

# Mrs Hilary Pereira comments

Page: [Draft New London Plan](#)

Section: [N/A](#)

This response is on behalf of the River Thames Society (RTS). It is noted many of the proposals are only indirectly related to the river, and even when water space is mentioned, it could as easily relate to the canals. There is much agreement with the plan overall as it affects the Thames.

Page: [Policy D7 Public realm](#)

Section: [3.7.1](#)

Very much agree as it applies to the Thames

Page: [Policy D7 Public realm](#)

Section: [3.7.9](#)

It is very important that access to the Thames, including the Thames path, remains free with the highest level of public access. We have concern at the increasing use of 'permissive' access to the Thames path which can then get closed by private interests, perhaps to support their own commercial use of what should be public space.

Page: [Policy D8 Tall buildings](#)

Section: [3.8.8](#)

Tall buildings should be built back from the river for the sake of the impact on humans as well as flight paths of birds. There is also a potential issue with tall floating structures, such as multistory static houseboats or other floating accommodation, which are only acceptable in limited areas where the river is wide and views are not being blocked from the bank. Local authorities may need reminding that static boats at permanent moorings can be brought under planning control and be subject to guidelines, even if still chattels.

Page: [Policy D11 Fire safety](#)

Section: [3.11.1](#)

Houseboats fall outside the Building Regulations and those based on Port of London waters have no compulsory safety checks. Houseboats can be moored up close together and be unable to move in an emergency. They often use bottled gas and carry other combustibles. There is no legal protection for houseboat tenants, including those in multiple occupation, and that includes fire safety. Fire safety considerations should be part of the process when new moorings or developments are being considered by local planners, accepting that much may be regarded as permitted development and fall outside planning control.

Page: [Policy D12 Agent of Change](#)

Section: [3.12.2](#)

This is very important for those that are trying to maintain boatyards, which are essential for the ongoing maintenance of the vessels we need to keep the Thames vibrant. Complaints from new housing developments about the noise inevitable in boatyard working risks destroying existing yards.

There is a special issue with safeguarded wharves, and the agent of change principle needs to be extended to these even when in temporary abeyance. Otherwise, the situation can be manipulated by developers to destroy the wharves by squeezing their land access/business, then complaining about the noise when they try to become active again.

Page: [Policy D13 Noise](#)

Section: [3.13.2](#)

Important to protect boatyards from adjacent housing development

Similarly for safeguarded wharves, which must be protected. The agent of change principle needs to be extended to provide protection for safeguarded wharves even if in temporary abeyance, otherwise in practice they could never become active again. Once lost, we can never get them back, and we need them

Page: [Policy S5 Sports and recreation facilities](#)

Section: [5.5.1](#)

The Thames is currently under-used for sports and recreation, from sailing to stand up paddling. The necessary facilities should be encouraged to enable these waterbourne sports to be more generally available to a wider range of users and for more stretches of the river. Supervised instruction means recreational use in unpowered craft can be safe and compatible with other types of river use, including passenger vessels and commercial carrying.

Page: [Policy S5 Sports and recreation facilities](#)

Section: [5.5.8](#)

The Thames path is the only route right across London and needs every encouragement and protection, making it accessible to all and with unrestricted access

Page: [Policy HC2 World Heritage Sites](#)

Section: [7.2.1](#)

The fact that the 4 world heritage sites in London are all on the Thames helps demonstrate the importance of the river internationally

Page: [Policy HC2 World Heritage Sites](#)

Section: [7.2.2](#)

The landscape and especially the riverscape are at least as important as the built environment to these sites. Kew Gardens is also the start of the Arcadian landscape on the Thames

Page: [Policy HC3 Strategic and Local Views](#)

Section: [7.3.2](#)

The view upriver from Richmond Hill deserves inclusion as a river prospect

Page: [Policy G3 Metropolitan Open Land](#)

Section: [8.3.1](#)

The water space of the Thames already has the attributes of MOL and should be given the added protection from inappropriate development, including encroachment, that would come from designation as MOL

Page: [Policy G4 Local green and open space](#)

Section: [Table 8.1](#)

The linear open spaces alongside waterways are highly significant, and if taken together with the water space, occupy a very significant proportion of London's open space. They should be celebrated and safeguarded as such.

Page: [Policy G6 Biodiversity and access to nature](#)

Section: [8.6.5](#)

Very important, agree

Page: [Policy SI14 Waterways - strategic role](#)

Section: [N/A](#)

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Page: [Policy SI14 Waterways - strategic role](#)

Section: [SI14](#)

Boroughs must work together on policies, especially where the opposite banks fall under different Boroughs. Joint Thames Strategies can then support individual Borough plans

The Thames Landscape Strategy should be name-checked here for the plan from Hampton to Kew and the Thames Strategy for Kew to Chelsea

Page: [Policy SI14 Waterways - strategic role](#)

Section: [9.14.8](#)

The formal designation of the River Thames as MOL would give it added protection from non-river-related development, including encroachment. The barrier for development would be raised, but this should not prevent the essential infrastructure needed for river transport and other clearly river-related purposes.

Without MOL designation, there is too great a temptation to regard the riverspace as cheap 'land' available for commercial development for functions that can be but are not obligated to be floating, eg residences (static houseboats), restaurants, offices, funfairs, cycle tracks, prisons, or built over as being proposed at Craven Cottage. Once the full width of the Thames has gone, it will be almost impossible to get it back.

Page: [Policy SI15 Water transport](#)

Section: [9.15.3](#)

There is an increasing shortage of boatyard facilities also for leisure craft and houseboats, and so the few existing ones capable of taking wide-beamed craft need to be protected, even if redevelopment as housing would be more profitable. The yards servicing commercial vessels in the winter months will have to accept a different clientele in the summer. Unlike the passenger boats, Thames-based houseboats may be incapable of travel to boatyards in the estuary or on the East or South coasts. It may even be unwise to tow some of them through the Pool of London. So yards with slipways and dry docks need to be maintained in the upper Tideway and at Sunbury.



Page: [Policy SI15 Water transport](#)

Section: [9.15.8](#)

The temporary use of safeguarded wharves should not set the baseline under the agent of change principle, but instead what would be found with it in full operation as a working wharf

Page: [Policy SI15 Water transport](#)

Section: [9.15.9](#)

Very important for existing yards, especially adjacent to sites being redeveloped for housing. But see comment earlier about modifying the agent of change principle for temporarily vacant but safeguarded yards so they are mitigated for their impact when fully working, not just when mothballed.

Page: [Policy SI16 Waterways - use and enjoyment](#)

Section: [9.16.2](#)

Agree that new moorings should be off-line (at least as far as the Thames is concerned) but please off-line even if navigation is not directly affected. This is especially important for static vessels, which act in effect as encroachment on the waterspace.

Page: [Policy SI16 Waterways - use and enjoyment](#)

Section: [9.16.2](#)

There is agreed to be a deficit of residential moorings in general across London. Those on the Thames are very expensive and so are only available to an elite, who in spite of what it might cost them, are not protected from exploitation. The demand on the river in the sorts of locations that are most attractive will never be satisfied. It is suggested the focus for new moorings should be the canals and docks, not the Thames. There should be active discouragement of new moorings on the river for non-mobile houseboats

For new moorings that are subject to planning controls, say because static houseboats are judged to have caused a change of use, it is important that local authorities use their existing powers to control houseboat appearance. Otherwise, over-tall houseboats, with little resemblance to 'real' boats, may blight the waterspace. The River Thames Society is working on guidelines for LA planners on this issue

Page: [Policy SI16 Waterways - use and enjoyment](#)

Section: [9.16.3](#)

very much agree

Page: [Policy SI16 Waterways - use and enjoyment](#)

Section: [9.16.3](#)

Agree

Page: [Policy SI17 Protecting London's waterways](#)

Section: [9.17.2](#)

There needs to be even greater caveats about development proposals for the Thames needing to be river-related. Any ancillary development has to be really exceptional and itself relate to the river and also provide public access, eg the example of a cafe on a passenger pier for the use of waiting passengers. In particular, residential development on/over the river should never be non-floating. Nor should houseboats be seen as the enabling development for other infrastructure, unless there is clear and ongoing public gain, with residential boats very clearly seen as ancillary not the other way round.

The situation may be different in canal basins and especially in the docks.

Page: [Policy SI17 Protecting London's waterways](#)

Section: [9.17.3](#)

The River Thames Society endorses the PLA Air Quality Strategy to reduce harmful emissions to air from marine sources within the tidal Thames and considers that the London Plan should make specific reference to this, with support for the PLA's strategy.

It was unclear if the provision of power was expected to extend to midstream moorings, including for small leisure vessels, but there are many practical problems with this.

Whilst most houseboats have mains supplies, and so do not need to burn noxious material for generating electricity, they may well burn smoky fuel for heating. Local authorities should be encouraged, together with the PLA and CRT, to use existing powers to negate the impact of the exemption boats have to the Clean Air Act 1993 s44, at least when houseboats are static at a home mooring. For new residential moorings, non-generation of harmful emissions can be made a condition of planning approval.

There is also concern about pollution of the water from discharges of black water, and there needs to be facilities for this to be discharged ashore from smaller vessels as well as from the big commercial ships

Page: [Policy T3 Transport capacity, connectivity and safeguarding](#)

Section: [T3](#)

Access to the Thames path needs to be genuine, and available to all, and not just permissive and so dependent on various conditions and restrictions.