

ORGANISATION	LONDON FIRST
ID	1588
MATTER	M86 WATERWAYS

M86. (a) Does the Plan contain justified and effective policies to promote and encourage the use of the River Thames and other waterways for the provision of passenger transport services and the transportation of freight?

1. London First generally supports the strategic policy approach set out in Policies SI14, SI15, SI16 and SI17 of the draft Plan.
2. The statement at paragraph 9.14.2 (supporting text to Policy SI14) that London's waterways are multifunctional assets is welcomed, including specific references to their cultural, heritage and amenity values and sustainable passenger and freight transport. This ensures integration between SI14 and SI15.
3. London First supports the increased use of the Blue Ribbon Network for freight purposes and the London Plan's aspirations to maximise the waterborne movement of aggregates and freight. In this regard, the protection and enhancement of piers and their capacity (SI15A) are welcomed, as is the Mayor's commitment to keep the network of safeguarded wharves under regular review (SI15D).
4. As set out in London First's consultation response to the GLA's Safeguarded Wharves Review in August 2018, London First believes that the safeguarding of wharves in London is important; however, it is disappointing that the Review did not attempt to evaluate the land safeguarded at each wharf to understand if the area of land is appropriate and if the boundaries should remain the same or be altered. Due to a combination of locational and operational factors, there may be sound planning and economic justification to increase the safeguarded land at some wharf locations, whilst decreasing it at others. Rather than accept the historic status quo, or rely on vested commercial interests, there may be a more sustainable land-swap solution available that better supports the overall Good Growth objectives of the Plan whilst optimising waterborne freight movement in the right locations.

5. Policy SI15D should therefore make an explicit statement that encourages the Thames-fronting boroughs that accommodate wharves to undertake this exercise at a local level in consultation with the GLA.
6. This principle also applies to river passenger services, which are, of course, common users of the river alongside freight and, in future, could potentially be joint users of pier and wharf facilities. Even if that latter scenario does not materialise, it is vitally important to look at freight (i.e. wharf) and passenger (i.e. pier) capacities, capabilities, and potential together. Policy SI15 should therefore encourage the boroughs to take a joined-up approach.
7. Finally, London First supports the reference at SI15H to ensure that development proposals near wharves should be designed to minimise the potential for conflicts and disturbance.

(b) Are all of the requirements of policies SI14 to SI17 necessary to address the strategic priorities of London, or do they extend to detailed matters that would be more appropriately dealt with through local plans or neighbourhood plans?

1. As stated above, London First supports the strategic policy guidance set out in Policies SI14, SI15, SI16 and SI17 of the draft Plan.