

**City of London
Thames Strategy
Supplementary Planning Document
Consultation Statement
June 2015**



Introduction

The City of London Corporation is preparing a Thames Strategy Supplementary Planning Document (SPD) to provide guidance on the application of Local Plan Policies for the Thames Policy Area.

Consultation requirements

Consultation on the draft City of London Thames Strategy SPD took place between the 18th March and 30th April 2015. The following stakeholder groups were consulted:

- Statutory consultees as identified in the City of London Statement of Community Involvement
- Stakeholders who have expressed an interest in planning policy and are included in the Development Plans consultation database.
- City of London Members (Planning &Transportation Committee January 2015)
- Key officers from City of London Corporation Departments

Under the Duty to Co-operate the following organisations were approached for comment : Mayor of London, City of Westminster, LB Tower Hamlets, LB Southwark, LB Lambeth, LB Bexley, Environment Agency, Historic England, Natural England, Marine Management Organisation, Highways Agency, City & Hackney Clinical Commissioning Group, NHS England, Civil Aviation Authority, London Enterprise Panel, Office of Rail Regulation, Local Nature Partnership, Port of London Authority, Thames Water, Inner Temple (Honourable Society), Middle Temple (Honourable Society), Bankside Neighbourhood Forum, Bermondsey Neighbourhood Forum.

The draft City of London Thames Strategy SPD was made available on the City's web site. Printed copies of the City of London Thames Strategy SPD were made available at the Department of the Built Environment Enquiries Desk and the City's five libraries, during their normal opening hours.

Responses

The consultation period triggered approximately 80 comments from 17 respondents. All representations were reviewed and appropriate changes made to the Thames Strategy. Table 1 shows the comments received and the City Corporation's response to each comment.

Table 1 Comments received in response to the public consultation on the draft Thames Strategy SPD.

Rep	Name	Organisation	Comment Highlighting identifies the main point of each comment All comments have been reproduced in full except where ** indicates that a comment has been summarised.	City of London Response (bold text indicates change strike through denotes deletion and <u>underlining</u> denotes additional text)
1/1	Keith Bottomley	N/A	I have lived very close to the river Thames for 18 years and have worked in the City for the same length of time. I am planning to put my name forward for the forthcoming by-election in Bridge Ward and have taken the opportunity, as a local resident, to seek the views of people who have a particular connection with that Ward and also more general views about the riverside . I hope that these views are useful and make a constructive contribution as part of the public consultation.	Comment noted No change needed
1/2	Keith Bottomley	N/A	<i>What particular places and qualities make the river special to you?</i> Its openness, history, pedestrian walkways and the changes of character from section to section are seen as making the river special. The whole length of the riverside walk is the quintessential hallmark of the City of London. Having good views is seen as particularly important. People appreciate the interface between maintaining the history of the river and the need in a modern society to provide facilities that allow for progression and technological development. The mixture of historic and modern buildings provide a unique setting along the river but care needs to be taken to ensure any new buildings do not compromise the look of the City and detract from its historical importance.	Additional Bullet Point added at 3.3 <u>• Opportunities for conservation of heritage assets, ensuring that new development does not detract from these assets and their settings.</u>
1/3	Keith Bottomley	N/A	<i>What are your favourite buildings and spaces along the river?</i> People mentioned spaces both north and south of the river. They included Custom House and Billingsgate, Tower Bridge, London Bridge, Butlers Wharf/Shad Thames, Tower of London, Tate Modern frontage, Clink Street. The first floor public viewing area to east of St Magnus the Martyr and Fishmongers' Hall. The view from the river of St. Pauls was also mentioned.	Each of these buildings is mentioned in the Thames Strategy <ul style="list-style-type: none"> • Custom House & Billingsgate (para 7.23.1) • Tower Bridge & London Bridge (para 7.39) • Public viewing area east of St Magnus the Martyr (para 7.27.1) – this paragraph has been amended to include reference to the public viewing area. • Fishmongers Hall (para 7.18.1) • View of St Paul's from the river (para 4.5.1) Butler's Wharf/ Shad Thames, Tate Modern frontage and Clink Street are in the London Borough of Southwark therefore it would be inappropriate to include them in this strategy.
1/4	Keith Bottomley	N/A	<i>What important features should be incorporated into any new developments? For example, shared uses and public facilities, new pedestrian routes through large schemes, interesting design features and use of materials etc.</i> Any new developments should not interfere with the objective of opening up the river walkway . There is a unique opportunity to incorporate some	Improvement in pedestrian routes and completion of the riverside walk are emphasised in several places within the Thames Strategy. The encouragement for office led commercial development is intended to include provision of cafés and restaurants where appropriate. (para 2.4.1) Paragraph 3.3.1 emphasises the need to protect the river for river

			<p>attractive cafes/restaurants which will allow people to enjoy the views of the river.</p> <p>There should be no loss of river space to non-river uses. The introduction of planted areas/pocket parks would be welcome. Avoid shops and cafes bars etc. other than in ground floor of buildings. Additional toilets should be provided. Public routes through and additional public spaces and green areas would be a good idea. New pedestrian routes, particularly west of London Bridge would help.</p>	<p>related uses</p> <p>Para 5.1.1 has been amended by adding the following sentence: <u>Public toilets are provided in two locations on the riverside and participation in the Community Toilet Scheme adds to provision</u></p>
1/5	Keith Bottomley	N/A	<p><i>How do you use the open spaces now, and what do you feel is lacking in the open spaces that could improve use in the future? For example, new amenities, such as additional seating, or space for new pursuits</i></p> <p>The main aim should be the achievement of a continuous riverside walkway. The introduction of planted areas/pocket parks is also desirable. More and better seating to allow for relaxing and taking in the ambiance will add to enjoyment. Also some open buildings worth visiting.</p>	<p>The role of the Riverside Walk Enhancement Strategy in identifying potential for planted areas, pocket parks and additional seating is recognised in the Thames Strategy.</p> <p>The majority of buildings along the riverside in the City are in private ownership. Greater public access to them could bring benefits by making the area more permeable but would need owner support.</p> <p>No change needed</p>
1/6	Keith Bottomley	N/A	<p><i>What type of businesses and/or shops do you feel are lacking and would like to see more of along the river? For example, which independent retailers do you support and value? Do you feel there would be local demand for small office or workshop spaces, etc.?</i></p> <p>The river should not become a shopping street. There would always be demand for small office or workshop space on the river at affordable rent, but good location is invariably available only at a premium for housing and business and City riverside land is surely a hugely valuable and hence expensive commodity. How can space be made affordable for small businesses who would not be able to afford to rent spaces along the river which are likely to fetch premium rates and also the City tends to be a bit empty in the evenings at certain times of the year.</p> <p>Retail over shops; workshops with crafts over offices; offices overhead are seen as attractive options.</p>	<p>The encouragement for office led commercial development could include workshops and retail as long as they do not conflict with residential amenity or neighbouring uses.</p> <p>No change needed</p>
1/7	Keith Bottomley	N/A	<p><i>What would make the streets more attractive and user-friendly? For example, shared use of streets by both vehicles and pedestrians, better crossings etc.?</i></p> <p>The city is famous for its passageways, alleys and pedestrian streets. Creation of spaces of this kind, away from areas of heavy through traffic should be the overriding aim. Active frontages are needed at ground level with work spaces of all kinds as necessary above.</p> <p>Better signage is required to direct people to and from the river and other sights and places of interest. Consideration should be given to use of Lower Thames Street as a cycle and pedestrian area over cars, and less intimidating and easier / quicker crossing of Lower Thames Street.</p>	<p>The Riverside Walk Enhancement Strategy identifies areas along the riverside where signage should be enhanced.</p> <p>The Mayor is implementing proposals for an east west Cycle Superhighway along Thames Street. (Para 7.4)</p> <p>Para 7.4 has been updated to reflect implementation of cycle superhighway</p>
1/8	Keith Bottomley	N/A	<p><i>How can access to the river be improved?</i></p> <p>Creation of a continuous walkway but not on or at the expense of river space should be the aim. Clearly marked and organised routes from all Underground Stations. More map boards, especially at Monument.</p> <p>Part of the walkway in front of customs house should be opened up as it is</p>	<p>The Riverside Walk Enhancement Strategy promotes improved signage and enhanced public access at Custom House.</p> <p>No change needed</p>

			quite restrictive.	
1/9	Keith Bottomley	N/A	<p><i>Would you like to see Swan Lane Pier re-opened?</i></p> <p>The prevailing view is yes. Use will depend on which services will be accessed from it. It would allow use of the water transport to get to Canary Wharf without having to walk across London bridge or to the Tower which is often quite congested. Water taxis would be a great addition.</p>	<p>Reinstatement of Swan Lane Pier is an aspiration included in the Thames Strategy (para 5.6.1, 7.20.4 and 7.22.1)</p> <p>No change needed</p>
1/10	Keith Bottomley	N/A	<p><i>Are there any other themes that the strategy should include? These might be related to the qualities and places you think make the riverside special.</i></p> <p>Incorporate a variety of places, small piazzas and other pedestrian spaces. No vehicles or cycles on river frontage. More soundscapes, which are particularly appreciated by blind and partially sighted would be very welcome. The front of Customs House should be made wider.</p>	<p>Paragraph 5.1.1 emphasises that cycling and skateboarding are not permitted on the riverside walk.</p> <p>Paragraph 5.4.1 promotes the use of soundscapes as an element of inclusive design.</p> <p>No change needed</p>
1/11	Keith Bottomley	N/A	<p><i>Are there any other comments that you'd like to make regarding the river more generally, outside those directly related to Bridge Ward?</i></p> <p>The Thames path along the south bank is surely London's most popular and most used urban "park". It is a great and safe way to enjoy the City and Westminster. The north bank offers great opportunities to match it, initially between Blackfriars Bridge and the Tower of London, at least.</p>	<p>It is important to strike a balance between vibrancy and quiet spaces on the City's riverside, recognising the role it plays in supporting the commercial City, providing visitor routes between attractions and maintaining amenity for riverside residents and residential uses.</p> <p>No change needed</p>
2/12	David Coleman	N/A	<p>I am responding to your recent invitation for comments.</p> <p>I was Regional Director of the Countryside Commission when the Thames Path National Trail was designated and I should like to comment on the treatment of public access to the riverside.</p> <p>The City has an outstanding record in rising to the challenge of forging new riverside access in such a challenging environment. The vast increase in public use of the riverside over the past 30 years has clearly demonstrated the public and tourism benefits which flow.</p>	<p>Comment noted</p> <p>No change needed</p>
2/13	David Coleman	N/A	<p>Section 5.3 should be worded much more forcefully, making it clear that completion of a continuous riverside path is a high priority and setting a stretching target date. If redevelopment opportunities are likely to be delayed, construction of a temporary cantilevered walkway should be considered. The weak language of "longer term aim" (7.14); "wherever possible" (7.19); "access ... will be sought" (7.25.2) does not reflect the scale of public benefits which this measure will deliver.</p>	<p>Change the wording as follows:</p> <p>para 7.14 "...Completion of the Riverside Walk at Queenhithe is a longer term aim- Planning permission has been granted..."</p> <p>para 7.19 "Enhancing riverside open space is a key ambition with inclusive public access wherever it is possible, bearing in mind that the stretch of riverside walk from Queenhithe to Cousin Lane is rather narrow"</p> <p>para 7.25.2 "Greater public access and more inclusive use of these spaces will be sought would be expected to complement any redevelopment."</p>
2/14	David Coleman	N/A	<p>Your Open Spaces Strategy notes that the riverside is one of only three areas in the City which meets the World Health Organisation guidance for noise levels in gardens and recreation areas. Peace and quiet is, for obvious reasons, a very rare commodity in the City and one much valued by workers, residents and visitors.</p>	<p>It is important to strike a balance between vibrancy and quiet spaces on the City's riverside, recognising the role it plays in supporting the commercial City, providing visitor routes between attractions and maintaining amenity for riverside residents and educational uses. The Thames Strategy provides this balance emphasising the need to protect residential amenity and avoid undesirable impacts on the City</p>

			<p>It should not be City policy to "enliven" the riverside (5.2.3; 5.3.2; 7.5.2; 7.5.3; 7.20.1; 7.27.1). Quite the reverse. The South bank is exceedingly lively; the USP of the City stretch of the North bank is peace and quiet. SPD should establish this as the guiding principle, making it clear that planning permission will not be granted for uses likely to erode the peace and quiet of this resource.</p> <p>This change will also help meet your concerns about residential amenity (7.14; 7.15.1; 7.30.2) and impacts on City of London School for Boys (5.2.2; 7.9).</p>	<p>of London School for Boys. No change needed</p>
3/15	Michael V Cooper	N/A	<p>St Magnus House at 3 Lower Thames Street is not a 1960s building, but was constructed between 1977 and 1980 following the closure and demolition of New Fresh Wharf. https://en.wikipedia.org/wiki/Fresh_Wharf#/media/File:New_Fresh_Wharf_near_London_Bridge.jpg</p>	<p>Text amended to state that both buildings were completed in the 1980s</p>
3/16	Michael V Cooper	N/A	<p>The draft planning document states that "The primary planning aim for this stretch of the riverside is that it should provide office led commercial development with associated uses which serve the needs of the business City. This could include retail and conference or event space which would not be compatible with residential development." I would like to suggest that a narrow focus on office development may not be commercially viable and overlooks more creative uses for the area.</p> <p>The riverside between St Magnus the Martyr church and old Billingsgate Market has only been used as office space since the 1980s. Both buildings are unloved. Northern & Shell (with whom I have no connection) has already convincingly explained why an office redevelopment on this site would be commercially unviable. There seems to be no good reason why other uses, including residential, hotel and tourism as well as retail should not be allowed. This could recreate the multi-purpose usage and feeling of community that existed in the area until the 1970s. New Fresh Wharf and Billingsgate Market are history, along with the businesses (such as Joe's Number One Snack Bar at 1 Lower Thames Street) that served them. However, it is surely time to start to reverse the disastrous planning decisions of the 1960s and 1970s, included the widening of Lower Thames Street and the demolition of the Coal Exchange, that has made the area so sterile.</p>	<p>The Local Plan policy CS 9 and Thames Strategy SPD both emphasize Office led commercial development. This does not preclude supporting uses such as hotels, conference and event space and retail which would enliven the area without compromising residential amenity in the existing residential cluster at Queenhithe.</p> <p>The issue of land use along the riverside was considered at the Local Plan examination in October 2014. The Inspector's Report stated that "Policy CS9, which gives more emphasis to office-led commercial development along the Riverside, than was the case in the Core Strategy, is sound in view of the likely pressures for residential development. I am satisfied that the site specific viability considerations are able to be given due weight, and that the City Corporation has already demonstrated sufficient flexibility in that process. Therefore I do not support any different approach for the Thames Riverside."</p> <p>Since this Local Plan policy approach was found to be sound at examination, it would be inappropriate to alter it through a Supplementary Planning Document.</p> <p>No change needed</p>
3/17	Michael V Cooper	N/A	<p>Until the Second World War Fresh Wharf was used not only for cargo, but also for passenger boats. The entrance to Fresh Wharf advertised daily sailings and establishments such as the Adelaide Hotel (on the site of Adelaide House) and the Steam Packet Inn on Lower Thames Street catered for tourists and day trippers travelling by boat. There may be scope for a new pier at Fresh Wharf and a new hotel. In any event there is scope to combine:-</p>	<p>The Thames Strategy promotes the reinstatement of Swan Lane Pier and does not preclude the development of additional piers at other locations.</p> <p>The Riverside Walk Enhancement Strategy and the Thames Strategy demonstrate a strategic approach which includes improvement of access between the river and Lower Thames Street (para 5.5.1)</p> <p>Paragraph 5.5.1 has been amended to add details of the mechanism for improved access across Thames Street. 5.5.1 The City of London</p>

			<p>a) the riverside walk enhancement strategy,</p> <p>b) better North/South access between the river and Lower Thames Street,</p> <p>c) further improvements to allow pedestrians to cross Lower Thames Street, whether via crossings, footbridges or underpasses,</p> <p>d) the East-West Cycle Superhighway between Lower Thames Street and Tower Hill,</p>	<p>Corporation will continue to work with Transport for London, the Highway Authority for Upper and Lower Thames Street, on further improvements to existing pedestrian crossings and the introduction of new crossing facilities to further improve connectivity.....</p> <p>Para 7.4 identifies the East West and the North South Cycle Superhighways which will present challenges particularly at the Temple Place to Blackfriars Bridge.</p>
3/18	Michael V Cooper	N/A	<p>e) a cultural strategy, taking account of the fact that from Fishmongers' Hall and London Bridge to Tower Bridge and the Tower of London there is a rich diversity of cultural assets, including the Monument, Billingsgate Roman Bath House, St Magnus the Martyr church, old Billingsgate Market, the Custom House and the River Thames.</p> <p>Surviving monuments could be linked to the wealth of archaeological information that has been gleaned over recent decades and to historical resources, e.g. in respect of Old London Bridge and the Great Fire of London, to create a vibrant cultural quarter for the benefit of tourists, residents and City workers.</p> <p>I would therefore urge the City Corporation to revisit its planning assumptions and think much more creatively about the potential uses for this stretch of the riverside.</p>	<p>Paragraph 7.23.1 highlights the wealth of heritage assets particularly in the London Bridge to Water Lane section of the riverside and paragraph 7.24 emphasises the need to identify suitable future uses for historic buildings in the area, which conserve and enhance their historic significance and commercial heritage.</p> <p>Paragraph 7.4 has been amended to include reference to the Riverside Walk Enhancement Strategy which promotes improvements to make the area more attractive for tourists, residents and City workers.</p>
4/19	Peter Massini	All London Green Grid	<p>Government guidance indicates that: 'Local Nature Partnerships are not subject to the requirements of the duty. But local planning authorities and the public bodies that are subject to the duty must cooperate with Local Enterprise Partnerships and Local Nature Partnerships and have regard to their activities when they are preparing their Local Plans'.</p> <p>The All London Green Grid partnership is recognised by Defra as the LNP for London. However, like many other LNPs, the All London Green Grid partnership does not have a governance structure that allows it to speak with a single voice on matters such as statutory consultations.</p> <p>Nevertheless, provided the Thames Strategy is in conformity with London Plan policies with regard to policies on green infrastructure, biodiversity, trees & woodland, and the Blue Ribbon Network your authority will be having regard to the activities and objectives of the London LNP.</p>	<p>This strategy is in line with the City of London Local Plan, which is in conformity with the London Plan.</p> <p>No change needed</p>
5/20	John Schofield	City of London Archaeological Trust	<p>p30 para 30. You have confused the two Baynard Castles. The first, established 1087, was to the north, on the west side of St Andrew's Hill. But this is outside the area being discussed, so rephrase this para as:</p>	<p>Paragraph 7.8.3 altered to read: Baynard's Castle was originally built in 1087 on the west side of St Andrew's Hill, and destroyed to build the Blackfriars priory after 1275. A</p>

			Baynard's Castle was originally built in 1087 on the west side of St Andrew's Hill, and destroyed to build the Blackfriars priory after 1275. A separate castle-like house called Baynard's Castle was built on the waterfront after about 1470. The foundations.. [continue]	separate castle-like house called Baynard's Castle was built on the waterfront after about 1470. The foundations.. Baynard Castle scheduled ancient monument was built in 1087 and destroyed to build Blackfriars Priory in 1275
5/21	John Schofield	City of London Archaeological Trust	p32 para 7.13.3 put the sentence about the Scheduled Ancient Monument at the end of the previous paragraph, where it belongs.	Text moved as suggested
5/22	John Schofield	City of London Archaeological Trust	p37 para 7.27.1. The W of the two buildings between St Magnus and Billingsgate market is of 1978, not the 1960s.	This building was completed in 1980 Text amended to state that both buildings were completed in the 1980s
5/23	John Schofield	City of London Archaeological Trust	p38 para 7.28.2. Not correct. All Hallows is of Anglo-Saxon date, as witnessed by the arch in its tower which survives, and although badly bombed in World War II, is medieval in outline. Its tower is of 1658.	Paragraph 7.28.2 altered to read: All Hallows Church (Grade 1 listed) is of Anglo Saxon date, as witnessed by the arch in its tower which survives and although badly bombed in World War II, is medieval in outline. Its tower is of 1658. was established in 675AD and rebuilt several times. The current church dates from 1658 and is Grade 1 listed.
6/24	Simon Vince	Heathrow Airport Ltd	** this response has been summarised** The three draft Supplementary Planning Documents for the City of London have been examined from an aerodrome safeguarding perspective and although we have no safeguarding concerns we would like to add the following comments. Aerodrome Safeguarding Aerodromes important to the national air transport system are officially safeguarded by the Civil Aviation Authority and the process of ensuring that their operation and development is not inhibited is an integral part of the town planning system. <i>This should take account of building height & structure, potential for electronic interference, lighting, bird strikes.</i> <i>Developers should engage early with the Planning Authority and the airport operator and consult the safeguarding map. Mitigation measures should be used wherever possible.</i> <i>The Planning Authority should consult the airport operator Civil Aviation Authority (CAA), NATS En Route Ltd. (NERL) and the Ministry of Defence (MOD) on any wind turbine development within 30 miles of Heathrow</i>	Comment noted No change needed
7/25	Katharine Fletcher	Historic England	Thank you for the opportunity to comment on the Thames Strategy SPD setting out the policies and strategy for the Thames Policy Area in the City of London. As the Government's statutory adviser on the historic environment Historic England is keen to ensure that the protection and enhancement of the historic environment is fully taken into account at all stages and levels of the planning process. In the context of this consultation we should mention that Historic England has recently been formed from a division of the responsibilities of English Heritage. From 1 April 2015 Historic England takes forward the role and responsibilities for providing historic advice previously provided by English	Comment noted No change needed

			<p>Heritage. The name of English Heritage is retained for the new charity caring for the National Collection of historic properties. As Historic England, we continue to protect and champion England's wider historic environment. This includes listing, planning, grants, research, advice and public information.</p> <p>The Thames Policy Area contains heritage assets of great significance. In addition to listed buildings, conservation areas and registered historic parks and gardens, the archaeology of the area is nationally important, and comprises both scheduled monuments and undesignated archaeological remains. The Thames foreshore is London's most extensive archaeological site. The contribution of the Thames riverside area in the City to the setting of the Tower of London World Heritage Site (WHS) just outside the policy area is also a key consideration.</p> <p>We welcome the recognition in the document of the long history of this area, and the influence of this on the present townscape and cultural interest above and below ground. The heritage assets are a defining quality of the riverside and represent a positive resource both for their intrinsic historic interest and also for their contribution to economic and social values. Conserving and enhancing the riverside heritage is sustainable in every sense.</p>	
7/26	Katharine Fletcher	Historic England	<p>While we support the high profile given to the significance of heritage in the City's Thames Strategy document there are some ways we suggest that this should be strengthened. These are as follows:</p> <p>1. The objectives for the strategy are set out in para 1.5. Within these there is a need to reconcile the demands made on the Thames, in terms of increased river transport (objective 2), with the related impacts this may have, including on the conservation of heritage assets (objective 3). The heritage assets of the Thames foreshore are highly vulnerable to erosion. It would therefore be helpful to include a section on balancing and reconciling potentially conflicting interests. This would align the SPD with the approach in paras 8 and 152 of the National Planning Policy Framework (NPPF).</p>	<p>The following sentence has been added to paragraph 1.5 : <u>Balancing and reconciling potentially conflicting interests arising from these objectives is an important intention of this strategy.</u></p>
7/27	Katharine Fletcher	Historic England	<p>2. The Future Issues identified in section 3.3 should include a bullet referring to the opportunities for conservation of heritage assets, and the potential vulnerabilities of this resource. The document identifies some of the key issues and challenges relating to the historic environment in section 7.</p>	<p>Additional Bullet Point added at 3.3 <u>• Opportunities for conservation of heritage assets, ensuring that new development does not detract from these assets and their settings</u></p>
7/28	Katharine Fletcher	Historic England	<p>3. Since the historic environment is a continuum the boundary of the SPD area is, in this sense, an artificial one. Figure 2 highlights this problem – the full extent of scheduled monuments that span the boundary are shown, helpfully, where they lie outside the area; however, where there are scheduled monuments on the border to the north they are not shown. We suggest that Figure 2 identifies all heritage designations immediately bordering the area, including the World Heritage Site. It would be suitable to emphasise that, in line with the historical description in the SPD, the riverside area has a strong relationship to its hinterland. In this respect the</p>	<p>Figure 2 shows heritage assets in the Thames Policy area. Where an asset is partially within the Thames Policy Area it has been shown. Showing assets that are wholly outside the area or indeed outside the City would be confusing. The Thames Foreshore is not a specifically designated Heritage Asset – it is an area with archaeological potential in common with the whole of the City. Therefore it would be inappropriate to mark it on the map</p> <p>Paragraph 2.4.3 has been amended with the following additional sentence:</p>

			section detailing policy from adjoining boroughs is useful, and it is a matter of drawing the point out more fully. We further recommend that the archaeological significance of the Thames foreshore is identified in Figure 2, and explained in section 4.	<u>The Thames foreshore is of particular archaeological significance.</u>
7/29	Katharine Fletcher	Historic England	4. The Tower of London World Heritage Site is rightly given prominence in the document within section 4. Its setting should be understood in terms of the wide definition in the NPPF ie. it encompasses 'the surroundings in which a heritage asset is experienced'. As the extent is not 'fixed' it should be made clear in the document that consideration of setting applies to a wider area than the 'locally defined setting' or the areas lying within the Mayor's LVMF views. While this point requires particular clarification in relation to the Tower of London it also has relevance in respect of the Monument, and other heritage assets in the area.	The Local Plan Policy DM12.1 requires developers to take account of the impact of development on the setting of heritage assets. There is no need to repeat this guidance in the SPD. The City of London Corporation will apply the Protected Views Policy CS13 and the City of London Protected Views SPD. In addition to this Historic England will have the opportunity to highlight any issues related to the surroundings in which a heritage asset is experienced through their role as statutory consultee on planning applications. Paragraph 4.6.1 has been amended to include reference to the Protected Views SPD as follows: Where necessary developers should provide evidence with the application of how their development proposal responds to the protected views requirements in line with the City of London Protected Views Supplementary Planning Document
7/30	Katharine Fletcher	Historic England	5. Historic England supports inclusive design in relation to access to the Riverside Walk, as outlined in section 5.4. Our guidance on this matter is available on our website at: https://www.historicengland.org.uk/advice/technical-advice/easy-access-to-historic-buildings-and-landscapes/ . We would be pleased to discuss proposals where sensitive adaptation of heritage assets is required.	Support noted No change needed
8/31	Heather Hilburn	Historic Royal Palaces	We are pleased to see that the Draft Thames Strategy supports our vision of enhancing the experience of Tower visitors and protecting the Tower for future generations. In particular, we are pleased to see references to the Tower of London Local Setting Study and World Heritage Site Management Plan, as well as the protection of the Tower's Outstanding Universal Value.	Support noted No change needed
8/32	Heather Hilburn	Historic Royal Palaces	We are also pleased to see the detailed consideration of the character, issues and opportunities in the 'Water Lane to All Hallows by the Tower' and 'Mark Lane to Mansell Street' areas which form part of the Tower's Local Setting. We offer the following suggestions to build on the points you have made. Water Lane to All Hallows by the Tower As you have seen from our Tower Future Thinking Plan, we have been reviewing how we can better accommodate rising visitor numbers, in order to reduce the length of entry queues. To accomplish this objective, we anticipate a future need to extend the Thames Path south of Wharfinger Cottage. This would have the additional benefits of removing the present severance to the Thames Path and providing additional spectator space for river activities. Whilst Wharfinger Cottage is located in Tower Hamlets, the west side of a Thames Path extension would likely reach the City.	The following sentence has been included in the first bullet point of paragraph 7.29. <u>There is potential for improved integration of the Thames Path in the City with that in Tower Hamlets.</u>

			<p>We would like Thames Strategy to note the present severance in the Thames Path next to Wharfinger Cottage as an issue (paragraph 7.29) and note a potential opportunity to extend the Thames Path to overcome this (paragraph 7.32).</p>	
8/33	Heather Hilburn	Historic Royal Palaces	<p>Mark Lane to Mansell Street In future, we wish to welcome our visitors outside Tower Hill Underground Station, and provide them with information about the Tower and the surrounding area. We also want to make it easier for visitors to find the public execution site in Trinity Square Gardens. We would like to see the following text added at the end of paragraph 7.34.3</p> <p><i>It will be important to provide and maintain suitable public realm and wayfinding within and adjoining the hotel cluster, accommodating access to the hotels and Tower Hill Underground Station and amenity space for visitors to the Tower of London.</i></p> <p>This would echo a point made in the report in paragraph 7.29 in relation to the Water Lane to All Hallows by the Tower area.</p> <p>We believe that the Draft Thames Strategy represents a significant step forward and will be a valuable tool for future development. Please let me know if you wish to discuss our comments in further detail.</p>	<p>The following sentence has been added to paragraph 7.34.3: <u>It will be important to provide and maintain suitable public realm and way-finding within and adjoining the hotel cluster, accommodating access to the hotels and Tower Hill Underground Station and amenity space for visitors to the Tower of London.</u></p>
9/34	Hong Chen	London Borough of Tower Hamlets	<p>Thank you for inviting the London Borough of Tower Hamlets Council (LBTH) to participate in the public consultation on the draft Thames Strategy undertaken between 18th March and 30th April 2015.</p> <p>Tower Hamlets Council is keen to cooperate with the City of London Corporation and other relevant stakeholders to ensure that the Thames Strategy represents an approach that is in line with policies and strategies and provides a framework which benefits the wider Thames environment. In particular, we would like to work closely with you to address some key challenges identified in the consultation document (page 12) together. Our comments to the consultation document are set out as follows for your consideration.</p> <ul style="list-style-type: none"> Paragraph 4.2.3 states that development in the Thames and Riverside could affect some of the views and any potential impact should be assessed through Townscape and Heritage Impact Assessment. Development and its impact on the Tower Conservation Area (and other conservations areas and heritage assets) must be assessed as part of the Environmental Statement- Townscape and Heritage Impact Assessment. LBTH would welcome early consultation on proposals which might have an impact on the character of the Tower Conservation Area. 	<p>The City of London Corporation will apply the Protected Views Policy CS13 and the City of London Protected Views SPD. In addition to this the London Borough of Tower Hamlets will have the opportunity to highlight any issues related to the Tower Conservation Area through their role as statutory consultee on planning applications.</p> <p>Paragraph 4.5.1 has been amended to include reference to the Protected Views SPD as follows: Where necessary developers should provide evidence with the application of how their development proposal responds to the protected views requirements in line with the City of London Protected Views Supplementary Planning Document</p>

			<p>The most significant threat to the Conservation Area is the pressure for buildings of excessive height and bulk beyond its boundaries to the detriment of its character and appearance. In making any planning decision the impact upon the character and appearance of the Conservation Area must be considered. In the case of the Tower the setting and backdrop are critical to its character and must be protected and the City of London forms part of this setting and backdrop.</p>	
9/35	Hong Chen	London Borough of Tower Hamlets	<ul style="list-style-type: none"> Paragraph 5.1 Recreation – It is noted that cycling and skateboarding are not allowed on the riverside walk in the City. Our spatial policy (SP04) of the Core Strategy (2010) encourages to improve accessibility to and along waterspaces to maximise usability and promote these places for cultural, recreational and leisure activities. Cycling is allowed on the riverside walk in Tower Hamlets. 	<p>The riverside walk in the City is very narrow in places with restricted turns where conflicts between cyclists and pedestrians could be dangerous. It would be inappropriate to allow cycling and skateboarding on the City's riverside. The Mayor's east west cycle route will provide a segregated cycle route parallel to the Thames path along Thames Street.</p> <p>No change needed</p>
9/36	Hong Chen	London Borough of Tower Hamlets	<ul style="list-style-type: none"> Paragraph 5.2.4 Tower Millennium Pier – LBTH strongly supports to further explore the opportunities to connect the pier with the Riverside Walkway through public realm improvements at Three Quays and Sugar Quay. In addition, it is suggested consideration should also be given to improve the pier facilities due to its popularity with tourists. 	<p>Support noted Improved pier facilities would be located in the London Borough of Tower Hamlets. Their impact on the City's Riverside Walk would be considered through the normal consultation routes.</p> <p>No change needed</p>
9/37	Hong Chen	London Borough of Tower Hamlets	<ul style="list-style-type: none"> Paragraph 7.35.3 – Since the adoption of the Tower Hamlets Core Strategy in 2010, Aldgate (which is very close to Mansell street) has been gradually transformed with a mixed office and residential. This has been reflected in the emerging City Fringe/Tech City Opportunity Area Planning Framework, which states: "The pace of residential development in and around Aldgate means that the area is likely to be more residential in nature than envisaged when the last detailed master planning exercise took place." Tower Hamlets Council will take the changing nature of Aldgate into consideration in the process of reviewing its Local Plan. In order to resolve potential cross boundary policy conflicts, paragraph 7.35.3 should be amended as follows: <ul style="list-style-type: none"> "The City Corporation will continue to promote office-led commercial development on the riverside to support the business city, while taking account for mixed use development coming forward in Aldgate in line with the London Plan and Tower Hamlets' Local Plan". This is to ensure neighbouring boroughs to work collaboratively and effectively to resolve conflict development pressures and strike an appropriate balance in different uses and contribute positively to the river related uses." 	<p>Aldgate is outside the Thames Policy Area and is some distance from the River Thames. The City of London Local Plan Policy CS8 identifies Aldgate as an office and residential location and commits the City to identifying and meeting residents' needs.</p> <p>No change needed</p>
9/38	Hong Chen	London Borough of Tower Hamlets	<p>Tower Hamlets Council supports the overall approach set out in the consultation document. We would welcome the opportunity be more closely involved in any discussions around the above points if required.</p>	<p>Comment noted No change needed</p>
10/39	Angela	Marine	<p>** this response has been summarised**</p>	<p>Comment noted</p>

	Gemmill	Management Organisation	<p>Thank you for inviting the Marine Management Organisation (MMO) to comment on the above consultation. The MMO has reviewed the document and whilst we have no specific comments to make we would like to draw your attention to the remit of our organisation as you may wish to be aware of this in relation to the consultation.</p> <p>The MMO is responsible for preparing marine plans for English inshore and offshore waters. In our duty to take all reasonable steps to ensure compatibility with existing development plans.</p> <p>The East Inshore and East Offshore marine plans were published in April 2014. Until such time as a marine plan is in place for the South East plan area we advise local authorities to refer to the Marine Policy</p> <p>The MMO's guide for Local Authority planners explains what local council planners need to know about marine planning (https://www.gov.uk/government/publications/marine-planning-a-guide-for-local-authority-planners).</p>	No change needed
11/40	Gillian Fensome	Natural England	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>We have considered the contents of the documents submitted to us and confirm that we have the following comments to make:</p> <p>Riverside Walkway</p> <p>We note that opportunities to improve or enhance the Riverside Walkway are mentioned several times in the Thames Strategy SPD. We confirm that, if it is The Thames Path you are referring to, which is a nationally designated long distance walking route, we are in support of carrying out improvements or enhancements to it and to realigning it back to alongside the Thames.</p>	Support noted No change needed
11/41	Gillian Fensome	Natural England	<p>Biodiversity</p> <p>We are in support of opportunities to improve biodiversity in the SPD area, through the use of Green Infrastructure (GI) and Sustainable Urban Drainage Systems (SuDS) (mentioned at page 24).</p> <p>The National Planning Policy Framework (NPPF) states at paragraph 114 that:</p> <p>"Local planning authorities should ... set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and GI".</p>	Support noted No change needed
11/42	Gillian Fensome	Natural England	<p>Strategic Environmental Assessment (SEA) screening</p> <p>We agree that the Thames Strategy SPD is unlikely to have significant environmental effects and therefore that a full Sustainability Appraisal/SEA of it is not required.</p>	SEA Screening response noted Included in SEA Screening Report

12/43	DP9	Northern & Shell	<p>Our client is owner and occupier of 10 Lower Thames Street, which is the blue glass clad building located between 3 Lower Thames Street and Billingsgate Market. The site falls within the area identified in between London Bridge to Water Lane in the draft Thames Strategy SPD.</p> <p>We would firstly question why the draft Thames Strategy SPD has chosen to geographically separate the area between London Bridge and All Hallows. In our view, the location between London Bridge and All Hallows forms a cohesive geographical area which is characterised by a mix of office, leisure/conference, retail and residential uses. It is an area which is distinctly different in character than that to the west of London Bridge, by not being dominated by office uses. We would recommend that these two areas are considered together under the Strategy</p>	<p>The predominant land use between London Bridge and Water Lane is offices with Old Billingsgate Market and St Magnus the Martyr church being the main non office buildings along this stretch of riverside. By contrast the section from Water Lane to All Hallows by the Tower includes a mix of uses including hotel and residential, offices and place of worship. The issues for this area relate largely to its setting adjacent to the Tower of London World Heritage Site therefore it is logical to separate these two areas.</p> <p>No change needed</p>
12/44	DP9	Northern & Shell	<p>We are supportive of the overall draft Strategy's objectives of enhancing the riverside walkway in terms of the provision of higher quality public realm and activation. However as we previously contended in our representation to the Local Plan and the Riverside Enhancement Strategy, to achieve these objectives will require our client's site to be developed for a mixed use office and residential development as redevelopment for offices alone is not viable. Therefore the statement at 7.27.1 that "The intention for this site is that it should be retained as office led commercial development realising the opportunity to enliven the riverside and provide pedestrian access and views of the river" will not be realised. In any event, we consider that it is not appropriate for the Thames Strategy as an SPD to set out what land uses would be appropriate on the site. An SPD should not deal with land use matters.</p>	<p>The issue of land use along the riverside was considered at the Local Plan examination in October 2014. The Inspector's Report stated that "Policy CS9, which gives more emphasis to office-led commercial development along the Riverside, than was the case in the Core Strategy, is sound in view of the likely pressures for residential development. I am satisfied that the site specific viability considerations are able to be given due weight, and that the City Corporation has already demonstrated sufficient flexibility in that process. Therefore I do not support any different approach for the Thames Riverside."</p> <p>Since this Local Plan policy approach was found to be sound at examination, it would be inappropriate to alter it through a Supplementary Planning Document.</p> <p>No change needed</p>
12/45	DP9	Northern & Shell	<p>We also note that the "site" referred to in 7.27.1 relates to both 3 and 10 Lower Thames Street. As these sites are in different ownership, there can be no guarantee that they will be brought forward together as one single development. We consider that the text should therefore be amended to make a distinction between each site.</p>	<p>Paragraph 7.27.1 has been changed to read: The site area between the Church of St Magnus the Martyr and Old Billingsgate Market is currently in office use comprising two separate buildings... The remainder of the paragraph has been amended to refer to areas and buildings rather than a single site.</p>
12/46	DP9	Northern & Shell	<p>Our client considers that the approach to land use needs to work alongside the public realm improvement. There is a need to provide a mix of uses along the riverside which generate greater levels of activity during the day and evening.</p> <p>At ground floor, this will require the introduction of cafes/restaurants but also the introduction of residential uses so that the area is not dominated by office uses alone. The redevelopment of 10 Lower Thames Street for a mix of office/residential and ground floor active uses could deliver an active more vibrant riverside in this area and realise objectives of the draft Thames Strategy. Without the introduction of a mix of uses along this part of the riverside, it is considered that the public realm will remain sterile after office hours, irrespective of the improvement in quality.</p> <p>In the context of the above we object to a number of references within the</p>	<p>The issue of land use along the riverside was considered at the Local Plan examination in October 2014. The Inspector's Report stated that "Policy CS9, which gives more emphasis to office-led commercial development along the Riverside, than was the case in the Core Strategy, is sound in view of the likely pressures for residential development. I am satisfied that the site specific viability considerations are able to be given due weight, and that the City Corporation has already demonstrated sufficient flexibility in that process. Therefore I do not support any different approach for the Thames Riverside."</p> <p>Since this Local Plan policy approach was found to be sound at examination, it would be inappropriate to alter it through a Supplementary Planning Document.</p>

			<p>London Bridge to Water Lane section of the draft SPD. The first bullet point states that: <i>"This part of the riverside offers the potential to enhance the City's attractiveness as a business location through the retention of office led commercial development, utilising prime riverside office sites with iconic views of Tower Bridge and the River Thames. These uses would not be compatible with residential development therefore residential development along this part of the river will be discouraged"</i> We object to the statement that office uses are not compatible with residential development. London's success is based on its mix of uses and the juxtaposition of residential and office uses which create a vibrant and active City. The riverside location in particular is one area where office uses alongside residential can assist in ensuring day time and night time activity enliven public spaces. We would question again whether it is appropriate for the SPD to be dealing with land use issues. We would recommend that the wording of the first bullet point of 7.24 is amended as follow: <i>"This part of the riverside offers the potential to enhance the City's attractiveness as a business location through the retention of office led commercial development, utilising prime riverside office sites with iconic views of Tower Bridge and the River Thames. These uses would not be compatible with residential development therefore residential development along this part of the river will be discouraged"</i></p>	<p>Paragraph 7.24 has been amended to clarify the City's intention that: Office development, together with further retail, conference and event spaces, will provide increased vibrancy and footfall to this part of the riverside. These uses would not be compatible with the delivery of a high quality residential environment and therefore residential development along this part of the river will be discouraged.</p>
12/47	DP9	Northern & Shell	<p>Paragraph 7.25.1 states that: <i>"The primary planning aim for this stretch of the riverside is that it should provide office led commercial development with associated uses which serve the needs of the business City. This could include retail and conference or event space which would not be compatible with residential development"</i> As per our comments above, we strongly disagree that retail, conference or event space would not be compatible with residential development. Retail floorspace at ground floor level above residential uses is a typical mixed use approach to development sites in Central London. Provided that there are sufficient controls on opening hours, servicing and deliveries, then residential uses can sit comfortably alongside such retail conference or event uses. Again we do not consider that the SPD should be addressing land use issues and determining what is appropriate in land use terms for this part of the river – this is a matter for the Local Plan. We therefore consider 7.25.1 should be deleted.</p>	<p>The issue of land use along the riverside was considered at the Local Plan examination in October 2014. The Inspector's Report stated that "Policy CS9, which gives more emphasis to office-led commercial development along the Riverside, than was the case in the Core Strategy, is sound in view of the likely pressures for residential development. I am satisfied that the site specific viability considerations are able to be given due weight, and that the City Corporation has already demonstrated sufficient flexibility in that process. Therefore I do not support any different approach for the Thames Riverside." Since this Local Plan policy approach was found to be sound at examination, it would be inappropriate to alter it through a Supplementary Planning Document No change needed</p>
12/48	DP9	Northern & Shell	<p>In summary, we consider that the location between London Bridge and All Hallows should be treated as one area for the purposes of setting out guidance under the Thames Strategy. We are concerned that the Thames Strategy is being used as a tool to set out the City's land use policy approach to the riverside and determine what land uses are acceptable or not acceptable. This is beyond the remit of an SPD and we consider that</p>	<p>The Local Plan policy approach was found to be sound at the Local Plan Examination, it would be inappropriate to alter it through a Supplementary Planning Document. No change needed</p>

			the draft SPD should be amended accordingly. If you would like to discuss the above further, please contact Jonathan Marginson at this office.	
13/49	Anneli Harris	Office of the Rail Regulator	Thank you for consulting ORR on the above Thames Strategy Supplementary Planning Document. The Office of Rail Regulation has no comment to make on this particular document.	Comment noted No change needed
14/50	Lucy Owen	Port of London Authority	Thank you for consulting the PLA on the Thames Strategy Supplementary Planning Document Consultation Draft (January 2015). I have now had the opportunity to review the submitted documentation and would like to make the following comments: 1.5 Bullet point 2 – paragraph 1.4 refers to the river's functional uses in transport, navigation and recreation yet bullet point 2 only seeks to assist in the implementation of increased river transport. It is recommended that bullet point 2 is widened to reflect the City of London's commitment to increased river transport, navigation and recreation.	Second bullet point has been amended as follows: <ul style="list-style-type: none"> Assisting the implementation of increased- <u>improved</u> river transport, <u>navigation and recreation opportunities</u>
14/51	Lucy Owen	Port of London Authority	1.5 Bullet point 6 – Walbrook Wharf is a safeguarded wharf and as such it is safeguarded for waterborne freight uses. As identified in para 7.20.2 its use as a waste transfer or waste management site is also protected and this is through the Local Plan. Bullet point 6 needs to be updated to reflect this, it is suggested that the text is amended to read "and at Walbrook Wharf for waterborne freight traffic including waste management."	Bullet point 6 has been altered as follows ...at Walbrook Wharf for <u>waterborne freight traffic including waste management.</u>
14/52	Lucy Owen	Port of London Authority	2.2 There is no reference to policy 7.26 of the London Plan	Paragraph 7.20.2 includes a reference to policy 7.26 of the London Plan No change needed
14/53	Lucy Owen	Port of London Authority	2.3 It is recommended that reference is also made to the Mayor's River Action Plan and that the reference to the Mayor's Safeguarded Wharves Review is changed to the Mayors Safeguarded Wharves Implementation Report (2005) and Safeguarded Wharves Review (2013) . What is meant by the Port of London Authority Strategy ? It is noted that there is a reference to the "forthcoming" Marine Plan for the South East Inshore, the PLA is currently undertaking the Thames Vision Project and it is suggested that reference is made to this forthcoming Vision document.	Paragraph 2.3 includes reference to the Mayor's River Action Plan Text has been altered to include reference to the Mayor's Safeguarded Wharves implementation Report (2005), the PLA's strategic priorities and the PLA's Thames Vision Project. The Port of London Authority strategic priorities can be found at: http://pla.co.uk/assets/PLASummary.pdf
14/54	Lucy Owen	Port of London Authority	2.4.1 It is recommended that the word "waste" is removed from line 6 as this is covered by "freight" and that it is made clear that this includes during construction of new developments. Additionally, in order to ensure that the river can be utilised for freight, passenger transport, navigation and recreation it is recommended that a reference is made in paragraph 2.4.1 to developments requiring a waterside location for river related use	"waste" deleted from paragraph 2.4.1 Paragraph 2.4.1 has been amended to delete "waste" and to include the following phrase:ensuring that development on or over the river is restricted to uses which require a riverside location for a river related use.....
14/55	Lucy Owen	Port of London Authority	3.1.1 The word "Thames" before river buses seems to be superfluous	Paragraph 3.1.1 amended to delete "Thames" before river buses
14/56	Lucy Owen	Port of London Authority	3.1.2 There is concern that the document is in effect advertising places where people can access the foreshore and that some of these places	Proposed wording has been included at the beginning of paragraph 3.1.2. The list of access points has been retained but referred to as

			<p>have little or no foreshore due to the tides! The PLA cannot support the current wording of paragraph 3.1.2 and suggests that it is amended along the lines of the Hammersmith and Fulham Draft Local Plan: "Access to the foreshore, which is primarily in the ownership of the Port of London Authority, can have a recreational and educational value. There is a right of access for fishing, navigational and other customary purposes, but public access must be considered in the context of the environmental and archaeological importance of the foreshore and particularly safety considerations, bearing in mind the fast tidal flows affecting this part of the Thames."</p>	<p>historic access points which must be retained rather than points of access to the foreshore.</p>
14/57	Lucy Owen	Port of London Authority	<p>3.3.1 – the reference to developments on and over the river needing to have a river related use is welcomed and the text in chapter 7 relating to each part of the City's Thames Riverside should reflect this. For example, there is a reference at 7.20.3 to permanently moored vessels between Queenhithe and London bridge needing to be used for a river related purpose but this is the only reference I have been able to find</p>	<p>An additional paragraph 7.2a has been included in the introduction to Chapter 7: <u>Some issues apply to the whole of the Thames riverside within the City. For instance policy CS9.4(v) requires that proposed development on or over the river must require a riverside location for a river related use and CS9.4(vi) requires that permanently moored vessels must be of national importance , have a connection with the City and the River Thames, be used for a river related purpose and not have a detrimental impact on navigation, river regime or environment These requirements apply to all sections of the Thames Riverside....</u></p>
14/58	Lucy Owen	Port of London Authority	<p>5.1.1 It would appear to be appropriate to include specific reference to lighting along the riverside and the need for it to be appropriately designed to minimise its impact on navigation and ecology.</p>	<p>New Paragraph 7.2a addresses this through inclusion of the following sentence: <u>... Similarly protection of the river's ecology and navigation must be considered in the design of lighting throughout the length of the City's riverside.</u></p>
14/59	Lucy Owen	Port of London Authority	<p>5.2 Focal points of public activity – the references to Blackfriars Pier and Tower Millennium Pier are welcomed – it would be beneficial to explain here the targets set in the River Action Plan relating to increased passenger numbers. Technically, part of the upstream extension of Tower Pier is within the City.</p>	<p>Paragraph 5.2.4 has been amended with the inclusion of the following sentence: <u>Passenger numbers are likely to increase in line with targets in the Mayor's River Action Plan</u></p>
14/60	Lucy Owen	Port of London Authority	<p>5.4 Inclusive design – it is recommended that the text on development and riverside walk enhancements includes a reference to designing them to include riparian life saving equipment</p>	<p>Paragraph 5.4.1 has been amended as follows: This includes provision of ramps or lifts adjacent to steps where there is a change in level between buildings and within the public realm, inclusive signage, tactile surfaces and consideration of soundscapes which aid orientation for people with visual impairments and the inclusion of riparian life-saving equipment.</p>
14/61	Lucy Owen	Port of London Authority	<p>5.5.2 See comments on 3.1.2 above. Paragraph 5.5.2 should be amended to the text set out in para 3.1.2. Whilst the reference to ladders and life belts are welcomed, reference should also be provided to grab chains.</p>	<p>Amended Paragraph 5.5.2 and 5.5.3 have been reversed and the new paragraph 5.5.3 has been amended as follows: There are steps down to the foreshore at the War Memorial on Victoria Embankment at Temple Gardens, Trig Lane, Cousin Lane, London Bridge and Custom House. Additionally there are private stairs at Vintners' Place and Fishmongers' Hall. These access points will be preserved and where possible made available for public access. Ladders are provided at intervals along the frontage for emergency access and egress to and from the river and foreshore. These ladders</p>

				should be retained and maintained. Life belts <u>and grab chains</u> are provided in several locations along the foreshore and on some of the bridges for emergency use.
14/62	Lucy Owen	Port of London Authority	5.5.3 Technically walking on the foreshore is not permitted. Paragraph 5.5.3 needs to be amended to the text set out in 3.1.2 above . If the Council wishes to include a list of dangers then this should also include wells disease and the composition of the foreshore .	Paragraphs 5.5.2 and 5.5.3 have been reversed and the new paragraph 5.5.2 has been amended by inclusion of reference to <u>wells disease</u> and inclusion of the following sentence: <u>Access to the foreshore, which is primarily in the ownership of the Port of London Authority, can have a recreational and educational value. There is a right of access for fishing, navigational and other customary purposes, but public access must be considered in the context of the environmental and archaeological importance of the foreshore and particularly safety considerations.</u>
14/63	Lucy Owen	Port of London Authority	5.5.4 It is recommended that the paragraph is amended to read "The use of a metal detector and associated digging on the Thames foreshore requires a permit from the Port of London Authority. Digging on the north foreshore between Lambeth and Tower Bridges, which include the city's stretch of the foreshore, is restricted to members of the Thames Mudlark Society. Digging is also prohibited in several sections including Queenhithe Dock (see figure 6 for restricted/prohibited digging areas). All finds must be reported to the Museum of London. The Thames Discovery Programme and Foreshore Recording and Observation Group coordinate events on the Thames Foreshore. The Museum of London coordinates archaeological recording.	Text amended as suggested
14/64	Lucy Owen	Port of London Authority	Figure 6 is also out of date	Figure 6 updated with version dated 22/01/2014
14/65	Lucy Owen	Port of London Authority	5.6.3 Remove "the freight movement facility at" and start the sentence "Walbrook Wharf (a safeguarded wharf) is currently used as a waste transfer station. It should be made clear the temporary pontoons are not used at Walbrook Wharf but rather within the City's boundary to enable the transport of construction and waste materials. The PLA would like to work with the City and developers to identify more opportunities to use the river during construction.	Paragraph 5.6.3 has been amended as follows: <u>5.6.3 The freight movement facility at Walbrook Wharf (a safeguarded wharf) is currently used as a waste transfer station. Temporary pontoons elsewhere in the river within the City's boundary, are used on occasions to enable the transport of construction materials and waste by river from development sites (e.g. Blackfriars Station redevelopment and Thames Tideway Tunnel Infrastructure Project).</u>
14/66	Lucy Owen	Port of London Authority	New paragraph 5.6.5 It is recommended that a new 5.6.5 emphasises the point made later at 5.8.2 that in order to ensure that the river can be used for its transport, navigation and recreation functions policy 9.4v is of particular important in refusing development on or over the river which does not require a river location.	New paragraph 5.6.5 has been added: <u>5.6.5 In order to ensure that the river can be used for its transport, navigation and recreation functions Local Plan policy CS9.4 (v) is of particular important in refusing development on or over the river which does not require a waterside location for river related uses</u>
14/67	Lucy Owen	Port of London Authority	5.8.1 Just under 1000 vessels took part in the Queens Jubilee River Pageant	Text amended to read <u>...almost 1,000 vessels took part in the Queens Jubilee River Pageant</u>
14/68	Lucy Owen	Port of London Authority	5.9 It would be useful to review the evidence that has been collected to enable the City Corporation to reach the conclusion that there are no deficiencies in river related facilities . It is also recommended that the text is updated to identify that the situation will be kept under review and that support will be given to proposals for river related facilities.	Paragraph 5.9.2 has been amended as follows: <u>The City Corporation has not identified any deficiencies in such facilities for the stretch of the Thames which passes through the City of London. This situation will be kept under review and support will be given to proposals for appropriate river related facilities</u>
14/69	Lucy Owen	Port of London	6.2.3 It is important to note that all works in the river require a river works	The following sentence has been added to paragraph 6.2.3:

		Authority	licence from the PLA and that works need to be kept in a good state of repair.	All works in the river require a river works licence from the PLA and that works need to be kept in a good state of repair.
14/70	Lucy Owen	Port of London Authority	7.2 Reword to read "River related issues and challenges include the safeguarding of Walbrook Wharf for waterborne freight uses..."	Paragraph 7.2 has been reworded as follows: River related issues and challenges include the safeguarding of Walbrook Wharf for waterborne freight uses as a working river wharf....
14/71	Lucy Owen	Port of London Authority	7.19 the retention of a "viable wharf" is essential	The third bullet point of paragraph 7.2.1 has been amended to read: At Walbrook Wharf, the retention of a viable wharf with river access and vessel manoeuvring space is essential
14/72	Lucy Owen	Port of London Authority	7.20.3 It is questioned why the reference to permanently moored vessels is only made here. Will they be acceptable to the Council in all the other areas?	An additional paragraph 7.3 has been included in the introduction to Chapter 7: Some issues apply to the whole of the Thames riverside within the City. For instance policy CS9.4(v) requires that proposed development on or over the river must require a riverside location for a river related use and CS9.4(vi) requires that permanently moored vessels must be of national importance , have a connection with the City and the River Thames, be used for a river related purpose and not have a detrimental impact on navigation, river regime or environment These requirements apply to all sections of the Thames Riverside....
15/73	Savills	Thames Water	<p>Thank you for consulting Thames Water Utilities Ltd. (Thames Water) on the above. Thames Water is the statutory sewerage undertaker and statutory water undertaker for City of London and the following comments are made in this respect. Thames Water Utilities Ltd (Thames Water) Property Services function is now being delivered by Savills (UK) Limited as Thames Water's appointed supplier. Savills are therefore pleased to respond to the above consultation on behalf of Thames Water.</p> <p>Thames Water fully supports the preparation of the Thames Strategy Supplementary Planning Document (SPD), but would like to make the following comments with respect to the Thames Tideway Tunnel, which is partially within the Thames Strategy area (as shown in Figure 1 of the draft SPD).</p> <p>Thames Tideway Tunnel.</p> <p>The Thames Water Utilities Limited (Thames Tideway Tunnel) Order 2014 as amended by The Thames Water Utilities Limited (Thames Tideway Tunnel) (Correction) Order 2015 (the DCO (as amended)) provides consent for the construction and operation of a wastewater storage and transfer project of national significance, known as the Thames Tideway Tunnel. This consent is a material consideration of substantial weight in the consideration of all projects, plans and proposals in the vicinity of the project. The National Policy Statement for Waste Water and the Examining Authority's Report make clear that the Government considers that there is an established, urgent need for this nationally significant infrastructure.</p>	<p>Support noted</p> <p>No change needed</p>

			<p>The tunnel alignments and sites that form part of the Thames Tideway Tunnel are safeguarded by means of Article 52 of the Order and requires that in determining any planning application within the TTT safeguarded area, the local planning authority must have regard to any recommendation received by Thames Water. Thames Water support the inclusion of the Thames Tideway Tunnel Safeguarding Area shown in Figure 1 of the draft SPD.</p>	
15/74	Savills	Thames Water	<p>In order to accurately describe the Thames Tideway Tunnel development, Thames Water suggest the following minor amendments to the SPD:</p> <p>Replace the 2nd sentence in paragraph 5.2.1 with the following:</p> <p>"Development Consent for the Thames Tideway Tunnel nationally significant infrastructure project was granted in September 2014 and will address the issue of London's combined sewer overflows into the River Thames"</p>	<p>Text amended to read <u>Development Consent for the Thames Tideway Tunnel nationally significant infrastructure project was granted in September 2014 and will address the issue of London's combined sewer overflows into the River Thames</u></p>
15/75	Savills	Thames Water	<p>Thames Water support the issues stated in paragraph 6.4.3 and suggest the following sentence is added to the end of paragraph 6.4.3:</p> <p>"The recently consented Thames Tideway Tunnel will address London's combined sewer overflows into the River Thames."</p>	<p>The following sentence has been added to paragraph 6.4.3 <u>The recently consented Thames Tideway Tunnel will address London's combined sewer overflows into the River Thames</u></p>
15/76	Savills	Thames Water	<p>Thames Water welcome the inclusion of Thames Tideway Tunnel in section 7.4 of the SPD. However, TWUL suggest the first sentence under bullet 2 is replaced with the following text:</p> <p>"this nationally significant infrastructure project is a major new sewer, urgently needed to protect the tidal River Thames from increasing pollution. The project comprises a wastewater storage and transfer tunnel designed to intercept identified combined sewer overflows (CSOs) that frequently discharge into the tidal reaches of the River Thames."</p>	<p>First bullet point in paragraph 7.4 has been amended to read <u>This nationally significant infrastructure project is a major new sewer, needed to protect the tidal River Thames from increasing pollution. The project comprises a wastewater storage and transfer tunnel designed to intercept identified combined sewer overflows (CSOs), including one at Blackfriars, which frequently discharge into the tidal reaches of the River Thames....</u></p>
15/77	Savills	Thames Water	<p>Paragraphs 7.5.3 and 7.7.1 of the draft SPD make reference to possible design features for the Project's Blackfriars Bridge Foreshore site. The application for development consent included an indicative level of design detail, framed within a series of parameters and design principles. The detailed design has not yet been developed. Future discussions with the City of London will be valuable in developing the design and ensuring matters relating to flood risk, public realm, landscaping and drainage are addressed appropriately, proportionately, and in the context of the functional requirements of the Project.</p> <p>Thames Water would be glad to work with the City of London to develop the Supplementary Planning Document.</p> <p>I trust the above is satisfactory, please do not hesitate to connect me should you require any further information.</p>	<p>Support for ongoing discussions regarding the Blackfriars Bridge foreshore site noted. No change needed</p>

16/78	Mark Day	Transport for London	The Thames Strategy is welcomed although there is a very minor error at paragraph 5.2.4 of the Thames Strategy where the first sentence should read "Tower Millennium Pier is used by river bus services, river tour services and private-chartered boats."	Text amended as suggested
17/79	Collette Willis	Westminster City Council	<p>Thank you for the opportunity to comment on the consultation draft Thames Strategy SPD</p> <p>I welcome the acknowledgment of the need for consistency with neighbouring boroughs on the approach to the riverside, and welcome coordination on cross-borough issues.</p> <p>There are several views originating in Westminster which take in the City's part of the river and riverside townscape. There are four draft Metropolitan Views (locally designated views considered to be of Metropolitan Importance). These are:</p> <ul style="list-style-type: none"> • View downstream from Westminster Bridge (draft Metropolitan View 44) • View downstream from Golden Jubilee Footbridge (draft Metropolitan View 43a) • View downstream from Waterloo Bridge (draft Metropolitan View 42a) • St Pauls from Somerset House Terrace (draft Metropolitan View 25) <p>There are also 'local views' which are identified in our conservation area audits. Of particular significance are the views contained in the audits for the Savoy and Strand conservation areas.</p> <p>Westminster trust that impacts on these views would be considered in development proposals adjacent to the River in the City of London, and we would welcome acknowledgement of this in your SPD.</p>	<p>Paragraph 4.1.4 has been added: 4.1.4 There are several views originating in Westminster which take in the City's part of the river and riverside townscape. These include downstream views from Westminster Bridge, Golden Jubilee (Hungerford) Bridge and Waterloo Bridge. Development proposals near the river should consider the impact on these views.</p> <p>Other draft views referred to are not considered to directly affect the City's Thames Strategy area.</p>
17/80	Collette Willis	Westminster City Council	An update at Paragraph 2.7.2 is required – it refers to the 'City of Westminster Core Strategy' this should refer to the adopted plan the 'Westminster City Plan: Strategic Policies'	Paragraph 2.7.2 has been amended to read: The Westminster City Plan: Strategic Policies document identifies the Thames policy area.....