

<b>Committee:</b>	<b>Date:</b>
Planning and Transportation	6 October 2020
<b>Subject:</b> Swan Lane Pier 1 Swan Lane London EC4R 3TN Erection of a new pier within the River Thames at Swan Lane, to comprise a refurbished landside access platform; new canting brow and pontoon; dredging and filling of river bed; repair and reinstatement of campshed and riverbank; replacement of mooring pile and installation of additional mooring pile.	<b>Public</b>
<b>Ward:</b> Bridge And Bridge Without	<b>For Decision</b>
<b>Registered No:</b> 19/00116/FULL	<b>Registered on:</b> 28 February 2019
<b>Conservation Area:</b>	<b>Listed Building:</b> No

### Summary

The application relates to the redevelopment of Swan Lane Pier. The pier is not in use which currently comprises just the dolphins and has been in its current state since 2012 when the regalia boat was removed from the pier. The pier is located and accessed via Swan Lane, which is south of Lower Thames Street.

Planning permission is sought for: Erection of a new pier within the River Thames at Swan Lane, to comprise a refurbished landside access platform; new canting brow and pontoon; dredging and filling of river bed; repair and reinstatement of campshed and riverbank; replacement of mooring pile and installation of additional mooring pile.

836 objections have been received from residents and local occupiers regarding the proposed development. The objections have raised concerns regarding the adverse impact on residential amenity, noise and air pollution from the use of the pier from charter vessels, namely the Ocean Diva. Further concerns relate to the emergency and national safety of vessels, antisocial behaviour, visual amenity and protected views, lack of transparency, highway and walkway congestion and that the proposal is contrary to policy.

It is considered that the proposed redevelopment of the pier would not provide for an inclusive pier, designed to accommodate a variety of vessels with particular regard to freight use and would be contrary to London Plan policy 7.24, 7.25 and 7.27, Local Plan policies CS16 and DM16.8, Draft Local Plan policy VT4 and S17 and the aims and objectives of the NPPF.

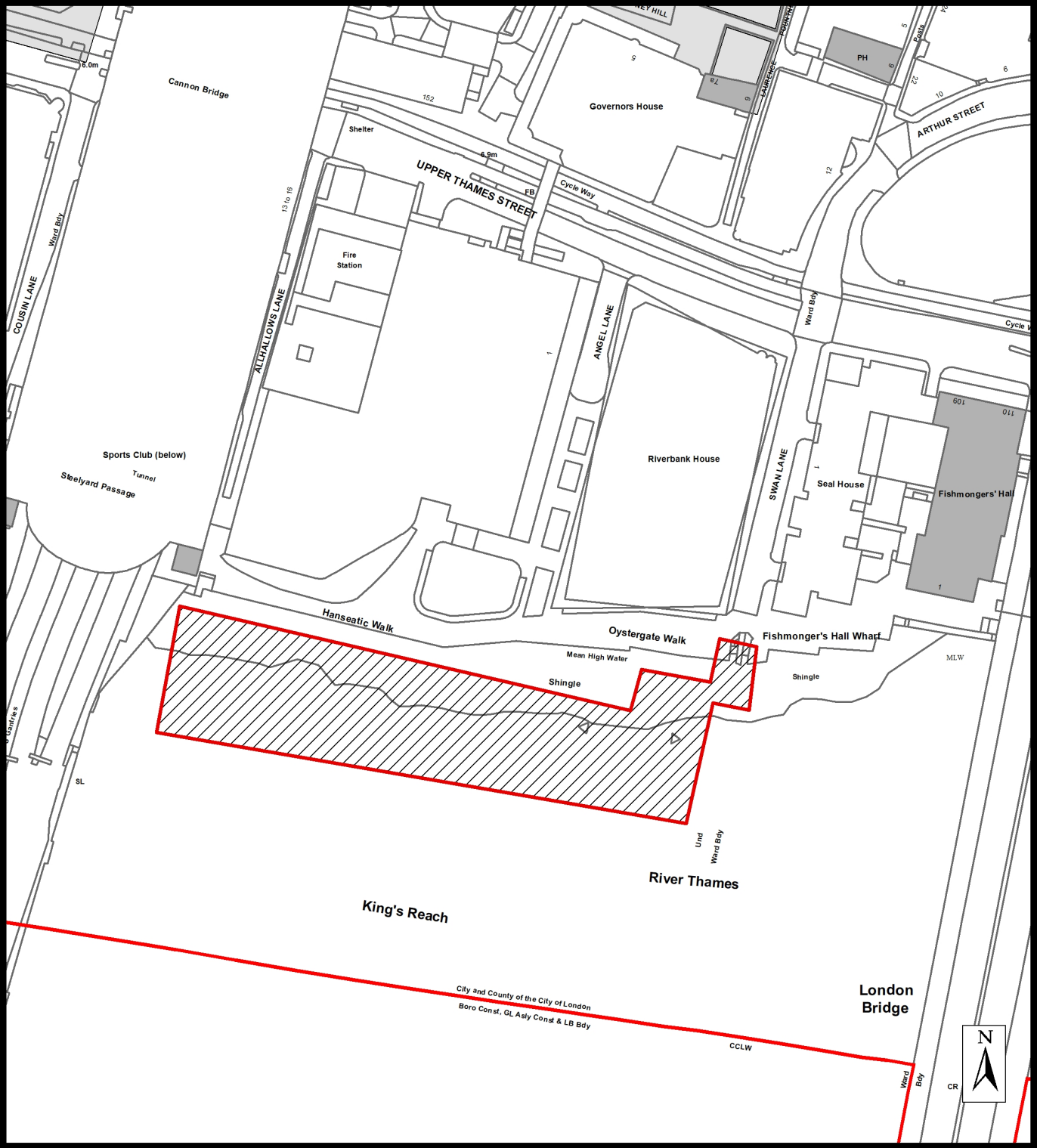
### **Recommendation**

1. That the application be refused for the reason set out in the attached schedule.

#### **Reason for Refusal:**

2. The proposed pier would not provide for a multi-use pier and would result in a pier which has not been designed to accommodate and provide for a sustainable freight offering for a variety of users contrary to London Plan policy 7.24, 7.25 and 7.27, Local Plan policy CS9, CS16 and DM16.8, draft Local Plan policy VT4 and S17 and the aims and objectives of the NPPF.



# Site Location Plan



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ADDRESS:  
Swan Lane Pier  
1 Swan Lane London EC4

CASE No.  
19/00116/FULL

-  SITE LOCATION
-  LISTED BUILDINGS
-  CONSERVATION AREA BOUNDARY





Swan Lane Pier 19/00116/FULL  
Existing site from the south bank



Swan Lane Pier 19/00116/FULL  
Proposed scheme



## **Main Report**

### **Site and Surroundings**

#### **The Site**

1. This application relates to the erection and reinstatement of a new pier within the River Thames located at Swan Lane. The site fell out of use in 2012 but retains two existing dolphins and a singular mooring pile riverside and bankseat, steps, loading bay and associated services landside. The Thames forms part of the Blue Ribbon Network for the purposes of London Plan policies seeking increased use of the network for a range of activities.
2. Swan Lane is located on the north bank of the River Thames and lies upstream of London Bridge and downstream of Cannon Street rail bridge. The site is accessed via an area of river walk off Swan Lane.
3. Fishmongers Hall (Grade II) and the towers of Cannon Street Railway Station (Grade II) are within close proximity to the application site. The site is not within a conservation area.

#### **Relevant Planning History**

4. Planning permission was granted in 1989 (Reference: 2899/1D) to position or to moor adjacent to existing pontoon barge an additional swim ended pontoon measuring 200 ft.
5. Planning permission was granted in 1985 (Reference: 2899/1C) to position a Livery Barge on Old Swan Pier (as a replacement for P.S. 'Princess Elizabeth' a proposed floating restaurant & function venue).
6. In 1975 planning permission was granted (Reference: 2899/1A) to permanently moor Paddle Steamer "Princess Elizabeth" with a brow from Watermen's Steps, to be used for restaurant purposes, at Watermen's Steps, Swan Lane.
7. Planning permission was refused in 1972 (Reference: 2899/1) for a landing platform adjoining Swan Lane Car Park for mooring of helicopter.

#### **Proposal**

8. Planning permission is sought for a refurbished landside access platform; new canting brow and pontoon; dredging and filling of riverbed; repair and reinstatement of campshed and riverbank; replacement of mooring pile and installation of additional mooring pile.
9. The application documents state that the proposed pier would be a multi-use pier with two berths for embarking and disembarking only. One berth would be used primarily as a mooring for larger event charter vessels.
10. The application states that the pontoon berth would have capacity for supporting freight operations, charter vessels and passenger ferry

services, such as river taxis and cruises, as well as emergency response operations.

### **Consultations**

11. The application has been advertised on site, in the local press and neighbour notification letters sent to local residents of the City of London and Southwark.
12. The views of other City of London departments have been taken into account in considering the amended scheme.
13. Greater London Authority have issued a stage 1 decision letter in which they consider that the application does not comply with the London Plan for the following reasons: lack of a detailed strategy on its intended operation and management, maximising the Blue Ribbon Network for freight transport, details on the impact on navigation, hydrology and biodiversity of the river, details of flood risk, air quality and noise and further details required in relation to trip generation, highway impacts and public transport impacts.
14. The Port of London Authority are supportive of the application and have offered conditions in relation to the charter vessels.
15. Transport for London raise no objection.
16. The Environment Agency's initial concerns have been satisfied with additional information provided by the applicant and have proposed conditions to mitigate any impacts of the proposed development.
17. City of London Police have raised concerns over the safety of patrons disembarking charter vessels, noise disturbance and a possible increase in crime and disorder.
18. The London Fire Brigade have made comments in relation to evacuation procedures and routes for up to 550 persons from the quayside in case of a fire.
19. Markets and Consumer Protection have stated that noise from patrons and associated activities could give rise to disturbance but can be adequately mitigated with noise management plans, planning conditions or a S106 agreement. The promoter has suggested a range of management controls such as the limiting of the use of outside areas, no music while docked, restriction on numbers of patrons, limitation on number of sailings per week and have proposed further conditions surrounding noise, hours of servicing, deck hours of use, contaminated land and promoted events.
20. The London Borough of Southwark raise no objection but comments with recommended conditions relating to the baseline report and survey, archaeological foreshore survey and reporting and provision of a detailed foreshore monitoring and maintenance scheme.
21. The London Borough of Tower Hamlets object to the proposal and raises the following concerns: limited freight offering and a missed opportunity to increase passenger and freight activity and noise

disturbance to residents arising from leisure boat activities using the pier, namely the Ocean Diva vessel.

22. Following the submission of the application in February 2019 there have been a further two rounds of formal consultation as follows:
  - Original application: February 2019
  - Amended application: July 2019
  - Additional information: June 2020
23. A total of 44 representations have been received in support of the proposals and 4 representations which are neutral.
24. A total of 836 representations have been received across the three rounds of consultations objecting to the application. A total of 238 objections were received during the final round of consultation undertaken in June 2020. The objections and the responses to these issues are summarised in the table below:

Representations Received	Consultation			Response
	1 <sup>st</sup>	2 <sup>nd</sup>	3 <sup>rd</sup>	
The Nature of the Ocean Diva (the principle, size, etc.)	234	180	180	Addressed in paragraphs 42, 44 & 93-96.
Environmental impact on the river and its ecosystem	191	72	136	The Environment Agency have proposed conditions to mitigate, monitor and control any impacts on the foreshore.
Noise Pollution	314	211	196	Addressed in paragraphs 60-65.
Light Pollution	79	67	10	It is unlikely that the light emitting from the proposed development will have a significant impact in the context of the surrounding area.
Air Pollution	193	120	51	The pier is not considered to contribute to air pollution. The associated vessel Ocean Diva is proposed to be fully electric Vessels are regulated by the Port of London Authority.
Highway and walkway congestion	92	138	162	Addressed in paragraphs 69-73 & 77-82.
Servicing, Freight and Waste Management concerns	8	15	66	Addressed in paragraphs 55-59 & 66-68.
Residential Amenity	172	83	88	Addressed in paragraphs 62-63 & 65.

Effects on health	53	29	13	Addressed in paragraphs 60-65.
Overlooking and Overshadowing issues	3	1	1	It is not considered there would be any overlooking or overshadowing from the proposed development.
Emergencies and Navigational Safety	100	106	40	Addressed in paragraphs 40-44.
Antisocial behaviour	49	19	87	This would be addressed through the management plan secured through a S106 agreement.
Strain on services	1	16	103	Addressed in paragraphs 77-82.
Security and terrorism	0	0	65	The City of London Police have not raised this as a concern.
Archaeology	6	3	91	Addressed in paragraphs 83-87
Visual amenity and protected views	72	49	61	Addressed in paragraphs 97-106.
Harm to nearby heritage assets	55	19	93	Addressed in paragraphs 97-106.
Project viability issues	14	0	11	Land ownership and private funding is not a planning consideration.
Lack of transparency/more information needed from the developer	73	66	52	Whilst developers are not obliged to hold public exhibitions, but it is recommended and in this case a public meeting was convened by the applicant.
Little or no public benefit	75	19	114	Reinstatement of the pier is supported by Planning Policy.
Decision should be made at the regional or national level	1	0	0	Local Planning Authorities cannot control how applications are received and must determine all applications in accordance with the guidelines laid out by the Government.
Contrary to the Local and London Plan Policy	34	93	67	Addressed in paragraphs 26-32, 107-110 & 113.



Sets unwanted precedent	27	19	26	Reinstatement of the pier is supported by Planning Policy.
Not inclusive	1	0	0	Level and step free access to the pier is proposed.
COVID19/Social distancing concerns	0	0	34	The use of the pier can be regulated to ensure social distancing and would form part of the management plan secured through a S106 agreement. Once on a vessel it would be a matter for the operator to address.

*Table 1: Objections received*

25. Not all the representations above are material planning considerations. Those that are have been dealt with in this report.

### **Policy Context**

26. The development plan consists of the London Plan and the City of London Local Plan.
27. The Mayor of London and the City of London have prepared draft plans which are material considerations to be taken into account.
28. The London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix A to this report.
29. The Draft London Plan is at an advanced stage. It takes forward many of the policy positions of the existing plan whilst strengthening and adding to others. On the 13th March 2020, the Secretary of State directed the Mayor not to adopt the Plan due to it not addressing a number of national policies in respect of housing ambition, small sites, industrial land and aviation meaning it will be some time before the plan is adopted. It has passed through the Examination in Public so is to be afforded some weight with matters addressed by the Secretary of State being less relevant to this site.
30. In relation to this scheme, the Draft London Plan continues to require development proposals to protect and enhance existing passenger transport piers and their capacity and supports new piers in line with the Port of London Authority and Transport for London's Pier Strategy.
31. The City's draft Local plan 2036 was agreed by the Court of Common Council in May 2020 for pre-submission, Regulation 19, consultation. The Plan is therefore a material consideration in the determination of planning applications. Regulation 19 consultation has been paused until early 2021 to enable the City Corporation to update policies in light

of changes to the Use Class Order, but the fundamental principles in relation to this application remain unchanged.

32. Government guidance is contained in the National Planning Policy Framework (NPPF) 2019 and the National Planning Practice Guidance (PPG) which is amended, as necessary.

### **Considerations**

33. The Corporation, in determining the planning application has the following main statutory duties to perform:

To have regard to the provisions of the development plan, so far as material to the application and to local finance considerations so far as material to the application, and to any other material considerations (Section 70(2) Town & Country Planning Act 1990);

To determine the application in accordance with the development plan unless other material considerations indicate otherwise (Section 38(6) of the Planning and Compulsory Purchase Act 2004); and

In considering whether to grant planning permission for development which affects a listed building or its setting, to apply considerable weight and importance to the need to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990). In this case there is not considered to be any effect of the proposals on either Fishmongers Hall (Grade II) or the towers of Cannon Street Railway Station (Grade II), which are the only listed building in proximity.

34. In considering the planning application before you, account has to be taken of the statutory and policy framework, the documentation accompanying the application, and the views of both statutory and non-statutory consultees.
35. It is necessary to assess all of the policies and proposals in the Development Plan and come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.
36. Paragraph 10 states that “at the heart of the Framework is a presumption in favour of sustainable development. That presumption is set out at paragraph 11”:
37. For decision-taking this means:
  - a. Approving development proposals that accord with an up-to-date development plan without delay; or
  - b. Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- c. The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
  - d. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
38. It states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.
39. There are policies in the Development Plan which support the proposal and others which do not. It is necessary to assess all the policies and proposals in the plan and come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.

### **Assessment of the application**

#### **Regulatory issues including passenger safety, vessel safety and licencing.**

40. Throughout the consultation process, issues have been raised which go beyond the controls and policies associated with planning and this application. The following table aims to identify the issue and which regulatory body is responsible for controlling it.

Organisation	Issues						
	Navigational Safety	Safety of Vessel	Environmental Protection of the River	Environmental Protection of the land affected by development	Impact on Public Realm	Heritage	Principle of River use and activities
Local Planning Authority			X	X	X	X	X
Highway & Traffic Authority					X		X
Port of London Authority	X	X	X				X
Marine Management Organisation	X	X	X				
Maritime Coastguard Agency	X	X	X				
Port Health Authority				X	X		X

*Table 2: Regulatory bodies*

41. The City of London Corporation as planning authority would be able to have control over the operation of the pier as part of any planning permission. Planning conditions could be used to restrict the hours of operation, frequency of vessels using the pier, duration of time that a vessel is moored at the pier and embarkation and disembarkation at the pier.
42. Significant consultation responses raise concerns over the use of the pier by the Ocean Diva vessel. The City of London Corporation as planning authority would only have limited controls over the operation of the Ocean Diva, or any other charter vessel when it is moored at the pier. The Ocean Diva would be licenced by its home birth, which is understood to be Royal Docks in the London Borough of Newham. As such the Ocean Diva could operate up and down the Thames without the benefit of Swan Lane Pier.
43. The City of London Corporation has liaised with all the other regulatory bodies to ensure they are aware of those matters contained in the objections which fall within their remit. All those bodies have been consulted and invited to make comments and representations on the planning application as a result of the objections relevant to their functions. It is hoped that reassurance is provided that, even if the issues raised in objections are not directly the responsibility of the City of London Corporation, the concerns have been communicated to the bodies responsible.
44. Further to planning permission, the proposed works would require the following consents from various bodies:
- River Works Licence provided by the Port of London Authority;
  - Dredging Licence provided by the Port of London Authority; and
  - A Marine Licence for dredging provided by the Marine Management Authority.
- The Ocean Diva, or any other vessel would require the following consents from various bodies:
- Premises Licence and Alcohol Licence provided by the vessels home birth, in this instance it is suggested the Ocean Diva would be regulated by London Borough of Newham; and
  - Vessel Licensing provided by the Port of London Authority.

### **The principle of development.**

45. Policy CS9 of the Local Plan promotes the functional use of the River Thames and its environs for transport, navigation and recreation, encouraging the reinstatement of Swan Lane Pier and the use of this facility for river transport. Policy CS9 further resists the permanent mooring of vessels; if 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. To accord with Policy CS9, the pier would only be used for embarkation

and disembarkation and the length of time any boat is moored would be conditioned and minimised.

46. Policy CS9 also seeks to protect public access along the riverside walk.
47. Policy CS16 of the Local Plan requires developers to demonstrate how the environmental impacts and road danger of servicing will be minimised, including through the use of river freight, and seeks to improve conditions for safe and convenient walking and cycling.
48. Policy CS 16.8 of the Local Plan supports the improvement of river-based transport infrastructure
49. The City of London's Riverside Walk Enhancement Strategy (2005) and Policy VT4 and Policy S17 of the emerging Local Plan all encourage the reinstatement of Swan Lane Pier.
50. Policy 7.26 of the London Plan supports the increased use of the Blue Ribbon Network (of which the Thames is a key part) for freight transport, while Policy 7.25 supports its increased use for passengers and tourism purposes. The Port of London Authority's (PLA) Thames Vision (2035) seeks to double the number of people travelling by the river, reaching 20 million commuter and tourist trips every year, and increase the participation in recreation on and alongside the water.
51. The design of the proposed pier responds to the structural and functional requirements of an operational pier. Access to the pier would be via the aluminium canting brow. It would have a 2.4m clear gangway and would be 45m long. On shore, level access would be created with a new integrated wheelchair lift, the existing steps would be entirely replaced with solid granite treads in a curved plan form to create a more generous access. All broken granite cladding panels on the river wall around the structure would be replaced and the proposed low-level lighting would be confined to the pier to avoid interrupting the existing view of the City from the river and south bank. Details of materials would be secured via conditions.
52. The reinstatement of Swan Lane Pier would, in principle accord with some of the requirements of the adopted Local Plan, the London Plan and the emerging City of London Local Plan, as well as being partially in line with the PLA's Thames Vision. However, it remains unclear whether the application would provide a feasible, sustainable and viable freight servicing operation available to a variety of cargo cycles and freight operators, alongside passenger and charter vessel transport. Officers are not satisfied that this has been demonstrated for the reasons set out below.
53. It is considered that the proposed freight offering is not sustainable due to the restricted dimensions of bike cargo access facilities. This results in lack of access to the pier of all but smaller cargo bikes. Such an arrangement restricts opportunities for fast, efficient and discreet transshipment by requiring containers to be moved by hand to the riverside walk for almost all types of cargo cycle. Having this

inefficiency designed into the pier would render the freight offering unsustainable. The soft market testing that has been undertaken for the last mile logistics hubs in the City identified that larger cargo bikes are required for commercially viable parcel delivery by bike. The reinstatement of the pier needs to allow for both passenger and cargo use and can be achieved by redesigning the access to the pier and the pier itself. It is considered that the reinstatement of the pier can be achieved without prejudicing policy CS9 whereby the parking and loading cargo bikes does not rely on the city walkway and can be undertaken from the pier.

54. The reinstatement of Swan Lane Pier is supported in principle. However, it has not been adequately demonstrated that the proposal would provide a feasible and viable freight servicing operation alongside passenger transport. In its current form, the proposed pier would not provide for a feasible and viable freight offering and in the absence of information to confirm whether freight use would be feasible and viable from the reinstated pier, the proposed reinstatement is considered to be contrary to Policy CS9, CS16 and Policy DM16.8 of the Local Plan and Policy VT4 and S17 of the emerging Local Plan.

#### **The use of the Pier for freight.**

55. Policy VT4 1 of the Draft City Plan 2036 states;
- The City Corporation will support improvements to river piers, steps and stairs to the foreshore and other river-based transport infrastructure to enable an increase in passenger and freight transport by river. The City Corporation will seek the reinstatement of Swan Lane Pier and development which prejudices this reinstatement will not be permitted.*
56. Proposal 38 of the Transport Strategy seeks to reduce the number of freight vehicles in the square mile by increasing the use of the River Thames for freight, specifically;
- Exploring the use of Blackfriars and Tower Piers and a reinstated Swan Lane Pier as points to transfer freight for last mile delivery on foot or by cargo cycle.*
57. The application is supported by a freight management framework. The framework details that cargo would be manually unloaded from a vessel into a dedicated freight handling room located on the pier. Small cargo bikes would be able to access the pier and retrieve cargo directly from the freight handling room for onward delivery. Swept path analysis demonstrates that larger cargo cycles would be unable to access the pier and would need to be stored on the riverside walkway or nearby highway for freight loading while cargo is retrieved on foot.
58. A wheeling ramp is proposed on the staircase access over the river wall immediately adjacent to the proposed platform lift. Cargo bikes



have much wider frames than normal bicycles and the cargo being carried may be wider than the frame. It is considered that cargo bikes may not be able to be wheeled up against the adjacent lift structure, as would be required with the current configuration.

59. The loading and unloading of bikes on Swan Lane and City Walkway is not acceptable. It is not permitted to undertake these activities on City Walkway and the parking of cargo bikes within the highway on Swan Lane would render any freight operation inefficient due to the time associated with walking to the pier and would be contrary to Local Plan policy CS9. It is considered that this practise would adversely affect conditions for pedestrians using the city walkway. A pier designed to accommodate only the small variety of cargo cycles would not be an attractive facility for any freight operator.

## Noise

### From the proposed pier

60. Local Plan policy DM15.7 states that 'developers will be required to consider the impact of their developments on the noise environment. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect neighbours, particularly noise sensitive land uses such as housing, hospitals, schools and quiet open spaces'. Concerns has been raised about noise from the proposed pier and the use of the pier by charter vessels.
61. It is considered that some noise will arise from vessels moving to and from the pier and from patrons on vessels and the associated activities and music. The associated reports with the application have considered these noise sources. The noise from the named Ocean Diva vessel itself is well controlled via sound insulation and should not give rise to unacceptable levels of noise.
62. The applicant has proposed a staggered embarkation and disembarkation to mitigate any adverse impacts on noise associated with the use of the pier. The operation of the pier could be conditioned to ensure the embarkation and disembarkation of patrons using charter vessels is adequately managed such that it would not result in a significant adverse impact on amenity.
63. The City of London as planning authority can only control the noise of any vessel once it is docked at the pier and the City would seek to do this via condition for music levels, limiting the number of patrons using the outdoor decks between certain hours and the staggering of embarkation and disembarkation. Once any vessel leaves the pier, it would not be controlled via planning conditions as these conditions and Section 106 covenants relate to the owners and occupiers of the development and only the development bound by conditions and obligations. The noise report details the anticipated noise levels and

planning conditions and a Section 106 agreement could be used to ensure no material increase in disturbance if the levels are met to safeguard the amenity of residents and local occupiers.

#### During the demolition and construction periods

64. The construction will require at least one tubular pile and several sheet piles. These works will be undertaken within the River Thames and will be noisy and impact both north and south of the river. It is possible that these works will also require extended working hours due to safety considerations.
65. Most of the other works will not be intrusive and it is considered that a condition requiring the development of a scheme of protective works and code of construction be secured and submitted would mitigate these impacts and safeguard the amenity of residents and local occupiers.

### **Transport, servicing, parking and impact on public highways.**

#### Servicing Arrangements and waste management

66. The Transport Statement submitted with the application details that most of the servicing, including waste removal, would take place off-site at other locations. The applicant states Royal Docks as an example, where the vessel the Ocean Diva is expected to be moored. The principle that most of the servicing of vessels using the pier should take place away from Swan Lane is supported and this could be secured by condition.
67. The Transport Statement states that occasional small deliveries would take place at the pier via Swan Lane.
68. A Delivery Service and Management Plan would be secured via planning condition prior to the occupation of the pier which would detail the quantity of delivery and servicing activity that would take place at the pier and how this would be managed. Conditions would be used to ensure that any deliveries to the pier would be prohibited between 7am – 10am, 12pm – 2pm and 4pm – 7pm in line with the City of London's draft Local Plan policy and Transport Strategy.

#### Trip generation

69. A transport statement has been provided which sets out the predicted trip numbers and mode share for arrival and departures from larger event charter vehicles for employees and customers. There are strategic transport concerns regarding the potential impact of coaches, taxis, and private hire vehicles on the adjacent highway, and possible overcrowding on the public transport network as a result of these proposals.
70. There are concerns about the dispersal of up to 1000 charter boat patrons in the early hours of the morning. Swan Lane is a relatively

narrow road and not suited to accommodate a turning circle for vehicles. With large numbers of people disembarking at the same time vehicle movements in the vicinity would be severely restricted. This could result in a large numbers of people moving to transport facilities.

71. The mode share for events is likely to depend on the nature of the event itself and some events may attract differing mode share. The Transport Statement states that mode share of taxis and PHVs would be 10% for arrivals and 25% for departures. The Transport Statement states that guests would be allocated staggered arrival times to mitigate the impact of arrivals on the surrounding highway, and that the staggered closure of facilities on the vessel following its return to Swan Lane would achieve a similar affect for departures.
72. As a worst case, the maximum number of drop-offs by taxi/PHV would be 12 in a 15 minutes window for arrivals and 25 in a 15-minute window for departures. As disembarkation would typically occur when traffic levels and servicing activity generated by the neighbouring premises would be low, it is not considered likely that this would unduly impact the safe operation of the highway.
73. The submitted Event Management Plan details crowd management and safety on the Thames Path; and pick-up/drop-off arrangements for coaches, taxis, and private hire vehicles as well as measures to disperse arrivals/ departures across a staggered time period. The applicant has committed to managing passenger vehicles through a booking system and the management of this would be addressed and secured through the submission of an operational management plan secured through a S106 agreement.

#### Cycle parking facilities

74. London Plan Policy 6.9 and Policy T2 of the draft London Plan, states that cycle parking provision should be made for staff and pier users. The application documents confirm a maximum of 110 would be required to service the Ocean Diva.
75. Fourteen cycle parking spaces should be provided in a secure and accessible location complying with London Cycle Design Standards. In addition to this, cycle parking provision for visitors to the site should be considered within 100 metres of the pier.
76. No cycle facilities are proposed as part of the proposals and in this instance it is considered acceptable. In terms of visitor parking, the proposed development has no space landside within its curtilage to provide for cycle parking and it is not appropriate for cycling parking hoops to be located on the riverside walkway. There would be no overnight mooring and the majority of servicing of vessels is proposed to be undertaken at the vessels home birth and it is therefore considered that any vessels arriving at Swan Lane Pier would be for the purposes of embarkation and disembarkation and staff would

already be aboard any vessel.

#### Public transport and pedestrian movements

77. The site is located approximately 100 metres from Upper Thames Street, which forms part of the Transport for London Road Network (TLRN). The area is well served by public transport, recording a Public Transport Accessibility Level (PTAL) of 6b (on a scale of 0-6b where 6b represents the most accessible locations).
78. The nearest station is Monument, located 300 metres to the north east of the site which is served by the Circle, District and Central line (at Bank station).
79. The adjacent area of the Thames River Path is known as Oystergate Walk and varies between 7 and 12 metres in width.
80. There are 11 daytime and 7 night-time bus routes serving London Bridge, with the nearest stops 200 metres east of the site. At weekends, night tube services on the Jubilee line can be accessed at London Bridge station 500 metres south of the site, and Central line services are available at Bank station 650 metres north of the site. The East west cycle superhighway extends along Upper Thames Street.
81. The site is well serviced by public transport and it is not considered the proposed development would have a detrimental impact or place strain on the local services.
82. Any queuing associated with embarkation and disembarkation of the proposed pier would be managed as set out within a management plan which seeks to stagger patrons arriving and departing from the pier and would not adversely affect pedestrian flows. Further details could be secured by condition.

#### **Archaeology**

83. The site is in an area of high archaeological potential on the foreshore and riverbed of the River Thames, where evidence from all periods from pre-historic to modern have been recorded. Land reclamation from the Roman period onwards has encroached into the river and the site was within the river until the post-medieval period.
84. An Archaeological Assessment incorporating Thames Foreshore Field Survey has been submitted with the application. There is archaeological potential for all periods from the Roman to modern and potential for environmental remains relating to the river channel and its natural topography. Remains of river structures such as jetties and revetments and artefacts dating from the Roman to post-medieval periods have been recorded on and in the vicinity of the site and the

Thames foreshore is considered to have significant archaeological potential.

85. Past events such as erosion which will have affected survival of river structures and archaeological remains and the potential is considered to be low, here, however there is known survival of structures and potential survival of artefacts.
86. The results of the foreshore survey, submitted with the application identified remains of a number of structures including barge beds, two phases of jetty, mooring points, a possible causeway, a timber platform, three phases of river wall revetments and other timber structures. It is considered that the structures and features date to the Post Medieval and Modern periods (18th to 20th centuries).
87. The construction groundworks would have an impact on the foreshore and riverbed that would remove or affect archaeological structures and remains. Controls would be secured by conditions which would include archaeological monitoring and excavation of structures and remains and details of foundations and other groundworks.

## **Biodiversity**

88. Policy CS15 of the Local Plan requires development to positively address the need to enhance biodiversity and provide for its conservation and enhancement, particularly for the City's flagship species and the City's priority habitats (urban green spaces, churchyards and cemeteries, built structures and the tidal Thames). The City's Biodiversity Action Plan outlines how biodiversity will be enhanced, including target species and habitats.
89. Policy CS19 seeks to encourage healthy lifestyles for all the City's communities through improved access to open space and facilities, increasing the amount and quality of open spaces and green infrastructure, while enhancing biodiversity, by increasing the biodiversity value of open spaces, paying attention to Sites of Importance for Nature Conservation (SINCs). Policy DM19.2 states that developments should promote biodiversity and contribute to urban greening by incorporating planting which encourages biodiversity and maintenance of habitats within SINCs. The River Thames is a Site of Metropolitan Importance for Nature Conservation (SMINC), which has strategic biodiversity importance to London.
90. The refurbishment of the landside access platform and provision of a new planter is welcome. Improvements to greening and biodiversity are particularly welcome along the riverside to improve green corridors and biodiversity links. Any dredging in this area would be conditioned to ensure it is limited to a small amount and not be dispersive in order to avoid disruption to biodiversity.

### **Campshed repair work, dredging and flooding**

91. The proposal includes reinstatement of the campshed which stretches the full length of the mooring. These works would be carried out as part of the proposals and would protect the toe of the river wall and the flood defence. The repair works have been designed in consultation with the Environment Agency who have raised no objection. Additionally, the Lead Local Flood Authority have raised no objection.
92. The minimum amount of dredging and filling works would be undertaken to facilitate the re-opening of the mooring and the repair of the campshed.

### **The use of the proposed Pier by charter vessels, namely the Ocean Diva**

93. Local Plan policy DM3.5 states that applications for night-time entertainment and related uses should include a Management Statement setting out how potential impacts on amenity will be addressed and minimised.
94. The use of the pier for embarkation and disembarkation for event charter vessels would be managed by an operational management plan secured via condition or S106 agreement. The application includes detail on the Ocean Diva vessel, which has been used to assess potential impacts of these event charters.
95. Three scenarios have been assessed, with the largest event accommodating 1,000 guests. A typical event would see guests arriving from 6pm before the vessel departs at 8pm. The vessel would then return at 11:30pm for disembarkation, with a staggered closing of event spaces encouraging staggered departures up to 1am.
96. The application is supported by an operational plan which confirms that up to 350 people can queue on the brow and the pier and that embarkation would be managed to ensure guests do not obstruct the riverside walkway. Further details would be secured via an operational management plan which would detail how guests arriving and departing at events would be managed and this could be secured by condition.

### **Impact on significance and setting of listed buildings and London Views Management Framework**

#### **Towers of Cannon Street rail bridge**

97. The pair of towers at Cannon Street Station are Grade 2 listed. The Italianate towers, by Sir John Hawkshaw and John Wolfe-Barry are monuments of stock brick and Portland Stone dressing. Completed in 1866, they display a 'Wrenesque' style to sit alongside his prominent Thames landmarks on the River skyline, comprising a gateway to the main City terminus of the ambitious South Eastern Railway Company,



once supporting the great train shed roof (lost during WWII). They are of architectural and historic significance. Their landmark sitting fronting the Thames, taking their place on the skyline with strong synergies with Wren's monuments, their prominence is a proud proclamation of the railway golden age. This aspect of setting makes a strong contribution to that architectural and historic interest.

98. The proposed development would appear in views of the towers from London Bridge
99. In this view, the proposal would appear as an appropriately scaled operational pier of restrained and refined appearance. The proposed pier would rise and fall with the tide and at high tide, the proposal would not block or obscure the view of the towers or detract from their pre-eminence on this part of the Thames. The proposal will not harm significance or setting of the listed towers.

#### Fishmongers Hall

100. This Grade 2\* listed building (which is also a Scheduled Ancient Monument) lies immediately to the east of the site. It is a refined Neo-Classical edifice with a principal temple front elevation addressing the Thames, by Henry Roberts, completed 1834, it was significantly restored post-war. It is of architectural, artistic and historic significance, much of which is contained in the composition and fit out of the interior Livery spaces, but also as a refined Neo-Classical Livery Hall with a strong river presence – the latter the trait of setting which makes a strong contribution to significance.
101. The proposed works are of a design, bulk and scale which is not considered to visually overpower the listed building, when viewed from London Bridge or the south bank. The design approach responds visually to that of an operational pier and is located on two existing dolphins within the River Thames. The proposed pier is considered to be a well-mannered architectural approach which is respectful of the special significance of Fishmongers Hall. The proposal is not considered to harm the setting and special architectural or historic interest of the listed Fishmongers Hall.

#### LVMF River Prospects view

102. The London View Management Framework (LVMF) is a key part of the Mayor's strategy to preserve London's character and built heritage. The LVMF Supplementary Planning Guidance (SPG) on the management of 27 strategically important views supports London Plan policies 7.10, 7.11 and 7.12. London Plan policy requires that development should not cause adverse impacts on World Heritage Sites or their settings and that new development should not harm and where possible should make a positive contribution to the characteristics and composition of strategic views and their landmark elements. The view impacted by the proposed development is London Bridge View 11A (upstream).

### London Bridge (View 11A)

103. This view focuses on St Paul's Cathedral and other landmarks such as Cannon Street Station Towers and the Old Bailey. The proposed development will be seen at the far right of the view, a significant distance away from St Paul's Cathedral at the centre of the view and would not block any view of the Cannon Street Station Towers.
104. The proposal will appear as an operational pier, which is to be constructed around existing dolphin structures located on the foreshore. The proposed development would be low, and the proposed pier would rise and fall with the tide. The proposal is considered to accord with the guidance for this view (para 195 and 196 of the LVMF) in the manner in which it does not block or impair views of landmarks including St Paul's Cathedral or Cannon Street Station Towers.

### Monument View

105. The proposed works would not be visible from Monument View three. The proposed development would be concealed by Seal House and Fishmongers Hall and there would be no change or impact on this protected view.
106. In summary the proposal would appear as a well-mannered neighbour to Fishmongers Hall and the Towers of Cannon Street Rail Bridge when viewed from the southern bank of the river and London Bridge. The structure of the proposed pier is not prominent in itself and would not block the any view of Fishmongers Hall or Cannon Street Station Towers.

### **The extent to which the proposals comply with Government advice (NPPF)**

107. Paragraph 102 of the NPPF advises that opportunities from existing or proposed transport infrastructure and changing technology and usage should be realised in development proposals.
108. Paragraph 110 of the NPPF states that applications for development should allow for efficient delivery of goods, and access by service and emergency vehicles.
109. Paragraph 130 of the NPPF suggests that permission should be refused for development of poor design that fails to take the opportunities available for improving the character of an area and the way it functions, taking into account any local design standards or style guides in plans of supplementary planning documents.
110. The potential of the reinstatement of the pier to support a sustainable, achievable and deliverable freight operation is within the public interest and the potential of such limited resource is a significant consideration. The NPPF is clear in its advice that permission should be refused for development of poor design.

## **Conclusions**

111. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the development plan and other relevant policies and guidance, SPDs and SPGs and relevant advice including the NPPF, the draft London Plan and the draft Local Plan and considering all other material considerations.
112. In the absence of satisfactory information to confirm that freight use would be feasible and viable from the reinstated pier, the proposed reinstatement is considered to be contrary to Planning Policy. For the reasons set out within this report, it is considered that the design of the pier would not accommodate a sustainable freight offering and the wider recreational benefits of the pier do not outweigh the lack of opportunity for use of freight. There are limited locations where a river freight offering can be accommodated, and therefore precluding a viable offering at Swan Pier would be highly prejudicial to the ability to achieve enhanced river freight capacity in the City.
113. For these reasons it is considered that the proposal should be refused and it is considered to be contrary to policies CS9, CS16 and DM16.8 of the Local Plan, Policy VT4 and S17 of the emerging Local Plan, policies 7.24, 7.25 and 7.27 of the London Plan, Policy T7 of the emerging London Plan and contrary to advice in paragraphs 110 and 130 of the NPPF.

## **Background Papers:**

### **Documents**

Letter, Dp9, 7<sup>th</sup> February 2019  
Letter, Dp9, 11<sup>th</sup> July 2019  
Letter, Dp9, 11<sup>th</sup> October 2019  
Letter, Dp9, 26<sup>th</sup> May 2020  
Operational Management of Ocean Diva dated 7<sup>th</sup> February 2019  
Design and Access Statement Revision 3, Beckett Rankine, March 2020  
Archaeological Assessment Incorporating Thames Foreshore Field Survey, CgMs, March 2019  
Indicative Construction Methodology, Beckett Rankine, March 2019  
Water Framework Directive Assessment, Harris Holden, February 2019  
Environmental Assessment, Harris Holden, March 2019  
Logistics Study, BearingPoint, June 2019  
Swan Pier Operational Plan Revision 8, May 2020  
Light Impact Assessment, Beckett Rankine, June 2019  
Air Quality Assessment, Hoare Lea, June 2019  
Noise Impact Assessment Report, Auricl Acoustic Consulting, April 2020  
Flood Risk Assessment, Beckett Rankine, July 2019  
Event Management Plan, Velocity Transport Planning, February 2020  
Transport Statement, Velocity Transport Planning, February 2020  
Freight Management Framework Rev 13, May 2020

### **Drawings**

Location Plan Existing - 1408\_010 REV A  
Location Plan Proposed - 1408\_011 REV A  
Existing Plan - 1408\_012 REV A  
Proposed Plan - 1408\_013 REV A  
Proposed River seat Plan and Elevations - 1408\_014 REV A  
Existing Elevation, Low Tide - 1408\_015 REV A  
Proposed Elevation, Low Tide - 1408\_016 REV A  
Proposed Elevation, High Tide - 1408\_017 REV A  
Existing Cross-section, Low Tide - 1408\_018 REV A  
Proposed Cross-section, Low Tide - 1408\_019 REV A  
Proposed Cross-section, High Tide - 1408\_020 REV A  
Location Plan Existing – Site Boundary – 1408\_030 REV A  
Location Plan Proposed – Site Boundary – 1408\_031 REV A  
Proposed Sheet Pile Wall and Dredging Plan - 1813-BRL-02-XX-DR-C-1401 REV P02  
Existing Campshed Arrangement - 1813-BRL-02-XX-DR-C-1400  
Light Freight Vessel – 1813-BRL-02-XX-SK-C-1002 REV P01

## External

External consultation responses can be accessed via the following link:

<https://www.planning2.cityoflondon.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=PMKFGWFHI8H00>

Letter, Environment Agency, 25<sup>th</sup> March 2019  
Letter, Environment Agency, 30<sup>th</sup> April 2019  
Letter, Environment Agency, 24<sup>th</sup> January 2020  
Email, Port of London Authority, 26<sup>th</sup> March 2019  
Letter, Historic England, 29<sup>th</sup> March 2019  
Letter, Historic England, 23<sup>rd</sup> June 2020  
Letter, Beckett Rankine, 29<sup>th</sup> March 2019  
Letter, Southwark Council, 20<sup>th</sup> March 2019  
Email, City of London Police, 12<sup>th</sup> December 2019  
Letter, Southwark Council, 28<sup>th</sup> July 2020  
Email, Southwark Council, 23<sup>rd</sup> April 2019  
Email, Transport for London, 6<sup>th</sup> July 2020  
Letter, Tower Hamlets Council, 22<sup>nd</sup> July 2020  
Letter, London Fire Brigade, 13<sup>th</sup> August 2020

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Email, Sian Berry, 22/07/2020  
Email, Joan And Michael Royle, 23/07/2020

#### Relevant Local Plan Policies

### ***CS10 Promote high quality environment***

To promote a high standard and sustainable design of buildings, streets and spaces, having regard to their surroundings and the character of the City and creating an inclusive and attractive environment.

### ***CS9 Meet challenges of Thames/Riverside***

To ensure that the City capitalises on its unique riverside location, sustaining the river's functional uses in transport, navigation and recreation, whilst minimising risks to the City's communities from flooding.

### ***DM10.1 New development***

To require all developments, including alterations and extensions to existing buildings, to be of a high standard of design and to avoid harm to the townscape and public realm, by ensuring that:

- a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;
- b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;
- c) appropriate, high quality and durable materials are used;
- d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
- e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;
- f) the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;
- g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that

would adversely affect the character, appearance or amenities of the buildings or area will be resisted;

h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;

i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;

j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;

k) there is provision of amenity space, where appropriate;

l) there is the highest standard of accessible and inclusive design.

### ***DM10.8 Access and inclusive design***

To achieve an environment that meets the highest standards of accessibility and inclusive design in all developments (both new and refurbished), open spaces and streets, ensuring that the City of London is:

a) inclusive and safe for all who wish to use it, regardless of disability, age, gender, ethnicity, faith or economic circumstance;

b) convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;

c) responsive to the needs of all users who visit, work or live in the City, whilst recognising that one solution might not work for all.

### ***CS13 Protect/enhance significant views***

To protect and enhance significant City and London views of important buildings, townscape and skylines, making a substantial contribution to protecting the overall heritage of the City's landmarks.

### ***CS16 Improving transport and travel***

To build on the City's strategic central London position and good transport infrastructure to further improve the sustainability and efficiency of travel in, to, from and through the City.

### ***DM16.2 Pedestrian movement***

1. Pedestrian movement must be facilitated by provision of suitable pedestrian routes through and around new developments, by maintaining pedestrian routes at ground level, and the upper level walkway network around the Barbican and London Wall.

2. The loss of a pedestrian route will normally only be permitted where an alternative public pedestrian route of at least an equivalent standard is provided having regard to:

- a) the extent to which the route provides for current and all reasonably foreseeable future demands placed upon it, including at peak periods;
- b) the shortest practicable routes between relevant points.

3. Routes of historic importance should be safeguarded as part of the City's characteristic pattern of lanes, alleys and courts, including the route's historic alignment and width.

4. The replacement of a route over which pedestrians have rights, with one to which the public have access only with permission will not normally be acceptable.

5. Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that signage is not necessary and it is clear to the public that access is allowed.

6. The creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into consideration pedestrian routes and movement in neighbouring areas and boroughs, where relevant.

#### ***DM16.8 River transport***

1. River piers, steps and stairs to the foreshore, the Walbrook Wharf safeguarded site, and other river-based transport infrastructure will be safeguarded and improvements will be supported.

2. Development adjacent to or over the River Thames must be supported by a Transport Assessment and a Construction Logistics Plan addressing the potential for the use of the river for the movement of construction materials and waste.

## SCHEDULE

APPLICATION: 19/00116/FULL

**Swan Lane Pier 1 Swan Lane London**

**Erection of a new pier within the River Thames at Swan Lane, to comprise a refurbished landside access platform; new canting brow and pontoon; dredging and filling of river bed; repair and reinstatement of camphed and riverbank; replacement of mooring pile and installation of additional mooring pile.**

## REASONS FOR REFUSAL

- 1 The proposed pier would not provide for a multi-use pier and would result in a pier which has not been designed to accommodate and provide for a sustainable freight offering for a variety of users contrary to London Plan policy 7.24, 7.25 and 7.27, Local Plan policy CS9, CS16 and DM16.8, draft Local Plan policy VT4 and S17 and the aims and objectives of the NPPF.

## INFORMATIVES

- 1 In dealing with this application the City has implemented the requirements of the National Planning Policy Framework to work with the applicant in a positive and proactive manner based on seeking solutions to problems arising in dealing with planning applications in the following ways:

Detailed advice in the form of statutory policies in the Local Plan, Supplementary Planning documents, and other written guidance has been made available;

A full pre application advice service has been offered;

Where appropriate the City has been available to provide guidance on how outstanding planning concerns may be addressed.

- 2 The Plans and Particulars accompanying this application are: Drawing numbers: Location plan, 1408\_011 REV A, 1408\_013 REV A, 1408\_014 REV A, 1408\_016 REV A, 1408\_017 REV A, 1408\_019 REV A, 1408\_020 REV A, 1813-BRL-02-XX-DR-C-1401 REV P02 and 1813-BRL-02-XX-SK-C-1002 REV P01.