

City of London

# Thames Strategy

Supplementary Planning Document  
Draft for adoption

June 2015



## Consultation

The City of London Corporation (City Corporation) consulted on a draft Thames Strategy Supplementary Planning Document (SPD) between 18<sup>th</sup> March 2015 and 30<sup>th</sup> April 2015 in accordance with the procedures set out in The Town and Country Planning (Local Planning) (England) Regulations 2012 and the requirements of the City Corporation's Statement of Community Involvement 2012.

This draft for adoption has taken account of the consultation comments made and is recommended for adoption. A consultation statement has been published outlining how the City Corporation has taken account of the comments made.

Copies of the documents are available:

Online at: [www.cityoflondon.gov.uk](http://www.cityoflondon.gov.uk)

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## 1 Introduction and objectives of the Thames Strategy

1.1 The London Plan requires Thames-side boroughs and the City Corporation to identify a Thames Policy Area and formulate policies and a strategy for this area. The City's part of the Thames Policy Area is identified in the Local Plan and on the Local Plan Policies Map. "Thames and the Riverside" is identified as a Key City Place in the Local Plan (Fig 1) and this Strategy will help to manage change within this area.

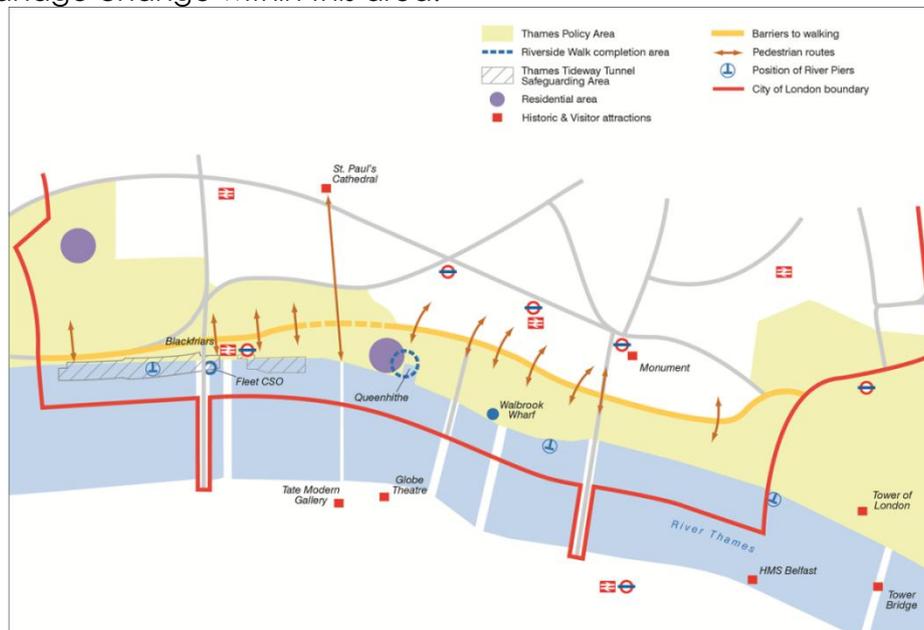


Figure 1 Thames and the Riverside Key City Place

1.2 The City Corporation adopted a Riverside Appraisal of the Thames Policy Area in the City of London in 2002 as Supplementary Planning Guidance (SPG) to the City's Unitary Development Plan 2002. Recent developments on the riverside and the Local Plan policy for Thames and the Riverside (CS9) necessitate a review of this riverside appraisal. The revised document is being re-named the Thames Strategy, in accordance with London Plan Policy 7.29, and will be adopted as a Supplementary Planning Document (SPD) to replace the 2002 SPG.

1.3 The Thames Policy Area spans a number of City of London wards therefore this strategy will impact to some degree on the following wards: Farringdon Without, Castle Baynard, Queenhithe, Vintry, Dowgate, Bridge, Billingsgate and Tower.

1.4 The riverside location of the City of London has shaped the City throughout its history and continues to present opportunities and challenges for the spatial planning of this area into the future. This strategy looks forward to 2026 identifying the issues that the riverside might face. The aim is that the City should capitalise on its unique riverside location sustaining the river's functional uses in transport, navigation and recreation whilst minimising the risks to the City's communities from flooding.

1.5 The key objectives of this strategy are to provide guidance on:

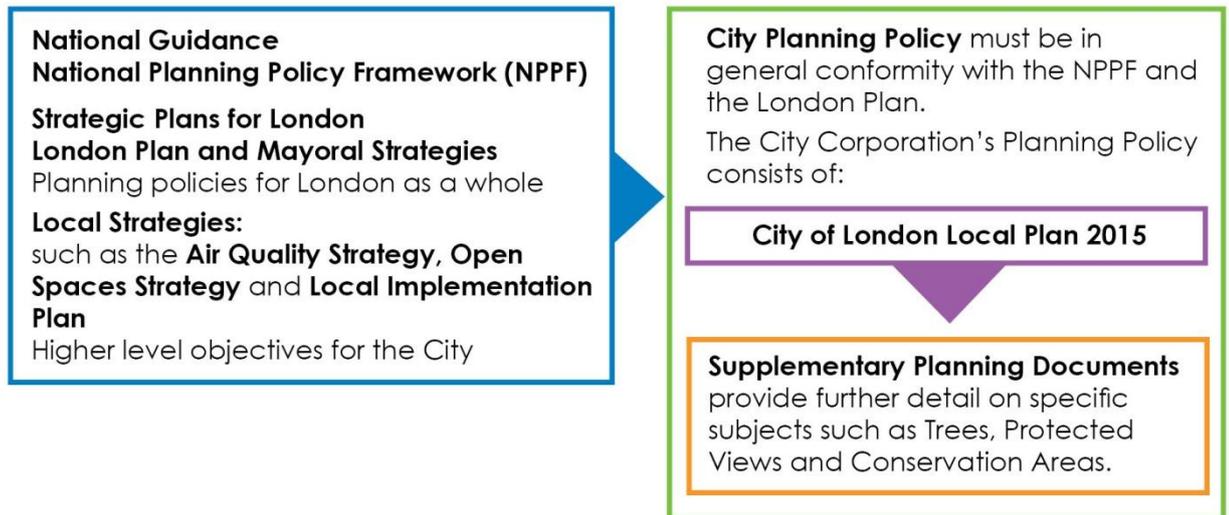
- Development and public realm enhancement within the Thames Policy Area;

- Assisting the implementation of improved river transport, navigation and recreation opportunities;
- Protection and enhancement of heritage assets;
- Inclusive access for all wherever practicable;
- Flood risk, climate resilience and biodiversity enhancement;
- The implications for development of site safeguarding at Blackfriars for the Thames Tideway Tunnel and at Walbrook Wharf for waterborne freight traffic including waste management.

Balancing and reconciling potentially conflicting interests arising from these objectives is an important intention of this strategy.

## 2 Policy context

2.1 The National Planning Policy Framework sets out the national planning policies for England and how they are expected to be applied. Planning for coastal and tidal waters is set out in Marine Plans and the Thames River Basin Management Plan. The relevant local policies and designations are contained in the City of London Local Plan which must be in general conformity with strategic policies in the London Plan.



2.2 Development on the riverside must have regard to the strategic policies in the London Plan including the following policies which have particular relevance for the Thames Policy Area:

- Policy 5.10 Urban Greening
- Policy 5.12 Flood Risk Management
- Policy 5.13 Sustainable Drainage
- Policy 5.14 Water Quality and Waste Water Infrastructure
- Policy 5.15 Water use and supply
- Policy 6.10 Walking
- Policy 6.11 Smoothing traffic flow and tackling congestion
- Policy 6.14 Freight
- Policy 7.2 An inclusive environment
- Policy 7.5 Public Realm
- Policy 7.8 Heritage Assets and Archaeology
- Policy 7.11 London View Management Framework (LVMF)
- Policy 7.14 Improving Air Quality
- Policy 7.19 Biodiversity and access to nature
- Policy 7.24 The Blue Ribbon Network
- Policy 7.25 Increasing the use of the Blue Ribbon Network
- Policy 7.27 Supporting infrastructure and recreational use
- Policy 7.28 Restoration of the Blue Ribbon Network
- Policy 7.29 The River Thames

2.3 Other relevant regional strategies include:

- The Environment Agency's Thames Estuary 2100 Plan (TE2100)
- Port of London Authority Strategic Priorities and Thames Vision Project

The Mayor's River Action Plan  
 Mayor's Transport Strategy.  
 Mayor's Safeguarded Wharves Implementation Report (2005)  
 Mayor's Safeguarded Wharves Review (2013)  
 Marine Plan for the South East Inshore (forthcoming)  
 The Environment Agency's Thames River Basin Management Plan

2.4 The City of London Local Plan provides specific policies which will guide development in the Thames Policy Area:

2.4.1 Policy CS9 *Thames and the Riverside* sets out the City's intentions for the Thames Riverside within the City, promoting office led commercial development on the riverside, requiring that development on the riverside contributes to the aims of the Riverside Walk Enhancement Strategy, ensuring that development on or over the river is restricted to uses which require a riverside location for a river related use, supporting the construction of the Thames Tideway Tunnel and promoting functional uses of the river for freight and passenger transport, navigation and recreation.

2.4.2 Policy CS10 *Design* requires that the design of spaces should provide for the access needs of all the City's communities and promotes the City's public realm enhancement strategies.

2.4.3 Policy CS12 *Historic Environment* sets out the requirements for protection and enhancement of the historic environment including conservation areas, listed buildings and structures and archaeological assets. The Temples, Whitefriars, Trinity Square and Crescent Conservation Areas, Baynard's Castle and Queenhithe Dock Scheduled Ancient Monuments and numerous listed buildings & structures fall within the Thames Policy Area. The Thames foreshore is of particular archaeological significance.

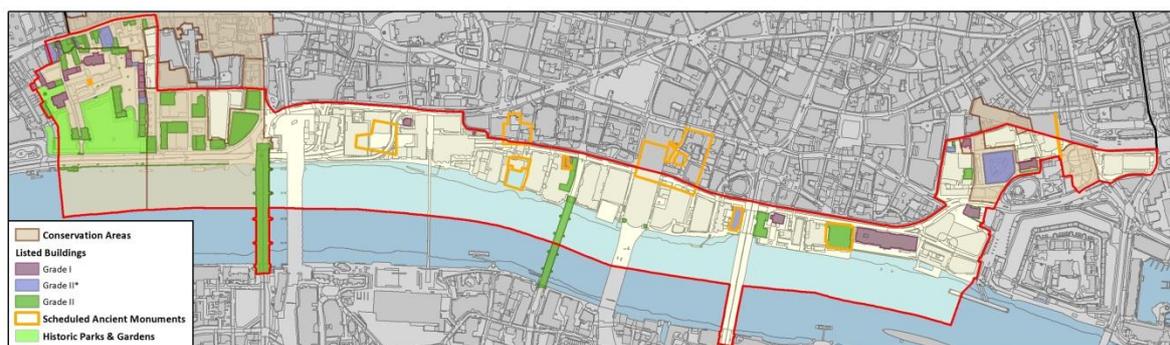


Figure 2 Heritage Assets in the Thames Policy Area

2.4.4 CS13 *Protected Views* protects strategic and local views of St Paul's Cathedral, the Tower of London and the Monument. It also protects the setting of the Tower of London World Heritage Site.

2.4.5 Policy CS17 *Waste* safeguards Walbrook Wharf and promotes the use of the Thames for the transport of waste and construction materials.

2.4.6 Policy CS18 *Flood Risk* aims to ensure that the City remains at low risk from all types of flooding. Most of the Thames Policy Area falls within the City Flood Risk Area and is susceptible to fluvial flood risk through breach

or overtopping of the flood defences and to surface water /sewer flood risk through overloading of the combined sewer network in the area.

2.4.7 Policy CS 19 *Open Spaces and Recreation* encourages improved access to open space aiming to increase the amount and quality of open space and green infrastructure while enhancing biodiversity. It also identifies that the River Thames is a Site of Metropolitan Importance for Nature Conservation (SMINC).

2.4.8 Core strategic policies are supported by Development Management policies which provide further guidance to determine planning decisions.

2.5 Other City of London Strategies. The City Corporation has adopted a series of strategies which are relevant to the Thames Riverside including:

- Riverside Walk Enhancement Strategy 2014
- Local Flood Risk Management Strategy 2014-2020
- City of London Waste Strategy 2013-2020
- City of London Air Quality Strategy 2011-2015
- City of London Visitor Strategy 2013-17
- City of London Cultural Strategy 2012-2017
- City of London Open Space Strategy 2015-2020

2.6 The City Corporation is the Port Health Authority for the tidal Thames dealing with health issues associated with the river and river craft.

2.7 Neighbouring boroughs' Local Plans

2.7.1 The Tower Hamlets Core Strategy identifies locally distinctive places across the whole borough. Along the riverside eight places are identified, the nearest three to the City are Tower of London & St Katherine's Dock, Wapping and Limehouse. The riverside policy area is designated in these places and policies promote protection of the settings of the Tower of London, extension of the riverside walk, the development of mixed use areas including employment, residential and complementary leisure uses.

2.7.2 The Westminster City Plan: Strategic Policies document identifies the Thames policy area and requires that developments in this area will need to demonstrate that they have particular reference to their riverside location and local architectural references, including long views of the riverside.

2.7.3 The Southwark Core Strategy – includes a vision for Bankside & London Bridge. This includes protection of access to and along the riverside and enhancement of the character of the riverside, encouragement for river transport, recognition of the importance of the Thames bridges, protected views and flood risk policies and identification of a Thames Policy Area. Preparation of a Bankside Neighbourhood Plan is underway.

2.7.4 The Lambeth Core Strategy identifies the Thames Policy Area to protect and enhance the special character of the River Thames and Thames-side.

2.7.5 The City Corporation is keen to ensure that this Strategy forms part of a comprehensive approach to the central London's riverside and will be consistent with neighbouring boroughs' strategies.

### 3 Local character

#### 3.1 The River today

3.1.1 The River Thames flows through the City from its boundary with Westminster to the west of Blackfriars Bridge, to its boundary with Tower Hamlets near Tower Bridge. The river is tidal, with a tidal range of seven metres twice per day, throughout this section. Flood defences and river walls protect riverside properties and public realm at high tide. At low tide wide areas of foreshore are visible at several locations along the river within the City. The natural extent of the river has been extensively modified and confined due to the extension of quays, wharves and buildings into the river. Six bridges span the river within the City (Blackfriars road bridge, Blackfriars Railway Bridge, Millennium footbridge, Southwark Bridge, Cannon Street Railway Bridge and London Bridge). The navigable river channel is used for a variety of vessels including barges towing waste and construction materials, river buses, leisure boats and river-patrol boats. The ecology of the river has improved in the last 50 years and it is now designated as a Site of Metropolitan Importance for Nature Conservation.

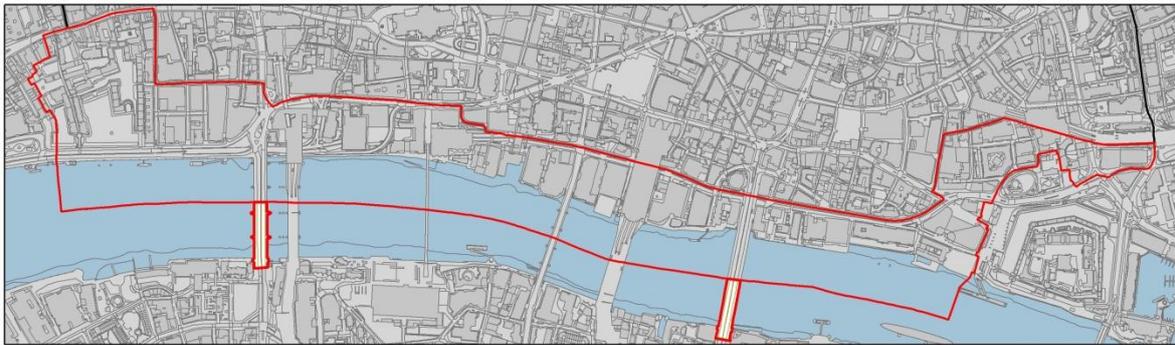


Figure 3 Thames Policy Area

3.1.2 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. Historic access points next to the War Memorial on Victoria Embankment at Temple Gardens, Trig Lane, Cousin Lane, London Bridge and Custom House, and private stairs at Vintners' Place and Fishmongers' Hall should be retained. Ladders are available at intervals along the frontage for emergency egress.

3.1.3 The flood defences vary in character along the Thames but all provide protection to at least the statutory flood defence level of 5.41m AOD. Environment Agency inspection, as reported in the Strategic Flood Risk Assessment 2012, confirms that the majority of the City's flood defences are in good condition, with a small stretch at Three Quays classified as 'fair'.

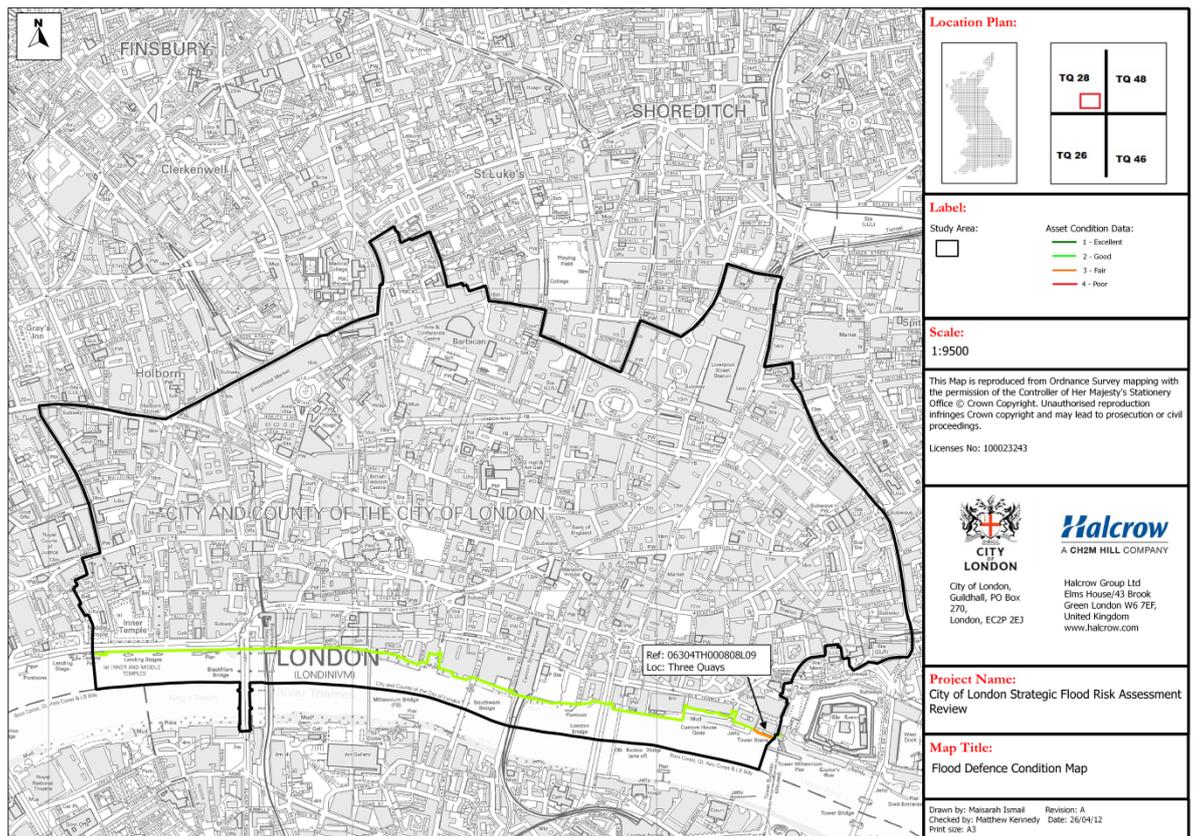


Figure 4 Flood defence condition

3.1.4 The Thames Estuary 2100 Plan identifies actions that will need to be taken during this century to protect the land adjacent to the tidal Thames from flood risk. This area, including parts of the City, is protected from tidal flooding by the Thames Barrier. However climate change impacts such as sea level rise and the prevalence of more extreme weather events mean that additional protection will be needed later this century. Within the City this will include the need to raise flood defences by up to 0.5 metre by 2065 and a further 0.5m by 2100. This will have an impact on riverfront structures and on views of the river from the riverside walk and from buildings adjoining the river.

3.1.5 In the west of the City the riverside is dominated by Victoria Embankment which is a busy dual carriageway. Although there is a wide tree lined pavement between the road and the river and Inner and Middle Temple Gardens to the north, the presence of this through route for traffic creates a noisy environment. To the east of Blackfriars Bridge the road enters Blackfriars underpass for a short distance and then continues through the remainder of the City to the north of the river along Upper Thames Street and Lower Thames Street. As a result of this the riverside from Blackfriars Bridge to the eastern City boundary at Three Quays is predominantly a pedestrian route.

3.1.6 In recent years several developments have been completed or permitted along the Thames riverside in the City. At the eastern end overlooking the Tower of London a 77 bedroom hotel with 64 residential flats has been developed at Three Quays. At Sugar Quay permission has been granted for a residential development of 165 flats. High specification

office developments, Watermark Place and Riverbank House, between London Bridge and Cannon Street Railway Bridge, were completed in 2010. The residential area at Queenhithe has expanded with the addition of Sir John Lyon House and Globe View which created a cluster of around 700 residential flats. Development associated with Cannon Street Railway Station and Blackfriars Station has improved transport infrastructure. At Blackfriars Station the Thameslink work includes platforms spanning the railway bridge allowing for longer trains than would otherwise have been possible.

- 3.1.7 The cumulative impact of this new development and associated public realm enhancements is to make the City's riverside an extremely desirable and inclusive location with pressure for residential and hotel development vying with commercial development proposals.

### **3.2 Historic development of the riverside**

- 3.2.1 The historical development of the City is closely bound with its location on the Thames. The City's primacy as a centre of commerce and finance owes its origins to its role as a port.
- 3.2.2 Roman Londinium was founded on ground above the flood plain at a point where the Thames could be bridged. Although not at first the capital of Britannia, London quickly became its most important trading centre. The river shore, which at that time was on the line of the present Upper Thames Street, was lined with wharves and warehouses; the scale of these, as revealed by archaeological excavations, demonstrates the port's considerable prosperity. Wharf construction started a process of reclamation that led to the continual narrowing of the river over the next two millennia. The River Fleet, which joined the Thames where Blackfriars Bridge now stands, ran outside the western wall of the Roman settlement and was navigable as far as the present Ludgate Circus.
- 3.2.3 Following the end of Roman rule the walled city was largely abandoned and a new Saxon trading settlement called Lundenwic grew up around the Strand. Viking raids in the ninth century caused the settlement to move back within the Roman walls. Defences were repaired and strengthened, including a wall along the River, the bridge was repaired and a new planned street network was laid out. As wharves were incrementally extended into the river a series of closely-spaced lanes and alleys running down to the water front developed between them, some of which remain today. Docks were created at Queenhithe and Billingsgate, the former still visible as an inlet.
- 3.2.4 The Normans built the Tower of London beside the River to establish their dominance over London. During the twelfth century the river wall was demolished and Thames Street was constructed to give easier access to the wharves. London Bridge was rebuilt in stone, remaining the only crossing of the Thames in the capital for nearly six centuries. The narrow arches of the bridge restricted the movement of ships, confining much activity to the Pool of London, downstream of the crossing, which by the end of the Middle Ages handled half of the nation's trade. The riverside in the west of the City was lined with royal and ecclesiastical buildings,

including those of the Blackfriars, Whitefriars and Knights Templar, their grounds running down to the water front.

- 3.2.5 The Hanseatic League, a trading partnership which extended across much of northern Europe, had a presence at Steelyard from the fifteenth to the late sixteenth century. Distinctive coin-like jettons used by the Hansa for accounts and lead seal hallmarks for wool have been excavated. Remains of the Guildhall of the merchants of Cologne, documented in London from 1175, and buildings associated with traders of the Hanseatic League have been recorded below Cannon Street Station.
- 3.2.6 Most of the medieval City was destroyed in the Great Fire of 1666. The rebuilding took full advantage of the City's location on high ground, creating a striking skyline seen from the riverside that was dominated by St Paul's Cathedral surrounded by 51 church towers and spires. The river fulfilled a ceremonial role, used for water-borne processions of the City and the Crown. River trade continued to be confined within the City's boundaries, its volume tripling by the eighteenth century to make London the world's busiest port. Banking, insurance, warehousing and related services developed to support the trade of the port, establishing the City's position as a financial centre. From the early nineteenth century the construction of large, purpose-built docks downstream led to the reduction of trade in the Pool; although by the 1890s there were still 50 working wharves on the City waterfront, these now handled specialised and fresh produce.
- 3.2.7 During this period there was much rebuilding along the river. In the eighteenth century the Fleet was covered over and New Bridge Street constructed above it. Blackfriars Bridge was built in 1769 and Southwark Bridge in 1819. Old London Bridge was famous for the houses standing upon it, but by the eighteenth century these had been removed in the interests of improvement. In 1831 the bridge was demolished and a new London Bridge built on a site further upstream; King William Street was constructed to connect to the changed alignment. The river shore between Blackfriars and Westminster was reclaimed for the construction of the Victoria Embankment, which provided an interceptor sewer and underground railway beneath a new road. Queen Victoria Street was cut through the existing street network to carry traffic from the Embankment onwards to Bank. Blackfriars Bridge was rebuilt in iron in 1869, Tower Bridge built in 1894 and Southwark Bridge rebuilt in 1921. Rail bridges were constructed at Blackfriars in 1864 and 1886, and Cannon Street in 1866, the stations forming new riverside landmarks.
- 3.2.8 The Victorian form of the City's river frontage remained largely unchanged during the first half of the twentieth century. East of Blackfriars Bridge the river was lined with wharves and warehouses, shipping continued to deliver goods and there was still much warehousing and manufacturing throughout the City alongside its now-dominant financial activities.
- 3.2.9 Post-war reconstruction led to radical changes to the riverside from the late 1940s onwards. River-borne trade dwindled as riverside warehousing and wharves were redeveloped for office buildings. Sites were

amalgamated, absorbing numerous lanes, alleys and stairs that formerly gave access to the riverside. Upper and Lower Thames Streets were considerably widened to form a dual carriageway. This route was continued westwards by the construction of the Blackfriars underpass on land reclaimed from the river. The underpass was decked over and a new pedestrian boulevard created to form a vista of St Paul's Cathedral from the river; this route was later extended to the south bank by the construction of the Millennium Bridge. As riverside sites were redeveloped a riverside walk was incorporated into each, eventually linking to form a continuous pedestrian route. In the 1980s a river bus service was introduced, with piers at Blackfriars and the Tower. An improved dock was built at Walbrook Wharf in the 1990s for the transfer of the City's waste onto barges; with the relocation of Billingsgate fish market in 1982 this remains the only river-related cargo handling activity in the City.

### **3.3 Future issues.**

3.3.1 The City's riverside has experienced constant change throughout its history and the challenges to be faced in the future will bring further change in the balance of activities that take place there. Particular challenges which this strategy must address are:

- Conflicting development pressures – particularly pressure for residential development on the riverside competing with commercial, particularly office, uses which support the business City.
- Pressure for development on or over the river and the challenge of ensuring that such development is essential to the functioning of the river and constitutes river related uses.
- Opportunities for conservation of heritage assets, ensuring that new development does not detract from these assets and their settings.
- Climate change impacts – particularly increased flood risk as a result of sea level rise and greater frequency of more extreme weather events.
- Increased numbers of pedestrians as a result of transport improvements and improved accessibility to tourist attractions.

## 4 Areas, structures and landscapes of particular sensitivity

### 4.1 St. Paul's Heights and other local views

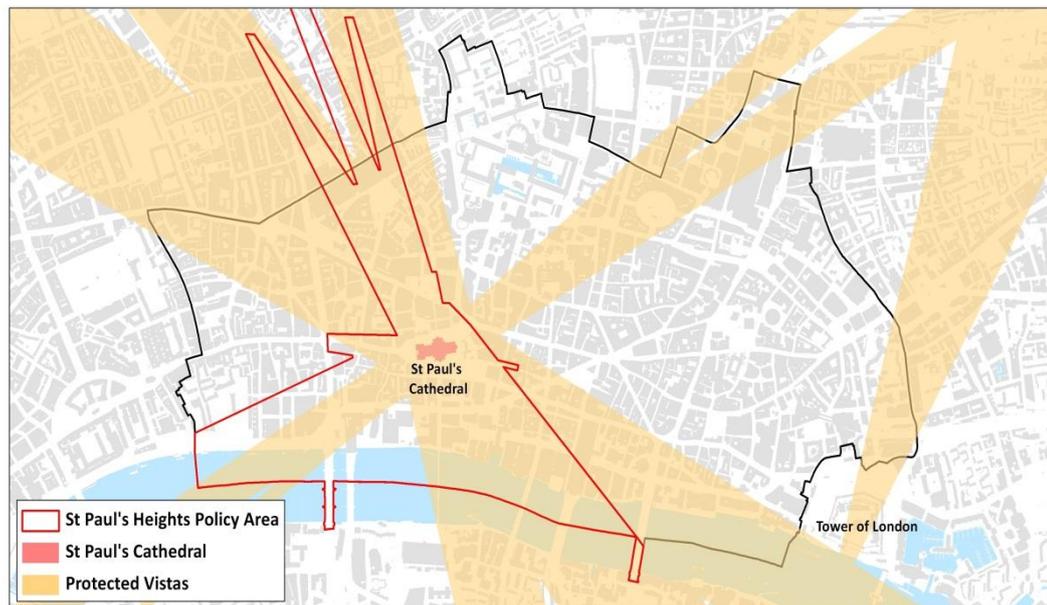


Figure 5 Protected Views

- 4.1.1 St. Paul's Heights limitations have been employed for over 70 years to protect and enhance the local views of the Cathedral for the enjoyment of Londoners and visitors alike. It is implemented through policy CS13 of the City of London Local Plan. The St. Paul's Heights operate by defining a series of inclined planes between the viewpoints and the Cathedral which form a ceiling on development through which no building can be allowed to rise if the views are to be preserved. The viewpoints protected by the St. Paul's Heights are from the Thames bridges, the south bank between Hungerford Bridge and London Bridge, and a number of views from streets to the west, north and east.
- 4.1.2 The St. Paul's Heights policy area covers the Thames Policy Area of the City from the City's western boundary with Westminster at Victoria Embankment, to the riverside walkway at Hanseatic Walk. The boundary of the St. Paul's Heights policy area extends to the southern end of London Bridge and Blackfriars Bridge. Many of these protected views are from viewpoints in Westminster, Lambeth and Southwark.
- 4.1.3 Development or redevelopment proposals must conform to the Heights limitations. The views protected by the Heights are sensitive to even small infringements. Consistent application of the limitations is therefore crucial to successful protection of the views. For more information relating to St. Paul's Heights, please view the City of London Protected Views Supplementary Planning Document (2012).
- 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.

#### **4.1.5 Tower of London Local Setting**

4.1.6 The Tower of London Local Setting is defined in the Tower of London World Heritage Site Management Plan (2007) as comprising “the spaces from which it can be seen from street and river level, and the buildings that provide definition to those spaces”. The Tower of London Local Setting Study (2010) sets out aims and objectives for conserving, promoting and enhancing appreciation of the Outstanding Universal Value of the Tower of London World Heritage Site, within a defined local setting area.

4.1.7 The study includes a series of suggested “approach routes”, based on the main historic routes to and from the Tower and surrounding urban environment. Movement along these routes offers the potential for pedestrians to appreciate the Outstanding Universal Value of the Tower from varying distances. In addition it provides for ease of access and understanding of the public realm relating to the World Heritage Site. several of these routes can be experienced in the Thames Policy Area:

- Route 2: Three Quays Walk (the aim is to create a high quality route from which pedestrians can experience the significance of the Tower's relationship to the river to the south and the City to the North).
- Route 3: Lower Thames Street (the aim is to create a high quality approach that allows pedestrians to appreciate the Outstanding Universal Value of the Tower, especially its Norman military architecture and concentric castle design).
- Route 4: Great Tower Street (the aim is to create an approach which reflects the significance of the relationship between the City of London and the Tower and maintains the open qualities of the threshold to Tower Hill, from where the Tower appears dominant in its setting as a recognisable landmark, and the defences are visible as a symbol of its military architecture).
- Route 5: Savage Gardens – aim is to create an approach that reflects the significance of the relationship between the Tower and the City and emphasises the threshold between the street within the local setting and the “Liberties”, retaining and enhancing views of the Tower.
- Route 6: Cooper's Row – aim is to create an approach that reflects the significance of the relationship between the Tower and the City and celebrates the Tower as a main focus point.
- Route 8: Vine Street – aim is to create views which facilitate people's appreciation of the Tower of London World Heritage Site
- Route 9: Minories – aim is to create an approach which celebrates the Tower as a main focus, revealing the prominent military architecture and outstanding example of concentric castle design.

4.1.8 The Tower of London Local Setting Study provides further detail on representative viewpoints that exemplify the Outstanding Universal Value of the Tower of London. Development in the Thames and Riverside could affect some of these views and any potential impact should be assessed through Townscape and Heritage Impact Assessment. The relevant views are:

- View 5: Main entrance to the Tower
- View 7: Wakefield Gardens (above Tower Hill underground station)
- View 9: Tower Bridge
- View 10: Queen's Walk
- View 11: London Bridge

## 4.2 Monument Views

4.2.1 The protected views from the gallery of the Monument are shown on Policies Map A of the City of London Local Plan. The views are protected by policy CS13 of the Local Plan and explained further in the City of London Protected Views Supplementary Planning Document (SPD) 2012. The policy protects and enhances significant local views of and from the Monument.

4.2.2 The Thames Policy Area is within four of the City's five views from the Monument. These are as follows:

- View One: South East to the Tower of London, Tower Bridge, the River Thames and HMS Belfast
- View Two: South to the River Thames
- View Three: South West to London Bridge and Cannon Street Railway Bridge
- View Four: West to Waterloo Bridge and Victoria Embankment

4.2.3 The height and massing of development should not visually intrude into the key features of the views, and views of the River Thames should be maintained.

4.2.4 The immediate setting of the Monument is formed by four surrounding street blocks defined on the Policies Map. Development in these four street blocks should not impinge on the general open character of the space around the gallery and should not detract from the elevation of the Monument in relation to its surroundings. The view from Queen's Walk (western end) northwards to the Monument is important to the Thames and Riverside area because it provides the most complete and intimate view of the Monument from the south bank and from the river itself. The view from directly opposite on the south bank is approximately on the line of Old London Bridge and remains one of the oldest and best views of the Monument. Most of the column of the Monument is visible from the south

bank walkway over the roof of St. Magnus the Martyr Church. It is important that there is no development north or south of the church which might harm this view.

4.2.5 For further information relating to Monument Views, please refer to the City of London Protected Views SPD 2012.

### **4.3 Mayor's London View Management Framework SPG: Protected Vistas**

4.3.1 The London Plan and the City of London Local Plan seek to protect strategic views which are defined within the London Plan's Supplementary Planning Guidance – the London View Management Framework (2012). In The Thames Policy Area, the following Protected Vistas need to be considered:

- Alexandra Palace to St. Paul's Cathedral (Wider Setting Consultation Area)
- Parliament Hill to St. Paul's Cathedral (Wider Setting Consultation Area)
- Kenwood to St. Paul's Cathedral (Wider Setting Consultation Area)
- Primrose Hill to St. Paul's Cathedral (Wider Setting Consultation Area)
- Greenwich Park to St. Paul's Cathedral (Viewing Corridor & Wider Setting Consultation Area)
- Blackheath Point to St. Paul's Cathedral (Viewing Corridor & Wider Setting Consultation Area)
- Westminster Pier to St. Paul's Cathedral (Viewing Corridor)
- King Henry's Mound, Richmond Park to St. Paul's Cathedral (Viewing Corridor & Wider Setting Consultation Area)
- The Queen's Walk to the Tower of London (Protected Silhouette, Viewing Corridor & Wider Setting Consultation Area)

4.3.2 Development proposals above Viewing Corridor threshold planes would normally be refused in accordance with London Plan policies 7.11 and 7.12 (as published July 2011). Development proposals in Wider Setting Consultation Areas must be designed or sited so that they preserve or enhance the viewer's ability to recognise and appreciate the Strategically Important Landmark, in this case St. Paul's Cathedral or the Tower of London. Further detail can be found in the London View Management Framework SPG.

### **4.4 Mayor's London View Management Framework SPG: River Prospects**

4.4.1 The London View Management Framework also includes a series of "River Prospect" assessment points from which the juxtaposition between elements, including the river frontage and landmarks, is appreciated within a wider London context. Development proposals must ensure that key features of each view can continue to be enjoyed in the context of their surrounding environment, including distant buildings. In the case of

the Thames Policy Area, the key landmarks include St. Paul's Cathedral, the Tower of London, the Monument, St. Bride's Church, Cannon Street Station towers and the Old Bailey.

#### **4.5 Views policy assessment requirements**

- 4.5.1 The process for assessing the impact of development on the protected views in the City is well established. Developers should use pre-application discussions to establish whether protected views might be affected by the development site. 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.
- 4.5.2 The impact of vegetation and temporary structures on protected views is an important consideration. Planning conditions may be used to limit the potential for these elements to obscure protected views.

## 5 Recreation, public access and marine infrastructure

### 5.1 Recreation

5.1.1 The Thames Riverside is the City's largest public open space providing a traffic free environment for relaxation and recreation. The riverside varies in character along its length with areas suitable for sitting, walking, jogging and other sport and fitness related activities. Cycling and skateboarding are not allowed on the riverside walk. Multipurpose street furniture has been designed to provide opportunities for exercise and play promoting activities which assist in combatting both mental and physical health issues. Public toilets are provided in two locations on the riverside and participation in the Community Toilet Scheme adds to provision. The riverside's role in relaxation and stress reduction should be enhanced through the retention of areas which remain relatively tranquil compared with the vibrancy of other parts of the riverside and the City generally. The City of London Noise Strategy includes policies which will identify, protect and enhance areas of tranquillity. Planning decisions will contribute to the reinforcement of quiet areas.

### 5.2 Focal points of public activity

5.2.1 **Blackfriars Station** is one of the busiest stations in the City with recent Thameslink upgrade works increasing the number of passengers entering and exiting the station. 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. The development will result in the creation of a new area of public realm to the west of Blackfriars Bridge. This area will be subject to periodic closure to accommodate the maintenance requirements of the Thames Tideway Tunnel infrastructure. Blackfriars Pier will be moved to a new location east of the Blackfriars Bridge increasing the potential for transport interchange and public activity.

5.2.2 **Millennium Bridge** is one of the busiest pedestrian gateways into the City, with approximately five million people a year using the bridge, which provides a pedestrian link between the Tate Modern on the south side of the Thames and St Paul's Cathedral and the rest of the City. There is potential for improvement to the public realm on the Riverside Walkway beneath the bridge and surrounding area but any enhancements in vitality would need to respect the amenity of the adjacent City of London School and the nearby residential area.

5.2.3 Over eight million pedestrians per year use **London Bridge**. This level of footfall presents an opportunity to connect London Bridge with the Riverside Walkway and enhance vitality along the riverside. A new open staircase connecting the riverside and London Bridge will be constructed in 2015 and will replace the existing stairs.

5.2.4 **Tower Millennium Pier** is used by river bus services, river tour services and private-chartered boats. Due to its location just outside the City and adjacent to the Tower of London, a large number of tourists use this transport facility and there are opportunities to connect the pier with the

Riverside Walkway through public realm improvements at Three Quays and Sugar Quay. Passenger numbers are likely to increase in line with targets in the Mayor's River Action Plan

### **5.3 Riverside Walkway**

- 5.3.1 The riverside walk is a focal point of public activity and is popular amongst workers, residents and tourists for its relative tranquillity and views of the Thames. Riverfront redevelopment projects provide good opportunities to enhance the Riverside Walk and encourage a more vibrant and inclusive environment in places, as has successfully been done in the Angel Lane area.
- 5.3.2 The City Corporation has prepared a Riverside Walk Enhancement Strategy which identifies projects and proposals to improve the City's riverside walk in a co-ordinated manner, preserving the amenity of residents while identifying areas with potential for enlivenment.
- 5.3.3 The Riverside Walk Enhancement Strategy was subject to public consultation and Planning & Transportation Committee scrutiny during its preparation. It represents the City Corporation's intentions for the riverside walk and was adopted on 15<sup>th</sup> January 2015.

### **5.4 Inclusive design**

- 5.4.1 Development and riverside walk enhancements must be designed to ensure accessibility for people with a range of mobility and access needs. 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, consideration of soundscapes which aid orientation for people with visual impairments and the inclusion of riparian life-saving equipment. The Riverside Walk Enhancement Strategy identifies wheelchair accessibility as an issue for certain parts of the riverside and promotes improved accessibility associated with all public realm enhancement schemes. There is a wide range of improvements that can be made to assist in access and ease of use for people with a range of capabilities. Design and Access Statements which are submitted with development proposals should fully explore opportunities to provide a fully inclusive environment.

### **5.5 Access to the riverside and foreshore**

- 5.5.1 The City of London 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. The main points of access to and from the riverside from the rest of the City are at Victoria Embankment, Blackfriars Bridge, Millennium Bridge, Southwark Bridge, Cousin Lane, Angel Lane, London Bridge, Water Lane, Tower of London and Tower Pier. The number of people using each point varies by time of day and time of the week with the tourist attractions being more popular points of entry to the riverside at weekends. The popularity of the bridges

as entry points to the riverside necessitates that connections which are inclusive for all are provided from the bridges to the riverside walk.

5.5.2 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. Anyone going onto the Thames foreshore does so entirely at their own risk and should be aware of the following dangers: The Thames rises and falls by over 7 metres twice per day, the current is fast and the water is cold. Hazards include raw sewage, Weil's disease, broken glass, hypodermic needles, wash from vessels and slippery stairs.

5.5.3 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. Ladders are provided at intervals along the frontage for emergency access and egress to and from the river and foreshore. These ladders should be retained and maintained. Life belts and grab chains are provided in several locations along the foreshore and on some of the bridges for emergency use.

5.5.4 . 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

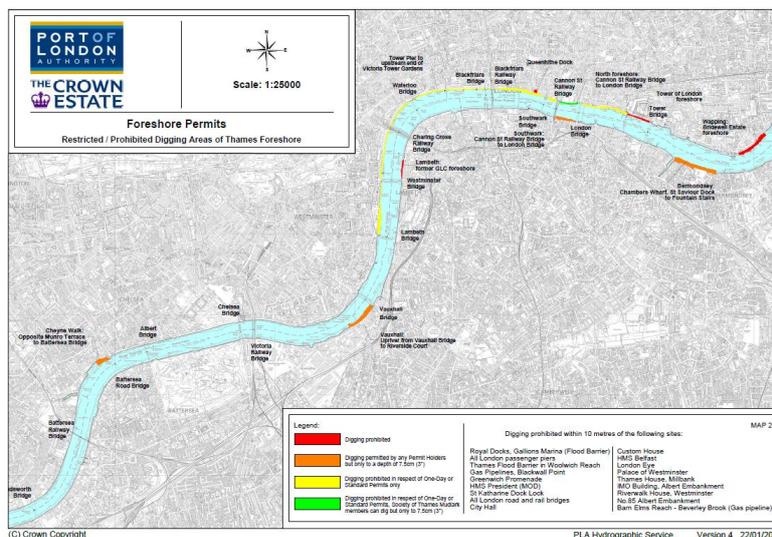


Figure 6 Permit requirements on the Thames Foreshore

## 5.6 Marine support facilities and infrastructure and moorings

- 5.6.1 Passenger Transport nodes in the City at Blackfriars Pier, and just to the east of the City at Tower Millennium Pier, enable passenger movements to and from the north bank of the Thames. A redundant pier at Swan Lane could be brought back into use to improve access to river transport.
- 5.6.2 The River Thames in central London is well served with river cruises catering for tourists wishing to view London's sights from the river. River cruises alight at Blackfriars Pier in the City and Tower Millennium Pier just outside the City in Tower Hamlets to the east and also at Bankside on the south bank in Southwark. Numerous specialist cruises and party boats include the City's section of the Thames in their itineraries.
- 5.6.3 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).
- 5.6.4 There is a private jetty at Sugar Quay and private stairs at Fishmongers' Hall and Vintners' Place which provide access to the river for small craft. Mooring points for larger leisure vessels are available at Tower Stairs Tier opposite HMS Belfast with access to the shore being via Tower Millennium Pier.
- 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 importance in refusing development on or over the river which does not require a waterside location for river related uses.

## 5.7 Access to flood defences

- 5.7.1 The TE2100 plan promotes the ongoing maintenance of local flood defences in the City and elsewhere along the riverside with defence raising proposed from 2065. In order to carry out this maintenance work access to the flood defences from the land and water is essential. Improving access to flood defences can be achieved on redevelopment of riverside sites alongside public realm improvements. These works must be designed such that views of the river from footpaths and buildings are not affected when flood defences are raised. It may be necessary to set the line of the local flood defences back when the defences are upgraded, where space permits, to avoid erosion damage to the defences particularly at Blackfriars. Where realignment is not possible, local under-pinning of the defences may be needed.

## 5.8 River pageants and events

- 5.8.1 Numerous boating events such as the Great River Race, the Doggett's Coat and Badge race, the Barge Driving Match and the Lord Mayor's Flotilla take place on the City's stretch of the Thames. In 2012, almost 1,000 vessels took part in the Queens Jubilee River Pageant. The Thames Riverside is important for accommodating supporters and spectators of

these events. Land based events such as the London Marathon which includes sections along Thames Street, the Lord Mayor's Show which runs along Victoria Embankment in the City and fireworks displays which focus on the river and its bridges also attract large numbers of spectators. It is likely that such events will continue to grow in popularity.

5.8.2 It is important that the Thames Riverside is designed to safely accommodate spectators and all potential visitors so that views of the river from the riverside and riverside buildings are not obscured. Policy CS9.2(i) and 9.4 (v) is of particular importance in maintaining such views of the river and refusing development on or over the river which does not require a river location. Policy CS9.4 (vi) is also important in restricting the permanent mooring of vessels to those which are of national historic interest and have a direct connection with the City.

### **5.9 Deficiencies in river related facilities**

5.9.1 The London Plan (paragraph 7.94) suggests that local authorities should identify deficiencies in the following river related facilities

- Water based passenger, tourism and freight transport
- Water based sport & leisure
- Access & safety provision
- Marine support facilities and infrastructure & moorings

5.9.2 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.

## 6 Ecology, biodiversity, climate change & flood risk

### 6.1 Sites of ecological importance for nature conservation

- 6.1.1 The **River Thames** is a Site of Metropolitan Importance for Nature Conservation due to its role as a corridor for wildlife and importance as a fish spawning ground. The River Thames is now cleaner and sustains a greater diversity of wildlife than it has for 200 years, supporting 119 different species of fish. The designation of the River Thames as a SMINC demonstrates its importance as a migratory route and ecological corridor through the densely developed centre of London. The City's foreshore is also an important habitat for wildlife. Artificial structures, flood walls and littoral foreshore make it easier for natural flora and fauna to colonise. Birds such as cormorants and grey herons, which feed on invertebrates living in the inter-tidal mud, are found on the City's riverbank.
- 6.1.2 **Temple Gardens** is a Site of Borough Importance for Nature Conservation. The Temple Gardens are home to a variety of plants species both native and exotic. As well as the attractive horticulture, it is also home to a variety of wildlife, providing nesting sites for many birds, including robins, thrushes, coal-tits and blue-tits. Bees and a dozen species of butterfly can be spotted in summer.
- 6.1.3 **Seething Lane Garden** is a Site of Local Importance for Nature Conservation. This simple garden is important for its association with Samuel Pepys. The garden is undergoing redevelopment including excavation and reinstatement of a redesigned garden with improvements for all users as well as for wildlife, improving the garden's biodiversity and sustainability value.

### 6.2 Biodiversity Issues and Challenges

- 6.2.1 The Tidal Thames Habitat Action Plan which forms part of the City's Biodiversity Action Plan identifies a number of factors which must be taken into account when considering development on the riverside including maintenance of the existing foreshore, particularly areas where the foreshore is exposed at low tide providing intertidal habitat.
- 6.2.2 Vertical concrete flood defence walls, in some areas clad with timber, can support a variety of plants and invertebrates. The City Corporation encourages the use of timber in conjunction with the building of new structures, as timber walls are easier for natural flora and fauna to colonise.
- 6.2.3 Artificial structures in the channel, such as the pier structure in front of Customs House, can provide roosting and nesting sites for birds. Bird species which have been recorded in the City stretch of the Thames include: Cormorant, Mallard, Herring and Lesser black-backed gulls. Wherever possible, the City Corporation seeks to retain old timbers currently in use or redundant from past structures. All works in the river require a river works licence from the PLA and such works need to be kept in a good state of repair.

6.2.4 Climate change and increased sea levels may affect the amount of foreshore that is exposed in the future. The intensive level of use of the riverside is also seen as a threat necessitating the incorporation of biodiversity enhancement features to mitigate for any alteration in habitat due to development. Water quality is also identified as a threat although the proposed Thames Tideway Tunnel will alleviate the periodic discharge of sewage into the Thames which results from intense rain storms overloading the sewer system.

### **6.3 Climate Change mitigation and resilience.**

6.3.1 Recent developments on the riverside at Angel Lane demonstrate good energy efficiency measures and the use of renewables to reduce carbon emissions. However, although efforts to reduce carbon emissions are progressing, scientists generally agree that some level of climate change is now inevitable and we will need to adapt buildings and the public realm to ensure resilience to changed climate patterns.

6.3.2 The most likely scenario to impact on the City's riverside is one where summers will be hotter and drier, winters will be milder and wetter and there will be more frequent extreme weather events. The City's riverside with its south facing aspect will be particularly vulnerable to over- heating and potential drought conditions. Conversely, more frequent heavy rainfall will increase the likelihood of surface water flooding and sewer overflows with the Thames Riverside being one of the most vulnerable parts of the City. Maintaining the river and riverside as a biodiversity corridor presents challenges under changed climate conditions since flora and fauna may not adapt quickly enough to altered conditions. Changing weather patterns may encourage certain species to thrive and in the case of pests and diseases this could be detrimental to health and the environment. Resilient planting and selective use of lighting to prevent illumination of the water will contribute to the preservation of the biodiversity corridor. The river could also make a significant contribution to reducing air pollution through an increase in its use for commercial transport, which reduces lorry movements on congested streets.

6.3.3 Higher summer temperatures could increase the attractiveness of the riverside, increasing pressure on public spaces for recreation. The open south facing aspect can be utilised to aid solar gain to heat buildings in winter and facilitate green shading to reduce the need for air conditioning in summer. Greening can also provide shelter from cold winds, which are more prevalent on the riverside, reducing the use of outdoor space heating. The use of green infrastructure and Sustainable Drainage Systems (SuDS) is crucial in this area to maintain the biodiversity corridor and reduce rainwater run-off. SuDS designs in this area can make use of the proximity to the River Thames to enable clean rainwater to run directly into the Thames rather than into the combined sewer network.

### **6.4 Flood risk**

6.4.1 The City Flood Risk Area is defined in the Local Plan and shown on the Policies Map. Encompassing most of the Thames Policy Area, it comprises areas that are at risk from river flooding and surface water or sewer

flooding. Overall, the City of London is at low risk of flooding relative to other parts of central London. River flooding and surface water or sewer flooding present different challenges which need differing but complementary mitigation approaches. The Thames riverside is protected from river flooding by the Thames Barrier and wider flood alleviation mechanisms in the Thames Estuary, and locally by the flood defence walls adjacent to the river. Maintenance of these flood defence walls is essential. Therefore access to them from both land and river must be retained or improved, particularly on redevelopment of riverside sites. Climate change will result in rising sea levels which in turn will raise the river level in the tidal Thames. The City of London Strategic Flood Risk Assessment is available on the City of London's web site and provides detailed modelling of the flood risks the City faces.

6.4.2 The Thames Estuary 2100 (TE 2100) proposals in the City for the period from 2010 to 2040 focuses on maintenance of the existing flood defences. Beyond that date the TE2100 recommendation is to implement a programme of defence raising by up to 0.5 metres by 2065 and a further 0.5 metres by 2100, to protect central London from river flooding.

6.4.3 The City's riverside is also vulnerable to surface water flooding and overloading of the sewer network which results in sewer discharges into the River Thames at Blackfriars and the risk of dilute sewage emanating from manholes in the area. The catchment area for the City's sewer network extends well beyond the City encompassing much of the London Borough of Camden to the north and as far as Hammersmith and Fulham to the west. Intense or prolonged rainfall in these areas increases the risk of sewer discharges along Victoria Embankment and Paul's Walk on the City's Riverside. The recently consented Thames Tideway Tunnel will address London's combined sewer overflows into the River Thames

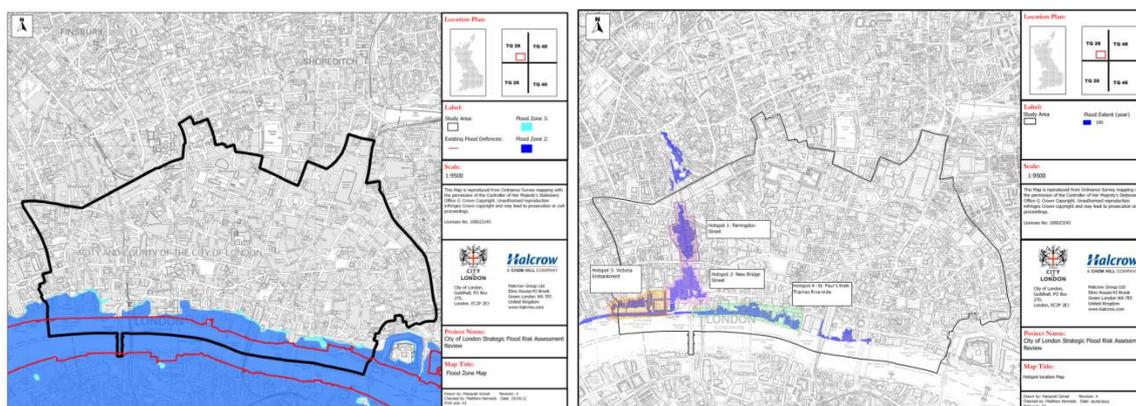


Figure 7 Flood Risk in the City

6.4.4 The increasing frequency of extreme weather events with climate change will increase the risk of surface water & sewer flooding in the future. It is important that development within the areas that are at risk should be designed with flood resistance and resilience in mind. Flood resistance should be designed to prevent the incursion of flood water into buildings through the use of impermeable structures at ground floor and basement levels, non-return valves on pipe and cable routes into the building and automated flood defence barriers at entrance points. Flood

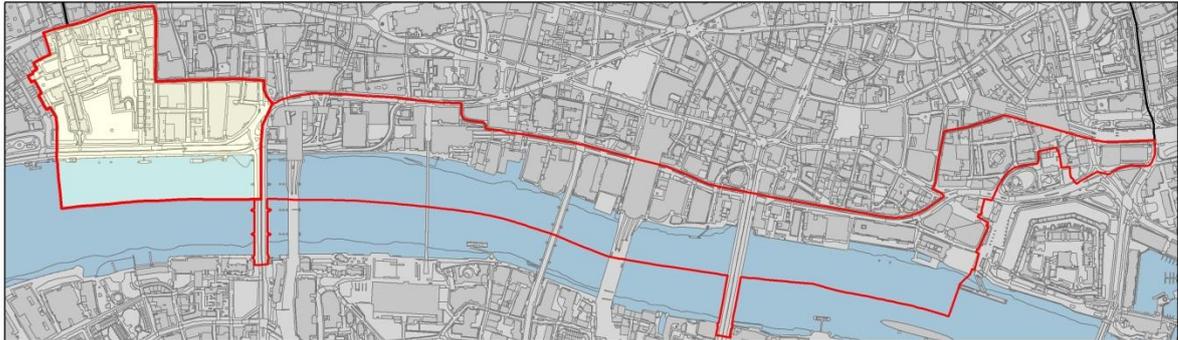
resilient designs ensure that, in the event of flooding, recovery times will be minimised by designing for ease of clean up and locating flood sensitive equipment above the projected flood water level.

6.4.5 The City of London Local Flood Risk Management Strategy addresses how the City Corporation as Lead Local Flood Authority is minimising the risk to businesses, residents and visitors from flooding.

## 7 Land use designations, issues and challenges

- 7.1 London Plan Policy 7.29 *The River Thames* proposes that Thames Strategies should be used to identify important riverside sites and determine the river related expectations for them. The following sections consider each part of the City's Thames Riverside and describe the character and heritage assets, issues and challenges affecting the area, planning policy intentions and development opportunities within each area.
- 7.2 In assessing each area the historic river related uses are highlighted and heritage assets such as Queenhithe dock are identified. River related issues and challenges include the safeguarding of Walbrook Wharf for waterborne freight uses and the development of the Thames Tideway Tunnel to tackle river pollution. For each area, a section on planning policy identifies the policy requirements for riverside sites set out in the Local Plan. River related challenges associated with development opportunity sites are highlighted.
- 7.2a 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. 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

## Temple Place to Blackfriars Bridge



### 7.3 Area character and heritage assets

7.3.1 The Thames Policy Area between Temple Place and Blackfriars Bridge is characterised by the Temples and Whitefriars Conservation Areas, Victoria Embankment and Blackfriars Bridge, all of which are heritage assets. This part of the City's riverside includes Blackfriars Pier but is dominated by the busy four lane road which runs along Victoria Embankment.

7.3.2 The Inner and Middle Temple legal precinct is a designated Park and Garden of Historic Interest and part of the Temples Conservation Area. The area contains a large number of listed buildings and structures. The collegiate plan creates an open aspect to the river with mature trees providing a screen along the Victoria Embankment. To the north and west chambers are arranged around an intricate variety of enclosed courts linked by intimate covered passageways.

7.3.3 Whitefriars Conservation Area contains large scale Victorian commercial buildings, several of which are Grade II listed, along with the former City of London School for Boys (Grade II). These buildings contribute to a formal grid street pattern, following the construction of Victoria Embankment which commenced in 1864 and was completed in 1870.

### 7.4 Issues and challenges:

- **Heritage assets** - conservation and enhancement of the character and appearance of heritage assets is a primary objective for this part of the Thames Policy Area.
- **Thames Tideway Tunnel** – 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. This will also create a new area of public realm, embanked from the Thames and located under and to the immediate west of Blackfriars Road Bridge. The existing Blackfriars Pier will be relocated to the east of Blackfriars

Bridge and the HMS President will be temporarily moved to the west. Disruption during construction works will present challenges in this area.

- **Garden Bridge.** Planning permission has been granted by Westminster City Council and the London Borough of Lambeth for a Garden Bridge to be built beyond the City's boundary to the west. This could result in greater pedestrian movement and the need for visitor amenities including toilets and refreshment venues. The proposed bridge will have potential impacts on protected views of St Paul's Cathedral, St Paul's Heights views, and protected views from the Monument. New views from the bridge could be created.
- The Mayor of London, as part of his Vision for Cycling in London is implementing **segregated cycle superhighways** to run east–west through the City between Tower Hill and Victoria Embankment and north-south between Farringdon and Blackfriars Bridge.

### 7.5 Planning Policy aims for Temple Place to Blackfriars Bridge

7.5.1 The Temples includes a mix of office and residential uses within the Chambers which creates a unique environment serving the needs of the legal profession. Change of use from office to residential in this area is acceptable provided that the balance between these two uses is maintained.

7.5.2 Elsewhere along this stretch of riverside, planning policy encourages office led commercial development. This could include further enlivening of the area around Blackfriars Bridge and the space adjacent to the riverside walk under the elevated section of roadway, with retail uses.

7.5.3 Development associated with the new sewerage infrastructure at Blackfriars will need to contribute to enlivening of the public realm and enhancement of the western section of the riverside walk in the City.

### 7.6 Relevant Local Plan policies:

- CS 9 Thames & the Riverside
- CS 2 Utilities Infrastructure
- CS 12 Historic Environment
- CS 13 Protected Views
- CS 18 Flood Risk
- CS 19 Open Spaces & Recreation
- DM 21.4 The Temples

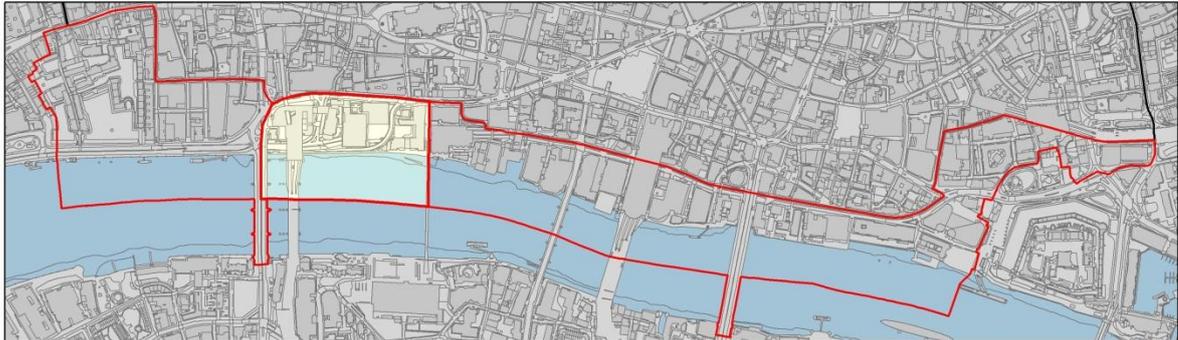
### 7.7 Development Opportunities Temple Place to Blackfriars Bridge

7.7.1 Although the Thames Tideway Tunnel site is an infrastructure site rather than a development site it presents opportunities for biodiversity enhancement, soft landscaping and recreation/play space in an accessible area of public realm on the riverside at Blackfriars. Prevention of flooding associated with this area is essential through the creation of flood defences that are suitable for the predicted river level rise due to climate change, and through the incorporation of sustainable drainage (SuDS) to reduce flood risk from surface water. The relocation of Blackfriars

Pier will create a transport hub with ease of transfer from rail to river services.

7.7.2 The proposed Garden Bridge, if built, will present challenges in dealing with additional pedestrian pressures and associated service needs at the City's western boundary

## Blackfriars Bridge to Millennium Bridge



### 7.8 Area character and heritage assets

7.8.1 The predominant character of the Thames Policy Area between Blackfriars Bridge and Millennium Bridge is post 1960s development which accommodates the entrance to Blackfriars underpass and the associated road network. Recently improved transport links at the redeveloped Blackfriars Station have increased passenger capacity. Brutalist concrete development dominates this area comprising the Mermaid Theatre and Conference Centre and Baynard House. Contrasting with this is the 1980s brick built City of London School and the glazed station building at Blackfriars Station. Blackfriars underpass accommodates heavy through traffic from Victoria Embankment through to Thames Street. Puddle Dock and White Lion Hill complete the complex road network in the area which effectively prevents pedestrian access to the riverside here from the rest of the City.

7.8.2 Blackfriars House was built during the period 1913-1916; this seven storey, steel framed commercial building is Grade II listed. Blackfriars Bridge (Grade II), the second bridge on this site, was opened by Queen Victoria in 1869 and widened on the western side between 1907 and 1910. The views to the west and east of the bridge are of major importance, as is the setting of St. Paul's Cathedral and several other landmarks such as those in the foreground on Victoria Embankment.

7.8.3 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 of the castle were exposed during archaeological investigations in the early 1970s and 1980s and have been preserved below modern buildings.

### 7.9 Issues and challenges

- The **severance of this area from the riverside walk** presents a challenge for any future redevelopment in the Baynard House/Puddle Dock area.
- The relocation of Blackfriars Pier to the east of Blackfriars Bridge will create **greater pedestrian pressure** on this section of the riverside walk. The relocated pier will be closer to the City of London School. It will be

important to prevent disturbance to the school. Relocation of the pier presents opportunities for increased use of the river pier and improved connections with Blackfriars Station and the rest of the City to the north. Additional visitor pressure could result from improved links between the proposed Garden Bridge and visitor attractions around the Millennium Bridge resulting in the need for an improved pedestrian environment.

- The presence of the City of London School on this stretch of the riverside must be taken into account in consideration of adjacent development, which must not disturb the **amenity of the school**.

## **7.10 Planning Policy aims for Blackfriars Bridge to Millennium Bridge**

7.10.1 Any redevelopment in this stretch should be focused on office led commercial development taking advantage of the improved rail and river transport links at Blackfriars and providing important employment premises to meet the needs of London and the wider south east. Improved pedestrian movement and the creation of additional open space could deliver future improvements in this area for businesses, residents and visitors. The preservation of Baynard Castle Scheduled Ancient Monument and public display and interpretation to enhance the public's understanding of its importance would be sought in any proposals for this area.

## **7.11 Relevant Local Plan policies**

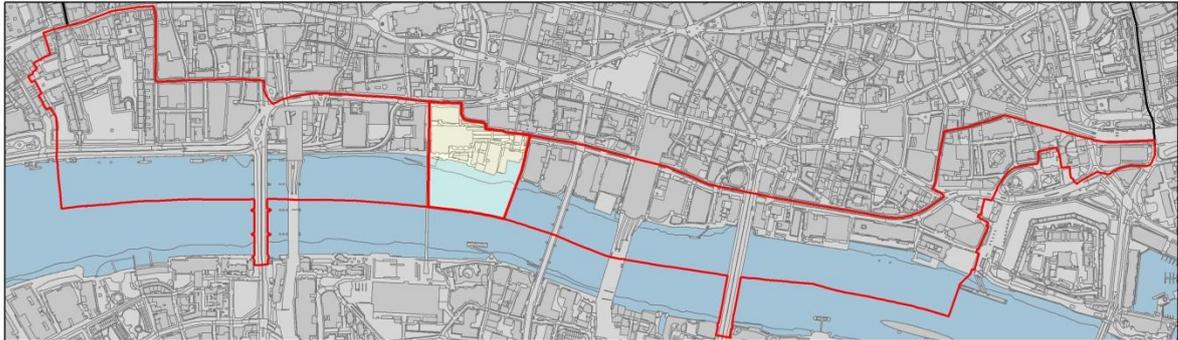
- CS 9 Thames and the Riverside
- CS 12 Historic Environment
- CS 13 Protected Views
- CS 18 Flood Risk
- CS 19 Open Spaces & Recreation

## **7.12 Development Opportunities Blackfriars Bridge to Millennium Bridge**

7.12.1 The site at Puddle Dock and Baynard House is predominantly 1960s built concrete development incorporating offices and the former Mermaid Theatre which is currently used as conference facilities. In line with Local Plan Policy CS9 *Thames and the Riverside* any redevelopment should focus on office led commercial development which could incorporate conference facilities, hotel and retail uses as long as they do not prejudice the primary business function of the City (Policy DM 1.1). This site is constrained by the St Paul's Heights policies and Monument Views policies (CS13&14). The severance of the site from the riverside should be addressed in any redevelopment with additional publicly accessible open space being provided if possible. The Thames Tideway Tunnel scheme will provide replacement stairs and a new lift on the east side of Blackfriars Bridge.

7.12.2 Proposals for redevelopment will need to consider the role and future use of the local highway network in this area with the potential transfer of underused highways to open space use.

## Millennium Bridge to Queenhithe



### 7.13 Area character and heritage assets

7.13.1 The area around Millennium Bridge is dominated by the presence of the Millennium Bridge approach and the views of St Paul's Cathedral (Grade I listed) to the north. Buildings on the Millennium Bridge Approach date from the 1980s with the City of London School on the western side and buildings that are predominantly in office use, with cafes and restaurants at ground floor and basement levels on the eastern side. The City's main cluster of riverside residential properties sits to the east of Millennium Bridge comprising four residential blocks, Norfolk House, Globe View, Sir John Lyon House and Queens Quay with about 700 flats in total.

7.13.2 Queenhithe Scheduled Ancient Monument, known from 898AD is the only remaining Saxon and medieval dock on the City's riverside. At low tide a substantial area of foreshore and vertical flood defence wall is exposed forming important habitats for river related species. The riverside walk which is on the edge of the Thames for the majority of its path through the City is diverted onto Upper Thames Street in the Queenhithe area. Adjacent to Queenhithe Dock lies Smith's Wharf, constructed in the 19<sup>th</sup> century. Most of this Scheduled Ancient Monument lies underneath Queensbridge House.

### 7.14 Issues and challenges:

- Maintaining **residential amenity** is an important issue in this location particularly as the area's attractiveness to visitors is improved and the potential for noise disturbance increases.
- **Completion of the Riverside Walk at Queenhithe** Planning permission has been granted for completion of the riverside walk associated with redevelopment of adjacent buildings.
- The vulnerability of residents to **flood risk** is a key concern since this area is at risk from both river flooding and surface water/ sewer flooding. Flood resistance and resilience measures will play a role in protecting residents and enabling speedy return to normal following any flooding.

### 7.15 Planning Policy aims for Millennium Bridge to Queenhithe

- 7.15.1 In order to maintain residential amenity, entertainment venues, restaurants and bars should be located and designed to avoid conflict with the residential cluster. However increased visitor numbers are expected as tourist amenity is improved through environmental enhancement projects around the Millennium Bridge and Paul's Walk and the links to St Paul's Cathedral and the City Information Centre. This will lead to increased demand for cafes and restaurants. Planning and licensing conditions will be important in ensuring that any venues that are permitted do not result in undue disturbance to residents.
- 7.15.2 Aside from the small residential cluster at Queenhithe, the area should remain principally in office use, with office led commercial development being encouraged.

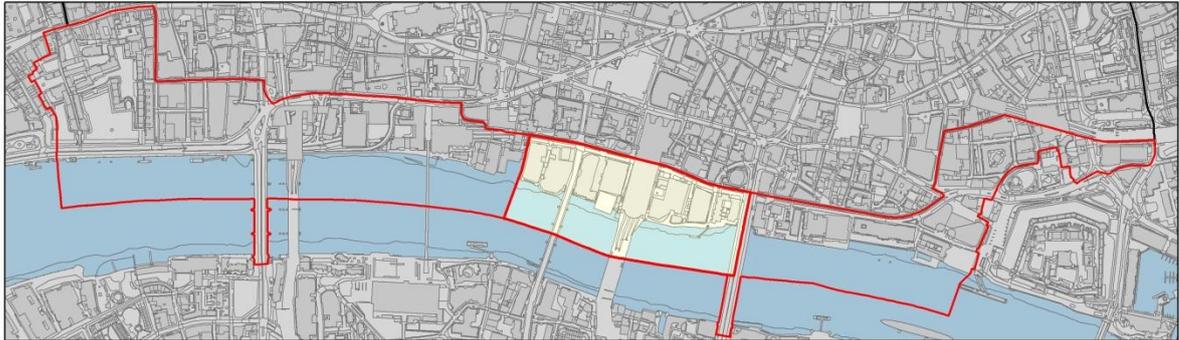
**7.16 Relevant Local Plan policies**

- CS 9 Thames and the Riverside
- CS 12 Historic Environment
- CS 13 Protected Views
- CS 18 Flood Risk
- CS 19 Open Spaces & Recreation

**7.17 Development opportunities Millennium Bridge to Queenhithe**

- 7.17.1 The residential cluster at this location limits opportunities for redevelopment although planning permission has been granted for the development of hotels at Queensbridge House (11/00572/FULMAJ) and Millennium Bridge House (12/00525/FULL) comprising over 500 bedrooms in total. Any further loss of offices in this area would need to satisfy the requirements of Policy DM 1.1 *Protection of Office Accommodation*. The Queensbridge House development includes the provision of a new section of Riverside Walk which will avoid the need to divert onto Thames Street for this section of the riverside walk. The main challenge for this area is maintaining residential amenity.

## Queenhithe to London Bridge



### 7.18 Area character and heritage assets

7.18.1 The predominant land use along this stretch of the Thames Policy Area is offices accommodated in a variety of buildings including modern, high quality office buildings: Watermark Place and Riverbank House. In contrast the historic Vintners' Hall and Fishmongers' Hall include the offices of City Livery Companies and provide event and conference facilities which service the business interests of the City and beyond.

7.18.2 The City's only remaining operational wharf is located adjacent to Cannon Street Railway Bridge and accommodates the City's Walbrook Wharf waste transfer station along with modern office space on the upper floors. Southwark Bridge, Cannon Street Railway Bridge and London Bridge make this a well-connected location for workers and visitors from a wide catchment.

7.18.3 This section of the Thames Policy Area includes numerous heritage assets including Southwark Bridge (Grade II listed), Vintners' Hall (Grade I listed) dating from 1671, Queen Street Place (Grade II listed), Cannon Street Station Towers (Grade II listed), Fishmongers' Hall (Grade II\* listed) and the Roman Governor's Palace site which is a Scheduled Ancient Monument.

### 7.19 Issues and challenges:

- The City's riverside has historically been a commercial area associated with the river – this commercial character remains today albeit in the form of offices rather than warehouses, wharves and docks. **Protection of office uses** will remain a key priority with supporting commercial uses such as cafes and restaurants being encouraged.
- **Servicing** is an issue for some buildings along the riverside with space being used intermittently for servicing and the requirement to service off Thames Street.
- 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.

- At **Walbrook Wharf**, the retention of a viable wharf with river access and vessel manoeuvring space is essential.
- Pier infrastructure remains in place at **Swan Lane Pier** although the pier is no longer in use. Increased use of the river for passenger and freight transport would be welcomed.

## **7.20 Planning Policy aims for Queenhithe to London Bridge**

7.20.1 Office led commercial development which could incorporate café, restaurant or similar uses at ground floor level will be welcomed for its contribution to enlivening the riverside walk, within an overall approach which seeks to protect existing office space.

7.20.2 Walbrook Wharf presents particular policy issues since it is a safeguarded wharf and therefore protected for waterborne freight handling use (London Plan Policy 7.26). This policy also specifies that adjacent developments and uses should be designed to minimise potential conflicts. In addition Walbrook Wharf's use as a waste transfer or waste management site is protected. Any change of use to a non-waste related use would require re-provision of an equivalent waste site elsewhere.

7.20.3 If permanently moored vessels are exceptionally permitted they must be of national importance, have a special 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.

7.20.4 Reinstatement of the former Swan Lane Pier for a river related use would be welcomed.

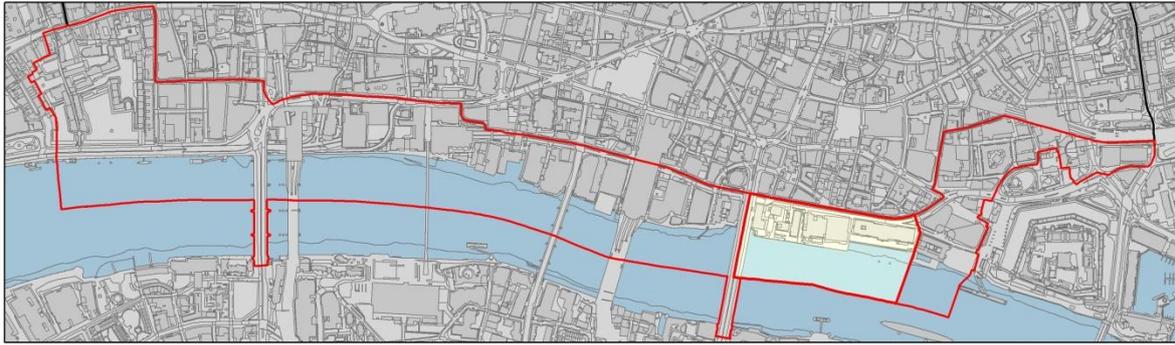
## **7.21 Relevant Local Plan Policies**

- CS 1 Offices
- CS 9 Thames and the Riverside
- CS 12 Historic Environment
- CS 13 Protected Views
- CS 17 Waste
- CS 18 Flood Risk
- CS 19 Open Spaces & Recreation

## **7.22 Development opportunities Queenhithe to London Bridge**

7.22.1 The established commercial nature of this stretch of the river will continue without dramatic change, though some upgrading of the existing office stock may occur. Re-use of the disused pier at Swan Lane for improved river transport would be welcomed.

## London Bridge to Water Lane



### 7.23 Area character and heritage assets

7.23.1 Heritage assets in this area include Adelaide House (Grade II listed), the Church of St Magnus the Martyr (Grade I listed), Old Billingsgate Market (Grade II listed) and Custom House (Grade I listed), and the Roman Bath House at 101 Lower Thames Street which is a Scheduled Ancient Monument. The 19th century Custom House houses HM Revenue & Customs offices at the eastern end of this section. Custom House Quay, the river wall, stairs and cranes are listed at Grade II\*. The Historic Billingsgate Market conference and event facilities service the business interests of the City and beyond. The Church of St Magnus the Martyr provides a place of worship occupying a site adjacent to the location of the old London Bridge.

### 7.24 Issues and challenges:

- 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. 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.
- Identification of **suitable future uses for the historic buildings** in this area which conserve and enhance their historic significance and commercial heritage is a key challenge.
- The Riverside Walk Enhancement Strategy identifies opportunities for **public realm enhancement, improved public access for all and increased vibrancy** to complement the business City.
- The riverside walk in front of Custom House is too narrow and is liable to occasional **flooding**

### 7.25 Planning Policy aims for London Bridge to Water Lane

7.25.1 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.

7.25.2 Better use of the riverward spaces adjacent to buildings would be welcomed. Car parking and vehicular access for servicing dominates several of the private spaces on this stretch of the riverside. Greater public access and more inclusive use of these spaces would be expected to complement any redevelopment. However some car parking may be needed to enable people with particular disabilities to park close to their destination.

7.25.3 Improved flood protection and the ability to raise flood defences in the face of climate change are important in this area.

## **7.26 Relevant Local Plan Policies**

- CS 1 Offices
- CS 9 Thames and the Riverside
- CS 12 Historic Environment
- CS13 Protected Views
- CS 18 Flood Risk
- CS19 Open Spaces and Recreation

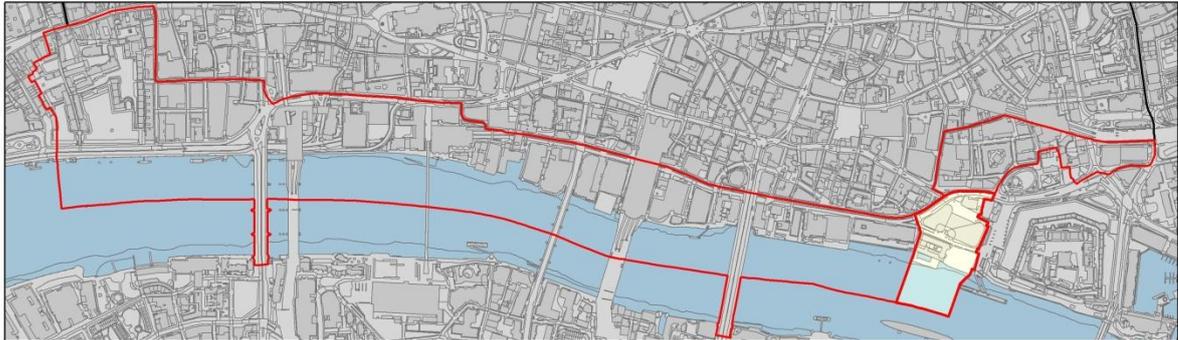
## **7.27 Development opportunities London Bridge to Water Lane**

7.27.1 The area between the Church of St Magnus the Martyr and Old Billingsgate Market is currently in office use comprising two separate buildings: a concrete building with public viewing area adjacent to a blue glass clad building, both completed in the 1980s. The key issues for this area are access to the riverside and servicing for these and adjacent buildings to avoid the need for vehicles to load and unload on the riverward side of the buildings. The intention for this area 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.

7.27.2 Future uses for the important listed buildings at Custom House and Billingsgate Market are a consideration. Billingsgate is currently in use as a conference and event space whilst Custom House is in office use. A range of commercial uses could be considered for these sites if the existing occupants vacate these premises. Alternative future uses should conserve or enhance the historic features of these buildings and should have river frontages that are well related to the adjacent open space and riverside walk.

7.27.3 Opportunities exist to improve the public realm on the riverside adjacent to historic Billingsgate Market and Custom House, particularly if the servicing arrangements and car parking issues can be resolved whilst recognising that some disabled people rely on the ability to park close to their destination.

## Water Lane to All Hallows by the Tower



### 7.28 Area character and heritage assets

7.28.1 New residential and hotel development characterises this part of the riverside with a new hotel and residential building at Three Quays and permission for residential development at Sugar Quay. Adjacent to Sugar Quay a jetty provides a private outdoor space over the river. The structure of the jetty and tidal range make the mooring of vessels here problematic. To the north of these riverside sites is a modern office complex at Tower Place and the church of All Hallows by the Tower. Three Quays and Tower Place are adjacent to the Tower of London World Heritage Site, Tower Millennium Pier and the City's boundary with Tower Hamlets.

7.28.2 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.

### 7.29 Issues and Challenges:

- It will be important to provide and maintain **suitable public realm** adjacent to the new residential and hotel developments accommodating access to the buildings, circulation space for users of the Millennium Tower Pier, amenity space for visitors to the Tower of London and its environs, and spectator space for river and bridge based events. There is potential for improved integration of the Thames Path in the City with that in Tower Hamlets. Once Sugar Quay and Three Quays have been completed there will be little scope for further development in this area.
- **Sugar Quay jetty** is a privately managed open space comprising a wooden decked area over the river. This area has been used in the past for occasional charity events associated with the use of Sugar Quay as offices. Any future use permitted will need to incorporate a river related use and provide for public access to the jetty.
- The **Tower of London Local Setting Study** published by Historic Royal Palaces identifies important issues and considerations in protection and enhancement of the Tower's setting such as development in the Tower Setting Area and views of the Tower from surrounding streets.
- **Tower World Heritage Site Management Plan** was published by Historic Royal Palaces in 2007 and is currently under review. The purpose of the

Plan is to ensure the effective management of the World Heritage Site for present and future generations and to provide an agreed framework for long-term decision-making on the conservation and improvement of the Tower and its setting.

- **London's World Heritage Sites – Guidance on Settings SPG:** published by the Mayor of London in 2012, the SPG supports the implementation of London Plan Policy 7.10 (World Heritage Sites). It is further complemented by other London Plan Supplementary Planning Guidance as well as World Heritage Site management plans which have been prepared for each of the sites and which set out actions for safeguarding and enhancing their Outstanding Universal Value

### **7.30 Planning Policy Aims for Water Lane to All Hallows by the Tower**

7.30.1 The City Corporation recognises the importance of office development in this location as evident at Tower Place. Although Sugar Quay and Three Quays together would provide residential flats, this is not considered as a residential cluster. Subsequent to the granting of planning permission for these sites, the City's office protection policy has been strengthened. Further residential development in this vicinity will be resisted.

7.30.2 In line with the London Plan and City of London Local Plan policy, the use of the Sugar Quay jetty will be limited to uses which specifically require a riverside location for river related uses. Temporary mooring of vessels may be acceptable subject to health and safety concerns regarding safe access to vessels given the tidal nature of the Thames at this location. Permanent mooring of vessels will be resisted unless the policy criteria in CS9.4(vi) can be met. The location of the jetty adjacent to proposed residential development will further limit the use of this space due to residential amenity considerations.

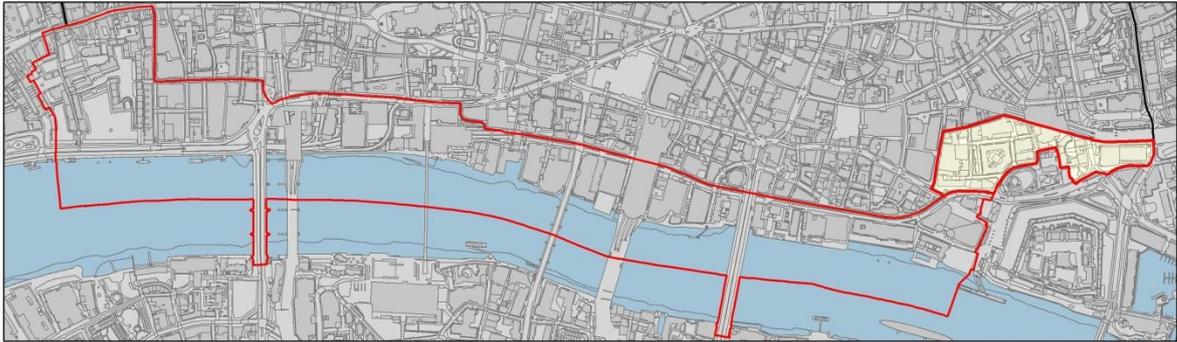
### **7.31 Relevant Local Plan policies**

- CS 9 Thames and the Riverside
- CS 12 Historic Environment
- CS 13 Protected Views
- CS 18 Flood Risk
- CS 19 Open Spaces & Recreation

### **7.32 Development opportunities Water Lane to All Hallows by the Tower**

7.32.1 There will be very little opportunity for development in this section of the riverside if the Sugar Quay permission is implemented, since the majority of sites within this section of the riverside have been developed recently.

## Mark Lane to Mansell Street



### 7.33 Area character and heritage assets

7.33.1 This section does not have a river frontage but is included as part of the Thames Policy Area because of its close relationship with the Tower of London which is an important landmark on the River Thames.

7.33.2 The City of London boundary cuts through the Tower of London Local Setting Area, with the Tower of London itself, Trinity Square Gardens and Tower Hill Station falling outside the City in the London Borough of Tower Hamlets. The Thames Policy Area extends north as far as Fenchurch Street Station and east to the City boundary at Mansell Street. This area includes the Trinity Square and Crescent Conservation Areas alongside modern hotels, residential and office blocks and Tower Gateway Station.

7.33.3 **Trinity Square Conservation Area** is focused on an intact group of mostly early 20th Century buildings with a distinctive imperial character unified by the use of Portland stone, all within the setting of the Tower of London World Heritage Site.

7.33.4 **Crescent Conservation Area** has an eighteenth-century street plan incorporating Crescent and Circus. When built it was one of the earliest planned developments in London and is one of the few such developments of this date to survive.

7.33.5 Other notable heritage assets in this area include a section of City wall which is a Scheduled Ancient Monument comprising one of the highest sections of medieval City wall above remains of the Roman Wall; St Olave's Church which is Grade I listed and dates back to the 15<sup>th</sup> Century; the former Port of London Authority building built in the 1920s and now being converted for use as a hotel and apartments, and Trinity House which was completed in 1796.

### 7.34 Issues and challenges

7.34.1 The **setting of the Tower of London** is an important consideration for this area. As a world heritage site protection is required for the area surrounding the Tower to protect views of the Tower from the local area but also to protect the backdrop of the Tower from further afield including river views (see paragraph 7.29)

7.34.2 Access to the riverside and to the Tower of London is separated from the rest of the City by the busy dual carriageway road which forms Byward Street and Tower Hill. This severance is a major issue in this area preventing the easy **movement of pedestrians** between Tower Hill Station and the Tower of London and the Thames riverside.

7.34.3 A cluster of **hotels** has emerged within the Mark Lane to Mansell Street area, serving the business City and tourist demand for close proximity to the Tower of London. 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.

### **7.35 Planning policy aims for Mark Lane to Mansell Street**

7.35.1 Local Plan Policy CS12 (5) seeks to enhance the Outstanding Universal Value, architectural and historic significance, authenticity and integrity of the Tower of London World Heritage Site and its local setting. Local Plan Policy CS13 (3) seeks to secure an appropriate setting of and backdrop to the Tower of London World Heritage Site, so ensuring its Outstanding Universal Value. The local setting of the Tower of London is shown on the Local Plan Policies Map A. Development proposals that affect the Tower of London should therefore assess their potential impact on the contribution made by its setting to its Outstanding Universal Value, through Environmental Impact Assessment including Townscape and Heritage Impact Assessments.

7.35.2 Any further development of hotels in this area must not compromise the business City. In line with policy CS11 Visitors, Arts and Culture and policy CS1 Offices evidence must be presented to demonstrate that further hotels are not compromising office development and will not create amenity issues for existing residential properties.

7.35.3 Although there are a number of small residential developments here the City Corporation does not consider this to be a residential cluster and therefore will resist further residential development in this area.

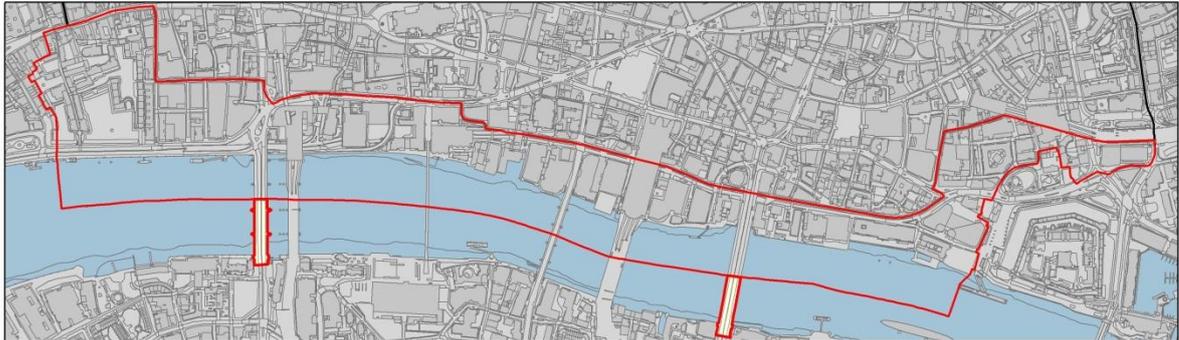
### **7.36 Relevant Local Plan policies**

- CS1 Offices
- CS 9 Thames and the Riverside
- CS11 Visitors Arts and Culture
- CS12 Historic Environment
- CS13 Protected Views

### **7.37 Development opportunities Mark Lane to Mansell Street**

7.37.1 The buildings on the corner of Byward Street at its junction with Mark Lane and the multi storey car park adjacent to Minories offer an opportunity for redevelopment. These sites are within the Thames Policy Area but are some distance from the river. However their proximity to the River Thames Site of Metropolitan Importance for Nature Conservation presents opportunities for biodiversity enhancement through provision of green roofs and walls.

## Thames Bridges and the Southern bridgeheads



### 7.38 Area character and heritage assets

7.38.1 The administrative boundary of the City includes the whole lengths of London Bridge and Blackfriars Bridge, including their bridgeheads on the south bank and the northern half of the other bridges. The current London Bridge was completed in 1973, and follows the alignment of the 19<sup>th</sup> century stone arched bridge formerly on this site. The original London Bridge, first built in Roman times, was located slightly further downstream. Blackfriars Bridge was first built in 1769; the current structure dates from 1869 and is Grade II Listed.

7.38.2 There are a number of listed structures associated with Blackfriars Bridge including the redundant bridge piers from the earlier bridge. Southwark Bridge is Grade II listed and Cannon Street Railway station towers are Grade II listed.

7.38.3 In the 1990s the City constructed a subway under the southern bridgehead of Blackfriars Bridge. This connected neighbouring sections of riverside walk along the south bank, which lie within the London Borough of Southwark. At London Bridge the south bank riverside walk follows Montague Close and Tooley Street, passing under the bridge approach south of the City boundary.

### 7.39 Issues and challenges

- Bridge House Estates is a charitable trust of which the City Corporation is the trustee, the primary object of which is the support and maintenance of Tower Bridge, London Bridge, Southwark Bridge, Millennium Bridge and Blackfriars Bridge. The trust's grant making arm The City Bridge Trust awards grants from charitable funds surplus to bridge requirements. Maintenance works on Blackfriars Bridge Southwark Bridge, and Tower Bridge must take account of their listed status/ statutory listed building controls.
- Any proposed development on the Thames Bridges must have a **river related use** and must not have a detrimental impact on navigation, river regime or environment and respect the river prospects and other protected views
- The Mayor of London's cultural strategy – "*achievements and next steps*" document commits the Mayor to exploring proposals for installing energy

efficient **lighting** schemes on a cluster of the Thames bridges in central London. This would need to be carried out sensitively to preserve and enhance the historic character of the bridges and other heritage assets and to avoid adverse impacts on the River Thames Site of Metropolitan Importance for Nature Conservation.

#### **7.40 Planning Policy Aims for the Thames Bridges and southern bridgeheads**

7.40.1 Current uses associated with the southern bridgeheads include the pedestrian underpass which includes an exhibition of pictures showing the construction of the bridge. At London Bridge, the John Rennie Vaults under the bridge head house a private leisure use. Any planning proposals for the City's bridges and the southern bridgeheads will be considered on a case by case basis

#### **7.41 Relevant Local Plan policies**

CS 9 Thames and the Riverside  
CS12 Historic Environment  
CS13 Protected Views  
CS19 Open Spaces & recreation

#### **7.42 Development opportunities Southern bridgeheads**

7.42.1 There is very little opportunity for development on the City's Bridges or the Southern Bridgeheads.