

Background Papers

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, 25th March 2019

Letter, Environment Agency, 30th April 2019

Letter, Environment Agency, 24th January 2020

Email, Port of London Authority, 26th March 2019

Letter, Historic England, 29th March 2019

Letter, Historic England, 23rd June 2020

Letter, Beckett Rankine, 29th March 2019

Letter, Southwark Council, 20th March 2019

Email, City of London Police, 12th December 2019

Letter, Southwark Council, 28th July 2020

Email, Southwark Council, 23rd April 2019

Email, Transport for London, 6th July 2020

Letter, Tower Hamlets Council, 22nd July 2020

Letter, London Fire Brigade, 13th August 2020

Kurt Gagen
Corporation Of London
Development Plan
PO Box 270
London
EC2P 2EJ

Our ref: NE/2019/129950/01-L01
Your ref: 19/00116/FULL
Date: 25 March 2019

Dear Kurt,

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.

Swan Lane Pier, 1 Swan Lane, London EC4R 3TN

Environment Agency position

Thank you for consulting us on the above application, we have reviewed the submitted documents and we **object** to this development as submitted for the following reasons.

The current development proposal would encroach on the inter-tidal foreshore, which as explained in our previous correspondence to the applicant (Ref: NE/2018/128790/01-L01), provides an important ecological corridor through London. As stated in the *City of London's Core Strategy Policy CS9: Thames and the Riverside*, there is an ambition of 'improving opportunities for biodiversity, in line with the *City of London Habitat Action Plan for the Thames foreshore*.'

Whilst the reinstatement of the campshed is beneficial to protecting the flood defence, the current proposal may prevent a larger than acceptable area from being connected to a dynamic tidal environment as it encroaches into the river Thames tideway and inadequate justification for this has been provided. It has also not been adequately demonstrated how any ecological impacts will be mitigated for and what net gain for biodiversity will be achieved.

The application as submitted to the City of London also lacks a method statement for the works and a Water Framework Directive (WFD) assessment, meaning we cannot conclude the work will comply with the WFD based on the current information provided.

We recommend that the application is refused on this basis.

Cont/d..



INVESTOR IN PEOPLE



Reasons

This objection is supported by paragraphs 170 and 175 of the National Planning Policy Framework (NPPF) which recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity as well as being in line with *Policy OS3: Biodiversity of the emerging City of London, City Plan 2036* which states that 'Development should incorporate measures to enhance biodiversity, including: Retention and enhancement of habitats within Sites of Importance for Nature Conservation (SINCs), including the River Thames'.

In this case intertidal habitat creation has been omitted by the applicant on the grounds of survivability for this busy stretch of the river, and the proposal does not seek to mitigate for the loss of habitat through any other means. The new pier and associated dolphins/pontoons may cause erosion to the intertidal area through wave wash of docking craft. At this stage, no information has been submitted to mitigate for this potential action either. Where harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated for, planning permission should be refused.

We note that the proposal involves new sheet piling and dredging works riverward of the existing campshed retaining structures. We provided the applicant with pre-application advice, requesting moving the location of the new sheet pile retaining wall landward of the existing line and removing the failing old timber/sheet steel piles, see Appendix B of the Environmental Assessment, Reinstatement of Swan Lane Pier dated February 2019 (Ref: P2018-09-EA-R2). This retreating of the campshed would allow a larger area of the bed of the Thames to change with natural geomorphological processes minimising the impact on the ecology and physical habitats in order to help achieve Water Framework Directive (WFD) requirements. This has however not been incorporated into the submitted proposal.

As the proposal has not incorporated our recommendation for moving the new retaining wall landward of the existing line to provide the net gains for biodiversity, and instead encroaches into the Thames tideway, it is contrary to the Thames River Basin Management Plan (RBMP) which states that the water environment should be enhanced to prevent deterioration and promote the recovery of water bodies and also does not meet the requirements of the Water Framework Directive, unless the provisions of Article 4.7 of the Water Framework Directive can be met.

In addition we do not believe that the dredge pocket relies on being backed by a sheet steel pile wall to make it stable, but rather it can be dredged and the edges sloped accordingly back to a sheet steel pile wall further landward, as we suggested above.

The current application also does not provide the necessary information to approve the application from a water quality perspective. We have received an application for a Marine Management Organisation (MMO) marine licence which includes the proposed dredging works for this development which contained a WFD assessment and method statement. A sediment analysis of a sample taken from the area to be dredged within these documents **indicates high levels of contamination**, which contradicts the information submitted in section 6 of the application form, where it is stated that no land is contaminated.

The supporting documents supplied to the MMO have not been included in this application, however they do have a bearing on the acceptability of the project as a

whole. Whilst it may or may not be the case that landwards of the flood defences there are no contaminated land issues, there certainly are contaminated sediment issues within the curtilage of the proposed works in-river, and these are very relevant to assessment of WFD water quality risks. Dredge works or other works which resulted in substantial mixing of the sediment with water would be completely unacceptable to us. Appropriate conditions applied to how the dredge and construction is carried out may mitigate water quality risks sufficiently to reach acceptable risk levels, however we would still expect the appropriate documents to be submitted as part of this application.

Overcoming our objection

It may be possible for the applicant to overcome our objection by submitting a revised scheme demonstrating:

- the justification for encroachment including why the new sheet steel pile further riverward is necessary;
- how proposals will mitigate for the loss of intertidal foreshore;
- what net gain for biodiversity will be incorporated;
- confirmation no dispersive dredge techniques will be performed.

The corresponding method statement and a WFD assessment should also be submitted to ensure the risks to water quality are sufficiently controlled.

Advice to applicant and LPA

Please note the method statement and WFD Assessment submitted with the MMO application provides for either removal dredge or a dispersive dredge techniques, however, we do not consider a dispersive dredge to be appropriate given the toxicity of the material. We would therefore object to the use of a dispersive technique as it is considered to pose an unacceptable risk for water quality. This material needs to be completely isolated from the waterbody such that it cannot contribute to a worsening of water quality.

The material is so badly contaminated it is unsuitable for disposal in the marine environment, even at licenced marine site, and therefore will probably have to be dealt with through waste licencing permits at an approved landside facility appropriate for the hazardous nature of the material. Because of this risk, it is likely that any activities which disturb the sediment in this area, not just dredging, will lead to elevation of the water quality risks, and methods of construction used should seek to limit the mixing of bed sediments and the water.

We recommend that a potential contribution to biodiversity gains if the existing camphed retaining structures are to be removed, may include the use of the old camphed timber attached to the new pier structures to provide improved habitat.

Advice to LPA

Please note that we have also been consulted by the Marine Management Organisation

(MMO) regarding the issuing of a marine licence for the works, ref: MLA/2019/00040. The above concerns have been raised in our response to this licence application and we are currently **not** in a position to recommend approval.

Final comments

Thank you again for consulting us. If you are minded to approve the application contrary to our objection, we request you re-notify the Environment Agency to explain why material considerations outweigh our objection, and to give us the opportunity to make further representations prior to the decision being made. Should our objection detailed above be removed, we will recommend the imposition of conditions to be included on any subsequent approval.

If you have any queries regarding our response please get in touch at HNL.SustainablePlaces@environment-agency.gov.uk.

Yours sincerely,

Mr Matthew Pearce
Planning Advisor

Telephone: 0207 714 0992
E-mail: HNL.SustainablePlaces@environment-agency.gov.uk
Address: Environment Agency, 3rd Floor, 2 Marsham Street, London, SW1P 4DF

Kurt Gagen
Corporation Of London
Development Plan
PO Box 270
London
EC2P 2EJ

Our ref: NE/2019/129950/02-L01
Your ref: 19/00116/FULL
Date: 30 April 2019

Dear Kurt,

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.

Swan Lane Pier, 1 Swan Lane, London EC4R 3TN

Documents reviewed:

- *Letter from Becket Rankine, dated 29 March 2019 (Ref: 1813-BRL-00-XX-CO-X-0001)*
- *WFD Assessment, Reinstatement of Swan Lane Pier, River Thames, dated February 2019 (Ref: P2018-09-WFD-R2)*
- *Revised Environmental Assessment, Reinstatement of Swan Lane Pier, dated March 2019 (Ref: P2018-09-EA-R3)*
- *Swan Lane Pier, Indicative Construction Methodology dated March 2019.*

Environment Agency position

Thank you for contacting us regarding the additional information supplied in support of the above application. We have reviewed the additional documents submitted and consider that these satisfactorily address our earlier concerns. We are therefore in a position to **withdraw our previous objection**, dated 25 March 2019.

Whilst we have no objections to this application, we would like to draw your, and the applicant's, attention to the following comments.

Cont/d..



INVESTOR IN PEOPLE



Advice to LPA and applicant

Gabion baskets

We strongly recommend the applicant revises the design of the proposed reinstatement of the campshed retaining structures to remove the need for gabion baskets. A continuous sheet pile wall along the full length of the reinstatement area would be preferable.

Development involving the use of gabion baskets within the River Thames may severely affect its ecological value. In the tidal environment of the river, gabion baskets can cause ecological damage as they can break down over time and the metal cage can fragment entering the watercourse posing a risk to bird and fish populations.

Advice to applicant

Flood Risk Activity Permit

Under the terms of the Environmental Permitting Regulations a Flood Risk Activity Permit is required from the Environment Agency for any proposed works or structures, in, under, over or within 16 metres of tidal defences on the River Thames, designated a 'main river'. For the avoidance of doubt, the 16 metre easement applies to known ground anchors and tie-rods. Details of lower risk activities that may be Excluded or Exempt from the Permitting Regulations can be found at www.gov.uk/guidance/flood-risk-activities-environmental-permits. Please contact us at PSO-Thames@environment-agency.gov.uk.

Further information

Our previous objection raised concerns regarding insufficient justification for:

1. The proposed encroachment into the Thames tideway for the construction of a new camp shed retaining structure
2. The lack of ecological enhancement,
3. The potential use of dispersive dredge techniques.

1. Encroachment

The justification provided for the proposed reinstatement of the campshed retaining wall riverward of the existing structures, is based on the engineering argument that the existing campshed ties would require cutting to install a sheet steel pile wall further inland which would pose an unnecessary risk to the flood defence wall's stability. We feel this is acceptable due to the potential unknown impact these activities could have on the existing defence structures.

We do not support reinforcing or installing new walls which encroach into the Thames tideway in order to artificially retain intertidal habitat is a sustainable approach and we would oppose any future application without strong justification for this.

2. Ecological enhancement

We agree that the campshed is too low and too high energy to form reedbed habitat or other improvements against it, however we would expect other forms of enhancement to be sought to add to net biodiversity gain.

In the response from Beckett Rankine dated 29 March 2019 (Ref: 1813-BRL-00-XX-CO-X-0001) it was mentioned that existing timbers will not be removed and where possible buried timbers will be repositioned to a higher level, however no further information was provided. The attaching of timber fenders to pier structures of sheet pile fronting was part of the potential ecological enhancement options we suggested previously, and we would expect this to be considered as part of the proposal.

3. Dredging

The WFD assessment states that the materials present are not suitable for dispersive dredge methods due to high levels of contamination. The response letter from *Beckett Rankine* (Ref: 1813-BRL-00-XX-CO-X-0001) and the *Indicative Method Statement* confirms a protective closed bucket back-hoe removal method (with associated offsite disposal at an appropriately licensed disposal site) will be used, in order to reduce the potential impacts on water quality.

We also agree that it would not be appropriate to re-use dredged contaminated sediment as fill for the campshed, and that suitable chemically inert fresh material would be more protective for water quality.

The short duration of the dredge activity suggests that any elevation of WFD relevant chemicals in the water column will be very temporary and therefore has relatively little potential cause WFD water quality failures of the annual average Environmental Quality Standard limits.

Final comments

In accordance with the planning practice guidance (determining a planning application, paragraph 019), please notify us by email within two weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

Thanks you gain for consulting us. If you have any queries regarding our response please get in touch at HNL SustainablePlaces@environment-agency.gov.uk.

Kind regards,

Mr Matthew Pearce
Planning Advisor

Telephone: 0207 714 0992
E-mail: HNL SustainablePlaces@environment-agency.gov.uk
Address: Environment Agency, 3rd Floor, 2 Marsham Street, London, SW1P 4DF

Kurt Gagen
Corporation Of London
Development Plan
PO Box 270
London
EC2P 2EJ

Our ref: NE/2019/129950/03-L01
Your ref: 19/00116/FULL

Date: 24 January 2020

Dear Kurt,

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.

Swan Lane Pier, 1 Swan Lane, London EC4R 3TN

I'm writing to you following our response dated 30 April 2019 (ref: NE/2019/129950/02-L01). It has come to our attention that the following additional information has recently been uploaded to the City of London planning portal, which we are yet to be consulted on.

- Transport Statement, dated September 2019 (ver:1.0)
- Event Management Plan, dated September 2019 (ver:1.0)
- Freight Management Framework, dated December 2019 (rev 05)

As part of our previous consultation we reviewed a Vessel Scour Wash Assessment included within the submitted Environmental Assessment. This document stated that *'Whilst Thames Clippers using the pier at some point in the future cannot be completely ruled out, it is considered to be highly unlikely as it would require exclusive use of the pier and therefore prevent other vessels berthing as intended'*, and the report concluded that scour from the wash of vessels, predominantly the Ocean Diva, using the pier would not have a significant impact.

Upon further review of the above documents it has come to our attention that the reinstated pier being considered for use by passenger river bus and freight services. Our concern here is that the particular vessels used for these river bus services and an increased frequency of vessels may have the ability to create erosive wash that could impact the foreshore and over time, negate the functionality of the reinstated campshed. We therefore wish to amend our previous response to include the following **condition** in any planning permission granted. Due to the increased use of the pier without this condition the application would be considered unacceptable.

Cont/d..



INVESTOR IN PEOPLE



EA Condition

Prior to any part of proposed development coming into use, a detailed foreshore monitoring and maintenance scheme should be submitted to, and approved in writing, by the local planning authority in consultation with the Environment Agency.

This scheme should include, but not necessarily be limited to:

- a baseline survey of the reinstated foreshore in order to suitably assess the potential future impacts from vessel wash,
- suitable trigger points for the implementation of scour mitigation measures, such as a specified amount of depletion in foreshore,
- a foreshore monitoring plan, to be carried out at suitable intervals for a justified period of time, we would expect the intervals to be at least every 3 months,
- suitable mitigation measures, including an implementation plan, to be put in place should the foreshore impacts breach the agreed thresholds.

The scheme should also include scope for revision should the activity or use of the pier change, or increase in size and/or frequency of vessels.

We expect the scheme to be fully implemented and subsequently maintained, in accordance with the approved scheme, or any details as may subsequently be agreed, in writing, by the local planning authority.

Reason

This condition protects the integrity of the flood defences in line with the London Plan Policy SI12, the City of London Core Strategic Policy CS18: Flood Risk, as well as the Thames Estuary 2100 plan which highlights considerations for eroding foreshore in the London City Policy Unit. This condition is to ensure the integrity of the reinstated intertidal foreshore at Swan Lane Pier, which is important for both providing biodiversity benefits and structural support for the river wall and flood defences. Without this condition the campshed and base of river wall could be eroded and undercut through the impacts of wave wash and scour from vessels.

Advice to applicant

We advise the applicant considers the construction of wash mitigation, in the form of floating wave wash booms/buoys to help dissipate wave energy, prior to the pier coming into use. This may negate the need to revisit other forms of mitigation such as changes to operational movements or foreshore reinstatement at a later date.

Informative

Flood Risk Activity Permit

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 16 metres of a tidal main river
- on or within 16 metres of a tidal flood defence structure or culvert

As the proposed works are within 16m of a tidal flood defence, a flood risk activity permit will be required before works could proceed. For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03702 422 549. The applicant should not assume

that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Final comments

Please consult us on the details submitted to your authority to discharge this condition and on any subsequent amendments/alterations. In accordance with the planning practice guidance (determining a planning application, paragraph 019), please notify us by email within two weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

Should you require any additional information, or wish to discuss these matters further, please contact me at HNL.SustainablePlaces@environment-agency.gov.uk.

Yours sincerely,

Mr Matthew Pearce
Planning Advisor

Telephone: 0207 714 0992
E-mail: HNL.SustainablePlaces@environment-agency.gov.uk
Address: Environment Agency, 3rd Floor, 2 Marsham Street, London, SW1P 4DF

From: Lucy Owen
To: [PLN - Comments](#)
Subject: 19/00116/FULL - Swan Lane Pier (DC841)
Date: 26 March 2019 11:59:42

FAO: Kurt Gagen

Thank you for your letter dated 4 March 2019 concerning the above planning application. The PLA has engaged extensively with the Applicant concerning their proposal and welcomes the constructive way that they have approached the discussions.

Policy Context

Both the London Plan and Local Plan support the use of the River for river related purposes and protect and support river related infrastructure.

Policy 7.24 of the London Plan (2015) seeks to prioritise the use of the waterspace for water related purposes, in particular for passenger and freight transport. Policy 7.25 seeks to increase the use of the river for passenger and tourist river services and Policy 7.26 seeks to increase the use of the river for the transport of freight.

Policy CS9 of the City of London Local Plan (2015) promotes the functional uses of the River Thames and its environs for transport, navigation and recreation, particularly through:

- (ii) encouraging the use of the River Thames for the transport of construction and deconstruction materials and waste;
- (iii) encouraging the reinstatement of Swan Lane Pier and the use of these facilities for river transport.

The Vision for the Tidal Thames “Thames Vision” (July 2016) sets out a 20 year view of the river’s future. It sets out a number of goals and priority actions including (i) the busiest ever Port of London, handling 60-80 million tonnes of cargo each year (ii) doubling the number of people travelling by river (iii) an improved tidal Thames Environment, including encouraging the uptake of new and green technologies to reduce the port’s environmental impact and (iv) more people enjoying the Thames and its banks.

The proposed development would result in the re-use of some of the existing Swan Lane Pier river infrastructure alongside the provision of new river infrastructure. The pier would be reactivated as a multi-use pier with two berths; one to be used primarily for charter vessels (non static) alongside a pontoon berth which will “*have the capacity to support light freight operations, charter vessels, passenger ferry services and emergency response operations.*” This would make Swan Lane Pier the first bespoke multi-use pier on the River Thames and set the standard for new piers on the Thames. As such the PLA is supportive in principle of the proposed development.

Mooring of Vessels

During discussions with the applicant, it was made clear that the facility should not be an extension of developable land through the mooring of vessels for prolonged periods of time.

The Applicant has addressed this point in part in the application documents, referring to the charter vessel berth as being non static and the operational management plan referring to embarkation, sail time and disembarkation. It is anticipated in a mature year there would be an average of 1 to 2 events held weekly. Whilst this information is welcomed, the PLA would be looking for greater control through the use of conditions on any planning permission and on any River Works Licence to ensure that the mooring does not become a permanent extension of land. It is recommended that this point is discussed further between the City of London, Applicant and PLA with a view to agreeing a suitably worded condition.

Environment

It is proposed that there would be sufficient electrical supply to the pier that vessels on the pier can use 'shore power' rather than running engines or diesel generators. The PLA welcomes this proposal which would assist in meeting Action 6 of the Air Quality Strategy for the Tidal Thames (June 2016): *"Encourage the installation of green technology including shore power on sites developed along the Thames."* The provision of shore power and the requirement for vessels to 'plug in' should be a condition on any planning consent.

All waste and recycling relating to the vessels would be dealt with at alternative service locations for example at the Royal Docks. Waste and recycling related to the other users of the pier would be removed via river transport. All vessel maintenance would take place at Royal Docks. Again conditions on any grant of planning permission should control these aspects of the development.

Given the increase in people that would be attracted to the riverside, a condition should be placed on any grant of planning permission requiring the submission and approval of a litter management plan which sets out the measures to reduce the potential for litter to enter the river from the proposed development.

Whilst reference is made to lighting, a condition on any grant of planning permission should require the submission and approval of all external lighting with details being provided of how the lighting has been designed to minimise light overspill to the river.

It is proposed to dredge an area of the river and a proportion of the dredge spoil is to be used as fill to reinstate the campshed. A dredging licence will be required from the PLA and the fill used for the campshed should be appropriate for the aquatic environment, uncontaminated and pre-washed to remove fines.

Conditions

Whilst some information is provided, conditions should require the submission and approval of riparian life saving equipment, and shore side safety measures.

River Works Licence

A River Works Licence (RWL) application has been submitted to the PLA for the proposed works. An outline Navigational Risk Assessment (NRA) has been submitted in support of the RWL application that demonstrates the satisfactory nature of the proposal but a full NRA before the PLA can formally approve the application and this may result in additional controls relating to the

mooring and movement of vessels.

Additionally, the PLA has raised a number of points that require clarification relating to the proposed campshed and gabion baskets and how they will tie in with existing works.

I hope the above is of assistance to you.

Regards

Lucy

Lucy Owen
Deputy Director of Planning and Environment
Port of London Authority

London River House, Royal Pier Road
Gravesend, Kent, DA12 2BG
01474 562384
07738 028540
www.pla.co.uk



Disclaimer

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you are not the intended recipient, you are hereby notified that any use or dissemination of this communication is strictly prohibited, and asked to notify us immediately (by return email), then delete this email and your reply. Email transmissions cannot be guaranteed to be secure or error-free and Port of London Authority (PLA) does not accept any liability for any errors or omissions in the contents of this message. Any views or opinions presented are those of the author and do not necessarily represent those of PLA.

website: www.pla.co.uk



Historic England

LONDON OFFICE

Mr Kurt Gagen
City of London Corporation
PO Box 270
Guildhall
London
EC2P 2EJ

Direct Dial: [REDACTED]

Our ref: P01047330

29 March 2019

Dear Mr Gagen

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**SWAN LANE PIER 1 SWAN LANE LONDON EC4R 3TN
Application No. 19/00116/FULL**

Thank you for your letter of 4 March 2019 regarding the above application for planning permission. On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation advisers, as relevant, specifically Kathryn Stubbs, with reference to the archaeological remains on the foreshore, which will be impacted upon by the construction.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.

Yours sincerely

[REDACTED]

Jane Sidell
Inspector of Ancient Monuments
E-mail: [REDACTED]



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.



Historic England

Mr Kurt Gagen
City of London Corporation
PO Box 270
Guildhall
London
EC2P 2EJ

Direct Dial: 020 7973 3738

Our ref: P01047330

23 June 2020

Dear Mr Gagen

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**SWAN LANE PIER 1 SWAN LANE LONDON EC4R 3TN
Application No. 19/00116/FULL**

Thank you for your letter of 15 June 2020 regarding further information on the above application for planning permission. On the basis of this information, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation advisers, as relevant.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

Jane Sidell
Inspector of Ancient Monuments
E-mail: [REDACTED]



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.



Our Ref: 1813-BRL-00-XX-CO-X-0001

29 March 2019

Matthew Pearce
Planning Advisor
Environment Agency
3rd Floor
2 Marsham Street
London
SW1P 4DF

Dear Matthew,

RE: 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.

Swan Lane Pier, 1 Swan Lane, London EC4R 3TN

The City of London has passed us a copy of your letter reference NE/2019/129950/01-L01 objecting to the above planning application. We have reviewed your comments and offer the following justifications in order to overcome your objections.

Sheet Pile Campshed

A productive pre-application meeting was held with Environment Agency technical teams on 30th July 2018, at which flood defence and habitat encroachment were discussed, amongst other topics. The comments and concerns raised at the meeting, and by the Environment Agency in their pre-application response, were taken into account in the Environmental Assessment. Where comments/suggestions could not be provided, these reasons were provided.

The reinstatement of the campshed is not a habitat loss. The area to be filled behind the new campshed retaining wall and gabion baskets is limited and reinstates the campshed to its original profile before it fell into disrepair. By restoring the campshed level the erosion which is currently undermining the river wall, which forms the flood defence, will be rectified thereby securing the flood defence.

The infill material for the campshed will be sourced to match the existing foreshore material (coarse sands and gravels). The reinstated levels are within the intertidal zone so it will continue to function as an intertidal habitat. The restoration of the campshed will involve a small increase, not loss, of intertidal foreshore.

The Environment Agency suggested realigning the campshed closer to the river wall to allow an area of the riverbed to change with natural geomorphological processes. As the subtidal area in front of the campshed will be dredged to create a berth, this is not considered feasible or beneficial as the subtidal dredge area will extend up to the face of the campshed. Active use of the berth by vessels is then expected to maintain the dredge depth at its reduced level.

A further disadvantage of setting the new campshed back is that it would result in loss of intertidal foreshore and would require cutting the existing campshed ties resulting in a temporary loss of support to the flood defence. While the level of that risk is unknown, due to the wall's construction details being unknown, we believe that this would be an unnecessary risk to the flood defence wall's stability.

Biodiversity

The Environment Agency has suggested that the installation of intertidal reed beds along the campshed is considered to add to the biodiversity habitat of the river and 'soften' the hard-engineered structures. The campshed is close to mid-tide level, between 3 and 4 metres above Chart Datum. This level is too low for any type of planting to survive, as evidenced by the lack of any growth at the site. Furthermore the river is fast-flowing and subject to regular wave agitation from passing craft which washes out the finer sediments. The only way of providing a habitat to support reed growth would be to raise the foreshore level to at least 5 metres above Chart Datum. This would involve significant encroachment into the water channel combined with loss of flood storage volume. For these reasons we have not included reed bed creation in the proposed scheme.

The existing timbers will not be removed as part of these works. Where possible timbers that are to be buried will be repositioned to a higher level.

Dredging Techniques

We can confirm that the applicant intends to undertake backhoe dredging at this location. There will be no dispersive dredging. At the point of application, we included both as an option, but wished to seek the guidance of the regulatory bodies on this following sediment sampling results. We have since had communication with both Cefas (through the MMO) and the PLA who have stated that dredging should not be dispersive and all dredged arisings should be disposed of through waste licensing permits at an approved landside facility appropriate for the hazardous nature of the material. The applicant is happy to comply with these recommendations.

Supporting Documentation

Please find enclosed the following documentation in support of the application:

- **WFD Assessment:** Section 4.2 states that the dredged material is not suitable for disposal at sea and that dredging should be undertaken using a closed-bucket grab dredger.
- **Indicative Method Statement:** This now confirms that dispersive dredging is not an option. This was clarified with the MMO Case Officer, Luella Williamson, during a phone call. This document was submitted to the Environment Agency for the Flood Risk Assessment Permit application.
- **Environmental Assessment:** Section 3 (consultation), Section 4.4.2 (intertidal habitat) have been updated to reflect the matters discussed in this letter. This document was submitted to the Environment Agency for the Flood Risk Assessment Permit application.

Concluding Remarks

Thank you again for providing your consultation response. We look forward to working with the Environment Agency to reach an agreement on this project's progression.

If you have any further queries, please do not hesitate to make contact.

Yours sincerely,

Jane Templeton

Direct Line: [REDACTED]

Email: [REDACTED]

SOUTHWARK COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)



www.southwark.gov.uk

FORMAL COMMENTS TO ADJOINING BOROUGH

Applicant Mr Kurt Gagen
City of London

LBS Registered Number 19/OB/0015

Date of Issue of this decision 20/03/2019

No comments with reference to your consultation on the following development:

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

At: SWAN LANE PIER 1 SWAN LANE LONDON EC4R 3TN

In accordance with your letter received on 04/03/2019 Your Ref. No.:

Signed *Simon Bevan*

Director of Planning

Your attention is drawn to the notes accompanying this document

Any enquiries regarding this document should quote the LBS Registered Number and be sent to the Director of Planning, Southwark Council, Chief executive's department, Planning division, Development management, PO Box 64529, London SE1 5LX, or by email to planning.applications@southwark.gov.uk

UPRN:

TP/2019/OBS/COL

From: [Gagen, Kurt](#)
To: [DBE - PLN Support](#)
Subject: FW: Swan Lane Pier (OFFICIAL - RECIPIENT ONLY)
Date: 11 September 2020 17:34:24
Attachments: [image001.png](#)

Please upload below comments from City of London Police to 19/00116/FULL

Thanks,
Kurt

From: Northmore Jo <[REDACTED]>
Sent: 12 December 2019 09:31
To: Gagen, Kurt <[REDACTED]>
Cc: Wynne Jesse <[REDACTED]>; Keeble, Ford <[REDACTED]>; Paul.Holmes <[REDACTED]>
Subject: RE: Swan Lane Pier (OFFICIAL - RECIPIENT ONLY)

Classification: **OFFICIAL - RECIPIENT ONLY**

I have thoroughly read the documents you sent Kurt for the pier and the main party boat that will be docking. The planners have already taken into account noise levels when the boat is docked. There will be no strobe affect lighting on the approach to the pier and whilst docked, music and announcements are not allowed on any outside spaces of the vessel whilst the party continues inside the vessel at the pier. The boat staff will be staggering disembarking as best they can and I note the pier can only take 150 persons at one time. Taking it would only take 7 minutes for all 1000 patrons to leave should they so wish to all leave at the same time on the busiest evenings.

My main concern will be the safety of those leaving who will be flooding across Lower Thames street and after 11pm Monday to Thursday most patrons will be wanting to get cabs, I believe Swan Lane and the surrounding areas will have significant traffic disruption with crowds waiting causing a noise nuisance. If there was significant frustration with the wait for transport on these occasions coupled with alcohol this will certainly lead to an increase in crime & disorder, the area is not equipped to deal with the large numbers of people leaving the main party boat, regardless of the projected dispersal arrangements.

Under what headers can we make objections officially on the planning portal?

Best regards



Jo Northmore
Inspector 11949r
Licencing Team Inspector
Federation work place representative / Post Incident Manager/
Federation PIP for call out.

p 0207 601 2791 | [REDACTED]
e [REDACTED]
w www.cityoflondon.police.uk f www.twitter.com/citypolice

This information has been classified as OFFICIAL and is accompanied by a handling code. If you are not authorised to read it, please delete and inform sender.

From: Holmes Paul

Sent: 28 November 2019 17:27

To: [REDACTED]

Cc: Wynne Jesse <[REDACTED]>; Northmore Jo

<[REDACTED]>; Keeble Ford [REDACTED]

Subject: Swan Lane Pier (OFFICIAL)

Classification: **OFFICIAL**

Hi Kurt, can you assist us please with the format of the representation that we would make in respect of the above application. Clearly the construction of a pier is not something that would create crime & disorder, which comes under our remit, but the use of the pier potentially would.

We are aware that the original discussion for the use of the pier was in connection with the MV Ocean Diva operating as a party boat. We understand that further information might be available about other vessels proposing to utilise this pier. Where can we get that information and how best do we express our concerns at the very real possibility of a large increase of crime and disorder in the vicinity of the pier, landside.



Paul M Holmes
Licensing Officer

Licensing Department | City of London Police

p 020.7601.2761 | e [REDACTED]

w www.cityoflondon.police.uk | www.twitter.com/citypolice

This information has been classified as OFFICIAL and is accompanied by a handling code. If you are not authorised to read it, please delete and inform sender.

Please consider the environment before printing my email

#####

Note:

This message is for the named person's use only. It may contain confidential, proprietary or legally privileged information. No confidentiality or privilege is waived or lost by any mistransmission. If you receive this message in error, please immediately delete it and all copies of it from your system, destroy any hard copies of it and notify the sender. You must not, directly or indirectly, use, disclose, distribute, print, or copy any part of this message if you are not the intended recipient. City of London Police and any of its subsidiaries each reserve the right to monitor all e-mail communications through its networks.

Any views expressed in this message are those of the individual sender, except where the message states otherwise and the sender is authorised to state them to be the views of any such entity.

All incoming and outgoing emails are virus checked, however we cannot guarantee that this message or any attachment is virus free or has not been intercepted and amended. City of London Police accepts no liability in respect of any loss, cost, damage or expense as suffered as a result of receiving this message or any attachments

City of London Police

Website: <http://www.cityoflondon.police.uk/>

#####

FORMAL COMMENTS TO ADJOINING BOROUGH

LBS Registered Number: 20/OB/0030

Date of issue of this decision: 28/07/2020



www.southwark.gov.uk

LBS Reg. No.: 20/OB/0030

Date of Issue of Decision: 28/07/2020

Your Ref No.:

Applicant Kurt Gagen
City of London

With reference to your consultation on the following development:

Proposal: 19/00116/FUL: Request for observations from City of London 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 the river bed; Repair and reinstatement of campshed and riverbank; replacement of mooring pile and installation of additional mooring".

This is a reconsultation 'observations' request, owing to amended and amended supporting information having been received.

At Swan Lane Pier 1 Swan Lane London EC4R 3TN

In accordance with your letter received on 16 June 2020 and supporting documents.

The Council's formal response is

2. LBS ARCHAEOLOGIST: NO OBJECTION BUT COMMENTS

COMMENTS:

The survey submitted by the applicant does not consider impacts from the construction or use of the pier upon the foreshore of Southwark. The data included in the baseline report is approximately 24 years old and does not include survey data obtained by the Thames Discovery Programme over many years.

An adequate baseline survey of the Southwark foreshore should be undertaken prior to the commencement of development works. This is to establish the character and nature of the foreshore before the commencement of development works and use of the site as a pier. The starting point for this work should be an assessment of the TDP data for the and confirmation of change and movement from the surveys undertaken over many years. This report should be followed up six months following the commencement of use of the site. The purpose of this second assessment is to measure change to the archaeology of the foreshore over time and potentially linked to the construction and operation of the pier.

RECOMMENDATION:

The London Borough of Southwark would recommend that two conditions - one relating to an archaeological foreshore survey and the other relating to archaeological reporting - be attached to any consent the City of London resolves to grant. Provided below is the

FORMAL COMMENTS TO ADJOINING BOROUGH

LBS Registered Number: 20/OB/0030

Date of issue of this decision: 28/07/2020



www.southwark.gov.uk

condition wording the London Borough of Southwark would use. The City of London Archaeologist should examine these conditions to ensure that they meet the standard conditions used by the City of London.

Archaeological Foreshore Survey:

- a) Before any work hereby authorised begins, the applicant shall secure the implementation of a programme of archaeological foreshore survey works within a 250 metre radius around the construction site upon the Southwark foreshore. These works will use Thames Discovery Project data as a baseline and assess the survival, significance and interest of material identified in accordance with a written scheme of investigation which shall be submitted to and approved in writing by the Local Planning Authority. This WSI will include provision for a second foreshore survey six months after the commencement of operations of the pier to record any changes to the foreshore due to the construction and operation of the pier.
- b) Six months after the operation of the pier has commenced the applicants shall secure the implementation of a programme of archaeological foreshore survey works based upon the 250m survey radius, to assess the impact upon the operation of the pier upon the Southwark Foreshore.

Reason:

In order that the applicants supply the necessary archaeological information to ensure suitable mitigation measures and/or foundation design proposals be presented in accordance with: the National Planning Policy Framework 2019; Strategic Policy 12 (Design and Conservation) of The Core Strategy 2011, and; Saved Policy 3.19 (Archaeology) of the Southwark Plan 2007.

Archaeological reporting:

Within three months of the completion of the final archaeological survey, an assessment report detailing the proposals for the off-site analyses and post-excavation works, including publication of the site and preparation for deposition of the archive, shall be submitted to and approved in writing by the Local Planning Authority, and the works detailed in the assessment report shall not be carried out otherwise than in accordance with any such approval given. The assessment report shall provide evidence of the applicant's commitment to finance and resource these works to their completion.

Reason:

In order that the archaeological interest of the site is secured with regard to the details of the post-excavation works, publication and archiving to ensure the preservation of archaeological remains by record in accordance with: the National Planning Policy Framework 2019; Strategic Policy 12 (Design and Conservation) of The Core Strategy 2011, and; Saved Policy 3.19 (Archaeology) of the Southwark Plan 2007.

3. LBS DESIGN AND CONSERVATION TEAM: NO OBJECTION BUT COMMENTS

COMMENTS:

The proposal is for a new pier in the Thames directly opposite Southwark Cathedral to the west of London Bridge. This area of Southwark forms part of the borough's most historic

FORMAL COMMENTS TO ADJOINING BOROUGH

LBS Registered Number: 20/OB/0030

Date of issue of this decision: 28/07/2020



www.southwark.gov.uk

district, incorporating not only the Southwark Cathedral but also the site of Winchester Place and the Borough High Street Conservation Area around the Clink Street area. The proposal is generally modest in scale and will rise and fall relative to the tidal ebb and flow of the river. In this location the relationship of the Cathedral to the river contributes positively to the setting of the Grade I Listed Building. The only impact on the area is likely to arise due to the number of boats landing or leaving the pier and the associated noise or other environmental implications. The proposal is outside the extent of the Conservation Area, being on the north bank of the river and a good distance from the Cathedral.

No Objection is raised at this stage.

The new pier is unlikely to cause any harm to the Conservation Area or the setting of Southwark Cathedral. The backdrop of the pier is a largely modern townscape and replaces a water-cleaning device previously moored in this location. Any harm identified is less than substantial and is likely to be more than outweighed by the benefits arising from the improved connectivity and transport links in the area.

4. LBS ECOLOGIST: NO OBJECTION BUT COMMENTS

COMMENTS:

The development should be consistent with the ZSL Guidance Document: Conservation of Tidal Thames Fish through the Planning Process. The developer should complete a Baseline Fish Survey at the proposed site during the times the works are proposed.

The developer should consider:

- Increasing the surface complexity of structures in the water to provide more places for algae and/or invertebrates to colonise. For example, this could be achieved through cladding of building materials with a more complex structure. This is likely to benefit fish by providing more cover and/or food.
- Creating areas with overhanging platforms, which may provide cover for fish and reduce predation.
- Including structures that provide areas of reduced water flow and/or back-eddies, which could aid movement of juvenile fish or fish migration. This could include installing concrete structures or on the foreshore in front of structures. These would have to be carefully designed and modelled to ensure that they lead to reduced flow.

These options can be incorporated into riverside structures at a relatively low cost, but would need to be designed specifically for each location.

5. LBS FLOOD RISK MANAGEMENT TEAM: NO OBJECTION BUT COMMENTS

COMMENTS:

It is noted that in their most recent comments (24 January 2020), the Environment Agency

FORMAL COMMENTS TO ADJOINING BOROUGH

LBS Registered Number: 20/OB/0030

Date of issue of this decision: 28/07/2020



www.southwark.gov.uk

expressed concerns regarding the potential for erosive wash from vessels which could impact the foreshore, recommending a condition for a detailed foreshore monitoring and maintenance scheme, as well advising the construction of wash mitigation measures to dissipate wave energy. The Council's Flood Risk Management Team would therefore concur with the EA's advice.

Signed: *Simon Bevan* Director of Planning

Site address: Swan Lane Pier 1 Swan Lane London

Reference: 20/OB/0030

;

From: [REDACTED]
To: [REDACTED]
Subject: FW: 19/00116/FULL - Swan Lane Pier Objection Letter - Living Bankside EPT ref
Date: 29 April 2019 10:27:21

Comments received for 19/00116/FULL from Southwark EHO

Please scan to file and acknowledge

Thanks,

Kurt

From: Gambill, Vendela <[REDACTED]>
Sent: 24 April 2019 17:09
To: Gagen, Kurt <[REDACTED]>
Cc: Bevan, Simon <[REDACTED]>; Sangweme, Dennis <[REDACTED]>
Subject: FW: 19/00116/FULL - Swan Lane Pier Objection Letter - Living Bankside EPT ref

Dear Kurt,

Please can you take the attached comments from our environmental protection team into consideration in regards to application: 19/00116 Swan Lane Pier

Kind regards,

Vendela Gambill

Graduate Planner | Fast Track & Validations

Place and Wellbeing Department | London Borough of Southwark

160 Tooley Street | London SE1 2QH

[REDACTED]

www.southwark.gov.uk

From: Prickett, Mark
Sent: Tuesday, April 23, 2019 12:29 PM
To: Gambill, Vendela
Subject: RE: 19/00116/FULL - Swan Lane Pier Objection Letter - Living Bankside EPT ref

Hi Vendela,

I have reviewed the application on behalf of Southwark's EPT.

For ease, the application can be viewed here:

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

I note that the City's determination deadline is for Thurs 25th April.

EPT comments

Swan Lane Pier is to the north of the River Thames in between London Bridge & Cannon St Rail Bridge. There are a number of existing residential properties on the Southwark's side of the river directly south of the proposed site, including the wharf buildings on Clink Street and Minerva House.

EPT do not raise objections to the erection of a new pier, per se, but would request that all construction/river works are undertaken during normal working hours and residents to the south of the river are kept informed or any works outside of standard hours.

The lighting of the pier must also comply with ILP's guidance to avoid artificial light disturbance to residents on the south of the river - <https://www.theilp.org.uk/documents/obtrusive-light/>
EPT do raise concerns with regards to the use of the pier by 'larger events charter vessels', particularly Ocean Diva which can accommodate up to 1500 persons and evening events finish up to 1am.

The operational management document states a 1am finish and then promotes the amount of

tube and railway stations in close proximity, however the last running tube trains in central are generally before 1am. It also states that disembarkation will be 2 hours, which generates concerns over the number of people on the boat when moored up late at night, perhaps with music still playing and persons still out on deck.

With regards to noise, the management plan merely states that “one of the design qualities of the vessel that any noise is well contained within the boat, which allows us to ensure noise management is not an issue”. No noise impact assessment has been provided.

As no noise impact assessment has been provided from large event boats then it is difficult to fully assess this application, and would request that City of London, if planning to grant permission, condition the need for a noise impact assessment which includes impact on not only residents to the south of Swan Lane Pier but also along the south bank when the boat is operational.

It would be EPT's view that the noise impact, as well as air quality impact, has not been adequately addressed at application stage and therefore should be refused.

Should permission be granted however, then other conditions to take into consideration would be a time limit on evening events to fully disembark by 23:00. Also when boats are stationary at Swan Lane Pier then no regulated entertainment to be permitted in outdoor parts of the boat and only background music in internal areas.

If possible also noise limits on the regulated entertainment when the boat is operational so as not to cause impact on amenity to the numerous residents on the south bank.

Kind regards,

Mark Prickett

Principal Enforcement Officer

Environmental Protection Team

Tel: [REDACTED]

Postal address: Southwark Council, Environmental Protection Team, Regulatory Services, 3rd Floor Hub 1, PO Box 64529, London, SE1P 5LX

Office address (By appointment only): Southwark Council, 160 Tooley Street, London, SE1 2QH

Air Quality web pages: <http://www.southwark.gov.uk/air-quality>

Construction web pages: <http://www.southwark.gov.uk/construction>

London Low Emission Construction Partnership - <http://www.llecp.org.uk/>



Please consider the environment - do you really need to print this email?

The email you received and any files transmitted with it are confidential, may be covered by legal and/or professional privilege and are intended solely for the use of the individual or entity to whom they are addressed.

If you have received this in error please notify us immediately.

If you are not the intended recipient of the email or the person responsible for delivering it to them you may not copy it, forward it or otherwise use it for any purpose or disclose its contents to any other person. To do so may be unlawful.

Where opinions are expressed in the email they are not necessarily those of Southwark Council and Southwark Council is not responsible for any changes made to the message after it has been sent.

From: [Gagen, Kurt](#)
To: [Devila, Neel](#); [DBE - PLN Support](#)
Subject: FW: 19/00116/FULL, Swan Lane Pier - Tfl comments
Date: 22 September 2020 15:32:15

Tfl comments for 19/00116/FULL. Please scan to file

From: McLaughlin Gavin <GavinMcLaughlin@tfl.gov.uk>
Sent: 06 July 2020 17:19
To: Gagen, Kurt <Kurt.Gagen@cityoflondon.gov.uk>
Subject: Re: 19/00116/FULL, Swan Lane Pier - Tfl comments

Hi Kurt

Further to my email last week, Tfl has the following comments on this application:

- Overall Tfl strongly supports the application, especially the freight proposals, and the pack of information submitted to support it is strong. The freight and river transport benefits of the proposed development are very clear.
- Legible London signage is required at the Pier and we request confirmation from the City that it will be secured or provided at the riverside by the City Corporation. Tfl will not support any other type of wayfinding signage being used at this location.
- Please can you confirm if the following restrictions will be secured by condition?

"To ensure that disembarking and embarking for two consecutive events do not overlap there will be a minimum of three hours between events." (TA para 3.2.5)

"There will be a maximum of two event charter vessels using the pier per day." (TA para 3.2.6)

"The number of guests on event charters using the pier will be capped at 1,000 guests." (TA para 3.3.3)

Once these conditions are confirmed, Tfl can comment further on the strategic transport impact of the development proposed, specifically whether any mitigation for trip generation impacts on public transport or cycling is required to make the development acceptable in planning terms.

- I request for the Event Management Plan to be updated to explicitly discourage Taxi and Private Hire travel to and from all events.

Travel by private vehicles should be discouraged in accordance with the Mayor's Transport Strategy (MTS) target for 80% of all personal trips in London to be walked, cycled or on public transport by 2041. This will require the City of London to reach 99% of personal trips being made by active or sustainable modes of transport by 2041.

As a result the Event Management Plan should be updated to commit to email all event guests asking them not to use taxi or private hire unless they are disabled. At the moment it includes some statements proposed to be sent to event guests which will clearly encourage and support taxi and private hire travel to the pier rather than minimising it.

Travel by walking, cycling or public transport is preferable to travel by private vehicles including taxis and the Event Management Plan should reflect London's strategic transport policy by making this clear - specifically Policies T1, T2 and T5 of the new London Plan.

Accordingly paragraphs 6.3.4 to 6.3.6 and 6.7.3 to 6.7.6 of the current Event Management Plan should be removed.

Thanks and kind regards,
Gavin McLaughlin
07792 643 608

From: McLaughlin Gavin
Sent: Friday, July 3, 2020 4:41 PM
To: Gagen, Kurt <Kurt.Gagen@cityoflondon.gov.uk>
Subject: 19/00116/FULL, Swan Lane Pier - TfL comments

19/00116/FULL

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 (Re-consultation- amended and additional supporting information received)

Please accept our apologies for a slight delay. This consultation requires input from specialist colleagues within TfL, some of who have been temporarily furloughed.

We are sharing the relevant documents with them and, following their input, will respond with full comments in due course. At the moment I expect to be able to share those with you early next week.

Thanks and kind regards,
Gavin McLaughlin
07792643608

The contents of this e-mail and any attached files are confidential. If you have received this email in error, please notify us immediately at postmaster@tfl.gov.uk and remove it from your system. If received in error, please do not use, disseminate, forward, print or copy this email or its content. Transport for London excludes any warranty and any liability as to the quality or accuracy of the contents of this email and any attached files.

Transport for London is a statutory corporation whose principal office is at 5 Endeavour Square, London, E20 1JN. Further information about Transport for London's subsidiary companies can be found on the following link: <http://www.tfl.gov.uk/corporate/about-tfl/>

Although TfL have scanned this email (including attachments) for viruses, recipients are advised to carry out their own virus check before opening any attachments, as TfL accepts no liability for any loss, or damage which may be caused by viruses.

Director of the Built Environment
Development Division
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

PLACE

Contact: Simon Westmorland
Tel: 020 7364 5365
Email: [REDACTED]
www.towerhamlets.gov.uk

SENT BY EMAIL

22 July 2020

Dear Mr Gagen

City of London Ref: 19/00116/FULL

Tower Hamlets Ref: NA

Address: Swan Lane Pier, 1 Swan Lane, London EC4R 3TN

Proposal: 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.

BACKGROUND

The above planning application was validated by the City of London on 28 February 2019 after which a first round of public consultation commenced. Following amendments to the scheme earlier this year, a further round of consultation was undertaken in June 2020.

To date, no neighbouring authority observation request has been received by the London Borough of Tower Hamlets. However, given the wide ranging impacts of the proposals, the Council wishes to place on record a formal objection to the proposals.

PROPOSED DEVELOPMENT

The London Plan policies 7.24, 7.25 and 7.27 offer wide ranging support for the reinstatement, refurbishment and intensification of use of existing riverside land for water related purposes, notably for passenger and freight transport. Whilst it is noted that the recent revisions to the application proposals have sought to introduce an element of freight transportation into the scheme, this appears tokenistic and is limited to one movement per day.

Tower Hamlets Council
Town Hall
Mulberry Place
5 Clove Crescent
E14 2BG

This freight offer appears constrained by the functional and operational requirements of the principal user of pier, namely the Ocean Diva Vessel.

Given the size and number of berths that could be available at a fully refurbished pier, this limited use for freight transportation would represent a significant missed opportunity to widen the River's capacity for passenger and freight infrastructure and thereby reduce usage/reliance on the capital's road and existing public transport infrastructure.

Further to the above, it is understood that the Ocean Diva vessel would be capable of accommodating in excess of 1,000 passengers who would board the vessel in order to partake in brand events, outdoor dining and drinking events and private parties. Given the scale of the proposals, understood to be the largest of its kind in London, the potential for noise disturbance to riverside residents, notably those living in the Tower Hamlets neighbourhood of Wapping and Limehouse, is of significant concern.

The application documentation contains insufficient information detailing how such noise disturbance would be mitigated and, given previous and ongoing disturbances to Tower Hamlets residents caused by similar riverboats (of smaller scale), the Council has significant concerns about the impact of the proposals on its residents.

CONCLUSIONS

The London Borough of Tower Hamlets is of the view that the proposals would represent a significant missed opportunity to increase the passenger and freight carrying capacity of London's waterways and such would be contrary to London Plan Policies 7.24, 7.25 and 7.27 as well as draft London Plan Policy SI15 which supports new piers in line with the Port of London Authority and Transport for London's Pier Strategy.

The proposals also fail to adequately demonstrate that they would not protect the amenity of Tower Hamlets residents by reason of noise disturbance resulting from the proposed leisure boat activities.

Yours sincerely,

Simon Westmorland

West Area Team Leader – Development Management

For and on behalf of the Divisional Director for Planning and Building Control, London Borough of Tower Hamlets



Kurt Gagen
District Surveyor
City of London
PO box 270
Guildhall
London EC2P 2EJ

The London Fire Commissioner is the
fire and rescue authority for London

Date 13 August 2020
Our Ref 00/165523
Your Ref 19/00116/Full

Dear Sir.

Premises: Swan Lane Pier
1 Swan Lane London EC4R 3TN

The London Fire Commissioner (the Commissioner) is the fire and rescue authority for London. The Commissioner is responsible for enforcing the Regulatory Reform (Fire Safety) Order 2005 (The Order) in London.

With reference to your recent request for advice I confirm the advice you were given as follows:-

Following construction phase of this project, consideration of Approved Document B access and facilities for the fire service be adopted. In addition evacuation routes for up to 550 persons from the quayside in case of fire be a priority consideration.

Any queries regarding this letter should be addressed to the person named below. If you are dissatisfied in any way with the response given, please ask to speak to the Team Leader quoting our reference.

Yours faithfully,

for Assistant Commissioner (Fire Safety)

Directorate of Operations
FSR-AdminSupport@london-fire.gov.uk

NOTE: The contents of this letter are without prejudice to any requirements or recommendations that may be made by the Commissioner under the Regulatory Reform (Fire Safety) Order 2005, the Petroleum (Consolidation) Regulations 2014, or the local authority or the Health and Safety Executive under other legislation. All alterations should comply with the appropriate provisions of the current Building Regulations.

Reply to Robert Hawtin

Direct T 0208 555 1200 35651