

Safeguarded Wharves Review 2018 - Statement of Consultation

Summary of Round One and Round Two Consultation – December 2019

MAYOR OF LONDON

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**Greater London Authority
December 2019**

Published by
Greater London Authority
City Hall
The Queen's Walk
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London SE1 2AA

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1. Introduction

The Mayor of London consulted on proposed changes to London's network of safeguarded wharves between 11 May and 17 August 2018 (Round One) and again from 20 August and 2 October 2019 (Round Two). The Safeguarded Wharves Review (the Review) documents consisted of:

Round One

- draft Implementation Report May 2018, Mayor of London
- Individual Site Assessments, WSP Consultants
- Forecasting Freight demand and Wharf capacity on the Thames 2015 – 2041, Ocean Shipping Consultants
- Strategic Environmental Assessment (SEA) – Safeguarded Wharves Review, WSP Consultants
- Habitats Regulations Assessment Screening, WSP Consultants
- Equalities impact assessment of the Safeguarded Wharves Review, Mayor of London

Round Two

- Safeguarded Wharves Review 2018 – Further Consultation, August 2019

The Review recommended:

- Removal of safeguarding directions for five of the current 50 safeguarded wharves primarily due to unfavourable berthing, access and navigational conditions, combined with a surplus capacity of wharves in north-east London
- Removal of safeguarding directions from a further three wharves in the Thameside West area if the Silvertown Tunnel project proceeds, as these sites will no longer be viable, and the existing operators can re-locate within the area and achieve greater efficiencies
- The application of new safeguarding directions to two currently in use and viable wharves.
- Various minor boundary changes to reflect marine infrastructure and/or site ownership.

Forty-three submissions were received in response to the Round One consultation, and a further twelve to the Round Two consultation. The responses ranged widely in their views, and predominantly addressed issues associated with individual wharves. Issues raised included support for the continued safeguarding of all wharves, the further release of safeguarded wharves, further review of the potential for mixed-use redevelopment of safeguarded wharves, individual boundary changes, and environmental and heritage considerations.

2. Matters raised

Please see Table 1 and Table 2 for the summary of key comments received and the GLA's response.

Table 1: Round One Summary of submissions

Submitter	Summary of comments	GLA Response
General comments		
London First; RB Kensington and Chelsea; LB Hammersmith and Fulham	The Review should have considered the option of mixed-use redevelopment of safeguarded wharves, along with the assessment of continued wharf use or its release in the ' <i>Individual Site Assessments</i> ' (WSP 2018). In addition, some London Boroughs would like to see the exploration of mixed-use development on specific wharves within their boundaries.	The Review's primary purpose is to assess the ongoing viability of London's network of safeguarded wharves, so an assessment of mixed-use redevelopment potential is outside the scope. As stated in Policy SI15 of the draft London Plan (2018), the purpose of safeguarded wharves is for ' <i>waterborne freight handling use, including consolidation centres</i> '. It is not within the purview of the Review to consider co-location of residential or other uses alongside this designated use. There are mechanisms within Policy SI15 for development proposals to include provision of a water-freight use alongside other land uses (above or alongside). It is up to individual landowners to explore these options, whilst ensuring that there are no conflicts of land use (for example within industrial designations such as Strategic Industrial Land (SIL) and Locally Significant Industrial Sites (LSIS)) and that the freight-handling capacity of the wharves is not reduced (as required under Policy SI15 G). Such issues are best dealt with through development plans.
Ballymore Group; Hutchison Property Group; U+I Group PLC	Comments on the freight capacity and demand estimates in the freight demand study, ' <i>Forecasting London's Freight Demand and Wharf Capacity on the Thames 2015 – 2041</i> ' (OSC 2016). Including that the freight demand study significantly underestimated existing capacity whilst also over-estimating demand,	It is important to ensure that the network of safeguarded wharves remains viable in the long-term, with the ability to increase waterborne freight movement in response to demand, both spatially and temporally. The freight demand study acknowledges that estimating the capacity of wharves is affected by many variables, from water depth influencing vessel size, restrictions on working hours, to the type of commodity handled. The freight

	<p>resulting in an over-supply of capacity and the unnecessary continued safeguarding of many wharves.</p>	<p>demand study took a robust approach to estimating capacity and used the best available data at the time. In estimating demand, the freight demand study looked at different approaches to estimating growth and assessed growth across the major commodity types transported by water. The approach taken provided a suitable basis to inform the Review.</p> <p>In addition, the safeguarding of wharves is not simply a matter of reconciling demand with supply across the entire network. It is important that there is an adequate spatial distribution of wharves, to support and encourage waterborne freight movement throughout London. To keep the network of safeguarded wharves resilient and flexible, it is necessary to maintain a surplus of capacity in the network to accommodate growth, and to ensure that safeguarded wharves are spatially distributed and provide a viable alternative to road-based freight movement throughout Greater London.</p> <p>It is prudent to take a precautionary approach to the release of safeguarded wharves, as once they are released from safeguarding they are lost from the wharf network permanently.</p>
<p>Cory Riverside Energy; Freight Transport Association; Company of Watermen & Lightermen; Port of Tilbury; Brett Group; Port of London Authority (PLA)</p>	<p>The review underestimated demand and did not consider increased modal shifts to waterborne freight handling, with some scepticism that there is spare capacity in the safeguarded wharf network.</p>	<p>The freight demand study acknowledges that estimating the capacity of wharves is affected by many variables, from water depth influencing vessel size, restrictions on working hours, to the type of commodity handled. Nevertheless, the freight demand study took a robust approach to estimating capacity and used the best available data at the time. In estimating demand, the freight demand study assessed possible approaches and assessed growth across the major commodity types transported by water. The approach taken provided a suitable basis to inform the Review.</p>

Freight Transport Association; Mineral Products Association	Strongly support the continued growth and use of the Thames and its waterways for waterborne freight handling.	Noted. This is recognised as an important area for growth and a tool to ease congestion on London's already busy roads. The continued safeguarding of wharves along the length of the Thames and its waterways is important in supporting the growth of waterborne freight handling.
Hutchison Property Group; LB Hammersmith & Fulham; London First	Industrial uses at some safeguarded wharves are no longer appropriate due to the surrounding sensitive land uses and, further, that this constitutes a 'waste of valuable land resources in London' with a potential negative effect on the increase in the supply of housing.	Policy SI15 of the draft London Plan requires development proposals adjacent to or opposite safeguarded wharves to be designed to minimise the potential for conflicts of use and disturbance, in line with the Agent of Change principle. Industrial uses on safeguarded wharves are important for the continuing viability of London's freight network and are essential in supporting the economic growth of the city. Safeguarded wharves are important in the movement of household and commercial and industrial waste and the import of aggregate material required for the construction and development industry, as well as logistics hubs for last mile transportation - all of which reduce the burden on London's already congested road network. Safeguarded wharves also provide both direct and indirect employment opportunities for London. Safeguarded wharves and their industrial uses are considered of strategic importance to London and it is important they can be maintained. Any impact on surrounding land users from their continued and ongoing use should be managed in line with the Agent of Change principle
Company of Watermen and Lightermen of the River	Support increasing the number of safeguarded wharves.	Noted
Canal and River Trust	Recommend that the Review include consideration of the operational needs and the opportunities for London's canals to support niche markets, and an assessment of	The Mayor supports opportunities to utilise London's waterways for the transportation of freight where they arise, including on London's canal network. The Review looked at opportunities to apply safeguarding to new and viable waterfront locations, and

	potential loading and unloading sites on London's canal network.	<p>found that two new wharves are suitable for protection and provide viable locations for the handling of waterborne freight.</p> <p>In addition, as part of the 2011 Safeguarded Wharves Review, an assessment was undertaken by URS (August 2011) of the viability of the canal network to support an increase in waterborne freight. The assessment found a number of barriers to the uptake of freight on the canals and concluded that the only realistic demand was for small, niche markets that were already occurring, or for temporary projects occurring close to the waterway. Whilst the GLA supports the use of the canals for freight where appropriate, these opportunities would not benefit from safeguarding of specific permanent sites.</p>
Port of London Authority (PLA)	Recommend the Review assess the potential for transport of alternative cargoes on the river and include this in the demand and forecast assessment projections.	The freight demand capacity report explored the transportation of alternative cargoes on the Thames and concluded that the main focus for expansion of additional cargo handling on the Thames will primarily stem from construction projects. The freight demand study adequately assessed the potential for alternative cargo handling for the purposes of the Review.
Gazeley	No objection to the removal of safeguarding on three wharves as a result of the Silvertown Tunnel Project, but request to be informed of any progress in this area.	Noted
Environment and heritage values		
Historic England	Recommend that further work is undertaken on the five sites proposed to have safeguarding removed in order to provide greater clarity on their heritage significance and the potential impacts of any new development that may follow. Submitted that the Strategic Environmental Assessment did not include a sufficient historic environmental assessment, as it did not refer to the	The Strategic Environmental Assessment (SEA) considered the historic environment and consulted Historic England in the initial scoping for the report. The SEA found that there were no known heritage assets within the immediate vicinity of the five wharves proposed for de-designation. In addition, as stated in Table 12 of the SEA, any redevelopment of wharves would need to comply with environmental legislative requirements, which would identify any potential impacts and set appropriate mitigation measures through planning conditions. It is more appropriate to consider

	London Historic Environment Record, nor was a map regression analysis undertaken.	site-specific heritage issues through site allocations and/or at planning application stage of any proposed wharf re-development. As such, it is not considered necessary to undertake further heritage assessments of the wharves proposed for de-designation.
Environment Agency	Request that the Environment Agency be consulted on proposed works to reactivate wharves, as the reactivation of existing wharves may have environmental impacts, particularly if dredging is required.	Any work to reactivate wharves would go through the required environmental approvals, with any impacts appropriately mitigated through planning conditions.
Environment Agency	Note that at the eight sites proposed for de-designation there is potential for the intertidal mudflat to re-establish and provide improved habitat value.	Noted
Frequency of reviews		
LB Hammersmith and Fulham; London First; Momentum Transport Consultancy	Recommend that the Mayor commit to regular review of the safeguarded wharf network and, in particular, set time frames to review wharves that have remained vacant or underused.	A set time frame for the review of vacant or underutilised wharves may lead to perverse outcomes and encourage land-banking. If a Safeguarded Wharf remains viable for the transportation of waterborne freight and there is sufficient demand within the network, the recommendation will be to maintain safeguarding status. Whilst the current use of a wharf is a consideration, it is important to also consider other factors including forecast demand trends, available capacity and the spatial connectivity of the whole network.
PLA	Note that this is the last time the PLA would expect to see release of any safeguarded wharves.	Noted
Other comments		

London First	Recommend that the Review consider TfL's Passenger Pier Strategy.	As the purpose of a safeguarded wharf is for the handling and movement of waterborne freight, it is not deemed necessary to include reference to the Passenger Pier Strategy.
Momentum Transport Consultancy	Note that the Review appears to be recommending the safeguarding of wharves 'for the sake of it'.	The Review took a robust approach to assessing the ongoing viability of the network of safeguarded wharves. Those recommended for safeguarding remain viable for freight handling purposes. In addition, as noted in the Inspectors Report on the draft London Plan, 'wharves are an essentially finite resource and once lost are highly unlikely to be replaced' ¹ and thus the policies in London Plan are justified in affording a high level of protection, consistent with national policy and necessary to address a matter of strategic importance and help deliver the Mayor's aim of Good Growth. This supports the approach in the SWR to support the viable area of Convoy's Wharf under safeguarding protection to ensure it remains available for waterborne freight handling.
Momentum Transport Consultancy	Recommend that the Review take the opportunity to make use of Safeguarded Wharves as micro-consolidation centres, and that the GLA should undertake a strategic review of how a network of wharves could support its efforts to promote consolidation of operational deliveries in central London.	The GLA supports the use of the waterways for the transportation of freight. However, the purpose of the Review was to assess the viability of the current network of safeguarded wharves. It is beyond the scope of the Review to determine the best and most effective use of these sites for the transportation and handling of waterborne freight.
Anonymous	Propose that the consultation documents lack an evidence base, the review fails to consider alternatives to safeguarding and does not meet EU law.	The Review is supported by a Strategic Environmental Assessment, an Equalities Impact Assessment, as well as strategic assessments of individual wharves. It is felt that these documents adequately support the proposals made in the Review.
Western Sub Region		

¹ The Planning Inspectorate (2019), Report of the Examination in Public of the London Plan 2019, Paragraph 533

LB Hammersmith and Fulham	<p>Contend that wharves located in LB Hammersmith and Fulham are not required as there is good rail access for freight available as a sustainable alternative, and the boroughs waste is transported out of the Western Riverside Waste Authority facilities next to Battersea PowerStation.</p>	<p>The Individual Site Assessments determined that although sites in LB Hammersmith and Fulham are vacant, they remain viable for waterborne freight handling, and that in addition there is long-standing interest from cargo-handling operators for the use of these sites. In addition, the freight demand study shows that the western sub-region has the lowest excess capacity. It is important to retain wharf uses in this region to ensure adequate spatial distribution of the network.</p>
LB Hammersmith and Fulham	<p>Object to the continued safeguarding of Hurlingham Wharf. Contend that the Review does not adequately justify the reintroduction of industrial uses on Hurlingham Wharf, and this would represent an underutilisation of scarce land resources and provide little in the way of employment, impinge on regeneration objectives, and reduce the provision of housing.</p> <p>Recommend consolidation of wharf activities on Swedish and Comley's Wharf, with Hurlingham Wharf released from safeguarding.</p>	<p>The Individual Site Assessments determined that the site remains viable for freight handling use and there is longstanding interest in the site by cargo handling operators. In addition, this site is currently in use by the Tideway Project, demonstrating its viability for water-borne freight.</p> <p>Freight handling sites are required to support the provision of construction materials for delivery of housing in this area of London.</p>
Ferrovial Agroman/Laing O'Rourke Joint Venture (FLO); Tideway	<p>Note that the use of safeguarded wharves (Hurlingham, Cremorne, Middle and Kirtling Wharves) by the Tideway Project does not necessarily demonstrate that these wharves remain viable for the transportation of waterborne freight. Contend that the Tideway Project is unique in its close connection with the river, with transported materials used immediately adjacent to the river, and that much of the works undertaken to bring the wharves back into use are only temporary in nature.</p>	<p>The Tideway Project is required to maintain the viability of these wharves in accordance with the London Plan. The use of these wharves for the transport of construction materials, even if only temporary, demonstrates that they remain viable for waterborne freight handling. In addition, the Individual Site Assessments found that there has been long standing interest in the use of these wharves by a range of cargo-handling operators. There is the potential for their use to be maximised post the Tideway Project, and as such it is appropriate to maintain safeguarding.</p>

Tideway	Correction, the Tideway Project is not required to 'boost the long-term viability' of Hurlingham, Cremorne, Middle and Kirtling Wharves as stated in the draft Implementation Report.	Noted, amendments have been made to the Implementation Report.
Ferrovial Agroman/Laing O'Rourke Joint Venture (FLO)	Object to continued safeguarding of Middle Wharf on the grounds that it is the smallest wharf in the area with very limited capacity, there are other wharves nearby that mean the area will remain well served for wharf capacity, there is a large surplus capacity in the west sub-region, there is no useable jetty, and the Tideway Project is not required to improve or boost viability.	The Freight Demand Study shows that the western sub-region has the lowest excess capacity of the three identified, therefore it is important to retain all potential wharf capacity in this region to ensure adequate spatial distribution of the network.
RB Kensington and Chelsea	Object to continued safeguarding of Cremorne Wharf on the basis that the site is constrained by poor road access and requires investment to bring it back into viable use, with the Tideway Project only temporary in nature and does not improve viability.	The Tideway Project is required to maintain the viability in accordance with the current and draft London Plan. The use of these wharves for the transport of construction materials demonstrates that they remain viable for waterborne freight handling. The Individual Site Assessment found that there has been long standing interest in the use of this wharf by a range of cargo-handling operators. There is the potential for its use to be maximised post the Tideway Project.
LB Wandsworth	Request assurances that meanwhile uses can be applied to Middle Wharf whilst it is awaiting its use for waterborne freight handling.	Any alternative uses of Middle Wharf would be required to go through the appropriate planning process.
Fuel Oils	Object to the continued safeguarding of Swedish Wharf as it is not economically viable to operate the site as a fuel distribution business due to access constraints and environmental requirements. In addition, the use of the site for petroleum storage is not appropriate due to public safety concerns and environmental issues.	The Individual Site Assessment found that Swedish Wharf remains viable and there has been long standing interest from a range of cargo-handling operators. The site is also important due to its location. It is more difficult to bring other sites in this part of London into wharf use due to typically higher land values and so it is important to retain existing, viable wharf sites.

Battersea Power Station	Request that the Review provide commentary on the assessment that led to reduced safeguarded area of Cringle Dock and Smugglers Wharf.	In 2017 the boundary of Smuggler's Way wharf was extended by 3,335 sq.m. to incorporate part of an existing household waste and recycling centre. This provided compensation for the reduction in the extent of safeguarded wharf uses at Cringle Dock by 3,335 sq.m. The boundary shown in the Individual Site Assessment reflects these boundary changes.
City of London	Support continued safeguarding of Walbrook Wharf	Noted
South East Sub-region		
LB Lewisham Councillors; The Lenox Project	Support the 'Lenox Project' proposal at Convoys Wharf, which proposes to construct a tall ship and workshop on the site. Request that the Mayor write in support of this proposal.	The Section 106 agreement for the outline application allows for part of Convoys Wharf to be made available to The Lenox Project for a period of circa.20 years, with the option to extend. However, the purpose of a safeguarded wharf is for the handling of waterborne freight and that is the focus of the Review. An historic ship building is not considered a water-borne freight handling use.
The Lenox Project	<p>The Lenox Project should be the designated preferred use of the Safeguarded Wharf at Convoys Wharf as part of the Safeguarded Wharf Review recommendations in order to satisfy the current Safeguarded Wharf recommendations and meet the requirements of the planning approval conditions. The Lenox Project should also be referenced in the Individual Site Assessment for Convoys Wharf.</p> <p>The Lenox Project is the subject of a planning condition and section 106 agreement in which an independent Feasibility Study has determined that the project should be located on a 1.0 ha site on the Safeguarded Wharf at Convoys Wharf. The site occupies the whole of the river frontage on the wharf and consequently precludes other uses such as bulk cargo handling (which would be an</p>	<p>The purpose of the safeguarded wharves review is to make recommendations around sites in relation to their ability to support waterborne freight handling uses. Other uses, such as historic shipbuilding, are outside of the scope of the Review. The Review also cannot designate uses on specific sites. The site assessment references the Section 106 agreement associated with the consent.</p> <p>As outlined in both the draft and current London Plan, the purposes of a Safeguarded Wharf is for the purposes of waterborne freight-handling. Whilst the Section 106 agreement applying to Convoys Wharf references the potential use of some of the site for the purposes of historic shipbuilding for a period of time, the review and relevant London Plan policies are about the</p>

	<p>unsuitable use in a predominantly residential area with inadequate road access) and associated introduction of a deep-water jetty.</p> <p>The review should specifically exclude bulk cargo handling as a potential designated use by virtue of it being on the list of excluded uses contained in the 2015 Planning Approval section 106 agreement for Convoys Wharf for reasons of causing noise and disturbance to neighbouring residential areas. The inclusion of bulk cargo handling would be incompatible with the Lenox Project</p>	<p>wider long-term protection of sites for wharf use. It is not appropriate for the Review to designate or preclude specific waterborne freight handling uses at individual wharves.</p> <p>The individual site assessment reiterates the terms of the extant permission which includes consent for a working wharf and recognises that part of the site has viability for cargo-handling.</p>
LB Lewisham Councillors; Hutchison Property Group; LB Lewisham	Object to continued safeguarding of Convoys Wharf, on the basis that the site is no longer suitable for bulk handling due to nearby sensitive uses, requirements of the section 106 agreement that applies to the development on site, and/or air quality impacts.	Part of the planning application for mixed use development on the site included an assessment of the wharf's viability and determined that 2.3 hectares plus a further 0.3 hectares on a new jetty of the current site was viable for cargo-handling. In addition, the Lewisham Core Strategy requires the Convoys Wharf masterplan to satisfactorily address the protected wharf status of the site, with any new development required to not interfere with wharf operations or prejudice its future operation. As such, the area assigned for wharf use should retain safeguarding.
PLA; Hutchison Property Group	Recommend the boundary of Convoys Wharf be amended to reflect the boundary shown in the Outline Planning Permission for the mixed-use development on site.	Addressed in the Round Two Consultation report, with a proposal to amend the boundary to reflect the boundary indicated on the outline planning permission.
RB Greenwich	Support continued safeguarding of wharves within RB Greenwich – Brewery Wharf, Victoria Deep Water Terminal, Angerstein Wharf, Murphy's Wharf and Riverside Wharf.	Noted.

Anonymous	Object to the continued safeguarding of Brewery Wharf on the basis that wharf related activities on Brewery Wharf are not appropriate as they have unacceptable impacts on the surrounding amenity, and there are other unused, larger and better placed alternative wharves located elsewhere.	The Individual Site Assessment found that the wharf has an ongoing and viable use and is one of the closest wharves to central London. It is appropriate that this site remain in active wharf use and retains safeguarding.
PLA; Land Edition	There is an apparent mapping error in the boundary data of the Brewery Wharf safeguarding allocation. It shows the boundary extending beyond the physical extent of Brewery Wharf's southwestern edges, and into the northern part of the adjacent Ravensbourne Wharf.	Noted. A boundary change was proposed in the Round Two Consultation report.
Hyde Housing Association	Object to the continued safeguarding of Riverside Wharf, as it is part of the Charlton Riverside Opportunity Area and its continued use would have a significant impact on the townscape, and it doesn't make a significant contribution to the capacity of wharves within London.	Riverside Wharf is currently in active use as an aggregates wharf and is located within an industrial area. The Individual Site Assessment recommended that the site remain safeguarded as it is in active use and retains flexibility to meet a range of operational needs. It is noted that the site lies within RB Greenwich's Charlton Riverside SPD, which recognises the safeguarded status of Riverside Wharf and protects it accordingly. Any development on the sites surrounding the wharf should recognise this continued use and will be required to adequately respond to this use in their design, including employing the Agent of Change principle.
LB of Bexley	Object to the continued use of Town Wharf for heavy metal recycling as it 'has a detrimental effect on the existing residential areas and continued regeneration of Erith', and impacts on surround road networks.	The Individual Site Assessment found that Town Wharf has berth characteristics appropriate for barge traffic and has good road access for the transportation of goods within London. The wharf is currently in active use for waterborne freight and remains viable.
PLA; U+I Group PLC; Morden	Support the removal of safeguarding from Tunnel Glucose Wharf and the safeguarding of Tunnel Wharf.	Noted.

College; RB Greenwich		
U+I Group PLC; Morden College	Recommend that the safeguarded area of Tunnel Wharf be reduced to the boundary of the current wharf operation, with the release of the Northern Warehouse and its forecourt from safeguarding.	The GLA understands that northern warehouse is currently being utilised as a bus depot and is compatible with the current wharf operations. Whilst the warehouse area may not be needed by the current wharf operator, it may support wharf operations in the future. The retention of safeguarding over this site will help to ensure that this site remains in industrial use and leaves the possibility open for the site to support an expansion of waterborne freight handling capacity in the future.
North East Subregion		
LB Barking and Dagenham	Object to continued safeguarding of Pinns Wharf, Steel Wharf, Rippleway Wharf, Docklands Wharf, De Pass Wharf on the basis that there is an over-supply of capacity within LB Barking and Dagenham, the River Roding is of poor quality as a navigable river, and there is a need to use land more intelligently to accommodate multiple land uses.	The Individual Site Assessment found that these wharves remain viable for waterborne freight handling, with all but one currently in active use. In addition, the data for the North East subregion shows strong growth in freight movement, with growth anticipated for this area.
Freight Transport Association	Object to the removal of safeguarding from Welbeck, Railway, Phoenix, and Mayer Parry Wharves, on the basis that it is preferable to retain safeguarding status until a developer can make a compelling case for a change in status.	The Individual Site Assessment concluded that the continued use of these wharves is less favourable due to access issues, navigational issues, and/or lack of commercial interest. It is therefore appropriate to release these sites for other uses and focus on maintaining and reactivating those wharves with favourable conditions.
LB Barking and Dagenham; PLA	Support removal of safeguarding from Welbeck Wharf.	Noted.

LB Bexley; PLA	Support removal of safeguarding from Railway Wharf.	Noted.
LB Barking and Dagenham	Support the continued safeguarding of Victoria Stone Wharf, Dagenham Wharf, Principle Terminal, No 1 Western Extension, East Jetty, No 4 Jetty, Ford Dagenham Terminal.	Noted.
Tate & Lyle Sugars; PLA	Request the removal of approximately 1.2ha of Peruvian Wharf from safeguarding to enable use of the site by Tate and Lyle Sugars. This boundary change would enable this site to be utilised by Tate and Lyle Sugars to expand their operations.	Updated advice from the PLA indicates that this change is no longer required.
PLA; Mineral Products Association	Support the proposed safeguarding of Royal Primrose Wharf.	Noted.
Ballymore Group	Object to the proposed safeguarding of Royal Primrose Wharf to compensate for the loss of wharf capacity because of the Silvertown Tunnel Project. This is on the basis that the balance of supply and demand suggests that it is not required and that there has been no assessment of alternative locations for consolidation of operations that will be displaced.	The existing use of Thames Wharf demonstrates that this is a viable area to continue waterborne freight handling, and these users will require an appropriate location for their continued operation. In addition, the Individual Site Assessment found that, although Sunshine Wharf and Manhattan Wharf are not currently in use for waterborne freight handling, they remain viable for such a use. The sites have good strategic access by road, and the berth characteristics remain appropriate for barge traffic, with dredging possible to improve viability. As such, appropriate offsets for this loss of potential capacity are required. Royal Primrose Wharf provides a suitable location for existing users and will offset the loss of potential capacity from currently vacant sites. Although Royal Primrose is currently vacant, the Individual Site Assessment found that the site is viable as it has appropriate berth characteristics and is located within an existing industrial area.

Ballymore Group	Support the removal of safeguarding from Sunshine and Manhattan Wharves.	Noted.
Freight Transport Association	Support removal of safeguarding from Thames, Manhattan and Sunshine Wharves if the Silvertown Tunnel project proceeds, provided that the operators are content to re-locate to Royal Primrose Wharf as proposed.	Noted.
PLA	Support removal of safeguarding from Phoenix Wharf.	Noted.
LB Havering	Object to the removal of safeguarding from Phoenix Wharf, as the site would provide a strategic location to support the proposed Heathrow Logistics Hub in Rainham.	The Individual Site Assessment recommended de-designation of Phoenix Wharf as its use is less favourable than other wharves due to fixed flood defence walls and lack of jetty infrastructure. In view of the surplus capacity in the north east, the lack of jetty infrastructure, and the limited potential to reactive that site the recommendation to de-designate will remain.
Specific comments on the draft implementation report		
FLO	Contend that paragraph 3.2 of the Implementation Report goes on to state that the Tideway project has seen “investment in them [the wharves] to boost their long term suitability”, but this is not correct. There is no requirement for the Tideway project to “boost” the suitability of wharves. The only requirement for the Tideway project as set out in the DCO at each of the wharf sites is to maintain viability in accordance with the London Plan.	Noted: See summary of changes in Table 3

PLA	Propose corrections to references to Table 2.18 and Table 2.19.	Noted: See summary of changes in Table 3
PLA	Recommend that within section 3, paragraph 3.5 is updated in light of the Secretary of State for Transport granting a DCO on the 10 May 2018 for the Silvertown Tunnel project.	Noted: See summary of changes in Table 3
PLA	Recommend a correction: In the demand section of the executive summary and the conclusions of the 'Forecasting London's Freight Demand and Wharf Capacity on the Thames 2015 – 2041' ('Forecasting Report') it is stated that overall trade will increase to 13.4 mt by 2028. However paragraph 2.24 of the Implementation Report states that the overall trend for the amount of cargo handles is forecasted to increase to 13.4 mt by 2027. For consistency, whichever year is correct should be the same in both documents.	Noted: See summary of changes in Table 3
Specific comments on site assessments		
LB Hammersmith and Fulham	Note erroneous references to LB Hammersmith and Fulham's former Core Strategy as the Development Plan for the borough.	Noted: See summary of changes in Table 4
Fuel Oils	Propose a correction: Industrial uses (fuel storage) at Swedish Wharf ceased in November 2017.	Noted: See summary of changes in Table 4
Morden College	Propose a correction: Reference is made to Tunnel Wharf being "...cleared and levelled except for an office block at the eastern end". This description refers to Tunnel Glucose Wharf.	Noted: See summary of changes in Table 4

PLA	<p>Propose that a number of wharves need explanations of where boundary changes have occurred:</p> <ul style="list-style-type: none"> - Swedish Wharf - Comley's Wharf - Pier Wharf - Victoria Deep Wharf - Mulberry Wharf - Pioneer Wharf - Standard Wharf - East Jetty - Ford Dagenham Terminal - Halfway Wharf 	<p>Due to errors in the 2005 boundary layer shown in the Individual Site Assessment it appears that there were boundary changes where none occurred. The GLA can confirm that the boundaries for the following wharves remain the same as the original directions issued by the Secretary of State in 2000 or 2005:</p> <ul style="list-style-type: none"> - Victoria Deep Water - Hurlingham - Pier - Mulberry - Pioneer - Standard - Pinns - East Jetty - Ford Dagenham - Halfway - Swedish <p>The boundary of Comley's Wharf had minor changes to reflect operations, ownership and highway works, as noted in the Individual Site Assessment.</p>
PLA	<p>Propose that the key on each Safeguarded Wharf Map should be amended to state '2018 draft' rather than '2017 draft' to ensure the document is up-to-date</p>	Noted
PLA	<p>Propose updates to the references to the Newham Core Strategy which was adopted in December 2018.</p>	Noted: See summary of changes in Table 4
PLA	<p>Recommend that the 'sites planning status, surrounding land use and planning context' section of Standard Wharf is updated to reflect the fact that the site has temporary planning permission (January 2018) for the erection of a concrete batching plant, with associated infrastructure.</p>	Noted: See summary of changes in Table 4

PLA	On the basis that the site owner is also pursuing reactivation of the Safeguarded Orchard Wharf, consider that this should be highlighted in the 'Market interest and alternative wharves' section of the site assessment.	Noted: See summary of changes in Table 4
Thames Water	Propose removal of reference to the Counters Creek Storm Relief sewer scheme in the individual site assessment for Cremorne Wharf.	Noted: See summary of changes in Table 4
FLO	Propose correction: In regards to Cremorne Wharf, it is stated that "Works to the berth are to be undertaken prior to Tideway's use of the wharf in connection with this project, which should improve the wharf's viability. This is not correct. A temporary camp shed and fender piles will be installed for use in connection with the Tideway project. These, however, are not in the location of the previous berth (alongside the condemned jetty) and are not permanent infrastructure.	Noted: See summary of changes in Table 4
FLO	Propose correction: The site assessment for Hurlingham Wharf currently states that the Tideway Project should improve the wharf's viability. DCO Requirement CARRR14 requires the project to maintain viability of the safeguarded wharf for cargo handling, not to improve the viability of the safeguarded site.	Noted: See summary of changes in Table 4
Battersea Power Station	Request that commentary on the assessment that led to the reduced boundary of the Smugglers Way Wharf (24 November 2017) be included.	In 2017 the boundary of Smugglers Way wharf was extended by 3,335 sq.m. to incorporate part of an existing household waste and recycling centre. This provided compensation for the reduction in the extent of safeguarded wharf uses at Cringle Dock by 3,335 sq.m. The boundary shown in the Individual Site Assessment reflects these boundary changes. This is proposed to be reflected in the updates outlined in Table 4.

Western Riverside Waste Authority	<p>Propose corrections: In the site assessments for Cringle Dock and Smugglers Way Wharf it states incorrectly that the WRWA current 30 year waste disposal contract comes to an end in 2022. This should be amended to correctly state that it ends in 2032.</p> <p>In addition, the refurbishment to the civic amenity site on Smugglers Way Wharf has been completed.</p>	Noted: See summary of changes in Table 4
Specific comments on the OSC report.		
Marine Management Organisation	<p>Propose correction: The wrong English marine plan area is referenced on page 12 para 2.12. The text highlights and quotes from the South Marine Plan but the Thames Estuary is within the South East Marine Plan and as such the objectives stated are not appropriate. The objectives for the South East Marine Plan will be wholly taken from the high-level marine objectives from page 11 of the UK marine policy statement.</p>	<p>Noted. This was a drafting error. It is acknowledged that the South East Marine Plan is the appropriate document to refer to in relation to the Thames Estuary, this is acknowledged in the draft London Plan. The South East Marine Plan will be taken into account where it is relevant. However, it is not considered necessary to re-issue the evidence report to make this update.</p>

Table 2: Round Two Summary of submissions

Submitter	Comment	GLA Response
General comments		
Marine Management Organisation	No further comments.	Noted.
The Lenox Project	The draft Summary of Consultation does not include reference to the original submission made by the Lenox Project. In addition, the draft Summary of Consultation incorrectly states that the duration of the Lenox Project is only 20 years, whereas the Convoy's Wharf Section 106 agreement specifically allows for the period of occupation of the project site on the Safeguarded Wharf.	As the draft Summary of Consultation was a summary of the submissions received, the Lenox Projects submission was included alongside other support for the use of Convoys Wharf for the Lenox Project. Table 1 above has been amended to include more specific reference to the submission made by the Lenox Project in August 2018.
The Lenox Project	The draft Summary of Consultation incorrectly asserts that shipbuilding is not a designated use on the wharf. However, it is described as such in the Convoy's Wharf Section 106 agreement, with specific reference to the Lenox Project. The full range of potential uses on the Safeguarded Wharf are therefore not represented in the draft Summary of Consultation.	As outlined in the Round one consultation response, the current and draft London Plan state that Safeguarded Wharves should only be used for the purposes of waterborne freight-handling. This means the movement of goods or materials by water to and/or from the wharf in question. Shipbuilding is not considered a freight handling purpose and as such it is beyond the scope of the Safeguarded Wharves Review to safeguard the site for such uses.
The Lenox Project	The draft Summary of Consultation indicates that the Lenox Project would have to coexist alongside waterborne freight handling, which is not envisaged in the Section 106 agreement recommendations relating to the location of the project site.	As already outlined in the Round one consultation response, the current and draft London Plan state that Safeguarded Wharves should only be used for the purposes of waterborne freight-handling. This is the primary focus of the Safeguarded Wharves Review which looks at the long-term use and capacity of wharves.

		The recommendations in the Section 106 agreement in relation to historic ship building are a separate consideration.
Ballymore Group	<p>Welcomes the intent to safeguard wharf sites for the transportation of goods and materials however remains concerned regarding the identified over-supply of wharf capacity and the lack of additional assessment by the Greater London Authority.</p> <p>Raised several points regarding NPPF policies that address the need to reflect changes in the demand for land, the need for housing outlined in the draft London Plan, and the over-supply of wharf capacity within all sub-regions of London.</p>	These comments are outside the scope of the Round Two consultation. Matters relating to capacity and anticipated demand were addressed in the Round One consultation summary (see Table 1).
Ballymore Group	<p>Ballymore Group has been in detailed discussion with the Port of London Authority (PLA) over the activation of Royal Primrose Wharf (which forms part of their landholdings around Knights Road). The future reactivation of Royal Primrose Wharf (identified by the Review as having capacity for 250,000 tonnes) is dependent upon the timely release of Sunshine (15,000 tonnes capacity) and Manhattan (4,000 tonnes capacity).</p> <p>The Review should now identify Sunshine and Manhattan Wharves as to be released and the referenced link to the Silvertown Tunnel should be deleted.</p>	Noted. As the DCO for the Silvertown Tunnel Project has been approved the GLA/Mayor will be recommending that safeguarding be removed from Thames Wharf, Sunshine Wharf and Manhattan Wharf, with safeguarding designation applied to Royal Primrose Wharf.
Port of London Authority	Request an estimated timescale of when the final set of recommendations will be submitted to the Secretary of State.	The expected timescales will be made available on London.gov.uk.

Port of London Authority	Given the demand for wharves for water freight and the implications of emerging environmental legislation that will encourage new cargoes onto the river, this is the last time the PLA would expect to see any proposed release of Safeguarded Wharves.	Noted.
Company of Watermen and Lightermen	Various comments on the draft Summary of Consultation, largely reiterating the round one submission made.	These comments are outside the scope of the Round Two consultation. Comments made in the Round One consultation are addressed in Table 1.
U+I Group	U+I asks the GLA to conclude that the safeguarded allocation at Tunnel Wharf should properly be reduced in the interests of good planning to only the boundary of the Sivyer operation, releasing the Northern Warehouse and its associated forecourt from the proposed safeguarded wharf allocation for other important employment purposes within a defined Strategic Industrial Location.	These comments are outside the scope of the Round Two consultation. Comments made in the Round One consultation summary are addressed in Table 1.
Hutchison Property Group	<p>We take the view that the SWR is not adequate as it has not followed a suitably comprehensive approach, as for example set out in NPPF and NPPG guidance.</p> <p>Our understanding is that the process that should be followed in the safeguarded wharf review should broadly follow the process used for developing strategic policies as set out in the National Planning Policy Framework (NPPF) and should broadly follow the principles set out in the approach to 'housing and economic land availability assessment' set out in the National Planning Policy Guidance (NPPG). The approach used by the GLA has a number of inconsistencies with this guidance.</p>	These comments are outside the scope of the Round Two consultation. Comments made in the Round One consultation summary are addressed in Table 1.

	<p>The GLA has not followed a comprehensive approach to reviewing alternative sites, including non-designated sites. It has also not set out what scale of buffer of surplus land is justified and why. Consequently it has not demonstrated that its approach is 'adequate and proportionate'.</p>	
Hutchison Property Group	<p>Given the significant surplus of capacity over demand overall and in the South East sub-region, the size, likely marginal/negative viability and significant land side constraints on Convoys Wharf and the attractive characteristics of other wharves in the sub-region, we propose that, even before consideration of development viability, there is a substantial case to de-designate the whole of Convoys Wharf.</p> <p>We have clearly set out in our previous representation why there is considerable excess of capacity over demand. The GLA says it is prudent to plan for a buffer but clearly this is a matter of degree. The GLA has not set out its criteria and justification for a buffer. Our view is that even with a reasonable buffer there is still a considerable excess of capacity over demand and this justifies further release of safeguarded wharves. The evidence for this is set out in our previous representation.</p>	<p>These comments are outside the scope of the Round Two consultation. Comments made in the Round One consultation summary are addressed in Table 1.</p>
RB Kensington & Chelsea	<p>It is noted that the review focuses on three wharves where boundary changes are proposed. It is understood that these are factual corrections to reflect existing site circumstances and the site assessments. These corrections will reduce the amount of area to be safeguarded, the consultation does not set out the</p>	<p>The changes to DePass and Brewery Wharf are very minor, reflecting real-world site operations and ownership, as such it is not expected that these proposed changes will have a material impact on the capacity of the wharf network.</p> <p>Whilst the reduction in Convoys Wharf is more significant in overall area, in reality this is likely to have not material impact on the freight capacity of the wharf given the implementation of the</p>

	implications of these will have on London's ability to meet the demand for wharf capacity.	extant planning consent and that the OSC Report demonstrates there would still be sufficient capacity in the network in the long-term.
RB Kensington & Chelsea	Whilst the Mayors response to the first consultation highlights "There are mechanisms within Policy SI15 for development proposals to include provision of a water-freight use alongside other land uses (above or alongside)" the Council is disappointed that a more detailed assessment of site constraints at Cremorne Wharf has not been undertaken.	Noted.
Question 1: Do you agree with the proposed reduction of safeguarding at Convoys Wharf? Why/why not?		
Port of London Authority	Supports the proposed boundary change. It is recommended that further emphasis is now given to the requirement for the site owners and partners, including the PLA to expeditiously progress with reactivation, particularly given the level of documented interest from operators to use the proportion of the site that has remained safeguarded for cargo-handling.	Noted. The reduced area of safeguarded wharf will continue to be protected by the policies in both the current and draft London Plan, which make it clear that these safeguarded wharves should be used for the purposes of waterborne freight handling.
The Lenox Project	The proposed change to the boundary of Convoy's Wharf means that assumptions contained in draft London Plan Policy SI15 relating to water-borne freight handling at Convoys Wharf are no longer valid in relation to the proposed boundary change, as previous assumptions were based on the safeguarded wharf occupying the whole of the Convoys Wharf riverfront with multiple access points.	The proposed boundary change will mean that Policy SI15 in the draft London Plan will only apply to an area of 2.3ha and 0.3 ha of planned waterway infrastructure at Convoys Wharf, as indicated in the Round Two consultation document.

The Lenox Project	<p>The wharf uses proposed for the redefined wharf area by the GLA are incompatible with the adjoining residential areas and inadequate road infrastructure serving the Safeguarded Wharf. These issues are not adequately addressed in the Round Two Consultation document, while the benefits that would be derived from The Lenox Project occupying the site allocated in the Convoys Wharf Section 106 agreement have similarly not been addressed or even referred to in the report. The GLA response should be amended to include a shipbuilding dock and a home berth for the Lenox as one of the possible uses on the Safeguarded Wharf in accordance with the recommendations in the Convoys Wharf Section 106 agreement.</p>	<p>As the Review concerns the use of safeguarded wharves for the purposes of waterborne freight handling, it is beyond the scope to address matters relating to the use of the site for the purposes of historic ship building. In addition, the Individual Site Assessment summarises the Section 106 agreement that applies to the site, including consideration of harmful impacts on residential and other neighbours.</p>
LB Lewisham	<p>Supports the proposed boundary change.</p> <p>The Council seeks clarification in any future recommendation made by the Mayor to the Secretary of State, that the proposed reduction and de-designation of the safeguarded area at Convoys Wharf should take immediate effect and not be dependent on the extant outline planning consent being delivered.</p>	<p>Noted.</p> <p>It is intended that the recommendation to adjust the boundary of the safeguarded area of Convoys Wharf will be included in the package of recommendations made to the Secretary of State.</p>
LB Lewisham; Hutchison Property Group	<p>Request that wharf infrastructure in the Thames is removed from safeguarding, the additional 0.3 hectares to include water-way infrastructure at Convoys Wharf refers to a new jetty which does not currently exist and the nature of the potential future operations have not been determined and it would be premature to identify a specific area and configuration.</p>	<p>The outline of the proposed jetty reflects the boundary shown in the outline planning permission, as this is one of the reasons that the boundary has been adjusted it is considered appropriate that this is reflected in the updated Direction.</p>

LB Lewisham	The Council supports the use of Convoys Wharf for the Lenox Project. This use supports the site's and Deptford's history, and is not expected to harmfully impact on existing and future residents or place undue impact on the local roads which access the site.	Noted. The Review does not preclude the use of part of this site for the Lenox Project, however such a use is outside of the scope of the Review, the focus of which is on the long-term use of sites for waterborne freight handling.
Hutchison Property Group	Supports the proposed boundary change , but takes the view that the GLA has not sufficiently justified its proposal not to completely de-designate Convoys Wharf. Our analysis of the evidence is that there is a good case for completely de-designating Convoys Wharf.	The GLA is not proposing to de-designate the entirety of Convoy's Wharf, safeguarding will still apply to the site area available for waterborne freight handling. Given the implementation of the planning consent on the site it is considered appropriate to focus re-activation on the section of the wharf that will remain.
Hutchison Property Group	On the wider question of whether Convoys should be safeguarded at all our assessment is that the GLA has not carried out an appropriate and comprehensive review of safeguarded and non-safeguarded wharves on the River Thames and should revisit its work and analysis. Once this exercise is carried out it will be clearer whether Convoys is not an appropriate wharf.	The area identified for wharf use in the outline planning permission remains viable for waterborne freight handling, as such it is appropriate that this remains safeguarded. It is appropriate to retain the remaining viable area of Convoy's Wharf under safeguarding protection to ensure it remains available for waterborne freight handling in the long-term. The scope of the review and analysis that informed it is beyond the scope of the round 2 consultation and is appropriately outlined in the implementation report.
Freight Transport Association; Company of Watermen and Lightermen; Commercial Boat Operators Association	Do not support the proposed boundary change. There is no evidence that Convoys Wharf is no longer viable or capable of being made viable in accordance with the requirements of Policy 7.77 of the London Plan. In particular: <ul style="list-style-type: none"> - It is a strategically important wharf as it is one of the largest safeguarded wharves and is well positioned to serve central and outer London. - The jetty is still, or could be made, accessible. - The reduced site area would have major access issues which are not shared with the current site. 	As the extant planning permission has been implemented it is not considered appropriate retain a wharf boundary which would no longer reflect where wharf use on the site is possible. It is important to focus on the reactivation of the part of the wharf that is to be retained and so the amendment is considered appropriate.

	<ul style="list-style-type: none"> - There is no evidence of any development work having been carried out on the site. 	
Question 2: Does the proposed boundary change at Brewery Wharf accurately reflect the area of operations at Brewery Wharf? Why/why not?		
Port of London Authority	Supports the proposed boundary change.	Noted.
Freight Transport Association; Company of Watermen and Lightermen; Commercial Boat Operators Association	Does not support the proposed boundary change, as: <ul style="list-style-type: none"> - if strip of land proposed is removed from safeguarding status it may be available for residential development right up to the boundary of the safeguarded wharf, which could result in restrictions on the operations on the safeguarded wharf and thus a decrease in water freight. - The boundary fence between the Euromix site and Acorn Exhibitions, where the proposed boundary lies, is very dilapidated and structure is temporary in appearance, which casts doubt on the Mayor's assertion that this parcel of land was incorrectly included in the original safeguarding directions of 16 June 2000. - Given the use of safeguarded wharf by Euromix and the current congestion on the site, Euromix may wish to acquire the area proposed for removal in due course. 	<p>It is considered appropriate to amend the boundary to accurately reflect the wharf use, including waterway assets and ownership. This would not preclude the future expansion of the wharf operators onto neighbouring sites in the future. Protecting a narrow strip of land outside of site ownership in case of future acquisition is not deemed an appropriate use of the safeguarding directions.</p>

LB Greenwich	Note the proposed boundary change to Brewery Wharf, no further comments.	Noted.
Question 3 – Do you agree with the proposed boundary change at DePass Wharf? Why/why not		
Port of London Authority	Supports the proposed boundary change. Support the proposed amendment to the boundary of DePass Wharf.	Noted.
Freight Transport Association; Company of Watermen and Lightermen; Commercial Boat Operators Association	Does not support the proposed boundary change. The removal of the former jetty area from safeguarded designation would remove the Wharf's right of access to the riverside, which may restrict any further opportunity for this to be reactivated for commercial use.	It does not follow that the removal of the former jetty area would restrict access. As the site still has direct access to the waterway, a new jetty can still be provided to support the operation of the use in a location suitable for the operators. Any new infrastructure into the river would need the relevant approval, taking into account relevant considerations including navigational safety and planning policies, including those in relation to safeguarded wharves.

3. Corrections to consultation documents

In response to submissions received, the GLA has made several changes to the Implementation Report and the Individual Site Assessments, as outlined in Table 3 and Table 4.

Table 3: Implementation report

Change location	Proposed change
<i>Paragraph 2.24</i>	The overall trend for the amount of cargo handled is forecast to increase to 13.4m tonnes by 202 87 . This peak could be pushed forward if there are significant delays in the major government backed infrastructure projects. Thereafter, is it anticipated that potential building/construction projects will continue, albeit at a lower less intensive rate than seen in previous decades. By the end of the study period, overall tonnes handled are approximately 12.3m tonnes. This total excludes new cargoes that may be transported on the river during the forecasts period, particularly containerised goods
<i>Paragraph 2.30</i>	Table 2.18 below highlights both commodity and capacity by sub region and the potential capacity gap. It is also shown in figure 2.9. However, this excludes vacant wharves as these are not assigned a commodity. Table 2.19 highlights the overall demand and capacity in each region through to 2041. These include current capacity assumptions for all wharves in each area, both operational and vacant as provided by the PLA.
<i>Paragraph 3.2</i>	However, the Thames Tideway Tunnel Project, a scheme to move sewage across London to Beckton, has brought vacant wharves back into active use (eg Hurlingham, Middle Cremorne), demonstrating their suitability for waterborne cargo handling, and seen investment in them to boost their long-term suitability in a wharf use.
<i>Paragraph 3.5</i>	If it proceeds- The Silvertown tunnel - a road-based river crossing between Greenwich and Newham – would will , during its construction phase lead to the temporary loss of the currently safeguarded Thames wharf. In addition, the non-safeguarded Dock Entrance wharf would also be lost. The public examination into this scheme ended in April 2017 and a Development Consent Order (DCO) was granted by the Department for Transport on 10 May 2018 and the Mayor is awaiting the outcome. This project possibility opens up options for the reconfiguration of wharf capacity in the Thameside west area of LB Newham. Current operators at Thames wharf and the non-safeguarded Dock Entrance wharf would need to be relocated.

Table 4: Individual site assessments

Change location	Proposed change
<i>Hurlingham Wharf, Page 5</i>	Comments: A drying berth, typical of the river upstream of the Thames Barrier. No campshed. Berth characteristics appropriate for barge traffic, which travels to the wharf on the flood tide, mooring at or near high water. Works to the berth are to be undertaken prior to Tideway's use of the wharf in connection with the Thames Tideway Tunnel which should improve will maintain the wharf's viability.
<i>Hurlingham Wharf, Page 5</i>	Site's planning status: The LB Hammersmith & Fulham Core Strategy (February 2018 October 2014) in paragraph 5.106 7.140 promotes seeks the consolidation of wharf capacity onto fewer better located sites. and in para 7.141 calls for the removal of the safeguarded designation at this wharf in the next Mayoral safeguarded wharves review.
<i>Swedish Wharf, page 8</i>	Site's planning status: The LB Hammersmith & Fulham Core Strategy (February 2018 October 2014) in paragraph 5.106 7.140 promotes seeks the consolidation of wharf capacity onto fewer better located sites. The site is was in industrial use (fuel storage) until November 2017 but is not currently utilising water transport.
<i>Swedish Wharf, page 9</i>	Current use: Petroleum products by road until November 2017. Last waterborne cargo handled c.2004.
<i>Comley's Wharf, page 11</i>	Site's planning status: The LB Hammersmith & Fulham Core Strategy (February 2018 October 2014) in paragraph 5.106 7.140 promotes seeks the consolidation of wharf capacity onto fewer better located sites.
<i>Smuggler's Way Wharf, Page 14</i>	Boundary Change: Yes, incorporation of marine infrastructure. the boundary shown reflects changes made in 2017 by the Secretary of State.
<i>Smuggler's Way Wharf, Page 14</i>	Site's Planning Status: LB Wandsworth have an adopted Core Strategy (March 2016) that in Policy PL9 maintains its protection for the 5 currently safeguarded wharves. The site is currently in use as a waste transfer station. The wharf is set within a wider site that includes a civic amenity site, which is currently being re-modelled.

<p><i>Smuggler's Way Wharf, Page 15</i></p>	<p>Current Use: Waste transfer station. - The waste is transported to the Energy from Waste facility in Belvedere (Middleton Jetty). A substantial part of the wharf area is given to the loading area for the waste vehicles that serve the site. The Western Riverside Waste Authority (WRWA) owns this site and their current 30 year disposal contract with Cory Riverside Ltd gives the operators control of the site until 2022 2032. This contract ensures the continued use of the wharf for residual waste to be transported by river barge. Site includes Materials recycling facility and upgraded civic amenity site. As part of a consent at Cringle Dock an additional area of safeguarding is proposed for this wharf.</p> <p>In 2017 the Secretary of State issued new directions to adjust the boundary of Smugglers Way wharf, which was extended by 3,335 sq.m. to incorporate part of an existing household waste and recycling centre. This provided compensation for the reduction in the extent of safeguarded wharf uses at Cringle Dock by 3,335 sq.m.</p>
<p><i>Cringle Dock, Page 20</i></p>	<p>Boundary Change: Yes, incorporation of marine infrastructure. The boundary shown also reflects changes made in 2017 by the Secretary of State.</p>
<p><i>Cringle Dock, Page 21</i></p>	<p>Current Use: Waste transfer station. - The waste is transported to the new Energy from Waste facility in Belvedere (Middleton Jetty). A substantial part of the wharf area is given to the loading area for the waste vehicles that serve the site. The Western River Waste Authority owns this site and their current 30-year disposal contract with Cory Riverside gives the operator control of the site until 2022 2032. ...</p> <p>In 2017 the Secretary of State issued new directions to adjust the boundary of Cringle Dock, which was reduced by 3,335 sq.m. The loss of this area was compensated by the addition of 3,335 sq.m. of safeguarding area at Smugglers Way.</p>
<p><i>Cremorne Wharf, Page 29</i></p>	<p>Comments: A drying berth, typical of the river upstream of the Thames Barrier. No campshed. Berth characteristics appropriate for barge traffic, which travels to the wharf on the flood tide, mooring at or near high water. Works to the berth are to be undertaken prior to Tideway's tunnel use of the wharf in connection with this project, including a temporary camp shed and fender piles. which should improve the wharf's viability.</p>
<p><i>Cremorne Wharf, Page 30</i></p>	<p>Site's planning status:</p>

	<p>...</p> <p>An application for the Counters Creek Storm Relief sewer scheme is expected imminently and will also utilise Cremorne Wharf during construction. Construction phases will overlap with Thames Tideway Tunnel. The site was previously proposed for an application for the Counters Creek Storm Relief sewer scheme. This would have utilised Cremorne Wharf during construction and for new below ground assets. Following a detailed review of the requirement for the new sewer, Thames Water have concluded that it is not an effective solution for the sewer flooding they are looking to address at this time. At this stage, the need for a new storm relief sewer in the future cannot be completely discounted, however, Thames Water is continuing to investigate what future resilience may be required.</p>
<i>Cremorne Wharf, Page 30</i>	<p>Current use: Site is currently being used as a tunnelling site for the Thames tideway Tunnel. An application is also expected for the Counters Creek Storm relief scheme. Last cargo handled prior to 1997.</p>
<i>Cremorne Wharf, Page 30</i>	<p>Market interest: The wharf is to be used in connection with the Thames Tideway tunnel project until 2022, handling over 30kt of cargo by water, including CD&E waste. The wharf has also been was previously identified as the main drive site for the Counters Creek scheme, handling over 400kt of cargo, including CD&E Waste, aggregates and tunnel lining segments. However, the scheme is not being progressed at this time. Informal marketing of the wharf indicates interest from operators within the Port of London for handling bulk cargoes, particularly aggregates.</p>
<i>Tunnel Wharf, Page 41</i>	<p>Site's Planning Status: ... The site has been was predominantly cleared and levelled in 2010, with a warehouse structure remaining at the southern end of the site. except for an office block at the eastern end.</p>
<i>Standard Wharf, Page 77</i>	<p>Site's Planning Status: ... The site part of the Erith Riverside Strategic Industrial Location and the Bexley Riverside Opportunity Area. Wharf is located directly to the east of Erith Town Centre, and is adjacent to recently developed residential units and a major supermarket. LB Bexley has an aspiration to base similar industrial uses to the west at the Belvedere Industrial Estate. The site has temporary planning permission for the construction of a concrete batching plant, with associated infrastructure.</p>

Orchard Wharf, Page 83	Site's Planning Status: ... Site has been vacant for 15 years. Following the conclusion of a lengthy process that ultimately resulted in the dismissal of the DfT's confirmation of the Compulsory Purchase Order for the wharf the owner is considering scenarios for the wharf's reactivation. The PLA is considering a further CPO for the wharf.
Orchard Wharf, Page 84	Market Interest: A recent marketing exercise undertaken by the PLA to identify a new 'preferred operator' for the site established considerable demand from operators within and new to the Port of London for a range of bulk cargoes, particularly aggregates, and containerised cargoes. The landowner is currently pursuing reactivation of the wharf use.
Royal Primrose Wharf, Page 98	Site's Planning Status: LB Newham Core Strategy (December 2018) seeks consolidation of safeguarded wharves in the Royal Docks area at Thameside West on Peruvian and Royal Primrose Wharves, with no net loss of functionality or wharf capacity
Thames Wharf, Page 92; Peruvian Wharf, Page 95; Sunshine Wharf, Page 103; Manhattan Wharf, Page 101	Site's Planning Status: LB Newham Core Strategy (January 2012-December 2018) seeks to protect wharves but seeks consolidation/relocation of wharves in the Royal Docks area. seeks consolidation of safeguarded wharves in the Royal Docks area at Thameside West on Peruvian and Royal Primrose Wharves, with no net loss of functionality or wharf capacity.
Hurlingham Wharf, Page 4; Swedish Wharf, Page 7; Pier Wharf, Page 16; Victoria Deep Water Terminal, Page 43; Mulberry Wharf, Page 58; Pioneer Wharf, Page 61; Standard Wharf, Page 76; Pinns Wharf, Page 115; East Jetty, Page 140; Ford Dagenham Terminal, Page 145; Halfway Wharf, Page 150	<i>Please note that the '2005 Report' boundaries shown for these wharves were incorrect. There are no proposed changes to the boundaries of these wharves. The '2017 draft' boundaries reflect those found in the original safeguarding directions. The maps have been updated in the final version of the Individual Site Assessments.</i>