

Planning Policy, Environment and Community Services
Town Hall
Wandsworth High Street
London
SW18 2PU

CBRE

CBRE, Inc.
Henrietta House
Henrietta Place
London
W1G 0NB

www.cbre.com

28 February 2022

BY EMAIL

Dear Planning Policy Team,

Representations To The Wandsworth Draft Local Plan: Publication Version

On behalf of our client, Henley Construct Ltd., CBRE has been instructed to submit representations to the Wandsworth Draft Local Plan: Publication Version.

Henley Construct Ltd. has a development agreement across 80-100 Gwynne Road within LB Wandsworth. Towards the end of 2021, a pre-application meeting was held between officers and Henley, in order to understand the Local Planning Authority's position on options for redeveloping the site. At that time, we were advised to wait until such time that the Publication Version of the Council's Draft Local Plan was made available, which would be critical in understanding how the Council intends to guide redevelopment of the site.

The Site

The Site is currently occupied by a 2-storey industrial building, located on a rectangular footprint, bound by Gwynne Road to the south and Lombard Road to the west. The building was most recently occupied by a plumber's merchant (Fraser and Ellis) who have relocated to alternative premises within Wandsworth. Wrapping the site, to the north and east, is the adjacent Safestore site. Figure 1 sets out the ownership arrangements.

The Site and the adjoining Safestore site are allocated within the Draft Local Plan as 'RIV8 19 Lombard Road, 80 Gwynne Road, SW11'. The Site Allocation is featured within the existing Local Plan under the Site-Specific Allocations Document (SSAD) (2016), as Site Allocation 10.13.

The area is at a formative stage of transformation, most prominently in the form of the 28-storey Lombard Wharf to the west of the site, and at 28 Gwynne Road, a residential building of 14 storeys, to the east.

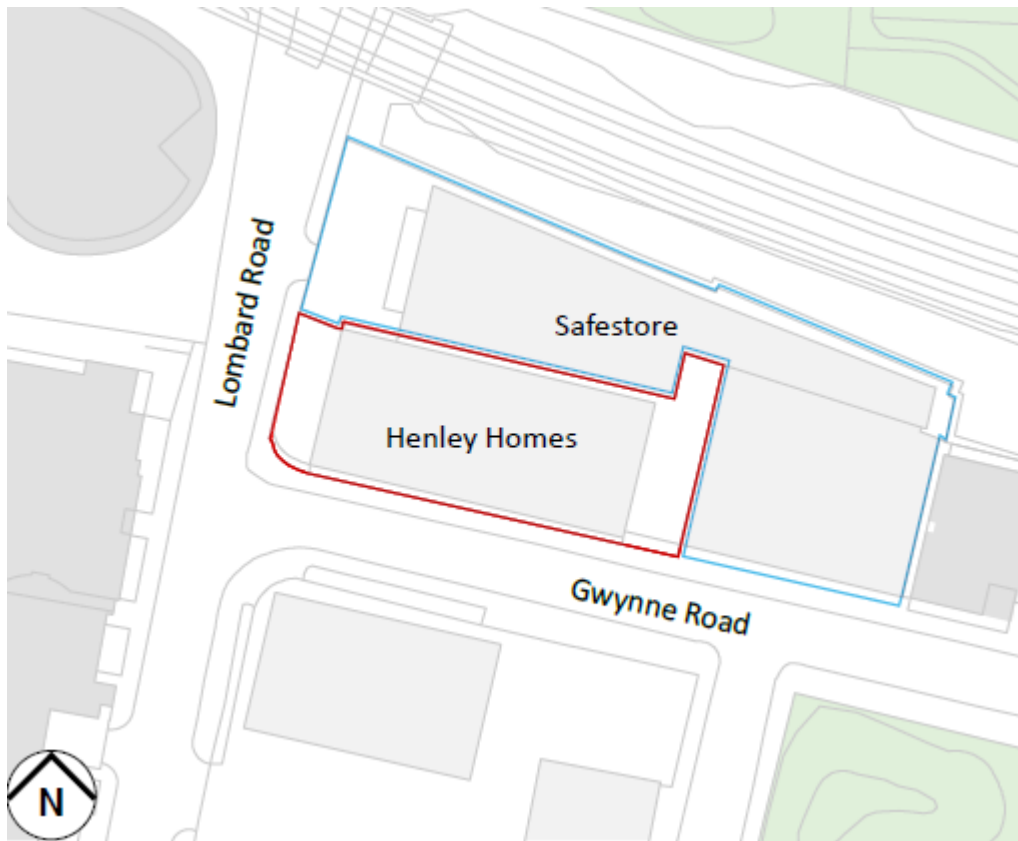


Figure 1 – Site Allocation demise with Henley Site Ownership (red) and Safestore Site Ownership (blue)

Site Allocation RIV8 19 Lombard Road, 80 Gwynne Road, SW11

We have reviewed the proposed wording for the Site Allocation. Whilst we support the identification of the site as being suitable for redevelopment, we do have some concerns as set out below.

Paragraph 11.60 – Building Heights

Current words:

In accordance with the tall building maps in Appendix 2, part of the site is located in tall building zone TB-B1-03. The maximum appropriate height range for the zone is 7 to 20 storeys, and the maximum appropriate height range for the site must be in accordance with the tall building maps in Appendix 2. The height of developments within that zone should not exceed the heights of, and be in accordance with, the tall building maps in Appendix 2, which set out the identified maximum appropriate heights in line with Policy LP4. Development proposals for tall buildings or mid-rise buildings will only be appropriate within the identified zone where they address the requirements of Policy LP4 (Tall and Mid-rise Buildings).

Appendix 2 – TB-B1-03

Tall building zone TB-B1-03 shows Map 23.5 (set out in Figure 2 below). The map indicates a lighter shaded area over the site in question.



Existing prevailing height: 2-20+ storeys

Appropriate height: 7-20 storeys (21-60m)

Figure 2 – Appendix 2: TB-B1-03, Map 23.5

Evidence Base – Urban Design Study

The map above is predicated on the Urban Design Study 2021, by Arup, which forms part of the Evidence Base for the Draft Local Plan. The Site Allocation within the 'Riverside Cluster Plan' sets out specific building heights (see Figure 3). Our client's portion of the site allocation is envisaged to deliver a scheme of 6-10 storeys.



Figure 3 - Riverside Cluster Plan (Fig.259) within the Urban Design Study 2021, by Arup

Comments:

It would appear that tall building zone TB-B1-03 reflects the heights set out within the Riverside Cluster Plan within the Urban Design Study 2021.

Moreover, supporting paragraph 14.31 (to Policy LP4 Tall and Mid-Rise Buildings) states that:

“The tall building maps included at Appendix 2 to this Plan identify an appropriate tall building height range for each zone and show how heights should be dispersed across the zone. Darker colours indicate where there is greater potential for height and the light colours indicate less potential for height. The Urban Design Study 2021 sets out the methodology used to define such potential. The identified maximum appropriate height does not apply to the entire zone; buildings will be expected to step down towards the edges of the zone as indicated on the relevant tall buildings map unless it can be clearly demonstrated that this would not be required having had regard to the local context. Development proposals exceeding the appropriate height will not be supported on design grounds.”

We consider that this approach does not pay due regard to the site’s context. To the west of the site is Lombard Wharf, a residential building of 28-storeys and to the east of the site is 28 Gwynne Road, a residential building of 14 storeys. Additionally, to the north, beyond the allocation, is the Overground Line from Clapham Junction towards Imperial Wharf, and beyond that, the open space of Fred Wells Park. To restrict development on this site at 10 storeys would not be consistent with Policy D3 of the London Plan, which states that:

“all development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site’s context and capacity for growth”.

In this policy context, and from a townscape perspective, the logical approach for a proposal on this site would be to mediate between the 28-storey Lombard Wharf and the 14-storey 28 Gwynne Road, delivering a natural step down in building heights. Given that there is not a natural stepping in the townscape as one moves north along Lombard Road (due to the combination of the railway line and open space), the logical approach, in townscape terms, is to provide a sense of presence and identity to the northern part of Lombard Road, as a context where tall buildings will come forward. This would ensure that development on the site would reinforce the spatial hierarchy of the local and wider context, aiding legibility and wayfinding and maintaining the prominence and subservience of Lombard Wharf, which sits on the bank of the River Thames. The ‘mounding’ approach to tall building areas proposed by the Urban Design Study is a simple, broad-brush one (necessarily, as it is being brought forward on a Borough-wide basis). In each case, it requires careful modulation and consideration. For the reasons outlined above, this is a site that should not be viewed as an ‘edge of area’ site where development should be lower.

Therefore, we would propose that tall building zone TB-B1-03 is amended to allow for a building up to 20-storeys, mediating between these two buildings and enabling a development that would respond to local context. We see no reason why a development of this height would not be capable of being acceptable, subject to an iterative design process in conjunction with the Local Planning Authority.

The proposed revisions would ensure that the allocation is in conformity with the London Plan, as required by Section 24 of the Planning and Compulsory Purchase Act (2004). It also ensures that the allocation is sufficiently flexible to be **effective** (NPPF Para 35.c) in facilitating efficient redevelopment of the site to take place in a manner which:

- Optimises the potential of the site to accommodate and sustain an appropriate amount and mix of development (NPPF Para 130.e). Considering the site’s context, the current site allocation is not considered to optimise site capacity;
- Makes effective use of land (NPPF Para 120) by promoting under-utilised buildings where this would help to meet identified needs for housing where such sites can be used more effectively.
- Makes efficient use of land (NPPF Para 124) taking into account viability and by promoting regeneration and change.

Summary

In conclusion, we are supportive of the principle of the Site Allocation but believe the above amendments will serve to allow for any forthcoming scheme to be developed effectively through the design-led approach, which optimises the site’s capacity, and accompanied by the necessary technical documents that show any forthcoming proposals in their townscape context.

It is our view that, in absence of these amendments, the site allocation will not conform with the London Plan and due to this, it is unlikely to be effective. Effectiveness is one of the tests of soundness within the NPPF.

Given the stage of the plan, our client wishes to reserve the right to be able to participate in any forthcoming Examination in Public.

If you have any queries regarding the site, please do not hesitate to contact me.

Yours faithfully



Adam Garcia MRTPI | Senior Planner
CBRE Ltd | UK Development – Planning
For and on behalf of Henley Construct Ltd.



Local Plan Review

Consultation on the Publication Draft Local Plan

10 January to 28 February 2022

RESPONSE FORM

The Council is inviting comments over a seven-week period on the Publication version of the Local Plan.

The Draft Local Plan sets out a vision and spatial strategy to guide the development of the borough from 2023, when the Plan is anticipated to be adopted, to 2038. It sets out key objectives for the borough, which are supported by planning policies, area strategies, and – at the smallest scale – detailed guidance for the development of specific sites. Collectively, these identify where development should be targeted and set out how the borough's neighbourhoods and places will change over the next 15 years.

This consultation is the final opportunity to comment on the Local Plan before it is submitted to the Secretary of State for independent 'examination in public'. At this stage in the plan-making process, in accordance with the national guidance, consultation responses should focus on whether the Local Plan has been developed in compliance with the relevant legal and procedural requirements, including the duty to cooperate, and with the 'soundness' of the Plan. Further detail on these concepts is provided in the accompanying guidance notes provided at the end of the form.

How to respond

Please read the consultation documents and other background information made available on the Local Plan website: <http://www.wandsworth.gov.uk/draft-local-plan-publication>

You can respond by completing this form, either electronically using Word or as a print out, and sending it to the Council by:

- Email to planningpolicy@wandsworth.gov.uk
- Post to Planning Policy and Design, Environment and Community Services, Town Hall, Wandsworth High Street, Wandsworth, SW18 2PU.

Alternatively, you can also make comments on the draft Local Plan online via our Consultation Portal, which is accessible at the website listed above.

All responses must be received by **11.59pm on Monday 28 February 2022**. The consultation is open to everyone; however please note that responses will not be treated as confidential and those submitted anonymously will not be accepted.

Part A: Personal Details		
	1. Personal details*	2. Agent's details (if applicable)
Title	Mr	Mr
First name	Phil	Adam
Last name	Kapur	Garcia
Job title (where relevant)	Sales and Development Director	Senior Planner
Organisation (where relevant)	Henley Construct Ltd.	CBRE Planning
Address		Henrietta House Henrietta Place London
Postcode		W1G 0NB
Telephone		██████████
E-mail address		██████████

*If an agent is appointed, please complete only the title, name and organisation boxes for the respondent and complete the full contact details for the agent.

Part B: About You...		
3. Please tell us about yourself or who you are responding on behalf of.		
Do you live in the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Do you work in the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Do you run a business in the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Are you a student in the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Are you a visitor to the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Data protection

Information provided in this form will be used fairly and lawfully and the Council will not knowingly do anything which may lead to a breach of the General Data Protection Regulation (GDPR) (2018).

All responses will be held by the London Borough of Wandsworth. They will be handled in accordance with the General Data Protection Regulation (GDPR) (2018). Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details like address, phone number or email address will be removed.

For further details regarding your privacy please see the Council's information published at:
www.wandsworth.gov.uk/privacy

Part C: Your Response		
4. Do you consider the Local Plan is:		
4.1 Legally compliant	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
4.2 Sound	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
4.3 Complies with the duty to co-operate	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Further information on these terms is included within the accompanying guidance note, which can be found at the end of the response form.		
If you have entered 'No' to 4.2, please continue with Q5. Otherwise, please go to Q6.		
5. Do you think the Local Plan is <u>unsound</u> because it is <u>not</u>: <i>(Please tick all that apply)</i>		
5.1 Positively prepared	<input type="checkbox"/>	
5.2 Justified	<input type="checkbox"/>	
5.3 Effective	<input checked="" type="checkbox"/>	
5.4 Consistent with national policy	<input checked="" type="checkbox"/>	
6. Please give details of why you think the Local Plan is not legally compliant and/or is unsound and/or fails to comply with the duty to co-operate.		
<p>Please make it clear which consultation document your comments relate to and, where applicable, please include the relevant policy name/number, the site allocation name/reference, the Policies Map change, and/or the paragraph number. Please be as precise as possible.</p> <p>If you wish to provide comments in support of the legal compliance and/or soundness of the Local Plan, or its compliance with the duty to co-operate, please use this box to set out your comments.</p> <p><i>Please note your response should provide succinctly all the information, evidence and supporting information necessary to support / justify the response. After this stage, further submission will only be at the request of the Inspector, based on the matters and issues they identify for examination.</i></p>		
<p>On behalf of our client, Henley Construct Ltd., CBRE has been instructed to submit representations to the Wandsworth Draft Local Plan: Publication Version.</p> <p>Henley Construct Ltd. has a development agreement across 80-100 Gwynne Road within LB Wandsworth. Towards the end of 2021, a pre-application meeting was held between officers and Henley, in order to understand the Local Planning Authority's position on options for redeveloping the site. At that time, we were advised to wait until such time that the Publication Version of the Council's Draft Local Plan was made available, which would be critical in understanding how the Council intends to guide redevelopment of the site.</p> <p>The Site</p>		

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Site Allocation RIV8 19 Lombard Road, 80 Gwynne Road, SW11

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Tall building zone TB-B1-03 shows Map 23.5 (set out in Figure 2 within the accompanying letter). The map indicates a lighter shaded area over the site in question.

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Comments:

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“all development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site’s context and capacity for growth”.

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Therefore, we would propose that tall building zone TB-B1-03 is amended to allow for a building up to 20-storeys, mediating between these two buildings and enabling a development that would respond to local context. We see no reason why a development of this height would not be capable of being acceptable, subject to an iterative design process in conjunction with the Local Planning Authority.

The proposed revisions would ensure that the allocation is in conformity with the London Plan, as required by Section 24 of the Planning and Compulsory Purchase Act (2004). It also ensures that the allocation is sufficiently flexible to be effective (NPPF Para 35.c) in facilitating efficient redevelopment of the site to take place in a manner which:

- Optimises the potential of the site to accommodate and sustain an appropriate amount and mix of development (NPPF Para 130.e). Considering the site’s context, the current site allocation is not considered to optimise site capacity;
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Summary

In conclusion, we are supportive of the principle of the Site Allocation but believe the above amendments will serve to allow for any forthcoming scheme to be developed effectively through the

design-led approach, which optimises the site’s capacity, and accompanied by the necessary technical documents that show any forthcoming proposals in their townscape context.

It is our view that, in absence of these amendments, the site allocation will not conform with the London Plan and due to this, it is unlikely to be effective. Effectiveness is one of the tests of soundness within the NPPF.

Given the stage of the plan, our client wishes to reserve the right to be able to participate in any forthcoming Examination in Public.

Please continue on a separate sheet / expand the box if necessary.

7. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, when considering any legal compliance or soundness matter you have identified at 5 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination.

You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please note your response should provide succinctly all the information, evidence and supporting information necessary to support / justify the suggested change. After this stage, further submission will only be at the request of the Inspector, based on the matters and issues they identify for examination.

This has been set out in the previous section.

Please continue on a separate sheet / expand the box if necessary.

8. If you are seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? (Please tick box as appropriate)

No , I do not wish to participate in hearing session(s)	<input type="checkbox"/>
Yes , I wish to participate in hearing session(s)	<input checked="" type="checkbox"/>

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

As per our representations, we consider elements of the plan to be unsound and therefore, we wish to participate.

Please continue on a separate sheet / expand the box if necessary.

If you are not on our consultation database and you respond to this consultation, your details will be added to the database. This allows us to contact you with updates on the progression of the Local Plan and other planning policy documents.

If you do not wish to be added to our database or you would like your details to be removed, then please tick this box.

Signature:

ADAM GARCIA

For electronic responses a typed signature is acceptable.

Date:

28/02/2022



Local Plan Publication Consultation

Guidance Notes to accompany the Representation Form

Introduction

1. The plan has been published by the Local Planning Authority [LPA] in order for representations to be made on it before it is submitted for examination by a Planning Inspector. The Planning and Compulsory Purchase Act 2004, as amended [PCPA] states that the purpose of the examination is to consider whether the plan complies with the relevant legal requirements, including the duty to co-operate, and is sound. The Inspector will consider all representations on the plan that are made within the period set by the LPA.

2. To ensure an effective and fair examination, it is important that the Inspector and all other participants in the examination process are able to know who has made representations on the plan. The LPA will therefore ensure that the names of those making representations can be made available (including publication on the LPA's website) and taken into account by the Inspector.

Legal Compliance

3. You should consider the following before making a representation on legal compliance:

- The plan should be included in the LPA's current Local Development Scheme [LDS] and the key stages set out in the LDS should have been followed. The LDS is effectively a programme of work prepared by the LPA, setting out the plans it proposes to produce. It will set out the key stages in the production of any plans which the LPA proposes to bring forward for examination.
- The process of community involvement for the plan in question should be in general accordance with the LPA's Statement of Community Involvement [SCI] (where one exists). The SCI sets out the LPA's strategy for involving the community in the preparation and revision of plans and the consideration of planning applications.
- The LPA is required to provide a Sustainability Appraisal [SA] report when it publishes a plan. This should identify the process by which SA has been carried out, and the baseline information used to inform the process and the outcomes of that process. SA is a tool for assessing the extent to which the plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.
- The plan should be in general conformity with the London Plan.
- The plan should comply with all other relevant requirements of the PCPA and the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended [the Regulations].

Duty to Co-operate

4. You should consider the following before making a representation on compliance with the duty to co-operate:

- Section 33A of the PCPA requires the LPA to engage constructively, actively and on an ongoing basis with neighbouring authorities and certain other bodies over strategic matters during the preparation of the plan. The LPA will be expected to provide evidence of how they have complied with the duty.
- Non-compliance with the duty to co-operate cannot be rectified after the submission of the plan. Therefore, the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector cannot recommend adoption of the plan.

Soundness

5. The tests of soundness are set out in paragraph 35 of the National Planning Policy Framework (NPPF). Plans are sound if they are:

- Positively prepared – providing a strategy which, as a minimum seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring authorities is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective - deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the NPPF.

6. If you think the content of the plan is not sound because it does not include a policy on a particular issue, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy (or the London Plan)? If so, does not need to be included?
- Is the issue with which you are concerned already covered by another policy in this plan?
- If the policy is not covered elsewhere, in what way is the plan unsound without the policy?
- If the plan is unsound without the policy, what should the policy say?

General advice

7. If you wish to make a representation seeking a modification to the plan or part of the plan you should set out clearly in what way you consider the plan or part of the plan is legally non-compliant or unsound, having regard as appropriate to the soundness criteria in paragraph 5 above. Your representation should be supported by evidence wherever possible. It will be helpful if you also say precisely how you think the plan should be modified.

8. You should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification. You should not assume that you will have a further opportunity to make submissions. Any further submissions after the plan has been submitted for examination may only be made if invited by the Inspector, based on the matters and issues he or she identifies.

9. Where groups or individuals share a common view on the plan, it would be helpful if they would make a single representation which represents that view, rather a large number of separate representations repeating the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

10. Please consider carefully how you would like your representation to be dealt with in the examination: whether you are content to rely on your written representation, or whether you wish to take part in hearing session(s). Only representors who are seeking a change to the plan have a right to be heard at the hearing session(s), if they so request. In considering this, please note that written and oral representations carry the same weight and will be given equal consideration in the examination process.