

Yes

No

Do you consider the core strategy to be legally compliant?



Do you consider the core strategy to be Sound?



Please tick the appropriate box

**If you have selected YES and you wish to support the legal compliance or soundness of the core strategy, please be as precise as possible when setting out your comments below**

Please make it clear which Paragraph number, Vision box number, Policy box number or Objective box number you are commenting on.

1	2	3	4	5	6	7	8	9	10

Please attach additional pages as required

**If you have selected NO do you consider the core strategy to be unsound because it is not.**

Justified



Effective



Consistent with national policy



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↳ Refer CO3 + CT1  
Transport / Better Travel Choices

Strategic Objective CO3 is concerned with better travel choices and Policy CT1 seeks to improve alternatives to car use. Reference is made to public transport, walking and cycling and parking. The PLA is pleased to see reference at CT1(m) to a requirement that new development adjacent to the River Thames takes full advantage of, and improves the opportunities for, public transport and freight on the water and walking and cycling alongside it.

The use of the River for the transport of passengers and freight is a sustainable method of transport that has policy support from the National Level downwards. Policy CT1 would therefore appear to be in broad conformity with London Plan policy. However, the Council should review the wording of Strategic Objective CO3 as it appears to be related solely to the transport of people however, policy CT1 is a broader policy and is concerned with the movement of people and freight. In order to accord with planning policy from the National Level downwards and with the Council's own policy CT1, Strategic Objective CO3 should therefore be widened to include reference to the transport of freight.

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#### Public Realm

Strategic Objective CO4 is concerned with an engaging public realm and the associated policy CR5 is specifically concerned with parks, gardens, open spaces and waterways.

CR5  
The PLA supports the amendment to policy CR5 which now includes at CR5(h) reference to transport. However, in line with Policy CT1 of the Core Strategy and planning policy from the National Level downwards it should be made clear that this includes transport of passengers and freight.

7  
In this section of the document reference is made to servicing. The use of the River for the transport of goods could be a sustainable way of getting goods to and from sites. Policy CR7 Servicing and its supporting text should therefore be re-drafted to encourage the use of the river for the transport of goods.

It is proposed that the Planning and Borough Development Directorate will work in partnership with British Waterways to help deliver improved blue infrastructure.' The PLA should be included in this given its land ownership and roles and responsibilities relating to the tidal river Thames.

Corporate Action No 12

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Policy CE3 is concerned with waste. It seeks to prepare a waste specific DPD which will safeguard the existing waste management sites along with Cremorne Wharf, maximising its use for waste management, water transport and cargo handling purposes. As the Council will be aware Cremone Wharf is safeguarded by Ministerial Direction and Policy 4C.9 of the *London Plan* seeks to protect safeguarded wharves for cargo handling uses and this includes for waste uses. Additionally Policy 4A.22 of the *London Plan* seeks for DPD's to safeguard waste sites, including wharves with an existing or future potential for waste management. The Council's approach to Cremone Wharf would therefore appear to broadly accord with *London Plan* policy.

CE3

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Environmental Limits

A 'green corridor' is shown on the plan on page 225 which seems to extend all the way along/over the river. Clarification is required on what is meant by this and early discussions will be needed with the PLA to ensure that what is being proposed does not have a detrimental impact on navigation, river regime and the environment.

~~CE4~~ CE4 ↓

Paragraph 36.3.23 highlights how the Borough is very accessible by river which can provide opportunities for sustainable transportation of residual waste. Whilst this reference is welcomed it is considered that this section of the core strategy could go further. The use of the river is a sustainable mode of transport which could assist the Council in achieving its environmental aspirations through the transport of people and freight.

There is planning policy support for the use of the river for the transport of passengers and goods from the National Level downwards and this includes the use of the River for the transport of construction and waste materials to and from development sites (see for example policies 4C.7 and 4C.8 of the *London Plan*). Additionally, the Council is fortunate to have a safeguarded wharf within its boundary and policy 4C.9 of the *London Plan* seeks to protect safeguarded wharves for cargo handling uses. The *London Plan* states at

36.5  
↓

paragraph 4.1.6.1 that increasing the Blue Ribbon Network for freight transport is a widely supported objective as this is a more sustainable method of transport and can help to reduce congestion and the impact of goods vehicles on London's roads. It is therefore considered that this section of the plan and its policies should be reviewed to place an increasing emphasis on the role that the river could play in meeting the Council's environmental objectives.

36.3 ↑

The PLA would wish for the Council in their waste DPD to set out the steps which will be taken in order to get waste materials delivered to and exported from the site by water.

36.3.25 ↑

It is noted that the Directorate of Transport, Environment and Leisure Services will work with the GLA to enhance the function of the BRN and particularly the use of the Thames for transport. The PLA should also be involved in these discussions.

**Please attach additional pages as required**

↑  
Corporate + Partnership Action ← p. 15  
(p. 35)

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Corporate + Partnership Actions ← N° 15  
(p235)

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It is noted at paragraph 18.3.11 that river transport will be supported including commuter links to the City and the west end. This approach would appear to accord with *London Plan* policy which encourages the development of new facilities that increase the use of the Blue Ribbon Network for passenger and tourist traffic.

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Lots Road / Worlds End

Paragraph 18.1.6 states that there is the potential for a pedestrian and cycle bridge to be built either within or alongside the existing Cremorne Railway Bridge that would link North Battersea with Imperial Wharf station. Clearly any links such as bridges across the Thames will require early and detailed discussions with the PLA to ensure that any proposal does not have a detrimental impact on navigation, environment and river regime.

Consideration should be given at Lots Road to the use of the River for the transport of construction and demolition materials to and from the development site. The use of the River in this way is sustainable and it would accord with Policy 4A.28 of the *London Plan* which seeks for wastes to be removed from sites and materials to be brought to sites by water wherever that is practicable.

Paragraph 18.3.12 makes reference to Chelsea Creek being used as a recreational waterway providing physical access to the Thames. It is unclear what is meant by this so this statement should be clarified.

Paragraph 18.3.13 states 'the safeguarded Cremorne Wharf will be preserved for waste management purposes, and could be reactivated for river cargo handling purposes. It is also stated that the use of Cremorne Wharf for waste management purposes could generate a high volume of lorry movements.' It is questioned what the evidence base is for the statement that the use of the wharf for waste management purposes could generate a high volume of lorry movements. Additionally, Cremorne Wharf is a safeguarded wharf which policy 4C.9 of the *London Plan* protects for cargo handling uses. It is therefore considered that the wording should be changed to read "and will be reactivated for river cargo handling purposes."

**Please attach additional pages as required**