.2.14 explains focus on waste and construction material.
		Sub-regional distribution	The broad distribution of the demand and capacity of wharves across three geographical regions has a lack of transparency on how the allocation of demand is completed; either being a reflection of the underlying commodity groupings that may be handled in each region or a broad percentage distribution of the total numbers, in line with historic data.	Paragraph 6.1.2 explains that the future demand is split between the regions based on historic trends and adjusted by two specific cases.
		Sub-regional distribution	Significant unexplained increases between the last historic year data (2010) and the first forecast year (2011) exist at the sub-regional level. In particular, for the West region where an increase of 30 percent is presented. Limited explanation is provided for this. The lack of transparency related to the underlying commodities creates issues with regard to the sub-regional projections. In particular for the West sub-region, where its annual growth of 1.7 percent appears to be inconsistent with the presumed underlying commodities. These being construction material and waste where the annual growth is presented as 1.3 percent and 1.7 percent.	Table 6.2 is based on high-level demand analysis of Chapter 3 - see in particular footnotes 22 and 24.
		Cremorne Wharf - planning	Operational restrictions of 1992 planning permission including working times and (normal working hours) and vehicle movements	This is not unusual for a wharf in an urban area and does not raise any issues relevant to the continued safeguarding of the wharf.
		Cremorne Wharf - implementation	Capital cost of reactivation between £ 885 k and £ 2,100 k - impacting on financial viability	Capital costs to be deduced from wharf's market value. - The comment does not raise any issues relevant to the continued safeguarding of the wharf.
		Cremorne Wharf - nativation	Barges cannot be moored at the front of the jetty due to Combined Sewer Outfall	This is a detailed issue primarily relevant for an operator to resolve and does not reaise any issue relevant to continued safeguarding
		Cremorne Wharf - land use context	Site isolated industrial use within a residentially led mixed-use context (Station House, Lots Road Power Station scheme)	No necessary incompatibility with nearby uses - and the planning system will help to address them when they arise
		Cremorne Wharf - environmental impact	Environmental conflicts with adjacent users including noise, heritage (Grade I listed pumping station), transport (limited access/egress), air quality (dust and vehicle emissions), lighting would mean that it is unlikely that required planning permission would be granted to a wharf use	Mitigation measures would be required in accordance with national, London and local planning policy. This is not in itself a reason for de-designation
		Cremorne Wharf - waste use	Waste and recycling for the WRWA area is delivered to Smugglers and Cringle Wharves with Cremorne being surplus to requirements	Whilst the waste demand forecast is quite broad in spatial terms it has to be considered moderate as it does only cover municipal waste and construction waste but not commercial and industrial waste. The scale of the latter is significant but the proportion that could be transported by water is very difficult to predict. This has to be taken into account. Also, the wharf is not necessarily safeguarded for waste - its safeguarded for waterborne freight handling.
		Cremorne Wharf - construction material	Site unlikely to be used for transhipment of construction material due to site limitations, spatial distribution of major construction projects and available alternatives and demand generated by Thames Tunnel is temporary	Several operator would be interested according to the PLA. And although the Thames Tunnel project is temporary its scale is significant and indicative of major future projects that could create increased demand.
		Cremorne Wharf - alternatives	Located close to 3 vacant wharves (Hurlingham, Swedish, Middle), all of which are recongised in the assessment sheets as operationally less sensitive than Cremorne due to their primarily industrial/commercial settings, and which have combined unused capacity of at least 452,000 tonnes pa, Hurlingham is considered sufficiently viable for a pro-active 'reactivation strategy'	Several operator would be interested according to the PLA. - In particular in West London all wharves are set within sensitive operational environments
		Capacity in West sub-region	Additional capacity will be delivered in the West sub-region by virtue of Comley's Wharf securing planning permission to increase capacity from 53k to 80k tonnes pa and at Kirtling Wharf , where capacity has risen from 114k to 230k tonnes pa	The significantly increased capacity for Kirtling Wharf has been reflected in the capacity figures
		Cremorne Wharf - demand forecast	Medium scenario only identifies shortage of capacity in 2031 - and even then only 100k tonnes pa, likely to be addressed by existing operational wharves - the activation of Cremorne Wharf is not required to address projected demand and supply projections	Precautionary approach - in particular in West sub-region with its few remaining wharves
25	Lafarge Aggregates - David L Walker	Mulberry Wharf - land use context	Object to proposed release of wharf as it is in an industrial setting and therefore surrounding landuses are complimentary to the nature of the wharf uses. Releasing safeguarding status could facilitate inappropriate development both on the site and within immediate surrounding area. - If safeguarding removed and inappropriate development allowed it would be impossible to concieve a scenario in the future for its reuse as a wharf.	Release of wharves with least favourable conditions proposed in areas where capacity surplus has been identified
		National policy context	Draft NPPF highlights that existing, planned and potential commercial wharves should be safeguarded, in addition to concrete batching, and the processing plants for secondary and recycled aggregates, which largely echoes policy provision of MPS1 - therefore all wharves should be safeguarded. - Significant Planning Policy support at national level for safeguarding of wharves and waterways also in PPS1 waterborne freight transport and PPG13 regarding protection of sites and routes that could be critical in developing infrastructure for freight transport (such as water transport). - There appears to be little link between national policy and methodology of freight trade forecasts and wharf capacity estimates.	Policy drivers as key factor of forecasting - see Figure 2.1. - NPPF also indicates that employment land should not be protected unnecessarily

		Mulberry Wharf - opportunities	Although wharf is currently only served by road, the infrastructure remains in place and would facilitate its reuse almost immediately - although does not currently receive freight by water this does not mean the situation will not change in the future as dynamics of industrial sectors evolve. - Removing safeguarding contravenes not only national planning policy, but also the broader principles of sustainable development - move towards movement of freight by water should be helped, not hindered.	Review is consistent with national policy. Only wharf capacity required to meet current and anticipated future needs should be safeguarded. - And the berthing conditions are considered unsuitable.
		Capacity in South East sub-region	Release of Mulberry, along with vacant Railway and Town Wharf, in order to reduce surplus capacity in respect of construction material and vacant capacity - release may be acceptable if there was a surplus capacity in other subregions, however this is not the case. Deficits in construction material amount to 1.2 mt in West and North-East sub-regions which almost balance with surplus in South East sub-region.	A sub regional basis has been chosen to ensure that wharves are retained in the places where they are required i.e. capacity meets demand. Therefore it would not be appropriate to retain a wharf in one sub region because there was a deficit in a different sub region. Relatively little leakage region to region
		Mulberry Wharf - construction material	Mulberry Wharf considered by Lafarge as a strategic site in the context of planned major construction projects to respond to increased demand for waterborne delivery of aggregates - Crossrail 1 and Thames Gateway Regeneration.	Major projects have been factored into the review and planning policy seeks for developments to maximise water transport for bulk materials
26	London Concrete - First Plan	Orchard Wharf	Fully support the reports proposal to retain safeguarding of Orchard Wharf.	Noted
		Orchard Wharf - boundary	Suggested that Wharf boundary be amended to to include thin strip of land east of the current boundary which comprises of a disused causeway running from the river edge to Orchard Place	No change at this would be premature at this stage
		Orchard Wharf - land use context	Operators are concerned that number of potential mixed use developments in close proximity to Orchard Wharf, as set out in the Tower Hamlets Core Strategy, could create potential conflict in land use and prejudice the long term use of the wharf. The review should include London Plan and TH Core Strategy references regarding protection of the wharf for cargo handling uses and that any new development does not prejudice use of the wharf.	The Planning section of the site assessment includes such references. - See also London Plan policy 7.26, clause Bc. - There is not necessarily incompatibility with nearby uses. The planning system will help to address them when they arise
		Orchard Wharf - land use context	Specific references ensuring that changing land uses around the wharf "do not reduce the operational viability of the wharf" such as those included on assessment sheets for Cringle Dock and Kirtling Wharf should also be applied to Orchard Wharf. Similarly, references that make specific reference to residential and mixed-use development in the vicinity of the wharf and confirm that "it will be important to ensure that this does not introduce conflicting land uses and retains appropriate HGV access" such as those at Brewery, Angerstein, Murphy's, Riverside Wharf etc, should be included in Planning Status and Land Use Context sections.	These issues are generally covered in Planning section of site assessment, and there is not necessarily incompatibility with nearby uses. The planning system will help to address them when they arise
		Orchard Wharf - land use context	Last sentence of land use context section should be replaced as follows to ...: "There is expected to be further re-development in the vicinity of the wharf, both north of Orchard Place and immediately to the east of the wharf. This is likely to comprise mixed-use development, including residential uses. It will be important to ensure that this does not introduce conflicting land uses, and that the layout and design of surrounding uses does not reduce the operational viability of this wharf. It will also be important to ensure that appropriate HGV access to the wharf is not compromised and that good access to the A1261 is retained."	These issues are generally covered in Planning section of site assessment, and there is not necessarily incompatibility with nearby uses. The planning system will help to address them when they arise
27	London Forum	Scenarios	Fully agree with the expressed view that "it is appropriate to follow a precautionary principle and consider the higher scenario as the basis to assess safeguarding of wharves" however strongly disagree with the subsequent decision to take URS advice (7.2.3) that safeguarding recommendations be based on the medium growth scenario.	See paragraph 7.2.1 for justification of medium scenario
		Engagement of small businesses and community-based groups	The review quite rightly notes the need to generate new demands for water freight. To this end, it should include a consideration of the potential for increased engagement of small businesses and community-based groups, encouraging them to come up with ideas for using both the waterways and the adjacent land. It is likely that many such uses would be locally based and smaller scale, and thus be particularly relevant to increasing the use of the canals – as would any analysis of appropriate levels of long term support or subsidy for water-based freight. Therefore strongly support for efforts to ensure that relevant boroughs recognise, and follow through, potential opportunities for using canals to help achieve modal shift.	See in particular paragraph 4.2.3 regarding borough engagement
		Historic demand	No units are given in Table 3.1; % change in vehicles should be +6% ; and to reflect a total change in petroleum products of 4514% during the 5-year (not 4-year) period 2005-10, the CARG should be 40.7%.	Amended accordingly, but forecasting outcome not affected
		Historic demand	Paragraph 3.1.12: Especially given the indication (in paragraph 3.1.4) that 2011 volume may be back to 2008 levels, it is simply not acceptable on the basis of this data to describe the decline in construction materials as "relatively consistent", and hence (without further back data and some more detailed analysis) to conclude that the decline is likely to be structural.	Addressed through changes to paragraphs 3.1.4 and 3.1.12
		Historic demand	The totals in Table 3.4 make no sense and in Figure 3.5 the chart values for steel do not correspond with those in Table 3.5. - Further on Table 3.5: The historic CAGR for vehicles is (correctly) stated as –1%, whereas calculating the CAGR for 2011 – 2031 from the forecast tables gives a massively different figure of around –9% for all scenarios.	Amended accordingly - and change of colour for 'Steel' in Figure 3.5 to distinguish better from our lines. Forecasting outcome not affected
		Historic demand	Assumption that any goods separately handled by 2 different wharves (most obviously in Table 3.2) are counted twice. It would be helpful to confirm this (especially given the comment in 6.2.2 that double counting should be avoided), along with the fact that Table 3.5 is the sum of Table 3.2 & Table 3.3.	There is no double counting. The data provided by the PLA is divided into three categories representing the total recorded tonnage in the PLA area. These are export/import, intraport and unitised.
		Historic demand	Strongly suggests that the correlation coefficient (r) in 3.2.9 has been wrongly calculated. If the DFT forecast is constant then r is undefined (numerically, the formula would give r = 0/0), whilst if it had a roughly constant negative trend, and estimating Historic Trade values from the chart (since they do not seem to correspond to anything in previous tables) gives r p 0.85. A positive trend would give r p – 0.85. This must raise doubts about the other stated values of r.	Figure 3.10 amended accordingly. Conclusion for DFT forecasts have not changed as a result

		Correlation to historic demand	It would be helpful if any charts used to compare employment forecasts with actual wharf trade (3.2.5) also included actual employment data, thus also enabling separate consideration of the two links in the chain between forecast employment and actual trade – namely, between forecast and actual employment, and between actual employment and actual trade. In using forecasts, it is also essential to state the dates at which the forecasts were made (presumably not the same as the quoted date of publication, which in any case sometimes differs between text and table).	Amended accordingly - source of related table provided
		Waste demand forecast	In Table 3.9, change in mass burn incineration should be – 11%; whilst 3.3.3 should more accurately read “...whilst recycling is expected to grow by 62% between 2014 and 2030, when it would form approximately half of waste processed in the GLA.” In Table 3.14, the units should be million tonnes.	Amended accordingly, but forecasting outcome not affected
		Aggregates demand forecast	3.4.1 refers to 2005 forecasts shown in T3.15, but the table only refers to 2010. 3.4.2 refers to MPG6 targets not being met – targets for what? T3.16 – T3.19 have no units, and row headings that make no sense. In 3.4.10, it should be “...i.e the same values are repeated.” Continuing the trend would (for the low scenario) imply further decline.	Amended accordingly
		Demand forecast - other commodities	Whilst Construction Materials is by far the largest category, in 2010 both Sugar and Vehicles have a higher tonnage than Waste, yet there is no discussion of the basis of forecasts for these two categories. For Vehicles this omission is compounded by the statements in Tables 3.22-4 that the basis is “Historic trend”, when this is clearly not the case. Thus in T3.5, the historic CAGR is (correctly) stated as –1%, whereas calculating the CAGR for 2011 – 2031 from the forecast tables gives a massively different figure of around –9% for all scenarios. The footnotes (20, 21, 23) only add to the mystery.	Amended accordingly, but forecasting outcome not affected - and see paragraph 2.2.14 for explanation of focus on waste and construction material
		Gap analysis	Tables 6.3 – 6.5: Forum's understanding of the adjustments described in 6.2.2 is that the totals in T6.3–T6.5 can be obtained from the corresponding totals in tables T3.22–T3.24 by adding first 10%, then 0.6mt for transshipment, and finally 0.2mt (for the medium scenario), 0.4mt (high) and 0.1mt (low) for supra-regional demand. Thus, taking 2021 high scenario as an example, the total in T3.24 is 13,775,662; adding 10% gives 15,153,228; and adding 1,000,000 gives 16,153,228. However, the corresponding figure in T6.4 is 15.4mt. Even allowing for rounding errors, there is clearly a substantial discrepancy.	As explained in paragraph 6.2.2 - deduction of 0.6 mt form total to avoid double counting
		Gap analysis	In terms of the adjustments themselves, it would be less confusing, and more in keeping with normal practice, if the allowance for frictional vacancy were made by adjusting down the capacity by 10%, to give “effective capacity”, rather than artificially increasing demand. And surely, since we are concerned with wharf capacity rather than tonnage transported, we should be double counting in the total since the waste is handled twice, in two separate wharves, so that there should be no deduction of 0.6mt from the final total.	Not aware of any particular convention regarding taking account of frictional vacancy. The logic in the applied approach is that the wharf capacity is essentially fixed therefore described as an actual quantum. In deciding whether that fixed capacity can accommodate estimated demand it is appropriate to factor in the need for a buffer of approximately 10% to accommodate fluctuations and spikes in demand.
28	London Thames Gateway Development Corporation	Priors Wharf, Mayer Parry Wharf, Sunshine Wharf	Supports that these wharves are no longer safeguarded.	Noted
		Thameside West consolidation	Supports the proposal for a consolidated wharf in the Thameside West area - over longer term LTGDC are of the view that there is considerable scope to implement a consolidated wharf.	Reflected in site assessments of relevant wharves. Any change to the current situation can only be pick up in future reviews
		Manhattan Wharf - future review	Accept continued safeguarding of the wharf at present even though it has been vacant since 2001. In context of Ballymore's longer term masterplan proposals being considered by LTGDC (features Manhattan Wharf) it would be acceptable to review safeguarding of wharf again as part of the next review and when extent of the currently planned landuse is fully understood.	Any change to the current situation can only be pick up in future reviews
29	London Waterways Commission - freight sub-group	Canals	Without some form of recognition, important canal loading and unloading sites that could facilitate modal shift may be lost thereby undermining the potential for London's canals to play a transport role by taking lorries off the road. - List of loading and unloading sites on London's canal network has been provided. Sites and facilities are operational and/or could be used for major infrastructure construction, or in connection with large development sites, projected for completion during the London Plan period to 2031. List is for boroughs to consider whether to identify these or other canalside sites to increase the use of the Blue Ribbon Network for freight transport in their LDFs.	List included in paragraph 4.2.3. However, one site excluded after consulting the relevant borough
30	Matthews & Son	Hurlingham Wharf	Support for the reactivation and in particular the related comments in Table 7.1 of the SWR.	Noted
		Hurlingham Wharf - viability	In view of our client's aspirations for the use of the site is viable from a commercial perspective and consequently we consider that the site already satisfies most of these five specific criteria and could be proven to satisfy the remainder. In the context of paragraph 7.77 the burden lies with any party proposing alternative development to prove that HW is unviable.	Noted
		Hurlingham Wharf - re-activation	Our client is keen to locate a concrete batching plant on the site. The Deputy Leader of the Council explained LBHF's own alternative development aspirations for the site together with an opinion on the likelihood of planning permission being granted for a concrete batching plant on the site.	Recognised in Planning section of site assessment
		Hurlingham Wharf - Implementation	The actions required to ensure waterborne use appear thorough although we would add that the comment on ‘adjacent sites’ in third bullet point should be supplemented by adding ‘and any other nearby proposals’.	Current wording considered sufficient to highlight the issue

31	Morden College - Geraldeve	Tunnel Wharf - planning and land use context	Site assessment relates to Tunnel Glucose Wharf site rather than the Tunnel Wharf site now proposed for safeguarding: Need to change planning status and land use context as follows to reflect new Tunnel Wharf location: Planning status: 'Tunnel Wharf has been predominantly cleared and levelled in 2010. The wharf is allocated as part of the Greenwich Peninsula West Defined Industrial Area within the UDP 2006. In the Greenwich Draft Core Strategy and DM Policies 2010, the wharf falls within the Greenwich Peninsula West Strategic industrial Location. In the adopted London Plan, the wharf is located witin the 'Greenwich Peninsula OA'. - Land use context: 'Tunnel Wharf is bounded by a proposed boat yard at Bay Wharf to the north, and warehouse buildings to the south and east. Tunnel Glucose Wharf lies to the south of the site and is located within a Strategic Development Location as defined in the Greenwich Draft Core Strategy Proposals Map. The policy indicates the suitability of this area for a new urban quarter to include residential, leisure and commercial uses.'	Some amendments made accordingly
		Tunnel Wharf - market interest	Question need for retention of wharf in the light of substantial excess capacity in south-east sub-region. Site is subject to lease until 2044, and the College has not actively sought new tenant. Therefore, no comment at this stage on demand or suitability for freight handling.	Release only of wharves with least favourable conditions proposed in areas where capacity surplus has been identified. There is operator interest in the site, and land ownership questions are not relevant to the question of safeguarding
		Tunnel Wharf - implementation	Strongly object to the use of CPO to bring the site forward for river freight handling and propose following change of wording of implementation section: 'Landowner has indicated a willingness to work with all relevant stakeholders in order to secure a viable and sustainable long term user for Tunnel Wharf, which will maximise the potential from the property. GLA and PLA to consider working with relevant stakeholders including the Council and landowner to bring forward the site.'	Need to retain reference to CPO in the light of difficulties with re-activation through negotiation although landowner appears open to work with stakeholders. - It is not the role of the review to decide if a particular CPO should be made or not
		Flexibility - alternative uses	Incorporate elements of flexibility into document to take account of future changes in land use, the planning environment, the property market and the wider economic environment. - Principle of flexibility - reflected in paragraph 8.2.4 - in terms of changes to safeguardings in future should be further emphasised throughout the document.	The review process itself provides an appropriate level of flexibility; the outcome has to be sufficiently clear to from the basis of regulations.
32	Mineral Products Association	Scenarios	Suggested in paragraph 6.3.1 that 'high' scenario of demand should be used when assessing overall capacity and surplus as a precautionary approach in context of uncertainty.	Paragraph 7.2.1 provides justification for medium scenario
		Aggregates demand forecast	Need for safeguarding of aggregate wharves in London should be considered in context of wider supply of aggregates from all sources and London is largely dependent on imports of land won and marine aggregates - Mineral Authorities outside greater London are planning to reduce the provision they are making for land-won aggregates in the future and therefore may increase reliance on imports to wharves.	Paragraph 3.4.5 in particular confirms the increasing reliance on marine dredge aggregates.
		Railhead safeguarding	Marine imports can only meet part of the need and study of adequacy of wharf provision assumes that no erosion occurs of capacity to import other materials by rail. MPA aware that a number of LB DPD's propose development adjacent to or at railheads which would prejudice their ongoing operation - GLA must ensure that safeguarding of railheads required in the policies is implemented.	This is beyond the scope of the review, but it may be considered in further alterations to the London Plan
		Capacity - competition and diversity	Safeguarding and retaining a larger number of wharves, as opposed to consolidating into fewer, larger facilities, can help to maintain competition, diversity and a supply of different markets.	Noted. The review will result in a good mixture of large and small sites
		Conflicting landuse context	To be effective, safeguarding also requires the prevention of the encroachment of incompatible development that may prejudice future operation and viability. Current London Plan policy provides for safeguarding of wharves themselves and that developments must be designed to 'minimise' conflicts, but a stonger approach must be taken to ensure effective safeguarding.	No necessary incompatibility with nearby uses - and the planning system will help to address them when they arise
33	Newham - Officer	Capacity in North East sub-region	Council supports surplus capacity of wharves within the North East London sub-area, and the recommended release of Priors Wharf and Mayer Parry Wharf in Canning Town and Sunshine Wharf in the Thameside West area.	Noted
		Thames Wharf - relocation	Support potential for reconfiguration or a land 'swap' to move the wharf functions from Thames Wharf to the adjacent Carlsberg Tetley site. This could be delivered within the lifetime of the London Plan and should also be included in the review (as an update to the Annex 5 assessment sheet). In particular, the last bullet point of the assessment sheet could be more positive in terms of progressing consolidation of wharf activity at Thameside West.	Amended Planning section to recognise opportunity - however, proposals have not progressed far enough to go further than this
34	Opecprime Development - WSP	Capacity estimates	It is unclear whether there has been a robust assessment of current available capacity of operational and non-operational wharves.	There has been a robust assessment of current capacity, see particularly chapter 5
		Scenarios	The Review does not adequately explain the starting point for current wharf trade across the three scenarios (ranges from 7.9 million tonnes (low) to 9.7 million tonnes (high), which makes it less able to be exact in predicting capacity required. Moreover, the forecasts for medium and high growth represent a leap of faith in that they go against current and observed market trends and consequently there is a greater risk that they do not materialise, as planned.	See footnotes 22 and 24 (to Tables 3.23 and 3.24); policy drivers and stakeholder consultation have informed assumptions. The methodology is robust. Given the inevitable levels of uncertainty about the future, it is right to test a range of potential outcomes.
		Demand forecast	It is unclear how general economic assumptions have underpinned the growth forecasts.	The report is clear about the economic assumptions - see section 3.2
		Waste demand forecast	The Review assumptions represent an over-optimistic view of additional capacity requirements. 90% of waste handled at the Belvedere EfW plant already arrives by water, therefore there is little scope to increase the proportion of waste by water.	The different scenarios were informed by consultation with stakeholders taking account of the issues mentioned and they are considered appropriate
		Waste demand forecast	The high growth scenario assumes an increase from 300,000 to 400,000 tonnes per annum for demolition waste. Demolition companies sometimes use the Thames to transport waste from riverside construction sites. However, the first priority is to reuse demolition waste, ideally on or near to the site where it is generated. 80% of demolition waste in London is reused locally.	This assumption was informed by consultation with stakeholders and is considered appropriate

		Waste demand forecast - West sub-region	Waste from the WRWA is already sent by barge to Belvedere EfW plant from Smugglers Wharf and Cringle Wharf, which together can accommodate all the waste from the WRWA area. Whilst additional capacity could be considered for other waste authorities, there is a clear balance to be struck between the implications of cross borough transport by road and the benefits of water transport in the final stages of the journey. It is also necessary to consider the dis-benefits of double handling of waste if the transfer facilities are not co-located with the wharf. - Volumes of recyclates are small with capacity in the area to receive additional materials. - Any construction waste is more likely to be taken to the Powerday facility at Park Royal which has a wharf on the Regents Canal but waste cannot economically be transported by water to West London wharves.	Whilst the waste demand forecast is quite broad in spatial terms it has to be considered moderate as it does only cover municipal waste and construction waste but not commercial and industrial waste. The scale of the latter is significant but the proportion that could be transported by water is very difficult to predict. This has to be taken into account. Also, wharves are not necessarily safeguarded for waste - its safeguarded for waterborne freight handling.
		Rail alternative - West sub-region	Because aggregates are very price sensitive, and transport is a major element of cost, any aggregates landed in West London are likely to be at a competitive disadvantage compared to aggregates sourced from rail terminals. This is because aggregates sourced from rail terminals benefit from large economies of scale, with long and heavy trains travelling direct from the quarry to the rail terminal. - There are no significant constraints rail's ability to meet increased demand. And it is at least as good as water freight to reducing road based freight in terms of CO2.	This is a review of safeguarded wharves not or rail capacity, and aggregates forecast primarily based on marine dredged, which by definition are not arriving by rail. Both modes serve separate markets and are generally not in competition. - Paragraph 3.4.5 confirms the increasing reliance on marine dredge aggregates.
		Hurlingham Wharf - construction material	Crossrail will not generate demand for movements by water from Hurlingham, as waste from the nearest major portal at Paddington is to be transferred by up to 5 trains a day by rail to Northfleet in Kent. There is also no evidence that the development construction projects in the vicinity such as Old Oak Common and Earls Court are planning to use water to tranship construction materials. Opening a new aggregates facility at Hurlingham might offer competitive advantage to a new supplier in the locality, but this may be at the expense of neighbouring wharves or rail terminals.	Noted - but does not affect proposed outcome
		Hurlingham Wharf - Thames Tunnel	Thames Water's proposals are still being discussed and have no planning status. Their proposals would result in only four barge movements a day, with most transport by road. In any event the use of Hurlingham Wharf, if not safeguarded, would be secured by CPO.	The review simply makes a factual statement about the current position
		Hurlingham Wharf - planning	Since 2005 other local development policies have been put in place, which clearly anticipate regeneration of the wharf for uses other than industrial related transhipment. Significant work would be required to provide the infrastructure to support a working wharf, with substantial mitigation and compensation required to make it acceptable in planning terms. Alternative schemes would avoid sterilisation of the site and result in a redevelopment of the wharf for uses more complementary to its immediate surroundings, consistent with the vision for the South Fulham Riverside West Area.	Comment does not in itself raise grounds for de-designation in terms of London Plan policy, which focuses on a test of wharf viability.
		Hurlingham Wharf - Implementation	Last used 15 years ago, it is likely that significant investment would be needed to bring the wall, berthing, campshed and supporting infrastructure up to a useable standard. It appears unlikely that the levels of potential revenues would make the operation of the site financially viable when the costs of brining the site into operation are taken into account.	These matter are for the market to resolve, but continued safeguarding is justified based on London Plan policy
35	Port of London Authority	General	Supports approach review has taken and general content	Noted
36	Ptarmigan Land	Swedish Wharf - road access	LBHF have plans to widen Townmead road, as is actually mentioned in Section 2 of the table, and this highway improvement will result in the northern boundary of Swedish Wharf being moved southward.	Information included where informed by H&F
		Swedish Wharf - land use context	Since the Fulham Wharf development is now consented it is unclear what action is envisaged to ensure the mixed use does not restrict cargo handling; it is obviously too late to change the nature of the Fulham Wharf development. The only possible action would appear to be to ensure that the development of any future cargo handling facility on Swedish and/or Comleys Wharves is designed so as to minimise the chances of conflict with the newly consented residential development on Fulham Wharf. If this is indeed the intended meaning of the last paragraph in Section 4 we would request that it be made clearer that this is the case.	Amended Planning section of site assessment to provide clarification in line with London Plan policy 7.26, clause Bc
		Swedish Wharf - implementation	To displace the existing profitable fuel distribution depots will require the purchase of an equivalent site in the locality for the relocation of the business which can be expected to be a costly exercise, particularly as alternative sites suitable for use as a fuel depot are difficult to find in Fulham. In the case of Swedish Wharf it is most unlikely that the subsequent use as an aggregate handling wharf will realise anything like the CPO value of the site. Compulsory purchase is consequently unlikely to be either a quick or a financially viable option.	It is preferable that stakeholders collaboratively seek the reactivation for waterborne freight handling. It is important to note that in the light of likely use of Cremorne, Hurlingham and Middle wharves for Thames Tunnel, Swedish Wharf remains the only wharf that could provide additional capacity whilst Tunnel is under construction
		Swedish Wharf - implementation	Instead proposal to bring forward the reintroduction of cargo handling in co-operation with the owners of Swedish Wharf. The advantages of this option are that it need not cost the GLA/PLA anything and cargo handling could be recommenced on Swedish Wharf relatively quickly - within a year or so. The proposed scheme that puts the wharf back into cargo handling use and, jointly with Cemex, have already started the process of working up a scheme for the wharf's reactivation. This emerging scheme has already been the subject of consultation with LBHF and the GLA. To reflect this the third bullet point in Section 8 should be reworded as follows: 'GLA and PLA to continue working with the site owners, the Council and the prospective cargo handling operator for Swedish Wharf to enable the development and implementation of a scheme that realises Swedish Wharf's potential for cargo handling. The scheme is to be designed so as to ensure that cargo handling viability is not adversely affected by the re-development of adjacent sites for which planning consent has already been granted.'	Too specific, but amended Planning section of site assessment to reflect consolidation possibility - however, proposals have not progressed far enough to go further than this
37	Quintain and London Development Agency	Consolidation / relocation criteria	Neither the London Plan nor the consultation report set out the principles and parameters that the Mayor of London will use when considering proposals for relocation and/or consolidation of safeguarded wharves. From all parties involved in the process (landowner's, local authorities, PLA and GLA) it would be beneficial to have certainty on the information that the Mayor of London will require in order to judge the appropriateness of a relocation and/or consolidation proposal. After demonstrating the operational characteristics the second test in considering the relocation and/or consolidation of a safeguarded wharf is whether the relocation/consolidation is deliverable. The key aspects that affect the deliverability of a proposal include the practicalities in terms of landownership, the associated financial and management arrangements.	Specific criteria not appropriate as consolidation has to be considered on case by case basis. London Plan policy sets out general principles through viability test

		Thames Wharf - relocation	Carlsberg Tetley should be identified as a safeguarded wharf by direction of the Secretary of State, either on satisfactory collaboration, completion and implementation of the consolidation and/or relocation proposals as set out in the LB Newham Core Strategy Submission document (February 2011), or as a result of acceptable planning submissions by the landowner/developer. - Carlsberg Tetley Wharf presents a comparable available location for an alternative safeguarded wharf to Thames Wharf with the potential to also contribute additional wharf capacity to help meet current and projected 'sub-regional' market demands. - Carlsberg Tetley, by virtue of its site characteristics, is capable of being made viable for cargo-handling as a replacement for Thames Wharf.	Amended Planning section to recognise opportunity - however, proposals have not progressed far enough to go further than this
38	Stema Shipping	General	Full support of the document	Noted
		Freight traffic	No mention of who will transport nor have they been consulted. This should include PLA marine staff/problems with 'trade' traffic and utility/passenger transport vessels - major problem area in the 'West.'	PLA has been involved and operators have been consulted
		Implementation - re-activation	Suggests that it would be 'better' to force some of the most viable wharves (Orchard/Peruvian/Hurlingham/Swedish) to be reactivated and release some of the others. Stema has worked with PLA for over 10 years on this and still non have been reactivated for cargo operations.	This review facilitates this - and particularly addressed through Implementation section of site assessments. Wharves have been reactivated and steps are being taken to reactivate others
39	Tarmac	Murphy's, Riverside and Pioneer Wharf	Fully supports continued safeguarding	Noted
		Conflicting landuse context	The review is considered deficient as it does not recognise that capacity has potential to be eroded through granting of planning permissions for mixed/use residential developments in close proximity to the wharves - whilst they may not impact on boundary of wharf sites the conflicting landuse have the potential to reduce capacity by impeding operational hours. - Suggestion of a form of 'buffer zone' around sites that trigger a policy requirement to consider potential impacts on wharf capacity if developments fall within it.	Issues addressed in London Plan policy 7.26, clause Bc. - There is not necessarily incompatibility with nearby uses - and the planning system will help to address them when they arise
40	TfL	Victoria Deep Water Terminal - road access	Changes to access to/from the wharf on assessment sheet - road layout at Blackwall Tunnel Southern approach have been altered on a trial basis and will be undergoing monitoring with a view to making changes permanent.	Amended accordingly
		Convoys Wharf - planning	Planning issues should be captured in the commentary on the site assessment sheet - large mixed-use development has been proposed for the currently-vacant site, incorporating a wharf capable of handling freight, this will require road widening and junction improvements if road access to the site is to be satisfactory for all users.	Amended accordingly
41	Thames Water	General	Fully support the approach taken in the review, and no objection to the GLA proposals to safeguard or release individual wharves.	Noted
		Thames Tunnel	Current Thames Water proposals considered by the GLA and PLA not to prejudice the future use if the wharves and long term ability of such sites to be used as wharves. If wharves were to be de-designated the project could face substantial uncertainty and delay and require Thames Water to use sites with more adverse planning/environmental impacts.	Noted
		Thames Tunnel	Paragraph 1.3.5: Would like to confirm that 'a large proportion of the construction materials will be transported by barge using existing wharves.' Would like to confirm that it is the intention of the Thames Tunnel project to transfer excavated material from main tunnel sites and cofferdam fill from a number of selected sites (approx. 4m tonnes), some of which are safeguarded.	Noted - see in conjunction with paragraph 3.4.7
		Thames Tunnel	Paragraph 3.4.7 states that following consultation with Thames Tunnel, the project estimates 6m tonnes of excavated material could possibly be transported by river. In response to GLA in April 2011, the Thames Tunnel project stated that 'the proposal is for excavated material from main tunnel sites and cofferdam fill material to moved by river, not aggregates.' To update, Phase two consultation recently began and proposals are to use river transport to move 'main tunnel and cofferdam material,' which is currently proposed to be approximately 4 million tonnes. The objective is to use river transport over road where it is economically viable and practical.	Amended accordingly
		Implementation - local planning conditions	Support the view in paragraph 4.4.2 that positive local planning conditions should be enforced to support the potential opportunities (new build on riverside designed to accommodate direct transfer of construction material by barge).	Noted
		Capacity estimates	Thames Water welcomes further information in regard to the wharf capacity estimates used in this section; and more details in regard to what specific figures GLA have used in regard to capacity estimates at Cringle Dock and Kirtling Wharf. This information would be useful to establish if the values are in line with current estimates for the project and future developments.	Approach set out in chapter 5; figures for specific wharves cannot be revealed due to commercial confidentiality
		Thames Tunnel	Paragraph 6.3.2: Review has taken into account that Thames Tunnel project will create additional demand for construction materials in the west sub region. Will work with the GLA in regard to providing information on the possible requirements for the project as the proposals are developed.	Noted
		Hurlingham Wharf - road access	Full support of the reactivation of Hurlingham Wharf. This supports the current proposals for the development of the Thames Tunnel project and the information provided in our Phase two consultation. Highway authorities should ensure proposed highway works retain suitable HGV access to the site, no reduction to the viability of the site from neighbouring developments, proposals to ensure that site is used to transport bulk construction/excavation materials by river and that the site can be used as a viable wharf following the completion of the Thames Tunnel. To be effective the wharf needs to be able to access at least 1 high tide per day for mooring.	Noted
		Cringle Dock, Kirtling Wharf and Middle Wharf - road access	No objection to the safeguarding, however, will require access in the future maintenance process.	Noted

		Cremorne Wharf - planning	No objection to the safeguarding, however, will require access in the future maintenance process both to existing combined sewer discharging from pumping station and proposed Thames Tunnel works. Important to note that that combined sewer is wholly within the wharf site and are aware of the landowners' wish to promote commercial development on site. This could severely impact on the necessary interception of the existing CSO. Thames Tunnel does not believe that their own current proposals will affect the future use of the site as a safeguarded wharf. The Review does not advise on the road access which is a viability criterion (para 7.77 of London Plan 2011) but does state RBKC's advice. It is suggested that the Review advises that there is suitable access, given that the wharf is currently operated under a planning permission that permits up to 150 HGV movements per day.	Surrounding Land Use section of site assessment addresses the access issue. As set out in the Implementation section of the site assessment, the long term viability of the wharf for the time after the completion of Thames Tunnel should be ensured.
42	Tower Hamlets	Flexibility - alternative uses	Suggest that long-term flexibility is embedded within the safeguarded wharves guidance to assess the potential for additional and/or alternative uses to be located.	The review process itself provides an appropriate level of flexibility; the outcome has to be sufficiently clear to from the basis of regulations.
		Northumberland Wharf - operation	LBTH confirm that wharf will no longer be used by the Council for the transfer of its municipal waste for the remainder of its current waste contract. As the site is safeguarded the Council intends to lease the site on a short-term to a private waste provider.	Noted. This does not affect the designation.
		Northumberland Wharf - future review	In preparation of LBTH's Managing Development DPD, the Council is working closely with the GLA to ensure it is able to meet its London Plan waste apportionment target in the most suitable way. If having agreed with the GLA the best means of meeting its waste apportionment target, it can be demonstrated that Northumberland Wharf is not required for the transfer or processing of waste, then LBTH would request a review of its safeguarded status, in respect of the surrounding areas residential status.	Any change to the current situation can only be pick up in future reviews
		Northumberland Wharf - future review	Suggested amendments to line 26, Table 7.1 - Saefguarding status/justification column - add "(transfer of additional waste)" Under 'proposed implementation actions' add "if needed for the transfer of waste. If it can be demosntrated that the site is not needed to meet the Council's London Plan Waste apportionment target then a review of the safeguarded status of the site will be undertaken with the potential for alternative uses much more compatible with the residential character of the surrounding areas."	Any change to the current situation can only be pick up in future reviews
43	Treasury Holdings	Cringle Dock and Kirtling Wharf - implementation	Does not suggest that wharves should no longer be safeguarded, but the Review should acknowledge the potential of redeveloping Cringle Dock and Kirtling Wharf to deliver more modern facilities, that better fit a world class regeneration project. Therefore, an additional bullet point should be added to Table 7.1, sites 6 and 7: "The Wharf owners and operators and encouraged to continue discussions with the Council, GLA and adjoining land owners to consider potential redevelopment options to achieve modern wharf facilities, potentially as part of a mixed use redevelopment of the wharves." Positive consequences as a result of development of modern facilities would include; state of the art facilities for the operators, increasing efficiency in handling of waste and aggregates. The enclosure of operations would result in the achievement of far higher environmental standards, reducing risk of noise, dust and odor, and they would also more attractive in the context of a major regeneration zone.	Planning policy and should ensure this through mitigation measures that would be required as part of redevelopment. We consider continued safeguarding to be appropriate
44	Una Hodgkins	Thames Tunnel	Important not to leave the fate of the wharves in the hands of developers, especially in context of Thames Tunnel.	Review promotes that water transport of construction/excavation material when Thames Tunnel is built - see Implementation section of relevant wharves
45	Wandsworth - Officer	Wandsworth wharves	Agrees that all wharves in Wandsworth should be safeguarded, as per review.	Noted
		Middle Wharf - future review	The Council supports the current safeguarding of the wharf during the construction of the Thames Tunnel to maximise the wharf's use for enabling waterborne transportation of construction and excavation materials, and supports its de-designation to support increased access to the riverside and support the regeneration objectives of the VNEB OA.	Any change to the current situation can only be pick up in future reviews
		Hurlingham Wharf - operation	Supports continued safeguarding, in context of Thames Water's proposed Carnwarth Road Riverside Thames Tunnel main shaft site. Use of Carnwarth Road would require the continued use of Hurlingham Wharf for removal of spoil and for importing of construction materials.	Noted
46	Western Riverside Waste Authority	Smugglers Way, Cringle Dock and Middleton Jetty	Support the continued safeguarding of these wharves. However, the transfer stations are becoming increasingly surrounded surrounded by uses that are not industrial or freight related.	Noted
		Consolidation opportunities and mechanisms	Supports safeguarding and promoting use of the Thames, but the Review also needs to include clear policy mechanisms whereby a consolidation, rationalisation or relocation of wharves can be permissable. - Consolidation of small wharves to allow the shared use of infrastructure and more flexible interim storage arrangements together with space for better vehicle utilisation would seem to be a strategy more likely to increase use of the river in the Western region.	Not principally against consolidation, and paragraph 8.2.4 sets out underlying approach
		Cringle Dock - future review	Lies within the VNEB regeration area and it could be in everyone's interests to consider a future relocation of the wharf so as to mitigate potential conflicts with neighbours, stimulate captial investment in the site and maintain or increse its throughput potential.	Any change to the current situation can only be pick up in future reviews
		Hurlingham Wharf - consolidation	Constraint by the fact that two of its potential access routes go through residential areas and have six foot six inch width restrictions. - Consolidation opportunities exist to the east of Wandsworth Bridge which would retain capacity and make the prospect of sites becomming operational more realistic as they would enjoy better access to the strategic road network whilst simultaneously releasing redundant sites of regeneration.	No in principle objection to consolidation, however there are a number of substantial issues that would have to be resolved before this could be considered as a serious proposition, and continued designation is appropriate.
		Waste demand forecast	Questions report's waste demand and capacity estimates for the Western region and accuracy of some of the non-operational site assessments in relation to supply and demand in the Western region. In WRWA's view there has been little or no positive change in the eight years since the Authority responded to the last consultation and believes it is a result of the policy being too rigid and is attempting to safeguard wharves for historic rather than pragmatic reasons. Waste tonnages have fallen by 38 % between 2005 and 2010, a reduction that began prior to the 2008 downturn in the economy. This mirrors Authority's experience particularly marked drop in residual tonnage although this still represents around 70 % of the overall waste stream.	Section 3.3 sets out a robust approach to the forecasting of waste by water, which is also informed by policy drivers and stakeholder consultation

		Waste demand forecast	Remaining 30 % of waste stream is made up of a very large number of diverse materials, generally recyclates, which means that the prospects of them having the economies of scale necessary to absorb the additional handling costs of a river transport operation are remote. Also, these products are traded actively within wide and diverse market place and long term fixed point-to-point river transport solutions are unlikely to be attractive. There is some recognition of this in the consultation document at para 3.3.4 but it is overlooked in the subsequent analysis.	Paragraphs 3.3.6 - 3.3.8 consistently build on paragraph 3.3.4 providing an estimate on recyclates by water
		Waste demand forecast	Similarly, no allowance has been made for the governance arrangements surrounding municipal waste. The Authority will, under statute, process all the municipal waste in its area and the residual waste element will be transferred via its two existing river transfer stations. Consequently, it is unlikely to ever need additional wharf capacity. Commercial waste streams would be smaller and suffer from the same economy of scale problems faced by the recyclates. Construction waste is now generally recycled by developers for use on-site or it is distributed so widely that a point-to-point river solution is unlikely to be a realistic option.	Whilst the waste demand forecast is quite broad in spatial terms it has to be considered moderate as it does only cover municipal waste and construction waste but not commercial and industrial waste. The scale of the latter is significant but the proportion that could be transported by water is very difficult to predict. This has to be taken into account. Also, wharves are not necessarily safeguarded for waste - its safeguarded for waterborne freight handling.
		Mayor projects	One-off major tunnelling projects should not define the underlying safeguarding policy.	However, their scale is significant and indicative of major future projects that could create increased demand.
Late submissions				
	Tower Hamlets - supplement - 26 June 2012	Orchard Wharf - planning and land use context	Objection against its safeguarding status in the light of Members refusal against officer recommendation of planning application for site reactivation. Principal reason is the changing nature towards mixed uses of the Leamouth area	The safeguarding designation is different from an individual planning application. The comment does not in itself raise grounds for de-designation in terms of London Plan policy, which focuses on a test of wharf viability. - The Council's own Core Strategy (adopted in September 2010) protects Orchard Wharf for cargo-handling within the vision of regeneration and mixed-use development at Leamouth. It further notes that 'effective buffers are needed to protect the residential amenity and the future operation of Orchard Wharf'.
		Orchard Wharf - environmental impact	Proximity to East India Dock Basin SNCI	Mitigation measures would be required in accordance with national, London and local planning policy. This is not in itself a reason for de-designation
	John Gordon - 14 May 2012	Orchard Wharf - planning and land use context	A concrete plant in the heart of a new mixed use seems inappropriate to the recent evolution in the area's fortunes. This plant is likely to reverse the positive urbanisation of this quarter.	The safeguarding designation is different from an individual planning application for a concrete plant. The comment does not in itself raise grounds for de-designation in terms of London Plan policy, which focuses on a test of wharf viability. - A planning application would assess impacts and mitigation would be put forward where required.
		Orchard Wharf - road access	The road access from the A1020 is along a narrow road which cannot be widened. This road is used by school children attending a primary school recently established at nearby Trinity Buoy Wharf, a place that also attracts many visitors by foot to its artistic installations. The frequent use of large aggregate lorries, estimated at one every 3 minutes during the plant's working hours, to access the plant does not seem compatible with these new uses. The exit for lorries will be onto a roundabout which already often gets congested. Your report makes no mention of these aspects.	Mitigation measures would be required in accordance with national, London and local planning policy. This is not in itself a reason for de-designation.
		Orchard Wharf - environmental impact	Proximity to East India Dock Basin SNCI and opportunity for development of visitor attraction on part of wharf site in conjunction with it. A wharf would also be highly visible in front of the otherwise attractive bird reserve when viewed from the new Emirates Air Line cable car running close by. Passengers views of the reserve are likely to be negatively impacted, possibly impacting negatively on the repeat use of the cable car by tourists.	Comment does not in itself raise grounds for de-designation in terms of London Plan policy, which focuses on a test of wharf viability. - A planning application would assess impacts and mitigation would be put forward where required.
		Orchard Wharf - alternative	There seems to be much empty land fronting the river to the east of the Lower Lee River Crossing as Tower Hamlets turns into the Borough of Newham that could make a viable alternative location for this plant.	No in principle objection to consolidation, however there are a number of substantial issues that would have to be resolved before this could be considered as a serious proposition, and continued designation is appropriate - particularly as there is operator interest in using the wharf.
	Colpy Ltd - DP9 - 21 May 2012	Demand forecast	Long term downward trend in cargo handled on the Thames (see AMR 2012) is not adequately reflected	The historic demand section (3.1) has been updated to reflect most recent figures. Section 2.2 sets out the methodology for the demand forecast, of which historic trends is one aspect
		Peruvian Wharf - planning and land use context	There has been significant change in the physical character of the area since 2007 and planning policy promoting the mixed use regeneration of the area. It is also benefitting from significantly enhanced transport links including direct links to a DLR station.	Comment does not in itself raise grounds for de-designation in terms of London Plan policy, which focuses on a test of wharf viability.
		Peruvian Wharf - planning and land use context	The NPPF advises against long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. LB Newham Core Strategy and Employment Land Review in particular promote release of employment land and a flexible approach	Site assessment demonstrates that wharf is viable and has potential. Consolidation opportunities within Thameside West are also highlighted.
		Peruvian Wharf - road access	Wharf has no road or rail access	The required investment is being addressed through the ongoing reactivation process
		Peruvian Wharf - navigation	Physical characteristics of the wharf are such that only low-value bulk commodities such as aggregates can be accommodated	For the North East sub region a shortfall in wharf capacity to handle aggregates has been identified
		Peruvian Wharf - market interest	There are already several aggregates operators in the immediate vicinity and there must be some doubt as to whether there is real market demand for another operator. Brett Aggregates has kept the site vacant on account of there being insufficient demand to justify their setting up on the site	For the North East sub region a shortfall in wharf capacity to handle aggregates has been identified, and there is interest from operators to use this site

		Peruvian Wharf - alternative use	For other river based uses - in particular boatyard and servicing facilities - there is increasing demand. This site is in an ideal location close to the downstream end of the passenger vessel operational zone to address this demand. The redevelopment of the site for a mixed use purpose could include such a facility. Through this the employment and housing benefits of the site could be maximised	This is beyond the scope of the review, and does not in itself raise grounds for de-designation in terms of London Plan policy, which focuses on a test of wharf viability. - Addressing the need to meet increasing demand for boatyard facilities is being explored separately
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