

THE REGENTS NETWORK

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A WATERWAYS RESPONSE TO THE NEW DRAFT OF THE LONDON PLAN DECEMBER 2017

AND LONDON'S BLUE RIBBON NETWORK

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Introduction

from a waterway point of view

Gradually the waterway strategies, policies and requirements in London are being whittled down, which is reflected in the succession of London Plans. The London Plans over the years have grown much larger (now over 500 pages), but the waterway sections have got progressively **smaller**:

2004 London Plan	34 BRN Policies	8,300 words of waterway text
2008 London Plan	24 BRN Policies	6,100 words
2009/10 London Plan	7 BRN Policies	4,100 words
2017 London Plan	4 Policies	3,200 words

And the attractive title **Blue Ribbon Network** has now been expunged! No reason is given, but the effect is very negative as it diminishes the focus and the close relationship of the Thames, rivers, canals, docks and water spaces with the environment, economy and community of our capital city.

However, the waterways get a mention in other parts of the new London Plan, and for instance with key functions in connection with waste, aggregates, sustainable drainage and flooding. Although the waterways are mentioned, it is in passing, and there is little or no cross-referencing to the main waterway section, so the relevance and profile of our waterways is not raised particularly high.

Sidelined?

Consider the diminishing regard for London's waterways in the context of the recent Mayoral strategies and reports – with a reduced or non-existent attention of this important asset:

Mayor's Infrastructure Strategy 2050 (travel and transport in London for the next 35 years)
- **No** mention of the Thames or the canals (only a brief mention in a supplementary report);

Mayor's Transport Strategy 2017

- A brief mention of the Thames passenger transport, canals are **not** mentioned at all;

Mayor's Draft London Plan 2017

- a much **reduced** attention to the Thames and canals etc in a greatly enlarged document.

There are distinct signs that London's waterways are being sidelined by London's authorities who should be giving the waterways more recognition in the every-day life of Londoners. It is not necessarily ill-will on the part of the authorities, but it may indicate more the lack of knowledge and understanding. Are decisions being made in ignorance?

Of course there are a large number of non-waterway issues that have priority and that are dealt with in detail in the enlarged London Plan, but that is no reason for diminishing the significance and value of London's waterways which also have an important part to play in our capital – and beyond. It seems to be a lost opportunity and a misplaced intent. **Are London's waterways in good hands?**

The New Draft London Plan from a waterway point of view

Not a good start

1.1 The Waterways Section in Chapter 9 opens with **Policy SI 14 ‘Waterways – strategic role’** in the Draft Plan. However, it does not introduce London’s waterways ‘strategic role’ at all, but only focuses on marine management which is a more remote aspect of the Thames in the London area well upstream from the North Sea, and something that may to be considered in due course. It is not a good (or useful) introduction to the diverse and functional issues of our waterways in the capital.

1.2 However relevant the MMO (Marine Management Organisation) guidelines will be when applied to the Thames in a few years time, they in no way introduce or identify any details and functions of London’s waterways at present and in the near future as the guidelines are only in draft form and will only apply to the tidal Thames. They will have no direct relevance to the non-tidal Thames, or the canals, tributary rivers, lakes and reservoirs etc.

1.3 There is no MMO South East Inshore Marine Plan at present dealing with the coastal and marine issues along hundreds of miles of the south east English coast, let alone any detailed notion of the outcomes relating to the river banks of the upstream River Thames in the London Area.

1.4 The London Plan has got the whole concept and focus of marine management in a twist.

In it for the long term

2.1 Regents Network has pointed out to MMO the muddled details on marine management as stated in the London Plan, following a SE Region MMO event in February where it became clear that it is premature for MMO to engage with the Thames in London in detail.

2.2 There were hundreds of very interesting ideas and notions floating around at the MMO event, and it was apparent that there are many potential issues that will be of benefit to the governance of the Thames a few years into the future, and that can be looked forward to.

2.3 It will be more than likely that the MMO SE Plan in due course will not be applied directly to the Thames, but may provide the development of spatial plans prepared by the PLA, for instance, in accordance with the MMO guidelines.

2.4 In the meantime, the emerging and underdeveloped marine plans will progress, but surely at present should not be expressed as ‘policy’ in the London Plan.

2.5 Also Para 9.14.9 in the draft London Plan dealing with the future SE Inshore Marine Plan is misplaced. A mention in the text to introduce the MMO may provide useful information in general terms for the moment, but it is not applicable at present.

A proper introduction

3.1 The Draft London Plan has failed to identify and introduce London’s waterways – in the same way as the well respected ‘**Blue Ribbon Network**’ introduced the capital’s waterways over the past decade or so in the previous London Plans.

3.2 The waterway section can begin with **Policy SI 14 ‘Waterways – strategic role’**. However, it needs to be completely and sensibly re-thought and re-drafted to meaningfully describe and introduce the wide and varied uses, values and appreciation of the Thames, canals, tributaries, lakes, boatyards, marinas and reservoirs, and the waterway’s enduring affinity and engagement with a wide spectrum of London life and Londoners. It is not a matter of editing the draft text, but rather scrapping Policy SI 14 and providing a complete re-written version from a new starting point.

Restructure of the introductory waterways section

Paragraphs 9.14.1 to 9.14.9

4.1 A substantial revision of the first five pages of the waterways section of the Draft London Plan needs to be undertaken. This section is muddled, with a number of omissions and with a wrong and defective focus.

Land-based focus to waterways!

5.1 It is important to establish the character and status of the waterways, and that the focus is on the waterways themselves rather than concentrated on the land around and beside the waterways. Too much of the attention in the current introduction to London's waterways in the Draft London Plan deals with land-based issues beside the waterways, and often for commercial and financial reasons rather than the waterway issues.

5.2 In that connection, it should be noted that the MMO guidelines mainly relate to the interface between the tidal Thames and the use of the riverside, and so are basically focussed on the use of the land along the banks in London, rather than use and activity of the river itself. This is a wrong and unhelpful issue.

5.3 Another glaring shortcoming of the published introduction to the 'waterways' is that the MMO issues only relate to the tidal Thames in London. The so-called introduction and misplaced 'strategic role' does not relate to the tributary rivers, canals and other waterspaces, nor the non-tidal Thames above Teddington.

Wider range of waterways

6.1 As an afterthought the 'introductory' Policy SI 14 then mentions that the term 'waterways' also deals with tributary rivers, canals and other waterspaces (Para 9.14.1). However, the content of the Policy SI14 does not deal with anything other than the tidal Thames, so the statement is muddled and incorrect.

6.2 To quote a much respected phrase from the previous London Plans when the water itself was still given its due consideration, "the starting point is the water" (LP BRN Policy 7.24, Para 7.71).

6.3 The introduction to London's waterways must deal with the whole wide-ranging subject, including the Tidal Thames in London; the non-tidal Thames above Teddington Locks; the 100 miles of canal network; London's second river the Lee; the many tributary rivers; creeks and inlets; the docks; boatyards, marinas and basins; reservoirs and lakes; wetlands; and more.

6.4 There are a lot of waterway issues to celebrate, but the first introductory paragraph in the Draft Plan does not give them a mention. The London Plan has already lost it way, in the very introduction to our waterways.

Unrecognised strategic importance?

7.1 The key to the long term future of London's waterways is their strategic importance, to contribute substantially to London's economy.

7.2 Although the introductory Policy SI 14 mentions that the "network of linked waterways is of strategic importance for London" (Para 9.14.1) there is no clear indication or description of what this 'strategic importance' amounts to.

7.3 It should be recognised that the strategic importance of the waterways is largely through development of waterborne transport on the Thames, and also on the 100 miles of canals running through the centre of the city.

7.4 With the other 6 references to ‘strategic’ in the waterways section of the Draft Plan, none of them refers to the strategic importance and value of the waterways themselves. Most of the references seem to refer to the relationship of the waterways to land based issues and planning.

London’s water freight industry

8.1 A key strategic importance of the waterways that can deliver a positive contribution to the economy of London is water transport, which includes the 100 miles of canals running through the centre of the city as well as the Thames. The added bonus from water freight is the subsequent reduction of commercial traffic on grid-locked roads, and the resultant improvement in air quality.

8.2 The strategic role Policy SI 14 should be rewritten to comprehensively deal with freight transport which is the main strategic role of the waterways as a transport route – it is much needed, very poorly developed and a missed opportunity – and the economy of London is not fully served as a result. The details and development of water freight are then dealt with in detail in the following Policy SI 15 ‘Water Freight’.

Important strategic roles

9.1 There are a number of other strategic issues that should also be introduced in Policy SI 14 that make an important contribution to London’s economy. These include most importantly passenger and tourist transport, leisure and recreation use, and sports as well as environmental and nature facilities, and of course the all-important flood risks.

9.2 Add to the strategic importance list boatyards, moorings, educational facilities, heritage and culture, and it is clear to see that the so-called introduction to London’s waterways section of the Draft London Plan has certainly completely missed the point and any useful focus.

9.3 With the wealth and diversity of London’s waterways and great benefits and potential prosperity to London, the waterways should be given greater consideration, and above all, greater protection and enhancement.

A new introduction

10.1 With the strategic value of London’s waterways taken into account and identified, then everything will now fall into place, and the introduction to this important part of London’s life and future can be drafted, and be fully comprehensive.

10.2 The introduction can then be followed by the key **Policy SI 14 ‘Waterways – strategic role’** as the focus can be directed to the importance of the waterways to London’s economy and long term future. The structure and governance can also be rationally identified without diverting attention away from the current responsibilities and requirements, although the future additional management and characteristics to be revealed by the MMO marine plans can be introduced.

10.3 How the MMO undeveloped and speculative issues ever became a ‘starting point’ is a mystery.

Starting from the water

11.1 It is important to remember that all the dealings with the waterways are based firmly on the waterways themselves rather than on the land alongside, which was encompassed so clearly in the well established terms and characteristics of the **‘Blue Ribbon Network’**.

11.2 To quote another well-appreciated phrase from the previous 2004 London Plan, the waterways “should not be used as a backdrop to land-based uses”, or especially property development. This all makes good sound common sense and should be included in ‘waterways’ in the Draft London Plan.

11.3 Reinstate the **‘Blue Ribbon Network’** – see below.

Figure 9.6 – London Network of Waterways Map

12.1 This is a poorly drawn map, and Map 7.5 in the previous London Plan was much more clearly drafted, and so is Figure 7.3 in the current draft London Plan. Corrections and improvements are:

- The map should be diagrammatic to make it clearer;
- The tributaries should be simplified where necessary;
- More clarity between tributary rivers and borough boundaries;
- Borough boundaries should be white, as Figure 7.3;
- Some of the channels up the west side should be omitted to avoid the confusion;
- Also the Lee Valley is a mess and should be simplified;
- What appears to be the lost Tyburn is un-named and should be omitted;
- And what appears to be the lost River Fleet should also be omitted;
- The canals and New River should be shown as a double line (as previously);
- Reservoirs, docks and lakes etc should be included (as before);
- The widening of the tributaries at various points should be omitted (too confusing);
- The tributaries in west London are not clearly named (Google Maps may not be accurate).

- The River Thames should be named;
- 11. Ingrebourne is wrongly spelt, and delete 'R' ('bourne' already means 'river');
- 12. River in full, rather than just 'R';
- 15. Also River in full, or commonly known as 'The Wandle';
- 16. Ravensbourne without the extra 'R';
- 19. Paddington Arm label should include 'canal' to make it clear. Or 'GU Canal Arm';
- Label 6 Badly positioned, and adjust other labels more carefully;
- The New River does not run so far south;
- The Thames is not clear that it runs along London's border in the south west.

12.2 A skilfully prepared map is necessary to describe London's waterways, and inform more clearly the extent of the waterways that generally seem to be unfamiliar to many people, and authorities.

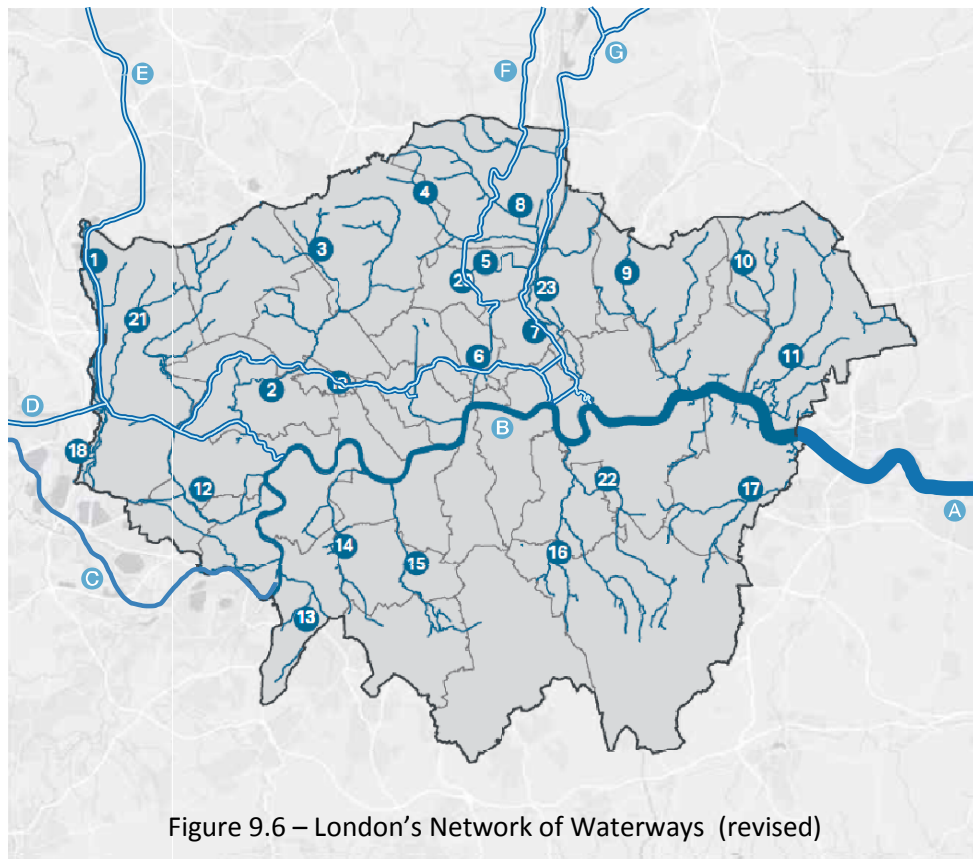


Fig 9.6 can become a much more useful and informative map, although it still needs tidying up.

It reveals the extent of the tributary rivers, and clearly illustrates that canals and waterways can provide viable and coherent transport routes.

- Additional Key:
- A. Thames Estuary
 - B. Tidal Thames
 - C. Non-tidal Thames
 - D. Slough Canal Arm
 - E. Grand Union Canal
 - F. New River 1613
 - G. Lee and Stort

12.3 The London Network of Waterways Map (Fig 9.6) can reveal some of the extent, character and importance of London's waterways provided that it is more carefully detailed and drawn. However, it does not adequately introduce the extensive and fully developed subject of London's Waterways.

12.4 Unfortunately the subsequent few pages in the Plan, even though they contain a wide range of details and information, fail to provide a coherent and satisfactory introduction and overview of London waterways. One glaring omission is the lack of coverage of all London waterways, as the selected focus is on the central tidal Thames and a number of associated issues.

12.5 There are only a limited number of Londoners who live near to the Thames in Central London, and although the Tidal Thames is dominant (obviously), there are many more thousands of Londoners to whom London's waterways are the upper reaches of the Thames, the Thames Estuary, the innumerable tributary rivers and streams, reservoirs and lakes, and a 100 miles of canal!

Waterways - a multifunctional asset for London (Para 9.14.2)

13.1 This is an excellent title to develop but it is a wasted opportunity (in Para 9.14.2) with a stream of over 25 issues all run together without any structure so it becomes a hotchpotch and the effect (and the information) is lost. It is rather disappointing, as celebrating the waterways as such a diverse and interesting asset in the heart of our capital should be very impressive.

13.2 The assets could be usefully divided up with five sub-headings (see below), so that they all can receive equal attention, and are given the full weight of their importance to London.

Strategic value: transport, sustainable passenger and freight transport; wharves and docks; cultural and community activities; recreation; health and well-being benefits; not forgetting (as the draft plan does) sport; tourism; visitor mooring and facilities.

Environmental issues: green infrastructure; series of habitats; biodiversity; not forgetting open space; waterside routes and access.

Heritage and setting: a worthy setting to heritage; landscape and views; heritage of the waterways themselves; long and eventful history; the Heart of London.

Water safety and management: drainage; flood and water management.

Infrastructure: not forgetting mooring; boatyards; boat building industry; piers and wharves; residential moorings; river restoration.

That looks more interesting! And far more instructive. What an asset the waterways are for London!

13.3 The last 3 lines of Para 9.14.2 which mentions management and strategies is out of place, and it does not serve to enhance and extol the many assets, and can be deleted.

The Thames and Waterways Forum (Para 9.14.3)

14.1 This new forum (Para 9.14.3) has yet to surface and demonstrate its purpose and effectiveness, following a glaring gap of 2 years before the Mayor appointed it to replace the London Waterways Commission and River Concordat. During this unforgivable gap, London's waterways were not properly recognised, as became apparent with the Mayor's Transport Strategy and Environmental Strategy that made little or no reference to the Thames and waterways.

14.2 The first job undertaken by the new Waterways Forum should be to provide an up-date to the Mayor's Transport Strategy and Environment Strategy to properly represent London's waterways in their rightful position as a great asset to our capital. This Para 9.14.3 is misleading to imply that the Mayor's Transport Strategy sets out waterways priorities, which it patently fails to do.

14.3 The Forum is placed in the hierarchy of the GLA which sets it apart from the waterway users and stakeholders, and Londoners. It seems that there will only be one (token) engagement a year with the stakeholders, which indicates a most unsatisfactory and impractical focus for the Forum.

14.4 The former London Waterways Commission was generally ineffective, and was rightly characterised as merely a 'talking shop', and it is hoped that the new Forum will be more proactive and relevant, and will contribute to the success and essential progress of London's waterways – and their status.

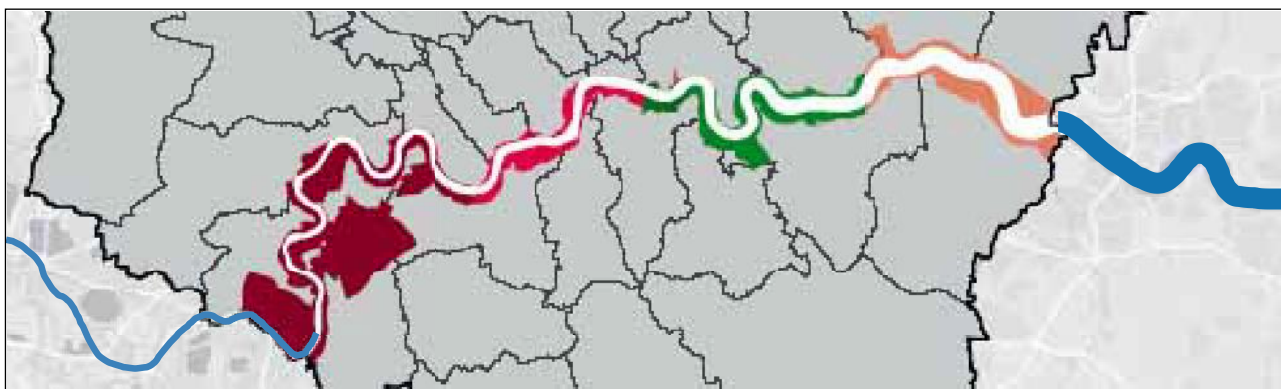
14.5 It will be interesting to see if the new Forum has a positive and relevant input into the consultation of the Draft London Plan, and an input on behalf of the users and waterway community rather than the authorities. The first London Plan 2004 was ably directed in waterway matters by a focussed Steering Group (with Regents Network as a member), and a very positive and relevant Blue Ribbon Network section to the London Plan resulted.

Thames Policy Areas (Paras 9.14.4 and 9.14.5)

15.1 The long-standing and carefully defined Thames Policy Areas (TPAs) by now need updating and a detailed re-appraisal. The definition of the land-based areas along the banks of the Thames and the details of the requirements that relate to the Thames are still sound and relevant. However, the information and descriptions should be updated, and would benefit from a re-assessment. This will bring the TPAs back to the surface, and more directly involved in the assessment (and control) of the flurry of development of the land alongside the Thames.

15.2 It is timely that the River Thames became the centre of attention in relation to the property development along the Thames, and, through focus on the revitalised TPAs, re-establishes that "the starting point for consideration of development and use of the Blue Ribbon Network and land alongside it must be the water. The water is the unique aspect and consideration must initially be given as to how it can be used, maintained and improved" (current LP BRN Policy 7.24, Para 7.71).

15.3 The map of the TPAs (Figure 9.7) should be a detail of London (as shown below) as the orientation of the Thames is very familiar. The opportunity should be taken to add as much



additional information with labels on the map and a more detailed key. This could include a list of the boroughs that the Thames runs through, as well as any features, boundaries and locations along its route to identify the areas. The continuation of the Thames to the East and West should be added.

15.4 Not only should the route be detailed, but also the key functions of the Thames pointed out.

Thames Strategies (Paras 9.14.6 and 9.14.7)

16.1 The boroughs in the TPAs should provide appraisals of their stretch of the Thames and the Policy Areas although this has not been carried out in a concerted manner.

16.2 It is important to note that the Thames lies on the edge of each of the boroughs that it passes through, and the borough boundaries run along the centre of the river, or one or other bank. This has the effect of the lack of coherent responsibility for the Thames as the boroughs only dip their edges into the river. Basically the focus of the boroughs is at their centre, so the Thames can too easily be sidelined as it is always on the fringe of the boroughs and a long way from their centres.

16.3 The consistency of any conservation areas along the Thames is also disjointed, and some share the same boundary along the river or the boundaries do not meet one another, so the protective coverage is not complete or coherent.

16.4 These inconsistencies result in the Thames Strategies becoming more important where the focus is on the Thames itself rather than the fringe of the boroughs. It also encourages the boroughs to coordinate in consultation with their neighbouring boroughs.

16.5 A concerted effort should be made by the Mayor and GLA to update the Thames Strategies and ensure that all the reaches of the Thames are covered. It is recommended that the guidelines in the current London Plan are used (LP BRN Policy 7.29, Para 7.90) rather than Paras 9.14.6/7 in the consultation Draft London Plan.

Metropolitan Open Land Para 9.14.8

17.1 This short and isolated single-sentence paragraph makes a useful technical point relating to planning issues, but it perhaps should explain the issues in more detail and make the point that the planning issues could be covered by a relevant Thames Strategy.

MMO South East Inshore Marine Plan Para 9.14.9

18.1 As pointed out above (Paras 1 and 2) the MMO SE Inshore Marine Plan is not yet written, and so does not have any relevance to the Thames Strategies at present.

Policy SI 15 ‘Water Transport’

19.1 Para A – after ‘Development proposals’ add: ‘on the Thames’. Unfortunately the waterways issues in the Draft London Plan are generally relating to the Thames, and the other waterways, especially the canals, are sadly and unnecessarily sidelined. This is poor understanding of the waterways and their strategic importance to London, and reveals ignorance about the scope and versatility of our waterways. Otherwise this is a sound policy.

19.2 Para B – after ‘Existing boatyard sites’ add: ‘on the Thames and canals’. Again, a blank spot in the knowledge and understanding of London’s waterways, and ignorance of the many boatyards on the canals. Any alternative use of a boatyard site should be rejected, as there is a serious shortage of boatyards. If the suggested alternative is property development, it should be made clear that a boatyard has to be at the waterside whereas a property development can be built in other locations. The proposal for a single boatyard is totally inadequate, and ‘a’ should be deleted and the sentence expressed in the plural. This inadequacy of limiting new boatyards to ‘one’ is unforgivable, and worrying that such little thought and consideration has been given.

19.3 Para C – a welcome proposal, but add ‘and canal’ after ‘by river’.

19.4 Para D – Line 1 after ‘safeguarded wharves’ add ‘on the Thames’ in recognition that there are no safeguarded wharves whatever on the canals.

19.5 Para E – The first sentence is spot on, especially the use as the much needed consolidation centres. The redevelopment of safeguarded wharves for other uses should be carefully planned, as even if the scale of use changes, a smaller wharf can be retained and the wharf space used for other commercial use (or even light industry) to retain the commercial use and possible viability as a wharf in the (long term) future. Other uses may include waste and recycling.

19.6 Para F – The increase in use of the safeguarded wharves is strongly supported.

19.7 Para G – This paragraph provides some essential protection that needs to be said, and repeated.

19.8 Para H – The conflict of use and disturbance needs to be recognised, and also includes conflict across river to the other bank as sound carries over water. The lesser known ‘Agent of Change’ principle needs to be identified or cross-referenced.

19.9 Para 1 – The potential for using water transport for demolition waste and construction materials, including on the canals, is a well developed principal and is raised by a number of boroughs as a planning condition. However, it is very rarely operated as the appraisal of the process is carried out by the contractors who without exception rule out the use of water transport in favour of lorries. This policy item must require the appraisal to be carried out by an independent specialist not engaged or financed by the developer or contractor (as agreed by the London Waterways Commission Freight Group, April 2015).

19.8 A missing issue is the mention of localised freight up or down stream, and across river between the safeguarded wharves on the Thames. There is a significant potential for smaller freight, other than large scale and container transport, which has as yet not been explored, but nevertheless should be mentioned.

19.9 Another omission is the matter of safeguarded wharves on the canal network, and at present no potential wharves are safeguarded in the same manner as for the Thames. However, in the most recent Safeguarded Wharves Review Final Recommendation (GLA March 2013) it was stated that ‘consideration’ should be given “of the appropriateness of safeguarding any wharves on London’s canals” in line with the London Plan.

Note 1: Currently Bangor Wharf on the Regents Canal in Camden Town is being reassessed with regard to being protected as a wharf, and a planning application for residential development on the site has recently been roundly turned down.

Note 2: According to the current London Plan 2016, “within LDFs boroughs should identify locations that are suitable for additional waterborne freight” (LP BRN Policy 7.26, Para C). This requirement should be included in the Draft London Plan, and particularly focussed on the canal network, but it is important that it is implemented this time round.

Pier Strategy Para 9.15.2

The river services should not only be extended to East London and the estuary, but should also be developed upstream to increase the number of people travelling by river.

Boatyards Para 9.15.3

Although it is pointed out that boatyards are essential, it is of concern that they are very much sidelined, and to suggest that an additional boatyard is required when many are needed (urgently) is most unsatisfactory. It is not only the larger boats that must have boatyards, but smaller boats also require constant attention, and the maintenance level of all boats is poor due to lack of facilities.

Freight Para 9.15.4

This is a fair and enlightened description of water freight, and with a forward-looking approach to develop water freight much further. It would be appropriate to recognise the importance of water freight to London by referring to it as the water freight industry, and to recognise that it can have a considerable economic value to the city rather than just being seen as a useful facility.

It should be noted that water freight is not only suited to ‘low-value, non-time-critical bulk movements’ and it will prove its versatility and advantages by transfer of smaller scale freight in localised transport services, including across river, and on the canals. This could include pallets, push-trolleys, crates and cartons, for instance, in local collection and delivery, as well as the customary waste and recyclates.

That it is stated that “the Mayor will promote positive action” is encouraging, but it must also be realised that this should apply to smaller loading and un-loading sites and jetties along the Thames, and even individual commercial destinations – or even to and from residential developments (waste and recyclates, for instance, as well as goods deliveries).

Freight wharves Para 9.15.5

The safeguarded wharves may be located in high value sites, but it should be recognised that a water freight facility must be beside water (which is the site’s true economic value), whereas residential developments can be in a variety of locations. Localised freight could be an important development for the safeguarded wharves, with localised freight transferred from wharf to wharf (even in the central area), and the separate safeguarded wharves could have a variety of facilities and uses. A regular review of the safeguarding by the Mayor would be welcome, as there is considerable opportunity for their useful development in London’s freight industry.

Redevelopment of safeguarded wharves Para 9.15.6

The true economic value of the safeguarded wharves to London is their transport facility by being beside the Thames as opposed to the residential ‘worth’ which is contrived and led by profit and investment issues rather than benefits and usefulness to our capital. The viability of the safeguarded wharves must be made by independent appraisal, and be forward-looking to the long term use and benefit to London. There should be no question as to the viability of a wharf for freight-handling as it can obviously be operated usefully in a variety of ways, and the viability answer should always be ‘yes’.

Assessing the viability of a safeguarded wharf Para 9.15.7

All the bullet points made are relevant, but the scope and vision of the appraisal should be wider. First of all, the viability appraisal should be by an independent specialist, not appointed or financed by the developer/owner of the wharf. Also the variety and scope of the water freight operations should be wide and comprehensive, and always be adaptable to the attributes and constraints of the wharf and its location. An important point to consider is that there could be many more additional wharf sites of varying sizes up and down the Thames that would enhance the range and facility of the main safeguarded wharves.

Neighbouring land uses Para 9.15.9

The potential conflict between working wharves and neighbouring developments is greatly reduced these days as modern freight handling techniques will transform water freight. The hydraulic lifting and handling equipment is more on the scale of lorry transport rather than the traditional Thames docklands cranes, and many of the freight craft may have their own handling equipment. This will facilitate a neighbour of a working wharf being able to mitigate any disturbance or noise from the wharf activities. Also the wharf operation is more likely these days to be fully or partially covered. Active 21st century wharves and residential developments should be able to be good neighbours.

The use of a ‘specialist’ issue such as ‘Agent of Change principle’ should be cross referenced or an explanation of the context provided.

Policy SI 16 Waterways – use and enjoyment

Para A, B and C – supported.

Para D – The mooring facilities referred to are on the Thames, and should be limited rather than optimised with so-called ‘development proposals’. The more general use of the Thames for static residential purposes which permanently take away open waterspace and ‘privatise’ portions of the Thames should be resisted. At present a proliferation of moorings is being encouraged by the authorities for financial gain, but the Thames should not be a fiscal item for the benefit of a few rather than a public asset for all.

The proposition that moorings should be off-line is helpful, but does not control or regulate the excessive use and the taking-over of our waterways for individual purposes. Moorings do not respect the character of the waterways (D2).

Para E – No, waterside development schemes should not necessarily provide new moorings.

Para F – Access points should be described as access points to and from (add) waterways, as it is not just the approach to waterways from the land that is needed, but use of the waterways themselves for navigation and other purposes when access is needed to the land (obviously).

Para H – Too many miles of the Thames Path and towpaths on the canals are no-go areas for pedestrians and families etc, as they are taken over by cyclists. Certain sections of the canal towpaths are designated a ‘cycle highway’ by Canal and River Trust Limited as well as by the Mayor (in the OPDC Local Plan). Cycling on the waterway paths should be controlled (and limited if necessary), as the conflict is not only a nuisance but can very often be dangerous.

In Para 9.16.1 (following) the London Plan advocates making the “maximum use” of cycleways along the waterways! This should be deleted.

Waterways Infrastructure Para 9.16.1

Apart from the unwelcome inclusion of ‘cycleways’, the wide ranging content of the use of the waterways and their infrastructure is most encouraging.

Deficit of residential, leisure, visitor and commercial moorings Para 9.16.2

There has been an uncontrolled and undesirable huge increase in the number of residential boats on London’s canals, and some sections of the canals in East London have become housing estates for the benefit of the few rather than a navigation and facility for all, and the canal authorities should manage the situation more competently. It is not the case that there is a deficit of residential moorings on any of London’s waterways. There is certainly a deficit of leisure and visitor moorings especially on the Thames, and it is now very difficult to visit London by boat without having to pass right through as there is little or no opportunity to moor temporarily – disgraceful! Most (or all) slipways and historic steps are not accessible.

Cultural Strategy (?) for the River Para 9.16.4

The Mayor’s Cultural Strategy for the River was published on 15 November 2010 and seems to have raised pre-Olympic aspirations and plans, and is no longer available on the Mayor’s website. In any event it seems that most of the proposals and ideas related to the land around the waterways rather than the waterways themselves which were to a certain extent sidelined. Cultural schemes should be reconsidered and refined, and the strategy updated for all the waterways.

Public art Para 9.16.5

London’s waterways have often been besieged by public art and cultural ‘happenings’ as people like to gather along the Thames as it is a central location. Artworks, sculptures and installations should only be given ‘advertisement’ consent which is time-limited (but can be renewed) and unfortunately the canals in particular are littered with uncared-for artworks. Also there are

numerous youth art projects (and mosaics!) where the great benefit and satisfaction is in the production rather than their longevity, and a time-limited installation through the planning system would be appropriate in most instances.

Policy SI 17 Protecting London's waterways

Para A to E – This policy gets full approval, and is to be welcomed for being so positive and proactive, and with consideration for the waterways and their long term future. The key points may be summarised as:

- Protect and celebrate waterways 'for themselves'
- Protect the distinct open character
- Respect their local character and environment
- Enhance local distinctiveness
- River restoration to enhance their biodiversity, water quality and biodiversity
- Vessels should preferably be moored off-line, and only supported for water-related use.

It would be appropriate to add to the list the strong objection to floating football pitches, swimming pools, cycleways and even the previous Mayor's floating village in the Royal Docks, with a:

- 'No' to floating structures

as they would not only be land-based uses, but a serious loss of open water space. It is welcome that the boardwalk cycle route along the waterfront at Kingston has now been scrapped (and over £10m saved). An exception may be made for the occasional converted craft as a floating bar or restaurant, including the very long established and attractive Chinese Restaurant at Cumberland Basin on the Regents Canal at Camden Town.

London's remaining dock areas Para 9.17.4

Two lines of text on the protection and promotion of the remaining London Docks tagged on to the end of the waterways section in the Draft London Plan is totally inadequate. These 'final words' exemplify the general disinterested attitude to London's waterways from the Mayor and GLA, and which is reflected in the reduced waterways section in the Draft London Plan.

Some of the former London Docks which have not been filled in have been put to good use as marinas, except for the extensive Royal Docks which seem to have been relegated as the setting for acres of property development with only limited use of the huge expanses of water for sport or water activity. The opportunity for marina facilities, extensive boatyards and boat building, and the urgent provision of maritime training and tuition has been delayed and postponed year after year, and it is not certain whether these key facilities will ever be provided by GLA on the publicly owned land which is being handed over for property development.

Re-drafting and re-think

The waterways must be sensibly defined and established as a key participant of London's life and economy, and the opening of the waterways section in the Draft London Plan needs to be re-thought and completely re-drafted. Just a bit of editing will not be acceptable. The rest of the reduced-down text needs serious thought and attention, and as the word count is so low there is opportunity to bring it up to standard and give the waterways the importance and credit that they deserve.

A conclusion

The Mayor must raise the profile of London's waterways in the London Plan and Strategies. Our waterways must be given respect, and be solidly protected, and given an active and strategic future, and above all **the Blue Ribbon Network principles and policies** must be reinstated forevermore.

APPENDICES AND AFTERTHOUGHTS

River crossings – ferries not bridges

As mentioned above in connection to Pier Strategy, the opportunity should be taken to add a few smaller piers or jetties for a number of cross-river ferries across the Thames in London and at intervals down the estuary. It is only surprising that it is not considered as an essential and obvious solution to the river crossing facility (as it has been for hundreds of years!).

There are a number of mentions in the Draft London Plan concerning transport connectivity and plans for road bridges or tunnels. These would require huge amounts of financing and be very disruptive for a number of years before any use could be made of them. Also there is the problem of introducing additional and unwelcome traffic streams at each end of the links, and incidentally increasing pollution and road congestion.

A number of small ferries can be very versatile and greatly beneficial at a fraction of the cost of bridges or tunnels, and readily available without years of upheaval and widespread disruption. Once a bridge is built, that is it, and it cannot develop and evolve. With ferries there is full flexibility. The routes need not be straight across the river, but directed up or downstream as required. Schedules can be altered from time to time, or by season, and additional ferries can be brought in as required. Ferries are the best answer, and a speedy solution to river crossings, especially down stream into the estuary.

It should be calculated how many ferries can be supplied for the £80-100m estimated costs of the proposed Rotherhithe Cycle and Pedestrian Bridge, for instance. Also the years of disruption at the landward ends of the bridge need to be recognised, and that the ends of the bridge take up valuable and scarce space. Another issue is that many cycle routes would be funnelled towards the bridge, rather than having ferry terminals spaced along the river at convenient locations to spread the load and give the cyclists more choice.

To provide cross river connections for the proposed opportunity areas eastwards, a selection of routes for pedestrian and cycle ferries (and small freight) would be very effective, and there is also an opportunity for a lorry ferry similar to the Woolwich Ferry. The new ferries at Woolwich are soon to be delivered, and their improved timetable and efficiency will be an encouragement for another large ferry further downstream.

There is no question of holding back growth and development to the east of London without road bridges and tunnels, as a new generation of ferries will provide a satisfactory service in many fewer years at a fraction of the costs, and that is apart from having the experience of a boat trip instead of more miles by road.

Again, the waterways have the answer – so why do the Mayor and GLA sideline them?

Lost rivers – lost without a trace

There are many tributary rivers in London that are only known by name, such as the Fleet, Tyburn, Westbourne, Effra and Walbrook, as they have disappeared underground, and unfortunately often ended up in the sewer system.

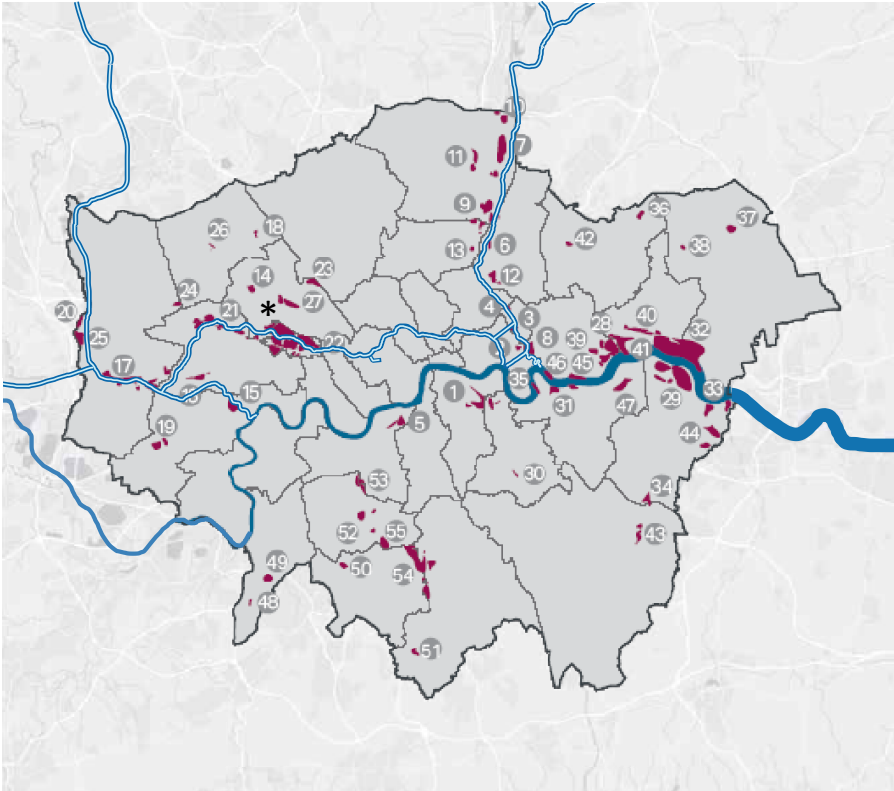
The opportunity should be more readily available to unearth some of these heritage waterways, which would be a very attractive and popular project, and would fairly readily attract some funding.

In West London a campaign is gathering support to seek and recover Stamford Brook, which could surface as it passes across the edge of Wormwood Scrubs, and further sections opened up and the concrete culvert ‘broken out’ which would make a suitable feature for the Mayor’s OPDC Old Oak and Park Royal development. Nearby is the hidden Counters Creek which will not be recoverable as it has been seriously compromised by a rebuilding of a sewer, so the opportunity is now lost!

Upgrade the LP maps with the Thames shown as the backbone and heart of London

Continuing on the subject of maps in the Draft London Plan it would be informative and sensible to include additional Thames and canal details. The Thames should run right through on all maps (obviously), and further waterways details shown where relevant, for instance:

Figure 6.2 Strategic Industrial Locations (revised)



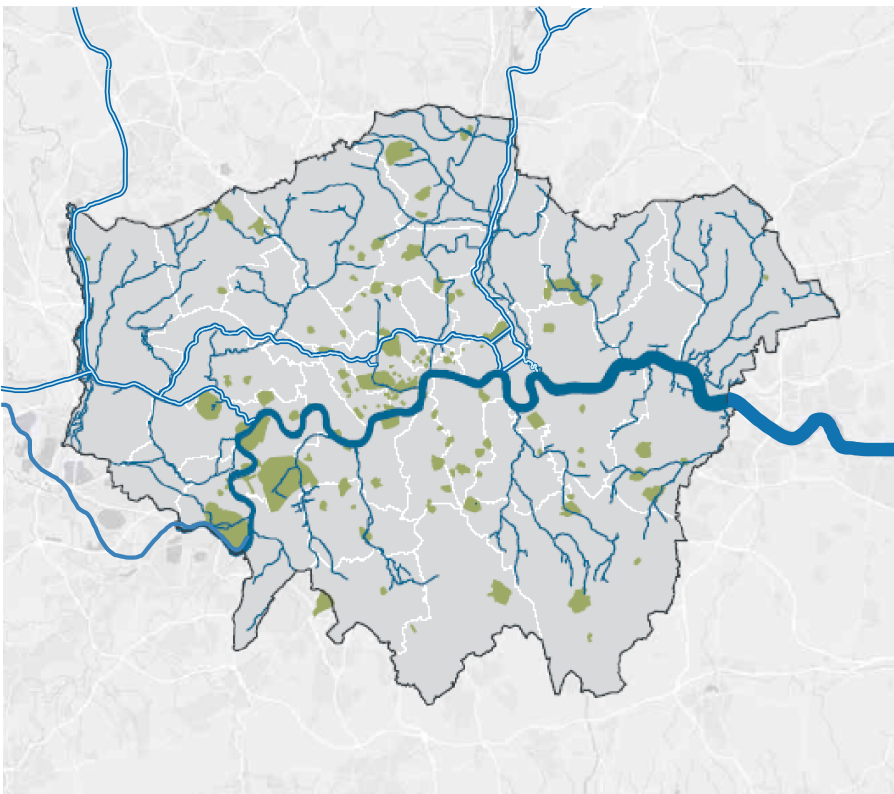
It is relevant that many of the industrial areas (SILs) are gathered around waterways, which indicates how important waterways have been for centuries in the growth and economy of London.

It makes no sense for visual representation of the city to show the Thames as a key transport route which stops at the city boundary!

It is also very revealing that the canals can continue to play an important role in the SILs as a transport route, such as at Park Royal (*).

It is hoped that logic and common sense will prevail.

Figure 7.3 London's Waterways and Registered Historic Parks & Gardens (revised)



It would seem obvious that a map dealing with 'London's Waterways' would do its best to represent the extent and potential of the waterways, including the Thames running right through the map area rather than being cut off.

The full extent of the canals is also important as a backbone of London's development, as well as future role as an important transport route.

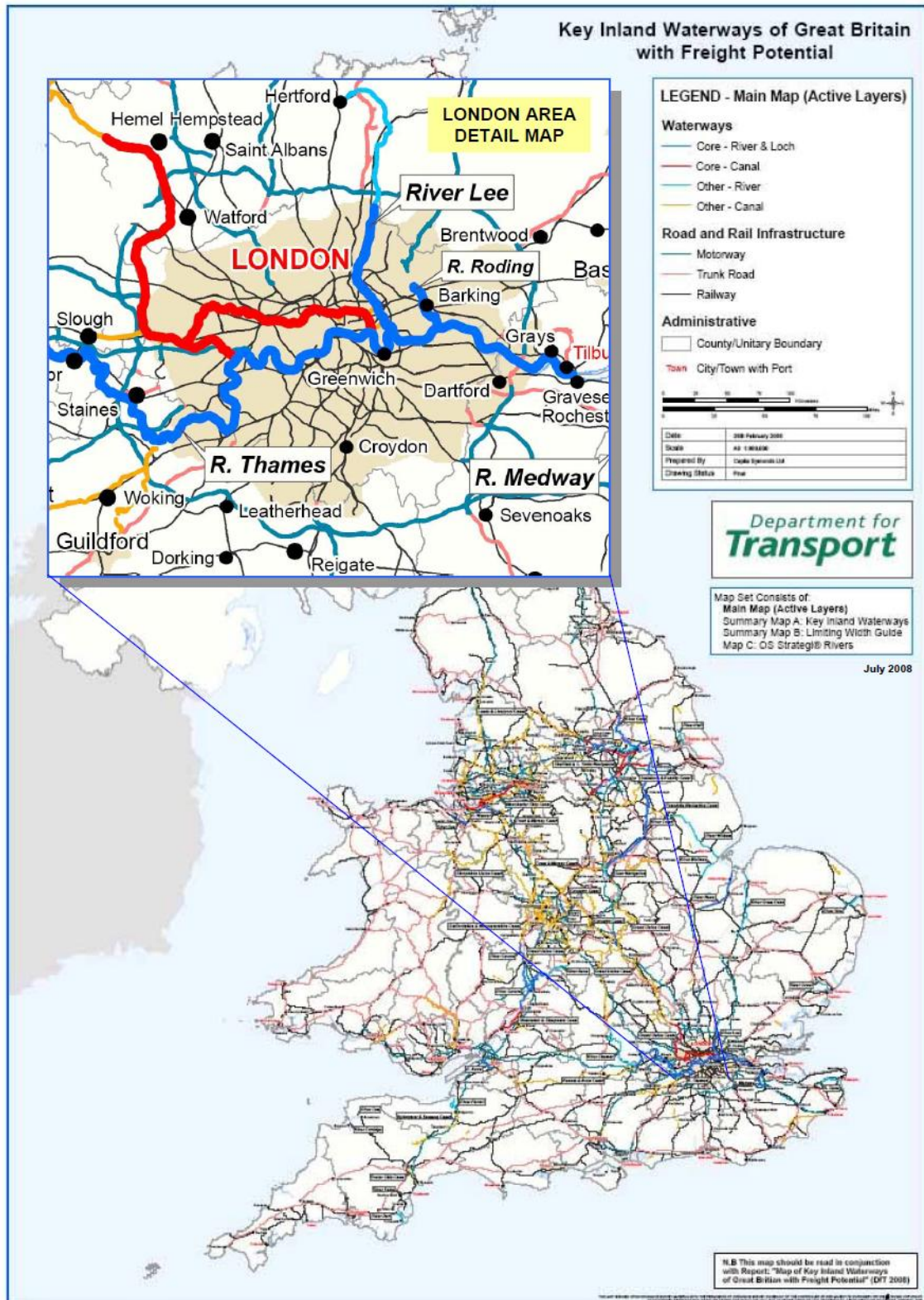
Of course, the tributary rivers also have an important place in London Life, and it is relevant that they are linked with parks and gardens. This may even result in more of the concrete channels being open up and 'greened'.

Recognise the freight potential of London's Waterways

For many years freight has been promoted by numerable authorities and government, but this potential has not been realised, and certainly not developed, by the Mayor (or previous Mayors) and the GLA. This map showing London's waterways, including the canals and the Lee Navigation as Key Inland Waterways of Great Britain with Freight Potential was promoted by Government in 2008, and it is about time it was recognised.

DfT DEPARTMENT FOR TRANSPORT

KEY INLAND WATERWAYS OF GREAT BRITAIN WITH FREIGHT POTENTIAL



Canal Water Freight Project

London's canals are virtually ignored by the Mayor and GLA, yet their strategic importance to the city is considerable. Without any interest or practical assistance from the authorities, nor even a mention in the Draft London Plan a water freight project is being developed, and focussed on the 2,000 businesses in Park Royal, where the Grand Union Canal runs through their centre.

• LONDON'S WATER FREIGHT INDUSTRY •

COLLECTIONS AND DELIVERIES BY CANAL

'BARGING AROUND LONDON'

Daily and weekly delivery and collection service at the canalside near you

Your local water freight service

LINK TO A40/M40

LINK TO A40/M40

LINK TO M4 AND HEATHROW

LINK TO A40

LINK TO A12/A13 & Blackwall Tunnel

BRIMSDOWN AND M25

NORTH CIRCULAR INTERCHANGE

LINK TO RAIL

LINK TO A40

LINK TO A12/A13 & Blackwall Tunnel

Legend:

- Green line: Paddington Arm
- Red line: Grand Union Canal
- Yellow line: Slough Arm

Legend:

- Black line: Regents Canal
- Blue line: Hertford Union Canal
- Pink line: Limehouse Cut
- Blue line: Lee Navigation

PARK ROYAL TIMETABLE*

PALLETS, SMALL CONTAINERS, PODS, ROLL CAGES, TROLLEYS, CRATES, PARCELS

Hayes

Greenford

N Circular

Park Royal

Old Oak

A40 Link

Paddington

Bulls Bridge

Lyons Dock

Brent Wharf

Northfields

Powerday

Kensal Green

Stone Wharf

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Leave each end at 0830 hrs and 1400 hrs

Estimated arrival times at the canalside near you - by App

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Brent Wharf

• THE NORTH CIRCULAR SHUTTLE •

Last mile delivery and despatch at various locations via the main road-linked depot - by arrangement and as required

Park Royal Freight

A canalside near you

• LOCAL FREIGHT PRIORITY •

Pallets, small containers, pods, roll cages, trolleys, crates, parcels from here to there by robot transport on an electric zero emissions barge

LONDON'S KITCHEN DELIVERIES

- Famous products transported environmentally and on time for London to be well fed

BEER BARGE

- Deliveries to a popular canalside pub or bar near you from a range of micro breweries and bottlers

SUPPLIES AND RAW MATERIALS

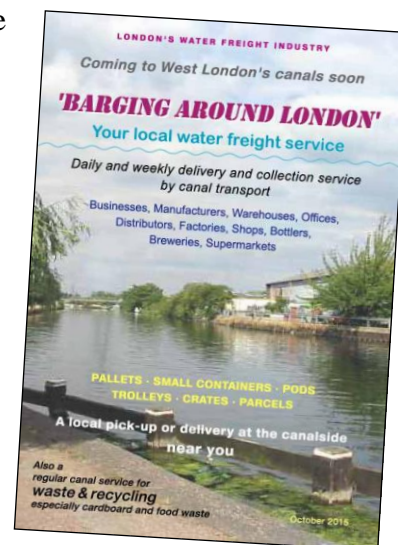
- Goods and supplies for your business and manufacturing brought quietly and calmly to a local drop-off point

Project Coordinator : Del Brenner, secretary@regentsnetwork.org

The prospects of the return of canal freight are very encouraging, and the canals could have a multi-million benefit to the economy of London.

The project has been developed through the Mayor's former London Waterways Commission Freight Group, in association with UCL University College London, the Commercial Boat Operators Association and the Just Space Network. It may not be long before the new fleet of electric barges will be operating around West London, and the service will then be extended throughout London's 100 mile canal network, and on to the Lee Navigation, London's second river.

As well as the localised freight project at Park Royal which is titled 'Barging around London', there is a range of uses and benefits that the GU Canal can bring to West London. An obvious one is the removal of waste and recyclates rather than using the very large road transport vehicles, as water transport is well suited to bulk loads.



In that connection, barges can be used effectively, and with 80% less air pollution, for the removal of building and demolition waste which will be crucial with the development of the OPDC area and the construction of HS2 including the huge tonnage of excavation waste from the tunnelling work. Just consider how many hundreds of huge lorries will be taken off the local roads in West London.

Sadly, in the meantime the canals are becoming more static under the current 'management' of the Canal and River Trust Limited; they are still beautiful, but at a standstill. But CRT Ltd whose major role is as a Navigation Authority, does not seem to have anything to do with transport at all, strangely!

Reinstate the Blue Ribbon Network

The important and well known title of Blue Ribbon Network was expunged without ever being mentioned in the preliminary stages of the Draft London Plan development. It was a determined decision taken behind closed doors, and no reason has been given in spite of enquiries being made.

Some information of the revisions of the Draft Plan were revealed at preliminary meetings with the London Plan Team, although not in any detail, and there was not a whisper of undermining one of the fundamental attributes of London's waterways and their optimistic future which was exemplified in the popular and expressive title 'Blue Ribbon Network'.

It is doubtful if the Mayor and GLA can be said to have consulted at the formative stage of the development and drafting of the new London Plan, when the preliminary meetings were superficial and undefined. Certainly the complete smothering of the fundamental title change for London's waterways was not in accordance with the consultation guidance of the Supreme Court in their judgement of October 2014.

The Mayor and GLA risk being challenged over the legality of removal of the waterway title 'Blue Ribbon Network' without any clear justification or prior consultation.

Del Brenner
Regents Network
and an associate of the London Forum and Just Space

2nd March 2018