

Date: 2 March 2018
Our ref:
Your ref:
DDI: 0203 400 4478
e-mail: Paul.Grace@blplaw.com

Berwin Leighton Paisner LLP
Adelaide House
London Bridge
London EC4R 9HA
Tel: +44 (0)20 3400 1000
Fax: +44 (0)20 3400 1111
DX92 London
www.blplaw.com

Sadiq Khan (Mayor of London)
New London Plan
GLA City Hall
London Plan Team
Post Point 18
FREEPOST RTJC-XBZZ-GJKZ
London
SE1 2AA

By email: londonplan@london.gov.uk

Dear Mr Khan

Re: Draft London Plan Consultation – Waterways Policies SI15A and SI17C

Introduction

We are a law firm with a market leading London based planning practice and set out below our consultation response on certain policies within the draft London Plan. In this response, we have focused our comments on policies relating to enhancement of waterway transport facilities and waterway related development.

Representations

A central strategic theme of the existing London Plan and the draft London Plan is the protection and enhancement of the use of the River Thames as part of London's passenger transport network. We support this policy objective and the Mayor's target (paragraph 9.15.1) of increasing the number of people travelling by river on passenger services to 20 million by 2035.

Upgrading and expansion of the existing passenger pier network is essential to achieve the Mayor's target. TfL's River Action Plan (2013) provides further strategic guidance on the opportunity presented by the pier network for place-making as part of the enhancement of existing piers. The River Action Plan recognises that encouraging investment in piers leads to (a) improved waterway transport capacity and services and (b) realisation of opportunities to create interesting destinations in their own right which encourage public access to the waterways.

The River Action Plan set a target to increase passenger journeys on the Thames to 12 million a year by 2020 (which will be superseded by the Mayor's ambitious 2035 target). It also includes plans for "improvement in the quality of public realm integrating the river pier to the city and other transport interchanges" (page 9); "enhancing place value of piers for tourists as well as locals" (page 9); "infrastructure improvements to piers" (page 20); "promotion of piers as destinations" (page 21) and the opportunity to explore provision of "high quality public realm". Reference is also made to the need to seek financial contributions from a joint developer or sponsor.

This "win-win" scenario provides conditions to encourage private sector investment in upgrading or creation of new pier facilities alongside high quality wider uses such as leisure or certain commercial uses which, as part of a high quality fully integrated scheme, would be complementary to place

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making objectives. We understand that a new Pier Strategy is to be published in draft which we trust will seek to build on the principles and objectives of the River Action Plan. At this time the draft Pier Strategy is not available and given its prominence in the draft London Plan policies, we reserve the right to supplement these representations in the light of the draft Pier Strategy when it is eventually published (which we trust will be in good time for the next stage of the draft London Plan process).

Against the above background, we consider the draft London Plan policies are unduly restrictive in respect of the precise form of development and uses which could come forward to unlock the full potential of the waterway pier and transport network. We consider that in order to achieve the Mayor's overarching objectives for river passenger numbers, the policy framework should therefore allow some additional flexibility which would need to be considered on a case by case basis for proposals coming forward. The range of locations piers are situated in, from Central London tourist areas to more commercial and industrial sites to the East, militates against a "one size fits all" policy approach. In our view, the planning harm from an overly narrow policy approach would be to deter potential investment in the pier network. Private sector investment, as recognised in the River Action Plan, is fundamental to achieving the Mayor's objectives for enhancement of the river passenger transport and the approach of the draft London Plan policies would therefore risk working against those objectives.

Bringing our representations together, we therefore propose amendments to the relevant policies and supporting text in the draft London Plan as set out below (our proposed amendments are shown as track changes).

- **"Development proposals into the waterways, including permanently moored vessels and development into the waterways should generally only be supported for water-related uses or to support and complement the enhancement of water-related purposes." (SI17C)**

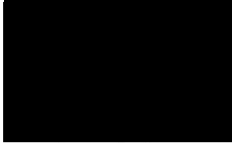
"Generally, permanently-moored vessels and development into waterways should only be permitted for water-related uses. However, uses such as bars and restaurants (for example ancillary to a passenger pier), or in certain cases other commercial use, for example leisure or retail uses if compatible with the wider location and integrated with the waterways related uses, and improved access to or along waterways and related public realm, can add to the diversity, vibrancy and regeneration of waterways, in particular in basins or docks or pier locations with high levels of accessibility and wider amenities. The specific siting of such facilities requires careful consideration so that navigation, hydrology, biodiversity and the character and use of waterways are not compromised" (paragraph 9.17.2).

- **"Development proposals should protect and enhance existing passenger transport piers and their capacity. New piers and proposals to enhance existing piers and promote place-making opportunities through such proposals will be supported in line with the Port of London Authority and Transport for London's Pier Strategy. The necessary provision of moorings, waste and sewage facilities for passenger vessels should be provided." (SI15 A).**

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We would be grateful if our representations could be considered and will await confirmation of the next steps in the process. If you require any further information, please contact Paul Grace at Paul.Grace@blplaw.com or on 0203 400 4478.

Yours sincerely



Berwin Leighton Paisner LLP

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