

	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 benefiting 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