

# Thames Estuary Partnership comments

Page: [Policy SD1 Opportunity Areas](#)

Section: [Thames Estuary \(10\)](#)

Most of the opportunity areas for development that occur along the Thames Estuary corridor correspond with critical flood risk zones and the highest number of barriers to migratory species seeking to enter the freshwater extents of the Thames Tributaries. In the face of climate change with associated intense rainfall events, tidal surges and sea level rise, development and regeneration along the Thames corridor, particularly within the historic floodplain areas must have the highest standards of sustainable city design and green infrastructure embedded within them to allow for water pollution attenuation and drainage of the area into the Thames. Thames Estuary Partnership with the Environment Agency will be producing updated Estuary Edges design guidance which will include examples of SUDs systems which integrate across the land/flood defence/water interface e.g. Royal Wharf. In addition, cross cutting with infrastructure development, innovation around intertidal habitat and greening the Thames path must be considered as part of any riverside development to contribute to biodiversity connectivity, creating healthier and happier communities and place making. Financial mechanisms to link the economic value of higher premium properties along the riverside to maintenance and enhancement of the natural asset from which they enjoy that higher premium, need to be established. If the health and aesthetic value of the river declines then the premium of that development will decline therefore something similar to CIL should be designed to facilitate funding to be made available for regular monitoring, maintenance and enhancement of intertidal habitat and the flora and fauna of the tidal Thames and its tributaries. TEP is currently working on such an idea with LSE and CH2M and would be happy to share ideas with the GLA.

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

Section: [N/A](#)

Although we recognise the economic and strategic importance of the Thames for London's economy and transport, it is also a major migration corridor essential for migrating wildlife including commercially important fish species exploited by coastal communities downstream of the GLA area and the wider North Sea. We are disappointed to see that the Thames will no longer enjoy status of Site of Metropolitan Open Space as mentioned in another policy area and would like to understand what designation it may enjoy that recognises the vital role it plays in supporting biodiversity. A search for the word Thames didn't bring this up.

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

Section: [N/A](#)

TEP (as I'm sure the other Strategy holders would agree) would welcome support to update the existing river strategies to ensure alignment with the TPAs and PLA's Thames Vision. With the development of the Marine Plan, now is the time to ensure these strategic and crucial plans are fit for purpose. Thames Strategy Kew to Chelsea and Thames Strategy East are now 10 years old. It would be good to also 'fill the gap' and create a strategy for the central section. We all know resources are restricted but given the amount of development opportunity areas identified along the Thames corridors, investment in the strategic plans should be seen as essential. In addition, the Marine Plan covers the tidal extents of all the Thames tributaries and therefore has an influence beyond purely the riverside, affecting developments along the upstream extents of the tributaries. You may wish to include this in your wording.

Page: [Policy SI15 Water transport](#)

Section: [N/A](#)

TEP supports the safeguarded wharf policy. However, we would welcome innovation around interim development of some or all currently disused or derelict jetties and wharfs. Many derelict wharves exist in heavily urbanised areas that won't be able to be used for freight transport for many years. These could be developed for community use in way that enable them to be brought online for commercial use in the future. Redevelopment of wharves as part of commercial development should also hold this principal to enable conversion to a community pier upon completion of the development project leaving key elements in place to enable commercial use in the future.

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

Section: [N/A](#)

TEP is the Vice Chair of the Thames Path Partnership which regularly convenes all the relevant organisations along the Thames Path including the PLA, TfL, Environment Agency, Natural England, several Boroughs and the Strategy organisations and would welcome this group being formally recognised in the plan. In addition, as well as enhancing access for water related uses, new infrastructure should look to enhance riverside habitat. As well as enhancing and linking with transport nodes, new or enhanced path works should seek link the All London Green Grid through greening the Thames Path and towpaths to fill the gaps in green corridors and help to reduce flood risk. Historic Thames steps are woefully lacking maintenance, especially privately owned ones limiting access to the foreshore and undermining health and safety for those that venture down to the foreshore. A lack of interpretation around existing and well maintained stairs can lead to people becoming trapped as they will naturally think that steps and stairs occur at regular intervals and will be as well maintained as those they used to enter the foreshore. Liaison with the owners of steps and stairs to make them aware of their duties should be a minimum to ensure public safety and enjoyment of our fascinating foreshore.

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

Section: [N/A](#)

TEP supports the safeguarded wharf policy but would welcome innovation around development of wharves to enhance public and community enjoyment. Many structures remain derelict in highly urbanised areas where little to no opportunity to utilise them for commercial or freight use will exist for many years. These structures could be brought on line as community spaces and designed in a way that would enable them to be brought online for commercial use in the future. In addition, those in industrial areas where commercial use is more likely, could be developed in a similar way for interim periods of time. It seems a shame for these structures to be lying derelict when they could benefit communities even if for an interim time.

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

Section: [N/A](#)

Protecting London's waterways should include reference to the need for adequate waste disposal infrastructure e.g. general waste and recycling bins and interpretation to stop the flow of litter into the waterways, the Thames and thus the ocean.