

# Memo

To Assistant Director (Development Management)  
Department of the Built Environment  
Email: [REDACTED]



From Donal Rooney  
Environmental Health Officer  
Department of Markets and Consumer Protection  
Telephone [REDACTED]  
Email [REDACTED]

Date 26 September 2024  
Our Ref 24/05552/NPLN  
Your Ref 24/00938/FULL

Subject River Foreshore Adjacent To Riverbank House Swan Lane EC4R 3BF

**Proposed removal/cutting down to bed level of the existing campshed timbers. Removal of gabion baskets and steel tie rods between the existing campshed and anchor posts. Installation of new sloped revetment formed from imported granular fill and rock mattresses. Installation of Rock Bags in the gap that has formed between two of the sheet pile campshed retaining walls at the western end of the site. Reinstatement of the bed level behind the installed rock bags to match the top level of the sheet piles.**

Thank you for your memorandum. I have reviewed the application and I would recommend that the following conditions be attached to any consent:

Works shall not begin until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the development process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).

City of London PO Box 270, Guildhall, London EC2P 2EJ

Switchboard 020 7606 3030

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

REASON: To protect the amenities of nearby residents and commercial occupiers in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to any work commencing in order that the impact on amenities is minimised from the time that development starts.

Prior to the commencement of development the developer/construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the NRMM Regulations and the inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.

REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

Regards



**Donal Rooney**

**Environmental Health Officer**

Pollution Team

Dept. of Markets & Consumer Protection

City of London, PO Box 270,

Guildhall, London, EC2P 2EJ

Mob: 

# SOUTHWARK COUNCIL

LBS Registered Number: 24/OB/0043

Date of issue of this decision: 08/10/2024



www.southwark.gov.uk

---

LBS Reg. No.: 24/OB/0043  
Your Ref No.:

Date of Issue of Decision: 08/10/2024

---

Applicant        Alex Thwaites City Planning  
                         City of London

## **NO COMMENTS made in reference to your consultation on the following development:**

Proposed removal/cutting down to bed level of the existing campshed timbers. Removal of gabion baskets and steel tie rods between the existing campshed and anchor posts.

Installation of new sloped revetment formed from imported granular fill and rock mattresses. Installation of Rock Bags in the gap that has formed between two of the sheet pile campshed retaining walls at the western end of the site. Reinstatement of the bed level behind the installed rock bags to match the top level of the sheet piles.

At                    River Foreshore Adjacent To Riverbank House Swan Lane EC4R 3BF

In accordance with your letter received on 3 October 2024 and supporting documents.

Signed:            *Stephen Platts*

Director of Planning and Growth



Historic England

Mr Alex Thwaites

City of London Corporation

Planning Department

Our ref: P01583123

10 October 2024

Dear Mr Thwaites

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

**RIVER FORESHORE ADJACENT TO RIVERBANK HOUSE SWAN LANE EC4R  
3BF  
Application No. 24/00938/FULL**

Thank you for your letter of 23 September 2024 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

**Historic England Advice**

The Thames foreshore as a whole is a sensitive and important archaeological site, particularly when considered within the City of London Archaeological Priority Area (Tier I). The proposal is also situated adjacent to the Fishmongers' Hall scheduled monument and grade II\* listed building.

The current campshed in this location is failing and needs replacement in order to ensure the preservation of the foreshore in this location. Therefore, we consider that the works would have a beneficial impact on the archaeological resource here. We also think that there would be no adverse impact to the significance of Fishmongers Hall.

The National Planning Policy Framework is clear that heritage assets are an irreplaceable resource, and states the requirement for conservation in a manner appropriate to the assets significance (para 195 and 205), with harm to heritage



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.*



significance to be avoided or minimised (para 201), and for any remaining harm to be clearly and convincingly justified (para 206).

The applicant has discussed the proposals with us prior to submitting this application, and we are satisfied that the potential for harm to archaeological remains is minimised by the proposals and could be appropriately controlled through conditions; i.e. for an agreed archaeological strategy which is informed by a walk-over survey.

## **Recommendation**

Historic England supports the application on heritage grounds.

We consider that the application meets the requirements of the NPPF, in particular paragraph numbers 201, 205, 206.

Should you be minded to grant permission for these works, we would recommend that it includes a condition specifying that no groundworks can commence until a programme of archaeological works has been secured through the provision and agreement of a written scheme of investigation.

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

Your authority should take these representations into account in determining the application. If there are any material changes to the proposals, or you would like further advice, please contact us. Please advise us of the decision in due course.

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

**Christina Reade**



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

Telephone 020 7973 3700  
HistoricEngland.org.uk



Historic England

Inspector of Ancient Monuments



cc Helen Hawkins (GLAAS)



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

Telephone 020 7973 3700  
[HistoricEngland.org.uk](http://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

Alex Thwaites  
Planning and Environment Department  
City of London  
Guildhall

Your Ref: 24/00938/FULLR3  
Our Ref: 225034

Contact: Helen Hawkins



15 October 2024

Dear Alex,

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)  
NATIONAL PLANNING POLICY FRAMEWORK 2023**

**River Foreshore Adjacent To Riverbank House Swan Lane EC4R 3BF**

*Proposed removal/cutting down to bed level of the existing campshed timbers. Removal of gabion baskets and steel tie rods between the existing campshed and anchor posts. Installation of new sloped revetment formed from imported granular fill and rock mattresses. Installation of Rock Bags in the gap that has formed between two of the sheet pile campshed retaining walls at the western end of the site. Reinstatement of the bed level behind the installed rock bags to match the top level of the sheet piles*

**Recommend Archaeology Condition**

Thank you for your consultation received on 10 October 2024.

The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.



Historic England, 4<sup>th</sup> Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 Facsimile 020 7973 3001

HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.

## Assessment of Significance and Impact

The proposed development is in an area of archaeological interest. The City of London was founded almost two thousand years ago and London has been Britain's largest and most important urban settlement for most of that time. Consequently, the City of London Local Plan 2015 says that all of the City is considered to have archaeological potential, except where there is evidence that archaeological remains have been lost due to deep basement construction or other groundworks.

An archaeological desk-based assessment has been provided with the planning application (Mills Whipp 2024). The desk-based assessment highlights that although the majority of the work proposed will be carried out to protect the foreshore from further erosion, the placement of rock mattresses over the foreshore will obscure any archaeological remains of post-medieval date that survive. A previous foreshore recording project was carried out in 2019, which covered part of the application area. This recording identified a number of post-medieval structures of interest located on this part of the foreshore.

Some of the works proposed include the removal of earlier riverbank structures, which may entail limited localised excavations. The need for and extent of excavations is currently unknown.

As outlined in the DBA, it is therefore recommended that the applicant undertake an archaeological walk-over survey, to encompass the entire width of the foreshore, and extend further downstream towards London Bridge and the base of Fishmonger Stairs for the c.50m that may be exposed at low tide, and upstream for a similar distance towards All Hallows Lane. The foreshore survey should be undertaken over two low tide windows in order to ensure full coverage of the visible archaeological resource.

Depending on the need for any excavations, the foreshore survey should be followed by the excavation of small trial pits, augering and the retrieval of timbers if appropriate. An archaeological Watching / Stopping Brief should be undertaken during demolition to record any archaeological features revealed.

### Planning Policies

NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 200 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.



Historic England, 4<sup>th</sup> Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 Facsimile 020 7973 3001

[HistoricEngland.org.uk](http://HistoricEngland.org.uk)

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



NPPF paragraphs 195 and 203 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.

If you grant planning consent, paragraph 211 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

### Recommendations

The significance of the asset and scale of harm to it is such that the effect can be managed using a planning condition.

I therefore recommend attaching a condition as follows:

Condition No demolition or development shall take place until a written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and

- A. The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
- B. The programme and methodology for an archaeological foreshore survey
- C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material.

This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI

Informative The written scheme of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

This pre-commencement condition is necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to this pre-commencement condition please let us know their reasons and any alternatives suggested. Without this pre-commencement condition being imposed the application should be refused as it would not comply with NPPF paragraph 211.



Historic England, 4<sup>th</sup> Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 Facsimile 020 7973 3001

[HistoricEngland.org.uk](http://HistoricEngland.org.uk)

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.

I envisage that the archaeological fieldwork would comprise the following:

### **Watching Brief**

An archaeological watching brief involves observation of groundworks and investigation of features of archaeological interest which are revealed. A suitable working method with contingency arrangements for significant discoveries will need to be agreed. The outcome will be a report and archive.

The need for a watching brief will be dictated by the development programme and an assessment of proposed impacts. The watching brief may also require excavation of small trial pits, augering and the retrieval of timbers

### **Foreshore Survey**

A foreshore survey should be carried out for the site and its wider area. The survey should identify where remains have been changed or lost since the previous survey in 2019 and record any new remains prior to the rock mattresses being inserted.

You can find more information on archaeology and planning in Greater London on our website.

This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.

Yours sincerely

**Helen Hawkins**

Archaeology Adviser  
Greater London Archaeological Advisory Service  
London and South East Region



Historic England, 4<sup>th</sup> Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 Facsimile 020 7973 3001

[HistoricEngland.org.uk](http://HistoricEngland.org.uk)

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** Network Rail Consultation Response for 24/00938/FULL - River Foreshore Adjacent To Riverbank House Swan Lane EC4R 3BF  
**Date:** 15 October 2024 15:49:35  
**Attachments:** [image001.png](#)

You don't often get email from [REDACTED]

THIS IS AN EXTERNAL EMAIL

OFFICIAL

Dear Planning,

**Network Rail Consultation Response: 24/00938/FULL - River Foreshore Adjacent To Riverbank House Swan Lane EC4R 3BF**

Thank you for consulting Network Rail on the above planning application.

Due to the close proximity of the proposed works to Network Rail's land and the operational railway, Network Rail strongly recommends the developer complies with the following comments and requirements to maintain the safe operation of the railway and protect Network Rail's infrastructure.

The developer must ensure that their proposal, both during construction and after completion does not:

- encroach onto Network Rail land
- affect the safety, operation or integrity of the company's railway and its infrastructure
- undermine its support zone
- damage the company's infrastructure
- place additional load on cuttings
- adversely affect any railway land or structure
- over-sail or encroach upon the air-space of any Network Rail land
- cause to obstruct or interfere with any works or proposed works or Network Rail development both now and in the future

Should you wish to discuss any of the above, please contact our Asset Protection team via [AssetProtectionLondonSouthEast@NetworkRail.co.uk](mailto:AssetProtectionLondonSouthEast@NetworkRail.co.uk).

Kind regards,



**Seda Guillen Izuma**  
Town Planning Technician  
Network Rail Property (Southern)  
A 1 Puddle Dock, London, EC4V 3DS  
E [REDACTED]  
W [www.networkrail.co.uk](http://www.networkrail.co.uk)

\*\*\*\*\*  
\*\*\*\*\*

The content of this email (and any attachment) is confidential. It may also be legally privileged or otherwise protected from disclosure.

This email should not be used by anyone who is not an original intended recipient, nor may it be copied or disclosed to anyone who is not an original intended recipient.

If you have received this email by mistake, please notify us by emailing the sender, and then delete the email and any copies from your system.

Liability cannot be accepted for statements made which are clearly the sender's own and not made on behalf of Network Rail.

Network Rail Infrastructure Limited registered in England and Wales No. 2904587, registered office Network Rail, Waterloo General Office, London, SE1 8SW.

\*\*\*\*\*  
\*\*\*\*\*

From: [REDACTED]  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: Port of London Authority Response (DC 365) Plan ref: 24/00938/FULL River foreshore adjacent to Riverbank House  
Date: 17 October 2024 14:53:50

THIS IS AN EXTERNAL EMAIL

FAO: Alex Thwaites

Dear Alex

Please see below for the Port of London Authority's (PLA) comments on the above-mentioned application at the river foreshore adjacent to Riverbank House Swan Lane, for:

The proposed removal/cutting down to bed level of the existing campshed timbers. Removal of gabion baskets and steel tie rods between the existing campshed and anchor posts. Installation of new sloped revetment formed from imported granular fill and rock mattresses. Installation of Rock Bags in the gap that has formed between two of the sheet pile campshed retaining walls at the western end of the site. Reinstatement of the bed level behind the installed rock bags to match the top level of the sheet piles. |

It is disappointing that the PLA have not been directly consulted on the planning application. Related to this as the redline boundary for the application extends into the Tidal Thames, it is also considered that formal notice should have been served on the PLA.

With regard to the proposed development itself to highlight that prior to any works taking place a River Works Licence (RWL) will be required with the PLA. This requirement must be added as an informative as part of any forthcoming planning permission. For information the applicant is in contact with the PLA's Statutory Consents and Compliance Team with regard to obtaining a RWL.

The PLA have no further comments to make on the planning application.

Regards

Michael

**Michael Atkins**  
Senior Planning Officer

*Port of London Authority*

Follow us at [@LondonPortAuth](#)



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.

Alex Thwaites  
Corporation Of London  
Planning & Transportation Department  
PO Box 270  
London  
EC2P 2EJ

**Our ref:** NE/2024/137464/01  
**Your ref:** 24/00938/FULLR3  
**Date:** 17 October 2024

Dear Alex,

**River Foreshore Adjacent to Riverbank House, Swan Lane, EC4R 3BF**

**Proposed removal/cutting down to bed level of the existing campshed timbers. Removal of gabion baskets and steel tie rods between the existing campshed and anchor posts. Installation of new sloped revetment formed from imported granular fill and rock mattresses. Installation of Rock Bags in the gap that has formed between two of the sheet pile campshed retaining walls at the western end of the site. Reinstatement of the bed level behind the installed rock bags to match the top level of the sheet piles.**

Thank you for consulting us on the above planning application on 23 September 2024.

**Environment Agency Position**

Based on a review of the submitted information, **we have no objection** to the proposal, however, please consider the following advice.

**Informative**

Please include the below informative for any permission granted.

**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 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culvert **including any buried elements** (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

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 or by emailing [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk). 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.

## **Advice to Applicant and Local Planning Authority**

### **Intertidal Foreshore**

The application proposes the installation of new sloped revetment formed from imported granular fill and rock mattresses. We strongly encourage more ecologically beneficial solutions are explored. The collapse of the existing campshed has created conditions which benefit the intertidal foreshore, including nearby intertidal mudflat, habitat which is listed as a Biodiversity Action Plan (BAP) priority habitat. This habitat is listed as being of 'principal' importance under s41 of the Natural Environment and Rural Communities (NERC) Act 2006.

We therefore strongly recommend the applicant considers alternative options that involve a more ecologically beneficial solution within the Thames. These could include but are not limited to retaining walls running parallel to the existing line of timbers and/or perpendicular to the flood defence or timber fronted steel sheet piling. Any softer approaches must still protect the tidal flood defence from scour, as well as stabilise and protect the toe of the existing defences.

### **Pre Application Advice**

Regarding future applications, if you would like us to review a revised technical report prior to a formal submission, outside of a statutory consultation, and/or meet to discuss our position, this will be chargeable in line with our planning advice service. If you wish to request a document review or meeting, please contact our team email address at [HNLsustainableplaces@environment-agency.gov.uk](mailto:HNLsustainableplaces@environment-agency.gov.uk).

Further information on our charged planning advice service is available at; <https://www.gov.uk/government/publications/planning-advice-environment-agency-standard-terms-and-conditions>.

### **Final comments**

Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated.

Should you have any queries regarding this response, please do not hesitate to contact me on [HNLsustainableplaces@environment-agency.gov.uk](mailto:HNLsustainableplaces@environment-agency.gov.uk), quoting the reference at the beginning of this letter.

Yours sincerely,

**Harry Scott**  
**Planning Advisor**

creating a better place  
for people and wildlife



E-mail: [HNL SustainablePlaces@environment-agency.gov.uk](mailto:HNL SustainablePlaces@environment-agency.gov.uk)

Telephone: 02030251774



**Memo**

**To** Assistant Director (Development Management)  
Environment Department

**From** Lead Local Flood Authority  
Environment Department

**Tele phone** [REDACTED]

**Email** [REDACTED]



**Date** 11 October 2024

**Our Ref** DS/SUDS24/0054

**Your Ref** PT\_A ZT/24/00938/FULL

**Subject** River Foreshore Adjacent To Riverbank House Swan Lane EC4R 3BF

In response to your request for comments in relation to SUDS/drainage the Lead Local Flood Authority has the following comments to make:

The Lead Local Flood Authority understands that the planning application does not constitute a major development. In accordance with the written ministerial statement and the Local Plan under which the Lead Local Flood Authority acts, we do not consider this application to fall within our remit. We did not need to be consulted on this application and therefore have no comments.