

WRITTEN STATEMENT ON BEHALF OF LONDON CITY AIRPORT

1. The background to London City Airports ('The Airport') representations are provided in their [original submission](#) dated 2 March 2018.

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. The Airport do not wish to provide any comments relating to use of the River Thames and other waterways for the provision of passenger transport services and the transportation of freight.

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?

2. In relation to policy SI14 specifically, the August 2018 Minor Alterations introduce the requirement for development plans and development proposals to maximise the multifunctional benefits waterways provide (part BA of Policy SI14). The Airport welcomes this further alteration as it acknowledges that the waterways can play a multifunctional role.
3. Policy SI17 sets out how the Mayor will protect and enhance London's waterways. The Airport supports the principle of making better use of waterways and, indeed, has previously been in extensive dialogue with TfL and others in relation to its new infrastructure and passenger facilities being currently developed for the City Airport Development Programme assist with this objective.
4. However, as currently drafted part C of draft Policy SI17 states that the development proposals into the waterways should generally only be supported for water-related uses. The August 2018 Minor Amendments (paragraph 9.17.1) introduce further constraints as follows '*the waterways should not be used as an extension of developable land in London, nor should parts be a continuous line of moored craft.*'
5. The Airport considers that this approach is too restrictive and potentially incompatible with other policies in the plan. The policy should allow non-water related uses where they can bring significant regenerative benefits without having a detrimental impact on navigation, biodiversity and or character or use of the waterways. Such an approach is consistent with paragraph 7.103 of the adopted London Plan which states as follows:

“7.103 The size and scale of the water spaces of the Royal Docks are unique in London and form an important part of the character and distinctiveness of east London. Improving public access to and activity on these water spaces can support the regeneration of the surrounding area and contribute to the creation of new jobs and homes. To help achieve this, development into parts of these water spaces may facilitate this transformation, provided that any such development maintains the visual integrity, openness and historic character of the relevant dock and provided that navigation, hydrology, flood risk management and biodiversity are not compromised.” [Our Emphasis Added]

6. It is not evident why this exception hasn't been carried over into the new plan, particularly given that the employment and housing targets for the Royal Docks & Beckton Riverside Opportunity Area are proposed to be 7 and 2.7 times higher respectively than the adopted London Plan; with employment growing from 6,000 jobs to 41,500 and homes from 11,000 to 30,000.
7. Limited infilling has been accepted on a number of occasions in the Royal Docks and elsewhere in London and can play an important role in helping to deliver regeneration without prejudicing the important characteristics of the Docks and other waterways. Examples in the Royal Docks include:
 - London City Airport – partial infilling of King George V Dock to help deliver Infrastructure and passenger facilities. Granted planning permission in July 2018 (LPA ref 13/01228/FUL) this delivers significant economic benefits including an estimated 1,500 jobs
 - Silvertown Quays – partial infill of Pontoon Dock to provide employment uses and public realm. Granted in November 2016 (LPA ref. 14/01605/OUT) the overall scheme was estimated to generate 20,860 jobs and provide up to 3,000 homes.
8. Elsewhere, examples of encroachment include:
 - Crossrail Overstation Development works at Canary Wharf - these strategically important station works involved partially infilling part of North Dock for the New Crossrail Station, together a new publicly accessible park of approx. 5,000 sqm and retail and leisure uses (LPA ref. PA/08/01666).
 - Wood Wharf, Canary Wharf - these proposals involved limited infilling of West India Dock and were accepted as part of major planning application proposals (ref. PA/13/02966) delivering up to 50,000 sqm of office floor space, up to 3,610 residential units, and a range of business, retail, hotel community, leisure and residential uses.
9. As drafted the August 2018 Minor Amendments would inhibit such development and act against other policies in the plan seeking to deliver regenerative development particularly in Opportunity Areas. Accordingly, policy should be revised to acknowledge the role of the docks in supporting the wider regeneration of such areas. The Airport recommends the following amendments to criteria SI17:

“C. Development proposals into the waterways, including permanently moored vessels should generally only be supported for water related uses or to support

enhancements of water related purposes. Development into waterways for non-water related uses will only be acceptable where it delivers significant regeneration benefits and provided that any such development maintains visual integrity, openness historic character of the relevant dock and provided that navigation, hydrology, flood risk management and biodiversity are not compromised.

10. In this way it recognises that certain types of developments can be acceptable and subject to the same safeguards as identified in paragraph 7.103 of the current plan. Supporting text for the Royal Docks and potentially other Opportunity Areas such as Canary Wharf would help to explain why such exceptions may be acceptable.