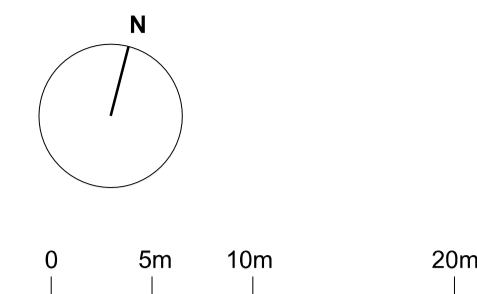




NOTES:



The proposed site plan includes the Ransomes wharf development (pl. application no 2017-3/3837) and the approved RCA development (pl. application 2018/ 4808)

- Proposed extension
- - - Property line
- - - - Extent of boundary - Ransomes Dock Business Centre
- - - - Extent of boundary - Ransomes Wharf Development
- - - - Extent of boundary - Ransomes Wharf Development

Rev	Date	Description
A	28.09.20	Planning
-	07.11.19	Planning

6a Architects
 Rapier House
 40 Lambs Conduit Street
 London WC1N 3LJ
 t +44(0)20 7242 5422
 f +44(0)20 7242 3646
 post@6a.co.uk
 www.6a.co.uk

PROJECT: RANSOMES DOCK MASTERPLAN

JOB: 353

TITLE: SITE PLAN

STATUS: PLANNING

DATE: 28.09.20 SCALE: 1:500 @ A1
 1:1000 @ A3

REV: A NUMBER: 1002

DO NOT SCALE FROM THIS DRAWING. ALL DIMENSIONS ARE TO BE CHECKED ON SITE. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL CONSULTANT'S INFORMATION

DRAWN: HA INSPECTED: MK

CB/JR/P08078
28th February 2022

Planning Policy Department
Wandsworth Council
The Town Hall
Wandsworth High Street
London
SW18 2PU

Dear Sir/ Madam,

London Borough of Wandsworth Local Plan; Publication (Regulation 19) Version Consultation (January 2022)

We write on behalf of our client City Land (UK) Limited, to make representations on the London Borough of Wandsworth Draft Local Plan (Reg 19 version) which is out for consultation. These representations are written with specific reference to the following site:

- **Ransomes Dock, 35-37 Parkgate Road SW11 4NP**

Our client acknowledges that their site falls within the proposed Focal Area Strategy under policy LP59 (Riverside Uses, including River-dependent, River-related and adjacent Use), Draft Policy PM9 (Wandsworth's Riverside), and Tall Buildings Designation TB-B2-04 and Mid-Rise Building Designation MB-B2-03 within Appendix 2 and controlled via Draft Local Plan Policy LP4 (Tall and Mid-rise Buildings).

We have made individual comments on the specific policies using the Council's consultation portal, however, given the scope of the comments we also set out our principal representations below.

The Site

The application site is a rectangular shape (0.27ha) located on the northern side of Parkgate Road. The site consists of three buildings that comprise of a mixture of offices, business units, residential accommodation and a roof top conservatory on top of Buildings 1 and 2; with a restaurant, business units and residential accommodation at first floor and penthouse levels in Building 3.

Buildings 1 & 2 are located along the western side of the site and Building 3 is located in the north eastern corner of the site backing onto the dock. On the south-east side of the buildings is an open courtyard used for car parking. The Ransomes Wharf development lies to the north and west; Ransomes Dock to the east; four-storey residential maisonettes exist opposite on the south side Parkgate Road.

Architecture Planning Interiors

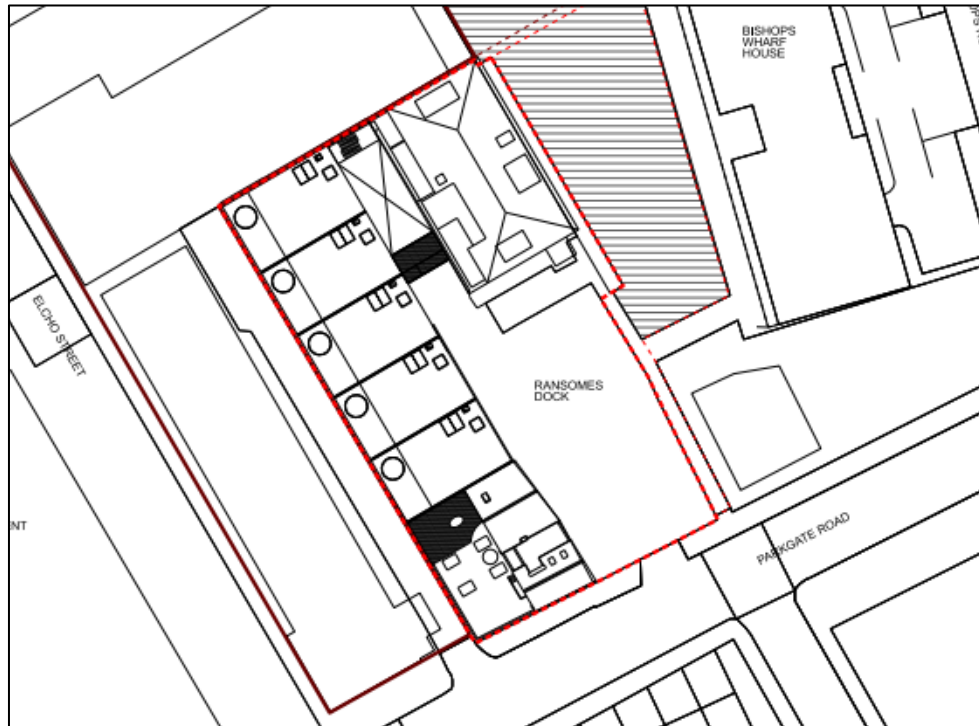
Old Church Court, Claylands Road, The Oval, London SW8 1NZ

T 020 7556 1500

www.rolfe-judd.co.uk

DD 020 7556 1529

E christb@rolfe-judd.co.uk



The site has been subject to a full planning application (2019/4915) for the following works:

‘Demolition of the existing second floor extension to Buildings 1 & 2. Alterations including erection of two-storey extension above Buildings 1 & 2 at second and third floor levels; installation of replacement electricity substation; installation of new link bridge between Building 2 and Building 3; installation of new and replacement external access staircases, in connection with the provision of five new residential units (4 x 3-bedroom units and 1 x 4-bedroom unit) and use of basement for flexible B1/D1 uses, with associated new cycle parking at ground floor level’.

The application was given resolution to grant at Planning Committee in February 2021 and the decision notice was signed off on 1st March 2021.

Proposed Area for Review

A number of key changes are sought to the Draft Local Plan which affect the Ransome Dock site. These changes are summarised below:

- Appendix 2 of the Draft Proposed Local Plan
- Policy LP4 Tall and Mid-Rise Buildings
- PM9 Wandsworth’s Riverside

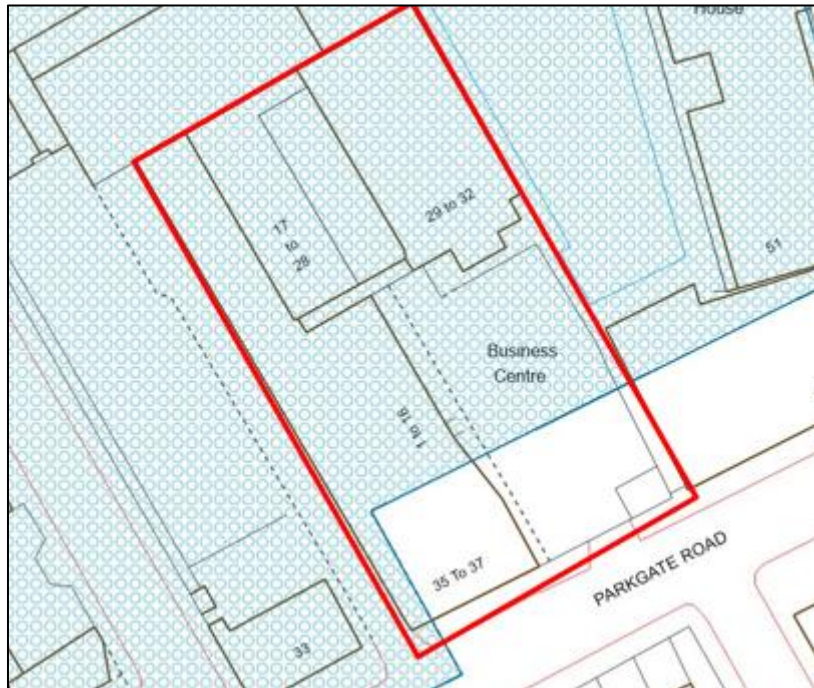
Each of these matters are addressed in more detail in the following sections.

Representation on the Draft Local Plan Document

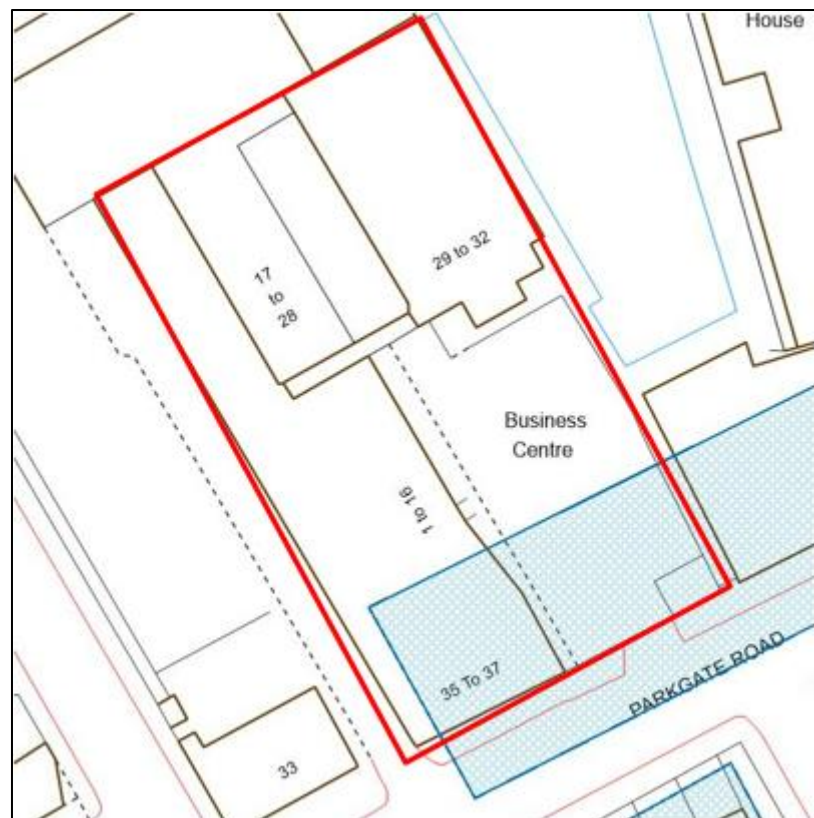
Appendix 2 of the Draft Proposed Local Plan

Draft Appendix 2 of the Regulation 19 version of the plan acknowledges that the site fall within Tall

Buildings Designation TB-B2-04 and Mid-Rise Building Designation MB-B2-03, each shown below:



TB-B2-04 Tall Buildings Designation



MB-B2-03 Mid Rise Buildings Designation

The emerging policy wording of LP4 states that any site outside of these designations would be an

inappropriate location for a tall or mid-rise buildings. Our client welcomes the designation of the site within both of these designations, particularly the fact the majority of the site falls within the 'tall buildings' designation. The designation clearly recognises the significant number of developments surrounding the site which have all been featured tall buildings, including, but not limited to:

Planning Ref: 2014/3837

Ransomes Wharf, 27-33 Parkgate Road and 2-42 Elcho Street SW11 4NP

Demolition of existing buildings and redevelopment of the site to provide new buildings ranging from 3 to 10 storeys in height comprising 118 residential units including affordable housing (Use Class C3), and 2,282m² of flexible commercial floorspace (Use Classes A1-A4/B1/D1/D2), together with associated car parking, open space, landscaping and infrastructure works.

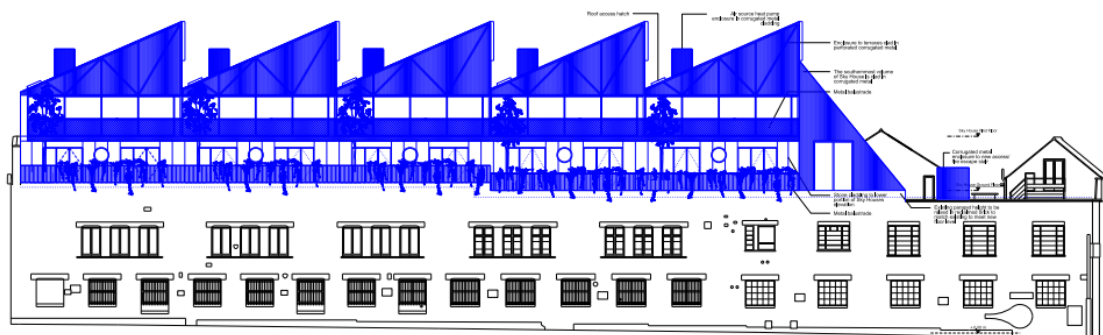
Planning Ref. 2017/6064 (as amended by 2018/2641)

RCA, 1-11 & 15-25 Howie Street 1-4 Elcho Street 7-9 & 15-25 Parkgate Road and Southern section of Radstock Street SW11 4AS

Demolition of existing buildings and redevelopment of site to provide a part 4-storey (23.43m high) and part 8-storey (32.75m high) college building (D1 use class) with ancillary uses including business incubators, academic research and conferencing space, to also include a cafe (A3 use class) with new shopfront accessed from Parkgate Road and shop (A1 use class) accessed from Howie Street, together with public realm, highway and parking (including cycle parking), waste storage, plant, including photovoltaics at roof level and associated works), to allow a change to the external appearance of the research building from Level 2 and above and layout of Level 7.

Both applications referenced above have demonstrated that tall and mid-rise buildings are suitable within this location.

The current planning permission on the Ransomes Dock site would create a 'mid-rise' 5 storey building' through the creation of 'sky houses' on top of 'Building 2' as shown below.



Approved app: 2019/4915 - Proposed West Elevation (Sky Houses in blue)

This indicated that there is existing precedent for taller buildings on site. Whilst the sensitivities of the surrounding area are acknowledged, the principle for greater scale has already been established on the site, therefore the policy is correct in recognising opportunities for additional height in this location as part of the future local context height. It is envisaged that Ransomes Dock site can achieve similar or greater building heights to its neighbours whilst complying with the criteria of draft policy LP4.

Policy LP4 Tall and Mid-Rise Buildings

As highlighted above, draft Appendix 2 of the Regulation 19 version of the plan acknowledges that the site fall within Tall Buildings Designation TB-B2-04 and Mid-Rise Building Designation MB-B2-03. Both designations are welcomed by our client.

Policy LP4 defines a 'tall building' as:

'Buildings which are 7 storeys or over, or 21 metres or more from the ground level to the top of the building (whichever is lower) will be considered to be tall buildings.'

The policy defines a 'mid-rise building' as:

'Buildings which do not fall within the definition of a tall building as set out in Part A, but are 5 storeys or over, or 15 metres or more from the ground level to the top of the building (whichever is lower) will be considered to be mid-rise buildings'

The Policy specifically states that proposals for tall buildings will only be appropriate in identified zones and they will be assessed against the criteria set out in Part B. Part D states that buildings should not exceed the appropriate height range identified for each of the tall building zones.

The tall building map has been based on an Urban Design Study (2021) which is a high-level assessment to identify suitable locations for tall buildings in the borough. Part C of the policy restricts any tall buildings outside of these zones, even where they demonstrate they meet the tall building criteria set out in Part B. Part D also restricts tall buildings to the 'appropriate height range' identified for each tall building zone, even if the site demonstrates they meet the criteria set by Part B.

It is considered that the policy is unduly restrictive and should not restrict building heights where it can be demonstrated they meet the requirements of Part B of the same policy. This approach does not accord with the new London Plan.

We refer to the recent High Court Judgement of London Plan Policy D9 (Mayor of London vs London Borough of Hillingdon, 15 Dec 21), which questioned how the policy is to be interpreted. Policy D9 (Tall Buildings) requires London Boroughs to define all buildings within their local plans (Part A), requires London Boroughs to identify within their local plans suitable locations for tall buildings (Part B), identifies criteria against which the impacts of tall buildings should be assessed (Part C) and makes provision for public access (Part D).

The High Court decision establishes that Policy D9 should be interpreted with flexibility and sites which are not designated in locations identified as suitable for tall buildings (Part B(3)) should not automatically be considered inappropriate. As such, it is considered that the 'mid-rise' designation covering the southern portion of the site should not automatically prevent our client from proposing a building height which exceeds the recommended range.

We therefore strongly recommend that Wandsworth amend Policy LP4 to ensure it is consistent with the London Plan and reflect the High Court judgement and the GLA's interpretation of Policy D9. It is considered that the Council should incorporate wording into the draft Policy to confirm that each site should be assessed on its own merits without the constraint of the policy automatically ruling out tall buildings. This would enable buildings to exceed the ranges given in both the 'tall' and 'mid rise' designations where the proposals are found to be in line with Part B of Draft Policy LP4.

PM9 Wandsworth's Riverside

Draft Policy PM9 (Wandsworth's Riverside) provides a set of policies relating to sites along Wandsworth's Riverside. Ransomes Dock previously fell within a 'Focal Point of Activity' designation and it is acknowledged that this designation has been upheld under the Draft Local Plan.

Part B (3) of the policy states that new developments should:

'Promote residential-led development in the Focal Points of Activity'

The principal of this is supported by our client as residential led-development will ensure that there is a critical mass of residents within this location in order to utilise the range of services within the Focal Point of Activity itself.

Part B (4) states:

'Existing economic floorspace within the Economic Use Protection Areas, Focal Points of Activity, and railway arches should be protected, and redevelopment should explore the opportunity for the intensification of industrial uses, where appropriate'

The policy allows for intensification of industrial uses but does not provide sufficient flexibility for office/commercial uses. In the case of Ransomes Wharf, the existing office space is not purpose-built and therefore the layouts are inefficient which leads to inefficiencies and a reduced employment density. A full redevelopment of the site could incorporate a more appropriate layout which would create an efficient floorplate, meaning that a greater employment density could be achieved over a smaller area.

Furthermore, these class E uses have flexibility to change to any use falling within this use (commercial, retail, restaurant or services), each of which are encouraged within Focal Points of Activity under Part G of Draft Policy LP59 (Riverside Uses, including River-dependent, River-related and adjacent Uses). As such, flexibility should be given to new developments to allow change of use to these use classes as they will accord with LP59's aim to 'create vibrant and active places'.

For the reasons given above, it is recommended that the Council continues to encourage residential-led development within Focal Points of Activity, whilst also incorporating wording within Policy PM9 B(4) to allow for the intensification and diversification of office/commercial uses in these locations in order to benefit the Focal Points of Activity and intensify inefficient or surplus commercial space.

Summary and Recommendations

In conclusion, our client welcomes their site being included within both the 'Tall' and 'Mid-Rise' Building Designations in Appendix 2 of the Draft Local Plan. The majority of development aims within the allocations align with our aspirations for the site which is welcomed, however, greater flexibility needs to be given to the potential height ranges within these designations to allow justification for greater heights where they can be justified under Part B of Draft policy LP4.

We make the following recommendations:

- The allocation of the site within Tall Buildings Designation TB-B2-04 and Mid-Rise Building Designation MB-B2-03 within Appendix 2 of the Draft Local Plan is welcomed and we encourage the Council to uphold these designations within the final version of the Local Plan.
- Incorporate flexibility within policy LP4 to allow for building heights to differ from the

'appropriate height range' where they satisfactorily demonstrate they meet the criteria of Part B. We therefore recommend the policy is updated to reflect the wording of the new London Plan and the clarifications of its implementation;

- Continue to encourage residential-led development within Focal Points of Activity, but also incorporate wording within Policy PM9 B(4) to allow for the intensification and diversification of office/commercial uses in these locations.

We would welcome the opportunity to meet with the Wandsworth Policy team to review the matters raised above and collectively work towards the formulation of a positive planning policy framework. Any future Local Plan should recognise the scale of development, and the mix of uses already established through the extant planning permission for the site.

We trust the above will be taken into consideration during the Consultations. Should you have any questions, please do not hesitate to contact the undersigned.

Yours faithfully,



For and on behalf of
Rolfe Judd Planning Limited

c.c City Land (UK) Limited



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	c/o agent	Mr
First name		Chris
Last name		Brown
Job title (where relevant)		Senior Planner
Organisation (where relevant)	City Land (UK) Limited	Rolfe Judd Planning
Address		Old Church Court Claylands Road Oval London
Postcode		SW8 1NZ
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 checked="" type="checkbox"/>	No <input 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 type="checkbox"/>	No <input checked="" type="checkbox"/>
4.2 Sound	Yes <input checked="" type="checkbox"/>	No <input 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 unsound because it is not:

(Please tick all that apply)

5.1 Positively prepared	<input type="checkbox"/>
5.2 Justified	<input type="checkbox"/>
5.3 Effective	<input type="checkbox"/>
5.4 Consistent with national policy	<input 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.

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.

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.

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.

We refer to the recent High Court Judgement of London Plan Policy D9 (Mayor of London vs London Borough of Hillingdon, 15 Dec 21), which questioned how the policy is to be interpreted. Policy D9 (Tall Buildings) requires London Boroughs to define all buildings within their local plans (Part A), requires London Boroughs to identify within their local plans suitable locations for tall buildings (Part B), identifies criteria against which the impacts of tall buildings should be assessed (Part C) and makes provision for public access (Part D).

The High Court decision establishes that Policy D9 should be interpreted with flexibility and sites which are not designated in locations identified as suitable for tall buildings (Part B(3)) should not automatically be considered inappropriate.

The judgement ruled that in considering whether to grant planning permission for a tall building which did not comply with Part B because it was not identified in the development plan, it would surely be sensible, and in accordance with the objectives of Policy D9, for the proposal to be assessed by reference to the potential impacts which are listed in Part C.

We therefore strongly recommend that Wandsworth amend Policy LP4 to ensure it is consistent with the London Plan and reflect the High Court judgement and the GLA's interpretation of Policy D9. It is considered that the Council should incorporate wording into the draft Policy to confirm that each site should be assessed on its own merits without the constraint of the policy automatically ruling out tall buildings.

Please refer to accompanying statement for further details

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.

We therefore strongly recommend that Wandsworth amend Policy LP4 to ensure it is consistent with the London Plan and reflect the High Court judgement and the GLA's interpretation of Policy D9. It is considered that the Council should incorporate wording into the draft Policy to confirm that each site should be assessed on its own merits without the constraint of the policy automatically ruling out tall buildings.

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 checked="" type="checkbox"/>	
Yes, I wish to participate in hearing session(s)		<input 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:			
<i>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.</i>			
<i>Please continue on a separate sheet / expand the box if necessary.</i>			
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.			<input type="checkbox"/>
Signature: <i>For electronic responses a typed signature is acceptable.</i>	Chris Brown	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.