

**Port of London  
Authority: Thames  
Vision 2035  
Goals and Priority  
Actions Consultation  
Responses**



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# Introduction

The Port of London Authority (PLA) launched a consultation on the goals and priority actions of a long-term Vision for the tidal Thames on 14 December 2015. A 20-year framework for the busiest tidal river in the UK, running 95 miles through London, Kent and Essex to the North Sea. The consultation closed on 15 February 2016. We received over 120 responses, 110 of which are included in this document. The remaining stakeholders either stated they did not want their response to be made public or their responses, although in relation to the Vision Project, were not specific to the consultation and thus have not been included here.



# Visual Summary of Responses

## Responses by River District

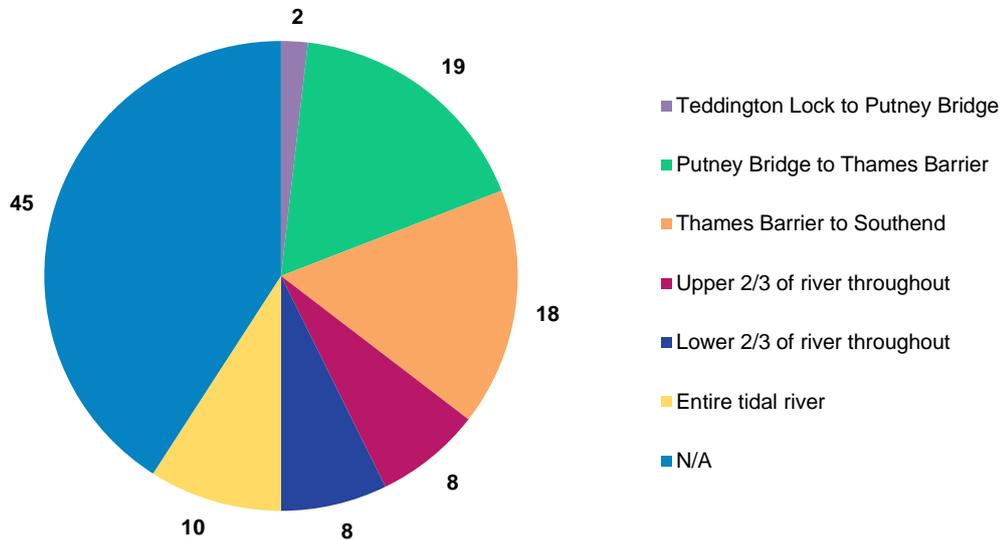
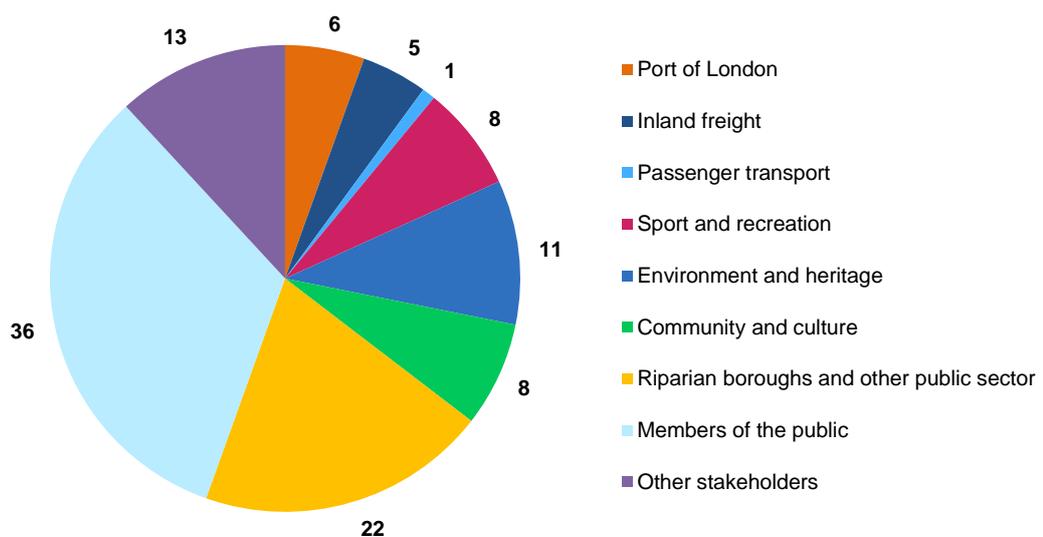


Figure 1 (above): Breakdown of the 110 responses included in the document by the section(s) of the river the responder’s views relate to. The section(s) which a response relates to was either directly mentioned in the response received or was inferred from the response’s subject matter and/or geographical origin. N/A was for those responses which did not fulfil these criteria clearly. Figure 2 (below): Breakdown of the 110 responses by the sector they have been placed in.

## Responses by Sector



# Responses by Sector

Where possible the responses are broken down into three sections under the headings 'Right Goals?', 'Right Priority Actions?' and 'Other Goals and Priority Actions?'. These refer to the three questions we asked for feedback on<sup>1</sup>. If the responses did not conform to this style then they are simply displayed in their original form.

## Port of London

### Armac Shipping Services

Response by the Director of Armac Shipping Services Ltd.



#### Right Goals?

The goals set in the vision for 20 years time are what the River Thames needs, the future use of both commercial and leisure has to move ahead in keeping with current times. But I do feel that the greatest emphasize has to be on commercial to maintain its income at the highest levels.

#### Right Priority Actions?

Yes I do believe these to be the right actions that need to be taken to ensure the future for our river.

#### Other Goals and Priority Actions?

The pilot service perhaps needs a new vision also, the delays to vessels currently being suffered will drive the trade to other ports where service can be given.

## NuStar Terminals

Grays Terminal

NST own and operate Grays Terminal, a long-standing import, storage, and distribution facility




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<sup>1</sup> The three specific questions we asked for feedback on were: 'Are these the right goals for the Thames Vision?'; 'Are these the right priority actions to achieve the Vision?'; and 'Are there other goals and priority actions you think are needed in the Thames Vision?'.

located at Askews Farm Lane, Grays, which benefits from two operational jetties extending into the Thames at Fiddler's Reach. Grays Terminal is one of around 70 operating terminals that make up the Port of London, and it is understood that it is one of only four that handle petroleum product bulk imports. It has been in operation for 50 years, and supplies a range of petroleum products mainly to independent importers who in turn supply retailers across the south east of England and East Anglia.

The imports handled by NST through Grays Terminal and the associated jetties are essential to meet demand in these areas for a range of petroleum products, including gasoline and diesel for road users, and kerosene and gas oil for domestic and commercial heating. Two high-capacity pipelines run from the Grays Terminal site, via an interchange station off of Wouldham Road, connecting with the two jetties at Fiddler's Reach.

The jetties at Fiddler's Reach comprise an integral element of the NuStar operation, facilitating the transfer of petroleum from tanker vessels into Grays Terminal facility. The jetties benefit from a depth of 10.6m at low water, and are served by approximately 180 oil tanker vessels per annum.

#### Thames Vision 2035

As an operator of the key strategic infrastructure asset within the South East, and stakeholder in the current and future operation of the Thames, NST wishes to make comments on the following 'Emerging Goals and Priority Actions' set out in the draft Thames Vision document, as well as on the Thames Vision Opportunity Map to 2035'.

#### Port of London: More Trade, more jobs

NST supports a continued and growing focus on sustaining and promoting a commercially attractive port operation along the river. The Thames Vision anticipates that 10.7 – 14.1 million tonnes of petroleum products will pass through the Port of London by 2035. Given the clear importance of the petroleum sector, and the key function of Grays Terminal in handling such products, NST seeks to reinforce its role in the delivery of the growth objectives set out in the Thames Vision.

#### Inland Freight: more goods off roads onto the river

NST supports a growing strategic emphasis on the use of the Thames as a means of transportation, not only of containerised goods, but also petroleum products such as those handled at Grays Terminal. The NST operation at Fiddler's Reach ensures that a significant amount of long-distance HGV imports from elsewhere in the UK are avoided. As such, NST

seeks to reinforce its role in the promotion of commercial river based transport that is set out in the Thames Vision.

#### Thames Vision Opportunity Map to 2035

NST recognises that the Grays Terminal facility is shown on the Opportunity Map, and labelled 'NuStar Terminal' Notwithstanding this, given their vital importance to the function of the Grays Terminal operation, and in recognition of the volume of oil tanker river traffic that they berth, it is also considered that the jetties at Fiddler's Reach should also be expressly recognised on the Opportunity Map as a Port of London facility. This would be in line with the approach taken to other existing and proposed piers within the PLA area.

The PLA should be aware that land immediately adjacent to the two operational jetties was previously the subject of a application for residential development that had the potential to prejudice ongoing operations at the site. This application is no longer being pursued, but given the vulnerability of the operations to such incompatible neighbouring uses, it is important to ensure every opportunity is taken to formally recognise and protect the status of the Terminal and jetties, to give them appropriate recognition within the planning decision making process.

#### Summary

NST appreciates the opportunity to engage in the emerging Thames Vision document, and to contribute to the PLA's strategy for the future of the river.

Through Engaging with this document, NST wishes to emphasise the importance of viable commercial operations such as that at Grays Terminal, and support investment into river-based and river-reliant businesses as part of a wider sustainable economic strategy. In particular, NST wishes to reinforce its own role as a key stakeholder in the future of the Thames, and in the success of the ambitions set out in the emerging Thames Vision. NST requests that its operation is appropriately considered in the context of river freight, and that the wider strategy takes NuStar's operation, including the jetties, into account.

## PD Shipping & Inspection Services

Response by the Port Manager at PD Shipping & Inspection Services Ltd.

### Right Goals?



I believe these are the right goals for the vision but not exclusive.

**Right Priority Actions?**

In principle yes.

**Other Goals and Priority Actions?**

I believe that the middle river stretches are somewhat overlooked in the majority of instances and perhaps some attention could be given to the on going situation regarding silt migration and build up which is now restricting several berths and their operations.

**Stema Shipping UK**

**Right Goals?**

Yes but the PLA seem to be missing some key points Under Port of London - More trade/ More jobs - Maintain all existing wharves currently in operational use for cargo traffic and look to expand the available land mass (land mass for wharves is critical - nearly all the wharves are under pressure from residential dwellings) Under Inland Freight, why only mention three wharves - why not take in cargo traffic through all safeguarded wharves.



**Right Priority Actions?**

Please see comments above - I think the PLA are far to vague as the overall priority should be to stop any further building on land mass used for and associated with river traffic, for future generation. By naming a very small number of safeguarded wharves can this be interpreted that the PLA will withdraw its objection to other safeguarded wharves (that is how I read it).

**Other Goals and Priority Actions?**

Yes to make specific reference that land mass is at present critical - the great expansion at London Gateway will increase container traffic but will not assist other trade up and down the river.

## Port of Tilbury

The Port of Tilbury supports the Thames Vision (TV) exercise and will support the PLA and other stakeholders in delivering the goals and aspirations contained within the TV.

After a number of contributions from the Tilbury management team, the points below focus on the detail of the proposed TV text:

- Under trade and jobs: add support for improved rail and road access to port operations/terminals. New and enhanced strategic road and rail connectivity is integral to the development of the 152-acre former RWE Tilbury power station site. Currently, the port is pursuing proposals for a new rail head and a new junction off the proposed Lower Thames Crossing option C route where route 2, 3 and 4 diverge near East Tilbury

- Under inland freight: supportive of a target for increasing river freight and would like to see this as a formal River Freight Action Plan. Need to be explicit that the improvements in river freight are seeking a step change in both inbound and outbound freight movements into London across all areas mentioned
- Supportive of activation of wharves, eastward pier extension, etc
- Under the passenger transport and the community and culture sections - no improved cruise outcome. The marketing of 'London' as a destination could cover the promotion of the cruise terminals up-and-down the river, too.
- London's new mayor - although the geographical scope of the PLA is wider than Greater London, it is important that the messaging is aligned with the main candidates' respective campaign messages: 'safer greener travel', 'championing new measures to encourage cycling', 'making cycling safer', 'relieving traffic jams and congestion at peak times', 'better transport', 'cleaner air and safer streets', etc
- It would be useful to understand the reporting methodology on the delivery of the TV aspirations in the years ahead.



PORT OF  
**TILBURY**  
LONDON

## Vopak Terminals UK

**Right Goals?**

Yes



### **Right Priority Actions?**

Yes

### **Other Goals and Priority Actions?**

More emphasis on the value of using the Thames to reduce urban traffic and statutory redirection of certain trades to use river facilities rather than road by targeted use of planning regulation, this will require buy in at Governmental and Local Authority level so significant lobbying and collaboration is required but could be a unity point for many stakeholders.

# Inland Freight

## Brett Group

Response by the Chairman of Brett Group.

My Overall reaction is that this is not ambitious enough.



Why is the ‘record’ 5.5mt achieved in 2014 the level to be sustained over the next 10 years? 5.5mt has already been met! On the basis that both the river has more capacity, and critically the opportunity exists (driven by increased demand for marine aggregates) to move more materials by river, surely the goal should be set on growth, not ‘maintenance of the status quo’.

Here, I won’t go into the various environmental, social and capacity reasons for moving heavy freight (such as aggregates) off the roads and onto the river, but the driver for the operator, such as myself, is long-term economic viability v’s alternatives. The barrier to unlocking this potential of a growth in volumes is availability of wharves.

The issue therefore is the appetite for positive action to grow the availability of wharves suitable for handling building materials.

If the Thames is to be ‘the default choice for the transport of.....construction materials.....’ then positive action is required to make wharves available and in order to do this, a more ambitious target than 10 years for bringing Peruvian, Orchard and Hurlingham wharves back into operation is required because with every year that passes they become more and more difficult to unlock – from planning, operational and logistics perspectives, in particular – and when they’re lost, they’re lost forever.

Operators such a myself are prepared in principle to invest in bringing wharves into operation and thereby increasing traffic using the Thames – thereby meeting your stated goal of ‘More goods off roads onto the river’ – but the wharves have to be available for us to do it.

In summary, you have the opportunity to make the ‘Thames Vision’ more ambitious.

## FM Conway

I think the vision is great and pleased to read that the investments we have made to move aggregates and bitumen by river will be supported by the Port of London Authority (PLA), however what I would also like to see is



how you are going to convert regular haulage of aggregates and waste from road to river. When the large construction jobs come along like Crossrail and Thames Tideway it's an easy thing for them to use the river for importation and exporting of goods by river, they either commandeer a jetty or build a temporary facility in the river as they have the planners and government behind them.

For us it is very different, we have been looking now for 3 years to use the river for the transportation of waste materials to Conway's jetty from the centre of London, i.e. Hurlingham? This site would be ideal, for us it would take around 100,000 tons a year off the highway and on to the river, why can't this happen? One thing is the developers would not want a transfer station next to high price accommodation and would the local authority really want it also?

There is the need for some form of shared jetty in that area, one operator can operate the service to many others, whether they be wanting clean aggregates for concrete or waste products to take away, if we have a need for it then so must others, what is the view of the PLA on how this can be achieved?

## Livett's Group

### Right Goals?



Currently I believe they are with the exception to:-

- Establishing a modern multi-purpose marine hub that can facilitate dry docking/ship repair capable of handling all types and sizes of vessels based on the tidal Thames
- Establishing Common User Berths (CUB) for multiple use including transshipment, spoil removal and deliveries in and out
- Establishing an East and West consolidation centre to service/deliver to major infrastructure projects

### Right Priority Actions?

The order of priority should be to ensure the foundations are in place i.e. boat yard/marine hub/training etc. before expecting the growth that will follow.

### **Other Goals and Priority Actions?**

Another action required is support from statutory authorities to deliver on time and in a cost effective manner on subjects such as licensing, consents, surveying, examinations, auditing and any other statutory obligations imposed on commercial entities.

## **Mineral Products Association (MPA) & British Marine Aggregates Producers' Association (BMAPA)**

The Thames and its wharves are critical to the supply of construction materials into London and the wider South East. The aggregate & cement trade represents one of the most significant the river supports, both in terms of overall tonnage and in terms of the number of vessel movements along the river.



Data in the Crown Estate Marine Aggregates Capability and Portfolio 2015 and the London AWP Aggregates Monitoring Report 2013 indicates that in 2014 over 7.3 million tonnes of marine aggregates were landed in the Thames wharves, with sales from London wharves increasing each year since 2010. Marine dredged aggregates provide 50% of all of London's aggregate supply and 50% of ready mix concrete in London contains marine aggregates.

With continued economic and population growth in London and the wider South East, combined with depletion of, and increasing constraints on land-won resources, it must be expected that demand and need for marine dredged and imported aggregates will continue to grow (as demonstrated in the growth scenarios presented in the Thames Vision document). Therefore, wharfage of adequate capacity to supply increasing demand, in the right place and of the right type, must be provided over the short and longer terms both for the primary landing and processing of material, and also to enable the delivery of processed construction aggregates further up the river, thus reducing pressure on the congested road network.

The MPA therefore generally supports the Emerging Goals that are identified in the Thames Vision document.

In particular we support the Goal 2.1 for the Port of London to be 'the busiest ever Port of London, handling 60 – 80 million tonnes of cargo each year, on the doorstep of Europe's biggest metropolitan consumer market.'

The minerals industry will be one of the sectors which provides the 'sustained private sector investment' that is sought, and will require the PLA to provide support in enabling it to maintain and expand operations and safeguard existing sites from direct loss and encroachment, and also from operational constraints resulting from inappropriate development taking place nearby.

We also generally support the Goal 2.2 for inland freight and to have 'more goods and materials moved between wharves on the river'. However, we are disappointed at the apparent lack of ambition in this Goal, particularly compared to the overall one for the growth of the Port, as it only seeks to maintain the status quo of the tonnage carried by water in 2014. The goal should be to increase this amount, in line with the wider Goal for the Port, and be reflected in the target proposed to be included in the Concordat.

The actions to deliver the Goals obviously are critical. Again, a lack of ambition is demonstrated in only seeking the re-activation of three wharves over the next 10 years. The Vision should be seeking to reactivate as many wharves as possible, and some in a shorter timescale, in conjunction with industry including the minerals companies, to enable delivery of a more ambitious goal. Our members are experiencing significant growth in demand and are looking for opportunities to expand operations significantly.

Additional actions are also required to deliver these Goals. Some BMAPA members have highlighted difficulties in securing Pilotage Exemption Certificates following the widened scope under the Marine Navigation Act 2013, which extends the eligibility to hold a PEC to any deck officer. Unfortunately, the examination process PLA (as the competent harbour authority) have introduced makes it more difficult to secure these.

In the absence of sufficient PECs, vessels are required to take a pilot to navigate up to their berth. However, with insufficient pilots available to support the number of vessel movements required on each tide (6 pilots for 26 vessel movements on one occasion), there is evidence that aggregate dredgers are increasingly being overlooked in favour of larger vessels. This has led to delays of 12 hours plus, with the consequence that some vessels have been diverted to customers elsewhere. Where vessels are delayed for a tide (or more), this results in a significant impact on their productivity (and the associated commercial implications that result), given normal practice will be for an aggregate dredger to turn on the tide.

## Tarmac

### Right Goals?

Tarmac support the emerging goals within the Thames Vision 2035. These address the key functions of the river and align closely with national planning policy.



### Right Priority Actions?

Tarmac wholeheartedly support the goal of promoting the transport of goods and materials along the river, taking more goods off of the roads and encourage the cooperative working with Transport for London and the Greater London Authority that is proposed. In addition, the encouragement of river-borne commuter traffic and a long term pier strategy in the lower Thames is supported. This is particularly relevant in looking at major growth opportunities, for example in and around Ebbsfleet Garden City.

Tarmac would note that the Thames Vision will need to work in parallel with other strategies and planning activity. The priority actions should therefore be part of an open list that would allow them to be updated as required across the period of the strategy."

### Other Goals and Priority Actions?

Whilst both commercial and recreational uses are incorporated into the emerging goals and priority actions, careful consideration should be given to the balance and safe integration of these different uses along the tidal River Thames while protecting and enhancing as appropriate environmental and heritage assets.

As part of this balance a further priority action might be in the long-term engagement with partners to deliver the vision, and a commitment to formal monitoring of the delivery of the vision and its priority actions.

# Passenger Transport

## MBNA Thames Clippers

### Passenger Transport

MBNA Thames Clippers welcome the Thames Vision to make more efficient use of piers and river space. It is important that the focus of this is at peak periods of



the day, which are relatively short and not all year round. Pier space should be prioritised for services that operate to piers for the longest operating periods (early morning until late at night all year round), that are driven by timetables and punctuality.

The long term pier strategy should be focussed on passenger transport and not try to make them multi-use. Leisure services and house boats should be separate to frequent commercial services that depend on direct, congestion free access.

Planning processes with riparian boroughs should be maximised to deliver new infrastructure moving forwards.

### Residential moorings

We have concerns as to any further development of residential moorings in the main river between Putney and the Thames Estuary. This is due to the large rise and fall of tides that in most cases result in the grounding of house boats in the main reaches, which inevitably are going to be affected by wash from passing vessels. Every effort should be made to consolidate these residential moorings to specific areas. This with the development of better camp sheds and wash protection will have less effect on journey times from repetitive ease down and acceleration of commercial craft, which are delivering essential river transport and will need to grow significantly throughout all day parts in order to meet the growing demand as a result of the landside residential and commercial developments.

Some routes currently operating on the Tidal Thames between Putney and Woolwich have been commercially constrained and resulted in unattractive timetables / journey times, due to the sporadic development of residential moorings.

MBNA Thames Clipper support the vision to identify where houseboat moorings should be best located and the plans to introduce infrastructure to ensure that these moorings are protected and fit for purpose. There is currently no legislation on the construction, design

and stability capabilities of house boats and standard criteria should be set, similar to building regulations applied to that of landside properties, that takes into account the marine elements they will experience on their moorings.

# Sports and Recreation

## Active360

The river is a very good environment for sport and is still underused for much of the year upstream of Westminster.

To achieve substantially more watersports participation there would need to be more places on riverside to store equipment with changing and showering facilities. These can be quite small facilities with a mix of indoor and outdoor storage and good access to the river.

Whenever a new development takes place on or near the river the local authority planners should be looking to secure this type of facility through a Section 106 agreement.

Also existing watersport bases need to be protected. There will always be demand by developers for prime riverside sites to be used for residential development. This needs to be resisted and the PLA could help by making the case for preserving existing provision.

Many people are apprehensive about using the river because they have a perception that the river is dirty. The Tideway Tunnel will help by reducing pollution but more work is required to remove plastic waste from the river and ensure less ends up there. Regular clean-ups of drawdocks and other points where plastic waste collects help – but more work to persuade people to reduce / give up use of single use plastic or at least dispose of it responsibly. Watersport participants could lead the way in generating awareness of this important issue as they are most in contact with water borne plastic litter.

When new structures are built in the river – pontoons, moorings, bridges etc. these should be constructed in a way which is as safe as possible for sport / recreation river users. Minimize creation of new pinning hazards and look to reduce existing.

Schemes for training river users can help to avoid increased traffic leading to more collisions / near miss incidents. Rowers should be a particular target as they seem to often be unaware of navigation rules or the need to look out for other river users.

Provision for short river closures for races and mass participation should be increased where this can be done without greatly disrupting other river users. There may be scope for making better use of closures to achieve more participation in sport. For example when the



river is closed for 3 hours before the Boat Race it may be possible to run a short SUP or canoeing race during the first hour of the closure without affecting the security of the race.

The ecology of the Thames is interesting but it is quite difficult to access information on wildlife, improving water quality and effects on diversity. A website / ecology guide for the Tideway would be very useful. This could also include user friendly tide information to increase web traffic. It could be maintained by advertising revenue.

## British Canoeing

British Canoeing believes the priority actions have the potential to achieve the goals identified by the public and users of the River Thames over the next 20 years. The river is a vibrant focal point and with a strategy has the capacity to further develop and facilitate sport and recreation, tourism, transport, industry, commerce, and housing. It is a mix that significantly contributes to prosperity in the London Region.



Thames Vision can build on this legacy in aspiring to focus on the use of the water space by:

- Creating a sense of place, sustainable vitality on the water and waterfront for all users.
- Ensuring in river structures do not compromise navigation
- Improving access to the river – required in many locations
- Retaining heritage
- Achieving an environmentally cleaner world class river
- Encapsulating infrastructure for different uses and a balance between public and commercial benefits.
- Securing the public and users commitment to the vision for all to enjoy.

To comment on Sport & Recreation Zones

Teddington Lock to Putney

Growing participation in sport and recreation on the water would benefit from a voluntary Sport Opportunity Zone from Teddington to Kew Bridge. There are very active canoe clubs based between Kew and Putney and an increase in participation to drive up movements in their immediate local reaches would likely extend the Zone when transiting to and from Kew into Syon Reach.

### Putney Bridge to Thames Barrier

The reaches between Putney and Vauxhall Bridges are regularly frequented by canoe clubs and activity centres. It is suggested the Sport Opportunity Zone is voluntary and extended from Chelsea to Vauxhall Bridge.

### Thames Barrier to Southend

The opportunity zone east of Greenwich spans the Thames Barrier Control Zone. How this would impact on the Sport Opportunity Zone is of interest. Further developing the use of Benfleet Creek for paddlesport is also of interest.

### Other Priority Actions

#### Improved tidal Thames environment

Water quality is an issue for recreation and reference to the Thames Tideway Tunnel is noted as it is key to improving the freshwater and marine environment for users and wildlife alike

#### Community and Culture

Residential moorings are identified to be in appropriate locations and they also need to fit in with the riverscape that is part of enjoying the river. A houseboat with a traditional powered vessels profile is preferable to a “floating house” on a raft that is becoming noticeable on other waterways.

### Other Goals and Priority Actions

To include promoting environmental awareness, responsible access and use of the river e.g. the Cleaner Thames Campaign.

## Greenwich Yacht Club

It's an ambitious project which certainly outlines the current situation, along with all the complexities of its current users, but the Vision demonstrates the huge potential that the River has to offer now and in the future. Practical considerations will need to be applied and I hope the momentum and energy continues to achieve the goals that have emerged from this process.



## 1. Environment and Heritage

Water Quality. As river users, it would be helpful if more information could be provided, similar to flood alerts or 'blue flag' beaches, if it was known that a risk, however temporary, was imminent.

We welcome your 'Cleaner Thames Campaign' but clearing litter from the foreshores should be the responsibility of the GLA, instead of building a 'vanity bridge project'. As you have noted, the growing curse of plastic bottles is growing year on year. Perhaps the PLA should consider different ways of collecting floating rubbish other than the existing methods which are obviously not sufficient and maybe look at alternative locations to catch flotsam and jetsam?

Long term, the Tideway Tunnel project will make a huge improvement to the quality of the river and the discharge of sewage into the Thames.

A joined up Thames path. A small section just beyond the Thames Barrier seems to have defied the planners for a number of years. We're looking forward to some innovative ideas to address that particular short section of the Thames Path.

Holding tanks for smaller leisure craft should be phased in over the next few years. If and when this is required, we have the capacity within the club's boat yard drainage system to provide this facility to our members. Incentives such as grants, should be considered, similar to the electric car charging points, to encourage pump out facilities at locations along the Thames in existing boat clubs or designated public piers (new or existing).

## 2. Sport and Recreation - More participants

We note your designated recreational activity areas and recreational opportunity areas. However, Greenwich Yacht Club falls outside your existing or proposed mapped recreational activity areas. We would have concerns if this suggests in the future, only these areas can be used for recreational use? As an active club that's been in existence since 1908, our current members participate in sailing, rowing and motor boating. Most of this activity, but not all, takes place in Greenwich Reach, Blackwall and Bugsby's Reach. The club also finds itself on the edge of the Greenwich Peninsula development, which over the next 10 to 20 years will see its local population rise considerably. There is no doubt that participation and interest in recreational water sports will increase. We are keen to be part of that development and would welcome our stretch of the river to be designated a 'recreational activity zone'.

As for 'recreational opportunity zones' further east of Greenwich, beyond Woolwich. If the demand, interest and finance exists for such facilities to be built and then managed, then it may happen. However, proposed river crossings may well interfere with any such proposals and plans.

For these activities to survive, now and into the future, existing and future changes to the PLA bye laws must consider leisure users on the River and not unintentionally prevent or discourage their activities. Especially with regard to sailing boats.

Moorings. There is definitely scope to increase visitor moorings in appropriate locations. We have identified some close to our own mooring footprint and in conjunction with the Royal Borough of Greenwich, we would be keen to explore developing these with the PLA.

Whilst new piers are going to be built at different locations, consideration should also be given to improving existing slipways and the building of new ones, this will benefit and facilitate public access to the river and enable boating activities to take place. More needs to be done to identify these facilities with improved signage, road access and parking.

### 3. Passenger Transport - more journeys

We look forward to the new summer timetables being set in 2016 by London River Services and how this will impact and hopefully improve sailing opportunities to the East of London. As you are aware, speed of craft and the resulting wash are issues for the. Further work needs to continue with the operators as to how this can be remedied.

Additional piers could have extensions attached for visiting small leisure craft and pump out facilities for holding tanks.

Whilst commuter and tourist trips may well increase, we would suggest that more research is undertaken to the type and design of craft proposed to undertake this role. Especially with regard to the effect the wash can cause on the foreshore, damage to steps and riverside buildings. If such speeds are necessary then barriers and other practical measures should be introduced to reduce the impact of scouring on our river foreshores. This could be an interesting university research project.

## North Kent Yachting Association

1. We strongly support the principle of provision of more landing/access points along the river, coupled with leisure-related facilities where practicable. The PLA has an important role to play as potential advocate and facilitator in this area.



2. Specifically, facilitate/provide visitor moorings and marinas in the lower reaches where there is currently a lack of safe havens for leisure vessels between Southend/Medway and Gravesend. (Holehaven is usable in an emergency, but not a desirable destination in its own right).

3. We would like to see the impact on leisure users specifically considered as part of any proposed changes to operating practices (whether through changes in Byelaws or General Directions, or through a change in approach to some aspect of river use), bearing in mind that:

- Leisure vessels are generally smaller than commercial vessels, so may not have electrical power or an engine, or stowage space for equipment. (Nor do they have as much potential to cause damage if something should go wrong!)
- Leisure users generally have a less formal approach to operation and safety than commercial users (but are not necessarily any less safe in consequence)
- Leisure users often have limited financial resources, but may have time available to devote to various aspects of their sport.
- A leisure user without formal qualifications is not necessarily lacking in competence (although they may!)
- Leisure users are typically volunteers using their spare time when carrying out administrative/regulatory tasks, and are rarely in a position to employ 'experts' to deal with such matters. It should therefore be borne in mind that any requirement to carry out such tasks may act as a disincentive to organise or participate in leisure activities on the river.

4. There are opportunities for 'joined up thinking', combining leisure and commercial interests within the same facility.

For example, ensure that there is access for leisure vessels at any of the proposed new passenger piers – as a minimum short-stay facilities; ideally provision for stays of several days or more, so that leisure sailors from out of the area can enter the Thames, moor at the new facility, and take one of the passenger boat services into London.

(This will not only increase commercial passenger traffic and tourism, but also reduce the number of leisure sailors passing through Central London) The same piers could also provide other services such as pump-out (increasingly needed) and fuel (sadly lacking on the Lower Thames).

5. While access to the banks of the Thames for land-based activities is a worthy objective, this should not cause operational difficulties for leisure or commercial interests which often need exclusive access to a modest stretch of the river bank in order to manage their operations safely and securely.

6. We support the use of the river to take lorries off the roads.

7. We support the aspiration to extend river passenger traffic downriver below Greenwich, but have reservations as to whether the weather will permit operation of a reliable and comfortable service all the year round.

Overall we would like to see much more encouragement of appropriate on-water recreation in the Lower reaches, where there is ample room for leisure activities without impeding commercial traffic. This activity will primarily involve the more seaworthy sailing dinghies and rowing boats, and sailing and motor cruisers, with zones close to the shore for craft such as windsurfers and jet skis.

Expanding on point 1, developers and infrastructure providers (e.g. flood defences, energy generators) could be encouraged to provide or facilitate leisure use of the river; for example:

- By designing riverside features to include good access to the water
- By making land available for shoreside support facilities
- By integrating support for leisure activities into other works

(As an example of the last item, a structure whose prime purpose is to house a turbine for tidal power might act as a breakwater for small boat moorings, and also support a small structure and mast for the starting of sailing races).

## The Cruising Association

The Vision is excellent. We congratulate the PLA for producing such a far-reaching and enterprising plan. We were not one of the organisations contacted during the preparatory work, but hope that we could make a contribution during the next phase when, presumably,

the Vision, Goals and Priority Actions will be translated into a Strategic Plan with concrete activities and milestones.

Although the document touches on the issue of leisure use, it could be strengthened with regard to the role of the river in generating tourism and the additional income for London businesses that each tourist brings.



With that in mind, we have read this document through the eyes of a potential visitor to London approaching up the Thames in a sailing yacht.

Such visitors include sailors from the USA/Canada, from other parts of the UK, and from the nearer parts of adjacent Europe, as well as Scandinavians and other Baltic sailors stopping off in the UK on their way to the Atlantic and the Mediterranean. Often these are individual yachts, but sometimes they are participants in club rallies with many yachts. A typical length of stay is one week but Transatlantic visitors often wish to stay longer.

For these visitors, there does need to be sufficient provision of visitor berths in the various docks and basins in and around East London. That provision also needs to be bookable in advance. Visitors will not make the long journey, by yacht, up the Thames on the off chance of finding a place.

Until the last few years when many previous visitor berths were available it was common to receive visiting clubs with up to a dozen small craft at Limehouse and St Katherine during bank holiday week-ends. Informal yacht racing was also organised by local clubs several times each year. None of this can now happen because many of the formerly available visitor berths are now allocated for residential use only.

Because the consultation document does not have a specific goal with regard to tourism and visitors, this need for visitor berths is not well addressed. Under the goal 'Sport and Recreation: More Participants' there is an 'Action Required' stating: 'More Visitor Moorings in Appropriate Locations on a Busier River'. However, this Action relates to a goal of: 'Greater Participation in Sport and Recreation on the Water' which, though important, has little to do with the need for visitor moorings.

If this vision is to be extended to include provision for waterborne visitors, it will also be important to distinguish between moorings for motorised leisure craft, without masts, above the Pool of London and sailing yachts everywhere to the east of Tower Bridge.

With the current, and proposed, increase in very fast moving traffic any extra moorings will need to be sheltered from heavy wash i.e. inside substantial pontoons or in locked basins: the issue of wash precludes any overnight visitor provision being in the river itself. However there are many docks and basins that have been put to this use over the past three decades at least. For the most part, these are not mentioned either in the text or on the Opportunity Map you provided and this type of leisure use is not visible on the Legend for that map (in fact the Legend is missing on the maps with the exception of the one in the summary document). So, for example, St Katherine's dock; Limehouse Basin; and Surrey docks do not feature at all.

Although the document briefly recognises the need for an increase in moorings it does not say how that will be achieved; in fact outside the locked basins, they would have to be either swinging or sheltered. The report states that there are at present 40 visitor moorings in addition to the now extremely limited visitor berths at Gallions Point, South Dock, Limehouse Basin and St Katharine's. We are unclear as to how that figure was arrived at but we believe it is an overestimate. The only listed facilities below Tower Bridge are the Town Pier at Erith & the heritage moorings for barges at Wapping. These should not be counted as provision for visitors.

A small number of swinging moorings, for visitors, further downstream would be very useful for small craft waiting for the tide as the 'holding' and rate of flow can make anchoring difficult.

Also, looking at the reference sources is difficult to see any information pertaining to the current use of the various docks and basins and how that use has changed over the last five years. We know that the housing crisis in London has led to a considerable expansion in the houseboat market and that whereas previously there was a mixture of houseboats and other leisure craft, the latter have now been squeezed out. Thus, those docks and basins, for the most part, no longer prioritise spaces for yachts, and in particular have few spaces for visitors.

That is particularly unfortunate because those docks and basins have good public transport links into London and were previously popular with visitors.

We understand that the PLA has no jurisdiction over the various dock areas, but believe that there is scope for a joint strategic approach with the relevant local authorities and other bodies led by the PLA with its Vision firmly in mind. Without this it is difficult to see how the need for considerably more, safe, visitor berths can be achieved. Given the interests of those various local authorities in optimising their river frontage as a valuable asset within

their local economies we would have thought that this was both necessary and feasible. Such an approach could encourage consideration of the differences between those bodies of water that have working small craft locks (and therefore suitable for visitors) and those with more difficult access which are nevertheless well-suited to houseboat use.

## Sons of the Thames Rowing Club

Response from the Publicity Officer

### Right Goals?

Many of the goals are conflicting. A river that carries freight and passengers is far more dangerous and unpleasant for recreational users in human or wind powered boats. Motor vessels routinely break the speed limit and show little concern for the safety of recreational users. I notice your documents says: "The PLA, Maritime and Coastguard Agency (MCA), RNLI and Police work together to provide services to maintain and improve river safety." I'm not sure what those are, and I don't think they're working. Environmentally, the key project is the Thames Tunnel which would hopefully stop most sewage from being discharged into the river. However, progress is slow partly because local authorities, such as Hammersmith, seem intent on disrupting and delaying the project. The idea of additional moorings is alarming. There are already far too many houseboats obstructing the river and are no more justifiable than caravans in a public park. Again, there is a fundamental conflict between the proposed uses of the river.



### Right Priority Actions?

The actions and objectives have not been prioritised have they? I suspect the PLA's only real priorities are maximising revenue.

### Other Goals and Priority Actions?

Wandsworth Bridge above which the 8 knot speed limit comes into effect is currently a key division on the river. The presence of large vessels and absence of any speed limit below the bridge makes it too dangerous for most recreational boats. The historic rowing clubs on the Lower Tideway have effectively been forced off the river and make do with the old docks for most of their outings. This is not acknowledged in your document or plans. There have to be strict limits on wash, and more accountability for motor vessel skippers. It is currently

often difficult to even identify speeding vessels from the small letters of the boat's name. Sad to say, the PLA itself does not take safety seriously - I wrote in length about the starboard lateral buoy opposite Dove Pier in 2011 since when it has caused many sinkings and accidents. I remain concerned that people will be drowned because of it.

## Strand on the Green Sailing Club

In general, of course, we are thoroughly in favour of the objectives and intentions of the Vision and wish you well. I am, however, mystified that our reach of the river from Kew Bridge to Putney Bridge seems to be omitted from your suggested 'sport opportunity zones'.

### Right Goals?

Yes

### Right Priority Actions?

Under 'Sport and Recreation, Actions Required' you identify sport opportunity zones from Kew Bridge to Richmond, Putney Bridge to Chelsea. Why the area between Kew Bridge and Putney Bridge is apparently omitted? It is the home of our sailing club and several others around Hammersmith, as well as numerous rowing clubs. I presume it is an oversight. I hope it can be corrected.

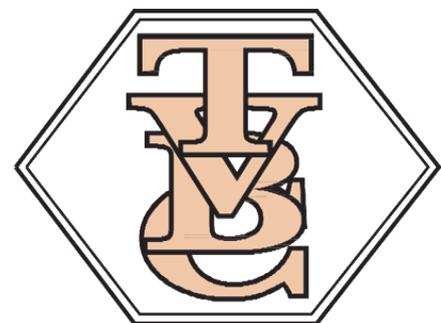
### Other Goals and Priority Actions?

No

## Thames Vintage Boat Club

Response by the Vice Commodore of the Club:

Having read your proposals to increase the usage of the Thames with regard to passengers and freight, I would like to remind you of the needs of recreational private craft which also wish to increase their usage and venture within the Port of London if the facilities were such to allow safe passage.



The Tidal Thames Navigators Club provides a great free service by supplying a detailed chart and tide tables, but the problem for smaller craft that can only maintain lower speeds is the lack of bolt holes on their passage from Teddington Lock.

From past experience, many of our members, who have suitable cruisers for tidal waters, find it unacceptable to have to 'lock in' to marinas and docks in order to wait for the tide or seek protection from the wash of passenger boats.

If there were visitors moorings available on piers that were dedicated for the use of pleasure cruisers, narrow boats and the like, the Port would then become a more viable cruising area for boat & yacht clubs and reduce the dangerous proximity of small craft and commercial craft.

During the 2012 Queens Pageant, the allocation of the outer arches of the bridges for smaller craft was a necessary safety strategy. If this approach could be adopted for general navigation, together with specific pier moorings you would undoubtedly see an increase in leisure craft from the Thames Clubs.

I have personally spent many anxious periods shepherding our club boats below Tower Bridge, waiting for the gate of St Katherine's Dock to open ( and that's in a 50ft classic yacht) If we are to encourage classic craft to attend events below Teddington, we need to provide specific facilities to ensure their safety.

# Environment and Heritage

## Biodiversity By Design

Response by the Director

The vision is good but for me lacks a key element – that of an holistic environmental enhancement of the Thames river banks from source to sea.



This started back in the late 1990s with initiatives such as the guidance that came out of the Greenwich peninsula regeneration vis.. *Greenwich Millennium Riverbank Experience*. Few people know that the Greenwich Peninsula is now one of the most important Sea Bass nurseries in the south of England – all man-made – through approaches like this.

The guidance produced by the Thames Estuary Partnership ‘Estuary Edges’ is not mentioned and is a vital part of a sustainable future for the estuary.

There is an absolute need in relation to the Thames ecosystem to continue and accelerate the managed retreat and ecological enhancement of the banks, changing sheet pile to terraces or even natural slopes wherever possible to promote the recovery of decimated fish nurseries and continue the Thames’ ecological recovery which began in the 1960s. This need not militate against increased use of the Thames as a transport corridor or commercial port. There are ways to ‘square the circle’ though too many see the two goals as necessarily conflicting.

If the vision does not capture this key point and promote it, it will not be in keeping with part of the Mission Statement of the PLA to enhance the ‘environment of the Thames’ and that is completely underpinned by its biodiversity.

The ancillary advantages of such an approach in terms of increased real estate values (vis Greenwich, Wandsworth etc), offshore fishery support, and climate change resilience (making space for water) should also be strongly emphasised in such a vision by a leading agency such as the PLA.

## Environment Agency

We agree that collaborative working, with all parties delivering improvements and



implementing best practice, is essential to achieving these goals. Overall, we agree with those goals and actions where the Environment Agency has both a shared interest and a statutory responsibility to deliver actions.

We are using the Thames River Basin Management Plan, the Your Tidal Thames (YTT) catchment partnership and the Thames Estuary 2100 Plan (TE2100) as a framework for continued protection and improvement of the environment of the Thames and are pleased to see these referred to in your document. We look forward to continuing to work with the PLA and catchment partnerships to help shape the YTT Tidal Thames Vision.

Improving the ecological status / potential of water bodies, under the Water Framework Directive, is a high priority for the Environment Agency. We note that one of the actions under the Environment and Heritage goal in the document, is 'water quality improves to 'good''. We are pleased to see the ambition of working towards good ecological potential embedded in your Vision for the Thames and agree with that overall goal. However, we would like to see that particular action expanded to 'improve water quality and habitats towards good', so that this goal could represent more than just nature reserves. Additionally, we think it would be useful to provide clarification, in general terms, on what is meant by 'good'.

We note that many of the goals in the Thames Vision document are aimed at increasing the use of the river Thames, for both economical and recreational purposes. Whilst, overall, we support your vision on this, we would want to work with you to help avoid or mitigate any impacts of increased use of vessels on the environment

On this matter, as discussed at our recent Thames Estuary Asset Management 2100 (TE2100) meeting with the PLA, we have some concerns around the effects of erosion on river walls and embankments, and accretion on flood gates and outfalls. We are currently undertaking a study to improve our understanding of the impact of sediment transport in the Thames on flood defences and we would look to work with you to determine any mitigation actions we can take in the future.

Climate change mitigation and adaptation is another priority area for us and we would hope to see further reference made to this in the finished Thames Vision document, in addition to your mention of the TE2100 plan.

We look forward to continued working with you on our shared objectives for the tidal Thames and would welcome further discussion on our comments, if required, prior to the final stages of development of the Thames Vision. We are happy for our responses to be available on

your website and we thank you again for allowing us, through this consultation, to help shape this important document.

## Historic England

As the reason for the earliest settlement on its banks, and the life-support for subsequent human habitation the Thames has enabled and made London what it is today. A corollary of this is that the river is the source of the most



Historic England

valuable records of London's past and the showcase for its townscape and historic landscapes. Over centuries, it has provided continuity and enabled change, imbuing historic significance through material assets and intangible association. The Tidal Thames, stretching from Teddington Lock to Southend, encapsulates a vast range of heritage assets, known and unknown, above and below the water. The Port of London Authority is in a unique position, with partners, to bring conservation and enhancement of this resource within the scope of its operation, as part of a sustainable approach to promoting greater use of the river, and public appreciation of all that it has to offer.

We welcome the references to heritage in the Vision consultation document within the Community and Culture goal. However, overall the goals and actions are disappointing in how they address the historic environment. This may be a result of limitations within the background evidence studies. We would like to see the coverage extended, to identify the significance of the river's heritage assets, both designated and undesignated, and to explain how their conservation can sit sustainably alongside the proposals for greater use of the Thames in the future. The following points are intended to assist you in taking this forward:

1. Assessment of capacity for change

The proposals within the Vision set out ways by which to increase the use of the Thames. At both a general and specific level these need to be set into the context of sustainable use, and an assessment of any threats and opportunities for the environment within and bordering the Thames, including its historic environment. To take the example of the goal to double the number of passenger transport journeys to 20 million by 2035 – what assessment has been carried out regarding the capacity of the river to accommodate this without erosion of heritage assets? If present concerns that passenger craft are damaging historic walls and structures is evidenced, the report needs address how these matters can be overcome to enable the future increase in traffic to be sustainable.

Historic England would be pleased to discuss these issues further. At this juncture, we recommend that the Vision document 'future proofs' proposals by providing for such capacity assessments along the way.

## 2. Heritage as a positive dimension of the environment

We would like to see the Vision make much more of the wide and varied benefits of the Thames' heritage, above and below water, and identify this as a positive resource. The 'Environment and Heritage' section misses this strategic aspect of the environment, although this is a key dimension of the environmental strand of sustainable development (National Planning Policy Framework, para 7). We suggest that this goal is extended to include the built and archaeological heritage of the Thames (above and below the water, and along its banks), and that the actions address how this resource can be conserved and enhanced.

In the forthcoming Vision document it would be helpful to identify some specific steps that could be taken to actively conserve heritage assets. The PLA could undertake to consider this in respect of its own estate, and encourage others to take a similarly positive approach to conservation of the river's heritage.

The value heritage brings plays into much wider economic and social agendas. Historic England is currently commissioning a report 'Valuing the marine historic environment'. This is examining ways of quantifying the social and economic benefits of the marine and coastal historic environment. We would be pleased to provide you with the results of this research, when available. Acknowledgement of the wider benefit of taking care of the Thames' heritage would be appropriate in the final Thames Vision.

## 3. Identifying Heritage Assets

The historic environment encompasses both designated and undesignated heritage assets. The Vision could be strengthened by including an appendix identifying the extent and nature of those assets, from wrecks to historic wharves, archaeology on the foreshore to historic boathouses. This could equally be covered in a supporting topic paper referenced within the Vision. An overview of the River Thames' heritage, including heritage assets 'at Risk', is an essential element to underpin the Vision.

The Historic Environment Records (HERs) contains information demonstrating that the Thames and its tributaries are dotted with many hundreds of undesignated heritage assets. Within London many represent the city's industrial and wartime heritage, as well as buried archaeological sites and locally significant buildings. It would be beneficial to explicitly acknowledge their important contribution to the character of London's riverside, alongside

the contribution of designated heritage assets. The HERs are managed by the Greater London Archaeological Advisory Service (GLAAS) in London, and by Kent and Essex County Councils for the estuary beyond London’s boundary.

#### 4. Integrating the historic environment into proposals

There are opportunities to preserve, interpret and improve physical and intellectual access to heritage assets as part of planned schemes such as the proposed footpath and biodiversity works, and to ensure that their significance is reflected and appropriately managed during river improvements. We recommend that the Vision includes a clear commitment to embed the value of the Thames’ heritage, and the opportunities it provides, within the considerations for all projects.

To take this point forward, it would be useful to include specific examples. These could include regaining public access to the Thames path in Blackwell between Virginia Quay and New Province Wharf, allowing the historic graving docks to be appreciated by the public. Another example could be to improve access to, and understanding of, the remaining historic Thames grazing marshes further downstream. GLAAS and Historic England would welcome the opportunity to provide advice on planned projects not already covered by the marine or land planning systems.

#### 5. Future major infrastructure

Historic England has actively engaged with the proposals for the Thames 2100 project and the Thames Tideway Tunnel, and we continue to provide expert advice on the latter as it develops. The Vision could set out a timetable for delivery of projects such as these and the statutory and other agencies that are involved in advising on them.

## Inland Waterways Association

IWA supports The Port of London Authorities vision and development framework for the river over the next 20 years. IWA would like to make the following observations on the specific goals and priorities.



### 2.1 Port of London – More trade, more jobs

The proposed increase in freight and passenger movements, especially by the use of RHIB's, should not have a detrimental effect on the ability of small recreational craft to passage from East London (Dockland, Barking, Limehouse) to Brentford and Teddington and vice versa by changing the section from a class C Waterway to a Class D Waterway. We believe this can be achieved by improved vessel design and operating practices.

## 2.2 Inland freight – More goods off roads onto the river

IWA strongly supports the use of the river for trade and, to enable that to occur, would support any proposals to protect and reactivate wharves along the river. We support the creation of the Skills Academy as we believe the training of more people is the key to achieving the rest of the goals and priorities. Consideration should be given to the creation of bursaries to encourage young people to take the opportunities on offer. We note that the PLA run apprenticeship is only available to your own boats and would suggest that ways of extending it to other operators should be explored.

## 2.3 Passenger transport – More journeys:

We strongly support the proposals to spread the peak hours of use and to provide new piers at Thamesmead, Erith, Greenhythe, Swanscombe (for the Paramount development), Grays and Tilbury. We believe that there is a need to enlarge the existing central London piers to enable more landings during the peak hours. We recommend that the fare structure should be reviewed to encourage people to travel outside peak hours

We would expect the existing Gravesend to Tilbury Ferry be kept and that some of the pressure for additional crossings across the river would be met by the provision of additional ferries.

## 2.4 Sport and recreation – More participants

We strongly support the proposals to create more visitor moorings but, would suggest that, these should not be confined to the central area but spread along the north and south banks, from Teddington to the sea, at locations that give access to historic attraction, facilities and transport links. We would expect that any charges made for the use of these facilities should be affordably priced.

We would hope to this end that the PLA would support the restoration of Northfleet Harbour, Dartford and Crayford Creeks as navigable recreational destinations.

We would look for the navigational creeks under PLA control, such as Broadness Creek and Dartford Creek, to be properly maintained and dredged to sufficient depth to improve

accessibility for recreational craft and they would be provided with buoys at their entrance for vessels to use whilst waiting for the tide. We are also concerned at the deterioration in the Waterman steps in central London and believe there is a need for safe steps to allow access to the foreshore and an escape route from the river in an emergency.

There are few viable slipways on the river to allow recreational boats to enter the river, we believe that additional provision should be a priority.

IWA does not support the encouragement of swimming in the river and considers there are too many potential risk factors.

## 2.5 Environment and heritage –Improved tidal Thames environment

We welcome the proposal for a joined-up Thames Path running from Teddington to the sea. However we would warn that, if this path is to be along the south bank, that urgent action is required to protect the route from Swanscombe Peninsula to Gravesend. The area is being developed, by Paramount and Ebsfleet Development Corporation, and we believe it is crucial that a riverside path be incorporated in the development works. Crest Nicholson's proposed development at the Pier at Ingress Park will place housing blocks between the re-routed Thames Path and the River, destroying the views.

If the path or part of the path is routed along the north (Essex) bank the developments in the Tilbury and Grays areas could cause significant difficulty unless urgent action to protect the route is taken now

The Environment Agency policy of conducting a 'managed retreat' of the flood bank, (for example alongside Shorne Marshes between Denton and Shornemead Fort), has rendered impassable the riparian public footpaths on both sides of the river at many states of tide. This could thwart the ambition of creating a path running from Teddington to the sea that can be used by all at any time.

## 2.6 Community and culture – More people coming to enjoy the Thames and its banks

IWA has long recognised that in London there is a large demand for affordable residential moorings and we welcome the proposal to establishing new residential moorings in appropriate locations on PLA waters. We would expect that all such moorings would include all facilities and designed so that boats can be easily moved clear in an emergency and for maintenance.

## London Wildlife Trust

The Trust welcomes the commitment of the Authority to develop and help co-ordinate the delivery of an ambitious plan for the tidal Thames. We would wish this plan embeds a rigorous commitment to environmental protection and enhancement of the river and associated habitats and species.

London Wildlife Trust has had a long-standing interest in the tidal Thames. We manage Isleworth Ait (on behalf of Thames Water) within the Thames itself, as well as a number of nature reserves on some of the main river's tributaries. We recognise that many of our

interests are being served by a much greater recognition of the Thames' biodiversity significance and commitments to conserve them than were present in the 1980s, and that a number of partner organisations are working through a variety of fora (e.g. Thames Estuary Partnership) to sustain this.

We have the following specific points to make on the consultation document of December 2015.

### 2.5 Environment and heritage (pp19-21)

Today 2015

We welcome the description on the importance of the Thames to wildlife and how this is reflected in statutory designations.

However, there is no reference to the local wildlife sites found along the tidal Thames. In London the Sites of Importance for Nature Conservation (the SINC series) have been in place since 1985; currently numbering 1571, these are critical in providing the foundations for nature conservation across the capital (1 London Wildlife Trust (2015), Spaces Wild; championing the values of London's wildlife sites). The whole of the Tidal Thames in Greater London is identified as a Site of Metropolitan Importance for Nature Conservation (Site M31), and a number of other SMIs lie alongside the river within Greater London (such as Rainham & Wennington Marshes, Erith Marshes, Battersea Park, Barn Elms, and Kew Gardens). There are also a number of sites of Borough or Local Importance, including Blackwall Basin, Leg of Mutton Reservoir, Petersham Meadows and Marble Hill Park, as well as most of the tributaries as they meet the Thames. The Thames plays a crucial role in the importance of these adjacent sites, and they provide additional habitats for some species that use the Thames (e.g. foraging and roosting areas for many birds).



We welcome the recognition of the challenges from untreated sewage, pollution and rubbish that affect the Thames' environment. In addition we suggest that there needs to be reference to the impacts of riverside development – some of which can adversely affect the biodiversity of the Thames, through for example, shading or impacting on foraging routes and roosting sites. We are concerned that accumulative loss of riverside open space to development – especially west of the Erith/Rainham is likely to incur a significant loss and damage to the ecological value of the Thames as a broad ecological corridor.

We welcome the recognition that the Thames Estuary designated habitats can be further improved. However, the Trust believes that this can be broadened to include the London SINC's as well as the overall Thames. Some of this can be undertaken by direct management of sites, enhancements to the water body (e/g through the Thames Tideway Tunnel), and potentially through development (for example enhancements secured as conditions).

We suggest that there should be reference to the presence and distribution trends of invasive non-native species that adversely impact the ecology of the tidal Thames, including zebra mussel, Chinese mitten-crab, and Himalayan balsam. The Thames Estuary acts as a primary portal for many new species into Britain (for example larvae carried in ballast tanks of shipping), and the Authority's future plans must include measures to restrict entry to damaging species (e.g. quagga mussel, 'killer shrimp', as well as means to effect control those already present, in line with the Government's strategy (The Great Britain Non-native Species Secretariat (2015), The Great Britain Invasive Non-native Species Strategy).

We welcome the 20-year goal, with its commitment to improved habitats in-stream and on adjoining land.

Of the proposed priority actions:

- Tideway Tunnel in operation by 2023: we support this, but would wish to see some specific reference to opportunities for green infrastructure opportunities to be sought in addition to the tunnel in order to improve surface water run-off and sewage outflow into the main river.
- Water quality improves to 'good'; we welcome this.
- Joined-up Thames Path: we support this in principle, but wish to raise that unmanaged access to some wildlife sites can cause disturbance to some species populations and damage some habitats without appropriate design or avoidance. Nature conservation organisations need to be engaged in the roll-out of the path to ensure that ecological impacts are minimised and opportunities for gain maximised.

- Improve biodiversity of nature reserves, wherever practicable all SSSIs along the river in favourable condition; we welcome this, but believe it doesn't go far enough in its ambition. We recommend that it's all the wildlife sites (statutory and non-statutory SINC)s that need protecting and enhancing, not just those managed for nature – and these can assist in the connectivity that the Authority seeks to achieve. Any losses to those sites from development will need to be adequately mitigated or compensated for.

The Thames Estuary has been identified as a candidate Marine Conservation Zone (MCZ)(<http://www.wildlifetrusts.org/sites/wtmain.live.drupal.precedenthost.co.uk/files/Thames%20Estuary.pdf>), on the basis of its importance in providing critical spawning and nursery grounds for fish. Dover sole, salmon, flounder, cod, herring, sprat, twait shad and both river and sea lampreys are all important inhabitants of the estuary. We, with The Wildlife Trusts – are keen to see this identified by the Government in due course, and we recommend that the Authority works with us and others to ensure that a Thames Estuary MCZ can be realised and play its part in conservation of the UK's seas.

In respect of our comments above on invasive non-native species (INNS), we recognise that control and preventative measures might form part of two of the above actions. Their presence or absence, too, might serve as indicators for measuring progress of the actions. Nevertheless, coordinated action is required to secure effective management of INNS, and we suggest that it is considered as a separate action for the Vision.

## 2.5 Community and culture (pp22-24)

Today, 2015

It would be good to recognise the role of the tidal Thames in helping to stimulate the birth of the modern urban nature conservation movement from the mid-1970s. Concerns at the polluted river from the mid-20th century had already begun to make improvements, but a symbolic change came with the creation of the William Curtis Ecological Park by Tower Bridge in 1976 (demolished 1983). Since then London Wildlife Trust and many other organisations (e.g. Richmond Environment Trust, TCV, RSPB, Thames 21) have worked with local communities and landowners to enhance the river and appreciation of its nature and culture (the two are often entwined – e.g. jellied eels, the London planes on the riverside at Richmond). There are riverside nature reserves that serve as education centres, such as Millennium Ecological Park and Rainham Marshes, as well as activities to raise awareness of the role of London's largest single natural feature in the shaping of the city. These

inevitably led to broader strategic approaches to place-making such as the Thames Landscape Strategy and the All London Green Grid.

The Thames festivals, TideFest, etc. are also means to promote the nature of the river as well as a celebration of its other features and values.

Vision, 2035

We welcome the goal for the riverside as a magnet for people.

Of the priority actions:

- Explore development of a Thames brand for culture, heritage and quality of life: we support this.

Conclusion

The Trust is shortly to launch our Water for Wildlife programme (running to the end of 2019), in which we wish to raise awareness on the role, value and need to manage London’s waterways and wetlands. Whilst we don’t currently have specific elements of this work targeted on the tidal Thames, the main river will be integrated within the programme. In addition we are opening two new reserves – Woodberry Wetlands (spring 2016), and Walthamstow Wetlands (autumn 2017) – at which we will be telling the story of water in London, for wildlife and people. The Thames, as ever, is critical to this story and we would hope to weave the narrative of our activities into the Authority’s vision for the tidal Thames. London Wildlife Trust is keen to play a role within the Authority’s plans to realise its vision. We hope that our recommendations can be taken on board, so that the ecological potential of the tidal Thames can be realised.

## Museum of London

### Right Goals?

Yes we believe that improving the Thames environment is integral to maintaining it as a rich source of shared heritage as well as a wellspring of archaeological evidence.



### Right Priority Actions?

Yes.

## Other Goals and Priority Actions?

Museum of London Docklands opened in 2003 and its audience has since grown to more than 250,000 in the last year. From the outset the museum has told the story of the river, port and people of East London, a subject that is of course fundamental to the history of the PLA.

The PLA are founding partners of Museum of London Docklands; we hold the PLA archive and the PLA's materials are exhibited throughout our galleries – including our brand new 'Number One Warehouse' gallery which opens in March this year. As such it would be fantastic if one of the highlighted priority actions under 'Environment and Heritage' could relate to supporting public engagement in the history of the area around the Thames, through the PLA's existing and ongoing partnership with the Museum of London Docklands.

We strive to make the riverside an attractive destination for visitors through our extensive public programmes and award-winning learning activities. We directly engage our visitors with the history of the Thames, using it to unlock London's fascinating social, working and environmental histories and encouraging visitors to contemplate the city's future and their place within it.

## Natural England

Overall, Natural England supports the Thames Vision project.

Environment and Heritage goals and actions:

- We support the actions for clean water and the Thames tideway tunnel.
- We support the idea of having a joined up Thames path and will explore the potential to link this in with our work on the England coastal path.
- *"Improve biodiversity of nature reserves: wherever practicable all Sites of Special Scientific Interest along the river brought into 'favourable' condition"*



We agree with improving biodiversity; however the headline wording of the action does not seem to fully summarise the accompanying text that underpins this action.

The supporting text describes the need to ensure connectivity and stepping stones between habitats, not just improve the favourable condition status of designated sites/reserves. We agree that favourable condition of SSSIs is a good aim/measure of biodiversity, but to fully convey the whole aim we suggest the headline text should be along the lines of “improve biodiversity and connectivity of habitats.” Also, the underpinning text should include a mention of marine habitats and species. These minor amendments would ensure a holistic approach to biodiversity in the Thames area.

#### Other actions

We support the other overall aims of the vision, and recognise the importance of sustainable development in the area. We do suggest that the vision could be expanded to include an onus on developers to do biodiversity improvements, either within the footprint of their own developments or to provide environmental gains elsewhere in the area.

## RSPB

The RSPB welcomes the opportunity to provide written observations on the Thames Vision consultation on Goals and Priority Actions (December 2015), developing upon our input earlier in the project.

We are strongly supportive of the Thames Vision project, presenting as it does an opportunity to formulate shared thinking and aspirations for the Thames in the period to 2035.



We are setting out below a number of comments and suggestions that we believe would further strengthen the Vision. These, inevitably, focus primarily upon section 2.5 Environment and heritage, but we have where appropriate included thoughts on other aspects of the consultation.

We support the overall 20 year goal for this topic. Our comments on the priority actions are as follows:

1. Tideway to build and bring into operation the Thames Tideway Tunnel by 2023

The RSPB is supportive of the Tideway project

2. Water quality improves to “good”

The RSPB supports this. The definition of “good”, set out in reference 11 on page 28 is, of course, derived from the Water Framework directive but may not explain the concept with sufficient clarity for a non-specialist audience. We suggest including a plain English explanation of what is meant by “good water quality” in a Thames context.

### 3. Joined-up Thames Path running from Teddington to the sea

The RSPB supports high quality access to the natural environment, providing a range of benefits for residents and visitors to the Thames and its surroundings. As such we agree with the actions set out here. There are numerous challenges involved in achieving this outcome, and there are sensitive sites along the Thames that will need to be carefully considered on a case by case basis to ensure that they are not damaged, either in the creation of the joined-up path or through increased disturbance by users. However, we are confident that this can be achieved through joint working between interested parties.

### 4. Improve biodiversity of nature reserves: wherever practicable, all Sites of Special Scientific Interest along the river brought into “favourable” condition

We have a number of observations on this action:

Firstly, the need to improve biodiversity is not restricted to nature reserves. There are very large areas of important wildlife habitats along the Thames that are not managed as “dedicated” nature reserves. Many of these have statutory designations including SSSI, SPA, Ramsar or SAC. We suggest therefore that the words “nature reserves” should be replaced by “sites recognised for their wildlife interest”.

Whilst we support the goal of bringing all SSSIs into favourable condition, and this is clearly the “bottom line”, we recommend that the ambition should be higher than this. The remainder of the text rightly mentions improved connectivity of habitats and managing a group of sites in a coherent way, reflecting the Lawton principles of “more, bigger, better, joined up”. There is a danger of these aspirations receiving insufficient recognition because they are not included in the bold headline text.

Accordingly, we recommend the headline text should be amended to: Improve biodiversity of sites recognised for their wildlife value, achieve favourable condition for all SSSIs, and promote better connectivity and coherent management of habitats at a landscape scale.

### Comments on other goals and priority actions

The draft Vision includes ambitious goals concerning increased trade, more movements of goods by river, more passenger journeys and so on, many of which are outside the RSPB’s

remit (except insofar as they should be achieved in ways that do not damage the biodiversity and other natural assets of the river).

Specific comments:

#### Section 2.1 Port of London – More trade, more jobs

- Lower Thames crossing downstream of Tilbury, by 2025

The construction of a new Lower Thames crossing, currently the subject of a public consultation, has the potential to cause significant damage to environmental interests, including the Thames Estuary and Marshes SPA and Ramsar, and indeed land managed for biodiversity by the RSPB and others, such as Shorne Marshes. Much depends on the precise location, design and mode of the new crossing itself (e.g. whether it is a bridge, a submerged tube tunnel or a bored tunnel) and the supporting new infrastructure (such as the links to the A13 and A20). The RSPB will be engaging fully with the proposals as they develop, but we would welcome an acknowledgement in this goal that the project should be undertaken in a manner that avoids damage to environmental assets.

#### Section 2.6 Community and culture – More people coming to enjoy the Thames and its banks

- Explore development of a Thames brand for culture, heritage and quality of life

The RSPB supports environmentally friendly improvements to access along the Thames, and we will play our part, working with partners, in achieving this and increasing an appreciation of the river and its surroundings by residents and visitors. We welcome the mention of Rainham Marshes! This reference should properly be to “the RSPB’s Rainham Marshes nature reserve” (rather than “Greater Thames Marshes”).

We hope that these comments are useful and look forward to working with the Port of London Authority and other partners in the future.

## Thames21

### 1. Inland Freight

Goal: Thames21 fully supports the increased use of the river for freight. Firstly, because this could reduce lorry movements on the



roads and the corresponding problem of oils and heavy metals which are deposited to become a major pollutant of our rivers.

Secondly, because a vibrant and well-used tidal Thames is more likely to be one which is highly valued, which engages all sectors of the population and therefore increases motivation and efforts to ensure its environmental wellbeing.

## 2. Environment and Heritage

Thames21 believes that these two elements of the Vision are hugely important in their own right, could require different priority actions and that they should not be 'lumped together' under one heading.

Thames21 actively supports the Thames Tideway Tunnel as the most important initiative for many generations that will improve water quality in the River Thames. This work will lead to water quality improving to 'good' - which should not be listed as a separate 'action' in the text, as currently (re-wording is required).

A joined up Thames Path is an important goal which is strongly supported by Thames21 and widely amongst Londoners generally. Actions to help achieve it should be listed under 'Actions'. Thames21 will work with local communities and stakeholders to support and help deliver a joined up and well maintained Thames Path.

The biodiversity actions for the Tidal Thames are disappointingly unambitious, being restricted to those required for SSS areas. There should be additional plans to investigate other opportunities to improve biodiversity along the Tidal Thames, for example through installing new wildlife habitat, managed realignment etc, and to work in partnership with others to implement these plans where practicable.

No mention is made of plans to help address the issue of plastic and other litter in the Tidal Thames, despite its impact on the environment – particularly on wildlife, the community and navigation. The PLA should continue its excellent work through its Driftwood service and in partnership with Thames21, communities and other organisations to help tackle the problem both in the river and at source.

## 3. Passenger Transport

See comments under 'Inland Freight'.

## 4. Sport and Recreation

Goal: Thames21 supports this fully.

Actions: These actions are important and we support them completely. Thought will need to be given to resolving the increasing risk of potential conflicts in recreational use of the river, for example conflicts between canoeists and anglers, and between motor cruisers and small boat users.

## 5. Port of London

The success of the Port of London is something that London itself should be very proud of, but because most of the activity takes place further out into the Estuary and is slightly removed from the capital, it tends to fly under the radar of the average Londoner. There should be more public education and awareness of the current Port operation, its continuing success and the implications for the country and the capital.

## 6. Community and Culture

Goal: This goal is supported actively by Thames21, and the charity delivers activities and community programmes to assist in its success.

Actions: They must include improving practical access to the river and its foreshore if the goal is to be achieved satisfactorily. Access can include both facilitating groups onto the Thames foreshore, eg through organisations such as Thames21; by identification of the safest locations for Thames access; and also by improving physical access routes through the Steps and Stairs project which has continuing wide public support, but has yet to be implemented widely.

## The Greenwich Foundation for the Old Royal Naval College

The Thames is the greatest artery of London; it connects and provides a focus for the capital city. It also can act as a barrier between North and South. We would like to encourage the principle of greater connectivity both physical and in perception. Building stronger relationships with tributary rivers and their authorities and surrounding communities strengthens not only the Thames but the value of wastespace in all those communities. With the rapid growth of population particularly in the East we support attractive connecting towpaths, more piers and more choice of river buses. We also support more bridges and crossings but these need to be of a scale and style that adds to local communities and does not blight them as would large dual



carriageway motor vehicle bridges that are unsightly, environmentally unfriendly and demand excessive space.

The Old Royal Naval College and Maritime Museum are two of the top tourist destinations on the River Thames but there is greater potential to be promoted for the whole Greenwich area and surroundings to include the O2, the Queen Elizabeth Park and even Canary Wharf as river attractions. This links into using cultural festivals as complimentary activities to both highlight and utilise the River to public benefit.

The PLA cannot hope to be expert in all the activities that deliver public benefit from the Thames. However the PLA can facilitate by providing the right safe and attractive infrastructure, and then building many partnerships with specialist skills and resources to multiply the efforts of the PLA. This requires an outward looking and open culture perhaps facilitated by an extension of the governance structure to include 'Advisory' Boards to extend the PLA's knowledge, access to resources and engagement with the wider community.

## Your Tidal Thames Catchment Partnership & Thames Estuary Partnership

### Right Goals?

Yes, Your Tidal Thames (YTT) supports the high level goals of the PLA Thames Vision.



### Right Priority Actions?

The priority actions are appropriate for most of the goals. We are particularly pleased to see that the Catchment Plan is mentioned but if this could be changed to specifically say Your Tidal Thames Catchment Plan we'd be grateful. Also, any acknowledgement of your role as technical advisors on the project team would be great as it speaks to your level of commitment to the plan.

### Other Goals and Priority Actions?

Education is a key goal which we feel is missing. Interpretation on piers, wharfs and jetties would be very useful in communicating environmental messages and information.

The Environment and Heritage goal could be more ambitious. The PLA has a lot of power to be able to help integrate better environmental gains in riverside developments through

advocating for river wall habitat enhancements (where appropriate), greening of the Thames Path (SUDs) and habitat creation around redeveloped wharfs and piers. We feel a fourth priority action could state this intention, going beyond best practice and enhancement of the nature reserves.

Sports and Recreation should include access on to the foreshore. Although this is a tricky area in terms of health and safety, better maintenance of the steps and stairs through working with the landowners and third parties and promotion of foreshore access through PLA or trusted third party supervised events would promote not only the recreational potential but also help reconnect people to their Thames 'natural' environment.

Would like to see a mention of how you work in partnership with key organisations for a sustainable future and will continue to do so, a specific mention would show transparency of process and community involvement.

# Community and Culture

## Apostleship of the Sea

### Right Goals?

Broadly speaking, yes. As a charity committed to supporting seafarers we welcome the projections for growth in the port of London. We would invite you to ensure that as the port expands you continue to work in partnership with seafarers' welfare charities like the Apostleship of the Sea to ensure that port based welfare facilities meet seafarers' needs in accordance with the provisions of the Maritime Labour Convention 2006.



### Right Priority Actions?

Yes

### Other Goals and Priority Actions?

No

## Compass Point Residents Association

### Right Goals?

Generally yes.

### Right Priority Actions?

As one major environmental consideration has not been considered - perhaps they are not.

### Other Goals and Priority Actions?

There is a complete failure to address diesel emissions from all commercial vessels that use the river. Your claims about reducing HGVs is somewhat hollow when HGVs have emission mitigation to a considerable level and the vessels on the river have virtually nothing. The PLA need to lead the way by ensuring all your own vessels can meet similar emission levels as Euro 6 HGVs. Without having a vision to improve vessel emissions - it's an incomplete

vision. I would also like the Thames Path to be enhanced especially on the North side extending East from Island Gardens.

## North Kent College (National Maritime Training Centre)

### Right Goals?

Yes - I am particularly interested in how we (National Maritime Training Centre) work with the Thames Skills Academy.



### Right Priority Actions?

From an economic and environmental point of view, we broadly concur with the PLA's goals and priorities. Use of the river for construction materials in particular will be important to the delivery of London Paramount and Ebbsfleet Garden City. We would be particularly keen to ensure that we work closely to ensure that people who work on the river have the right skills to work safely and competently.

## Organisation of PLA Customers

The draft document makes the general claim "Overall, the most compelling single message was that people wanted to see more use of the river" (page 4). It occurs to us that the PLA would want to see more use of the river; it is your source of revenue, particularly freight traffic. Existing users of the river may however have an alternate view, more quality of use rather than more quantity - they may want the PLA to concentrate on their regulatory role rather than their revenue role and to better manage the existing use. The recent massive increase in damage and danger caused by excessive wash is an outstanding example of this - users of the river certainly do not want more wash. This rise in wash is clearly a direct result of the PLA's unilateral decision (and without consultation) to relax the 12 knot speed limit and allow speeds of up to 30 knots.

In fact the quote on page 4 of the draft ""Overall, the most compelling single message was that people wanted to see more use of the river"" does not tally with the PLA's own summaries of responses at <http://www.pla.co.uk/About-Us/The-Thames-Vision/Evidence-Base> , or indeed with the actual public responses. Of the 10 categories of responses devised by the PLA, only the 'Inland Freight' section seems to demand more use of the river,

with freight carriers unsurprisingly wanting the PLA to “develop piers/wharves/container facilities” and “promote and encourage river use”.

Section 2.3 ‘Passenger Transport – More journeys’. This section of the draft is quite shockingly one sided (given away by the title). It concentrates only on more passengers and devotes no thought to managing this, especially managing wash. In fact the wash problem is not mentioned in the entire section, not even under the heading “What is needed to achieve this goal in a safe and sustainable way? “

The wash problem only gets a mention in section 2.6 ‘Community and Culture’. There section 2.6 states “a roundtable discussion hosted by the PLA, make the case for increasing the number of residential moorings.” I was at that meeting and while I do recall the property developers present making that particular case, I also recall the representatives of the existing residential moorings making a case for better quality of moorings rather than better quantity. This returns us to the theme seeming to run throughout the vision – increases in quantity (and therefore PLA revenue) without regard to the PLA’s main role – regulating the safety of the river. Existing houseboat owners raised the issue of charges, transparency and even handedness of charging, visitor mooring fees and wash at the roundtable meeting. More openness and transparency in the enforcement of speed limits to prevent wash was discussed. None of this seems to have made it into the draft.

As regards wash, section 2.6 only covers the type of vessels and the mooring arrangements for the houseboats. It does not cover the main cause of inconsiderate wash – the method of operation of the vessels, in particular speed, acceleration and deceleration and the importance of passage plans to minimise wash in residential locations.

The concentration in 2.6 on the mooring arrangements is typical of the PLA attitude , namely ‘you are experiencing wash because your boat is not moored up correctly’. Houseboats have been moored in these locations for 50 years and more without issues. It is almost akin to a policeman saying "you’ve been raped because you weren’t dressed appropriately".

There should be a goal in 2.6 of setting up an efficient and respected reporting system for wash that encourages victims to report issues.

There should be a goal in 2.6 of open and transparent actions against wash offenders by the PLA. Prosecutions and warnings should no longer be issued in private.

There should be a goal in 2.6 of improving the PLA monitoring of speeding incidents on the Thames, including automatic identification of speeding from AIS data. It is the PLA’s job to

enforce speed limits and they should not rely on the public to have to report something before action is taken.

We are concerned that the draft does not properly address issues arising from the wash of high-speed vessels, mainly clippers and ribs. Since the 12 knot speed limit was relaxed, a fierce and often chaotic wash has become normal wherever these vessels operate, making the River dangerous and inhospitable for all other users except, possibly, heavy freight traffic. And it is not just the speed, but also the sudden acceleration and deceleration, which causes a surge.

The reference at Section 2.6 to wave heights of up to 1 metre is unhelpful, because it does not recognise the nature of the problem. The point is that the wash generated by wind and tide on most stretches of this River has nothing like the force of the wash caused by vessels travelling at high-speed. In particular the 1m waves as defined by Category C would not occur naturally (i.e. by weather) on a large section of the upper tidal Thames –therefore technically and legally this section would actually be Cat B not Cat C.

Furthermore, storm conditions take time to develop, making it possible to adopt safeguards or reschedule. Storms also eventually subside, allowing life to return to normal. The wash arising from high-speed vessels is remorseless and routine, occurring at frequent intervals every day and evening, causing sudden lurches and crashes.

Most residential boats and moorings can, and could always, cope with the natural elements experienced in this sheltered estuary. So, the problem is not the wind and tide, nor the residential boats and moorings, but the wash from vessels travelling at excessive speed, or accelerating and decelerating unsafely, or failing to take account of the river conditions such as states of the tide.

Wash from high-speed vessels now routinely exposes River users to injury and loss of life and limb. The perpetrators of the wash and the regulators have a statutory duty to eliminate or mitigate this significant hazard. Both should be mindful of the provisions of the Corporate Manslaughter Act 2007 should a fatality ever occur through failure to exercise this duty.

The force of the wash from high-speed vessels is also causing migration of river bed material. It is difficult to predict with any certainty what effect this is having on bridge buttresses and abutments, embankments and flood defences, but the consequences could be catastrophic.

Organisms living in the inter-tidal zone are adapted to cope with normal storm conditions, which are invariably followed by periods of calm allowing recovery. It is likely that the routine

and remorseless wash from high-speed vessels is having a serious long-term adverse effect on marine organisms in the River and the ecosystem of which they are a part.

Safety and sustainability are fundamental to the goals of Vision Thames. It is appropriate, therefore, to refer to the internationally endorsed Precautionary Principle: 'In order to protect the environment, the precautionary approach shall be widely applied by States according to their capabilities. Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation.' (Principle 15).

Unless measures are taken to reduce substantially the adverse effects of excessive wash, not only will it be impossible to achieve many of the goals set out in Thames Vision, but the River is liable to become degraded.

## Residential Boat Owners' Association

It should be noted that the RBOA is confining its comments directly to the matters within our purview and experience: these being residential boating, from static houseboats, via narrowboats and widebeams through to barges and sea going vessels (some of which have permanent home moorings) many of which cruise for part of the year and others who are continuous cruisers.



On the positive side the Thames Vision commitment to new residential moorings in appropriate locations is fully supported. There is no doubt that many benefits will accrue to the river and its adjacent communities, both aesthetically and economically, particularly to local businesses and councils. Bearing in mind the ever increasing need for residential moorings it would have been good to see a more positive determination to develop this aspect.

The experience of those of the RBOA membership who use the area covered by Thames Vision, whether permanently or occasionally, has consistently brought up issues of safety. There seems to be a percentage of river users both professional and amateur, who have a lack of understanding about the effects of moving water.

These hydrodynamic misunderstandings stem from a complete lack of recognition of the differences between the normal effects of weather, wind and tide, and the seriously

abnormal effects of conventional and chaotic wash (caused by hull shape, prop shape, wave shape etc.) and surge (caused by a combination of the washes and high speed acceleration/deceleration.) Weather effects, however severe, have a natural build up and let down. Boat behaviour is entirely sporadic and therefore violent in its nature and consequences.

There are areas of the Thames Vision that overlook the need to include the residential element of river users. The RBOA Memorandum of Understanding with the Port of London Authority should be the forum of experienced consultation on the specific elements of any proposed development that could/should include a residential capacity.

## River Thames Society

Response by the Chairman of the River Thames Society:

### 2.2. Inland Freight.

Crossrail and the Lea Tunnel are given as examples of construction projects using the river – also suggest adding the Blackfriars Station extension, for which almost all work was undertaken by river and the Robert Wynn & Sons movement of Concord and other large loads on “Terra Marique”.



I know Jim Trimmer won't mind being quoted and I came across his contribution to a 2005 London Rivers Association (a body now sadly defunct) Forum called, interestedly, “What's Happening on the Thames? Is there an Emerging Vision?”

He said as a key action Financial Equilibrium: River transport is still more expensive than road transport. If road transport is not made more expensive through road pricing – which currently is very unlikely to happen- then the only alternative is to improve the financial benefits for river transport. Freight Facilities Grants are currently available for capital costs, which has helped, but should be expanded to cover the variable revenue cost of running river transport. PLA is pressing DfT for this. We need a carrot for river transport.

Is any of the above still relevant?

The London Waterways Commission supported a proposal from the Canal & River Trust to develop a Water Freight Knowledge Hub – a web based portal to function as a repository for London specific water based reports, navigational information, freight best practice and case studies.

I believe the PLA has supported this project.

Is there a place for a River Freight Concordat rather than extending the successful River Concordat, to involve shippers, agents, brokers etc?

Perhaps worth noting that Alan Yarrow, the new Lord Mayor of London is a ship broker, member of the Baltic Exchange, a Younger Brother of Trinity House and a former rower.

#### 2.4. Sport & Recreation.

On existing visitor moorings, I would say they are all dependent on availability, rather than just Limehouse Marina, St.Katharine Dock and Imperial Wharf.

Perhaps useful to focus on developing a few sites, with the PLA taking the lead - bringing together local authorities and commercial interests - such as Richmond Town Centre and Greenwich - where no readily available alongside visitor moorings exist . Their creation would assist local economies, enhance river life and encourage more visiting boaters

#### 2.6. Community & Culture.

The Vision refers to “ramblers, historians, artists and others “, but surely the latter category is very important, as it presumably includes Londoners and tourists, foreign or domestic?

On providing information about the river and related activities – Visit London has a river section on its web-site and there is also the mainly non-tidal [www.visitthames.co.uk](http://www.visitthames.co.uk), supported by local authorities and the Environment Agency under the aegis of the River Thames Alliance.

Perhaps discussions between these sites and Totally Thames to see how best to publicise / market tidal events?

I would suggest that the culture, heritage, tourism aspects deserves pride of place and feel that the section on houseboats doesn't fit in here – perhaps with that on developing other moorings – as many existing houseboat pontoons etc. have spaces for visiting boats.

## Totally Thames

Response by the festival director

I think the PLA is occupying a really important strategic position in seeking to identify wider goals for the Thames – as a place to live and work, its use for commercial and recreational interests, its value to London as an environmental amenity and its rewards as a visitor attraction within its own right.



As you know, Totally Thames has become a valuable tool for London & Partners and local authorities to encourage visitation to London during what has traditionally been a shoulder month for tourism. Indeed, its 215 events in 2015 achieved significant media interest and reached an audience of 2.6 million people, thereby contributing significantly to the London economy. The river is at the heart of all of this activity and I consider that these play a valuable role in:

- Commissioning and creating great art and culture for the Thames and its environs
- Developing opportunities for more river journeys
- Working with partners to open up and promote participation in river sport
- Lobbying for an improved Thames environment
- Encouraging more people enjoying the river and its river banks
- Nurturing positive perceptions of the Thames
- Educating young people into a greater understanding and appreciation of the river

Regarding the PLA's consultation:

1. I think it is excellent that you endorse the role of Totally Thames and I urge you to continue doing so, thereby recognising and valuing well organised events and activities on and around the river as opportunities to promote engagement with the Thames and its many and varied assets.

2. I urge for a more coherent 'voice' for the river at City Hall. Merging the interests and lobbying forces of the current Concordat and River Commission would seem to be sensible.

## West London River Group

For the most part the Goals and Actions are “motherhood and apple pie”. They will be welcomed by most, and have already been well rehearsed in documents like the Thames Strategy – Kew to Chelsea. Sadly there is very little that is new.

We note that one goal and set of priority actions is headed “Environment & Heritage”. However the PLA’s “Vision” has no reference to heritage goals or priorities.

The PLA’s Vision should recognise the Thames Strategy and its analysis of the river’s different character areas, heritage and preservation of views.

We welcome the proposal to create sport opportunity zones, particularly Putney Bridge to Chelsea. But there is a need to say how this will be done – for a start the PLA should remove unnecessary moored craft which obstruct navigation, develop safe movement channels for sporting and recreational craft, and enforce speed limits and wash limitation.

The PLA should insure that riverside development does not adversely impact recreational and sporting use. It failed to do this with Fulham FC’s plan to encroach into the river, and block wind patterns, which clearly threaten the future of sailing on this stretch of the river.

The PLA is right to support residential moorings in appropriate locations, but they need to be appropriate vessels – not floating flats. The PLA’s “Vision” does not address this issue.

The PLA talks about “Passenger Transport: More Journeys” and “More people enjoying the Thames” but does not follow the logic of this by exploring the option of increased tourist boat services, particularly upstream, and incorporating the numerous sites of heritage importance.

The PLA makes no reference to water abstraction issues. In present circumstances they may not be a problem, but a twenty year look ahead should assume they will be.

# Riparian Boroughs and Other Public Sector

## City of London Corporation

Right Goals?

The goals identified in this vision are in line with the City of London's aspirations for the river and riverside in the City.



Port of London: more trade more jobs

The City of London Local Plan 2015 identifies the City as the world's leading international finance, business and maritime centre (paragraph 2.1). The City of London provides a wealth of maritime services including ship-broking, insurers, commercial and investment banking, trade finance, commodities, legal and accountancy services. Promotion of the Port of London and the River Thames particularly through private sector investment will depend on these services for its success.

Inland freight: more goods off roads onto the river

The Local Plan promotes the use of the River Thames for freight and waste movement, safeguarding Walbrook Wharf as a wharf suitable for river transport of materials including waste and supporting the inclusion of river transport in assessments and construction logistics plans for new development. The PLA should consider the opportunities presented by the river to support consolidation of freight and servicing, removing unnecessary service vehicles from the road network. The on-going protection of river piers and wharves should be based on clear economic, environmental and social benefits resulting from the use of such infrastructure.

Passenger transport: more journeys

Local Plan Policy CS9 Thames and the Riverside and the associated Thames Strategy Supplementary Planning Document supports greater use of the River Thames for passenger transport through retention/ re-provision of Blackfriars Pier and access to Tower Pier from the City's riverside walk. The possible reinstatement of Swan Lane Pier for passenger transport could also provide greater capacity in one of the busiest locations on the river.

Sport and recreation: more participants

The Vision identifies that some parts of the river in central London are already at capacity in terms of numbers of vessels at peak times during the summer, and notes that some river

uses are not compatible in certain stretches of the river. The promotion of greater recreational use of the City's stretch of river would need to take this into account avoiding further activity at peak times.

Environment and heritage: Improved tidal Thames environment

The City Corporation supports the Thames Tideway Tunnel, the completion of the Thames path and improvements in biodiversity associated with the Thames which is a designated Site of Metropolitan Importance for Nature Conservation. In parallel with this the City Corporation is committed to conservation and enhancement of the City's heritage assets many of which are on the riverside, and protection of the archaeological potential on the foreshore. This section should include greater emphasis on the historic significance of river related heritage assets within and adjacent to the river.

Community and culture: more people coming to enjoy the Thames and its banks

The implementation of the City of London's Riverside Walk Enhancement Strategy will further improve access to the City's riverside for residents, workers and visitors to the City.

The City Corporation supports these goals as suitable aspirations for Thames Vision between now and 2035.

### **Right Priority Actions?**

Many of the priority actions shown in fig 1 are applicable to the City's central London location, and will require careful integration into the wider environment to enable their successful implementation. For example:

Establishing the Thames as the default choice for transport of waste and construction materials may be practical for riverside developments but could increase local traffic if applied to developments further away from the river. This action should be redefined to focus on developments within a certain distance of the river.

Making more efficient use of piers and river space may require landward infrastructure to be modified to cope with altered pedestrian movement.

The proposed long term pier strategy should consider the benefits of reinstatement of Swan Lane Pier to increase passenger capacity in central London.

Monitoring of the impacts of the Thames Tideway Tunnel on water quality will be needed to verify whether targets have been met or what additional measures will be needed to improve biodiversity.

The overall aspiration for greater use of the River Thames will have implications for the riverside environment in riparian boroughs and the City of London, which should be considered throughout the development and implementation of this plan.

### **Other Goals and Priority Actions?**

Climate change resilience and adaptation should be included in the Thames Vision goals for 2035. The context section of the consultation document identifies climate change and flood risk as having a potential influence on the future river. It states that a decision on the Thames Barrier replacement will not be needed before 2035. However other infrastructure to address climate change could be more easily incorporated into new development along the riverside now than retrofitted later. The Thames Estuary 2100 Plan will require flood defence raising along the riverside in central London later this century. The PLA Vision could include strategic planning for this work such that riparian development could take account of the flood defences needed during the lifetime of the development. Further actions could provide resilience against the impacts of more extreme weather events and warmer summer temperatures particularly on the south facing Thames riverside. Measures to minimise the impact of climate change on biodiversity could also be included.

Section 2.5 Environment and heritage concentrates on actions to improve the environment. There should be more emphasis on actions to address heritage issues.

There should be some reference to the funding mechanisms for these actions to ensure that they are deliverable.

## **Gravesham Borough Council**

### 1. Port of London

GBC recognises the positive economic impact and importance of the River on the local economy – employing 1,543 FTE in the borough with a total GVA impact per annum of £150m (2015 River Thames Economic Prosperity PLA document). This is an uplift from 2010 from 1,434 FTE and GVA impact per annum of £120m.



Whilst in general agreement with this part of the vision, GBC objects to a Lower Thames Crossing immediately to the east of the urban area of Gravesham given the substantive case for this location has not been made by Highways England relative to other options.

Closure of level crossings affecting operational terminals should not adversely affect other land uses or preclude safe pedestrian or cycle access along or to the riverfront where possible.

## 2. Inland Freight

GBC generally supports this section of the Vision but notes that the PLA has in the past promoted the creation of a Centre of Marine Excellence at Gravesend adjacent to and including its operational centre at Denton Wharf. Gravesham supports the principle of such a development as consistent with the wider mixed-use development of the area and would like to see the PLA investigate its feasibility further.

It is noted that no location has been identified for the Thames Skills Academy. GBC assumes that, at least initially, it will be a virtual academy but, if some physical presence is needed in due course, there could be clear synergies with a Centre of Marine Excellence at Gravesend.

In terms of the protection and reactivation of safeguarded wharves, it is noted that the planning system needs to perform a number of roles to achieve sustainable development. The London Plan and the Mayor of London's Safeguarded Wharves review (2013) considers the viability of wharves in their approach to safeguarding and provides exceptions – i.e. the policy states that 'redevelopment of safeguarded wharves for other land uses should only be accepted if the wharf is no longer viable or capable of being made viable for waterborne freight handling' and our expectation is that a similar approach is needed for the future.

## 3. Passenger transport

GBC supports this part of the vision and the goal of encouraging the use of the River Thames for passenger traffic.

The potential synergy with London Paramount and Ebbsfleet Garden City is noted, particularly in terms of promoting new piers at Greenhithe, Swanscombe and Grays to facilitate passenger traffic both up and down and cross river.

As owner of the historic Gravesend Town Pier, GBC recognises the benefit of additional piers on the Thames between London and Gravesend and how this would help to attract

new pedestrian/ Commuter/ tourist and leisure services. GBC would therefore welcome the opportunity to engage with the development of a long-term pier strategy.

Facilitating cross river traffic in this area (including at the existing Gravesend – Tilbury Ferry) has the potential to reduce demand placed on Dartford River Crossing and would serve to extend the regeneration benefits of London Paramount and Ebbsfleet Garden City to the north of the river into Thurrock.

#### 4. Sport and Recreation

GBC supports the concept of greater participation in sport and recreation for the economic, health and cultural benefits that can accrue.

Attention is drawn to the strategic location of Gravesend between London and the coast and its potential as a focus for longer distance sailing and cruising trips

The synergy between recreational boating and boat building/repair should also be recognised – this also possibly tying in with the concept of a PLA Centre of Marine Excellence at Gravesend.

#### 5. Environment and Heritage

GBC supports the general thrust of this part of the vision, particularly in relation to the Thames Path; improvements to the water environment and achievement of WFD objectives; and the aim of bringing SSSIs (including SPAs and Ramsar sites) up to favourable condition.

Thames Estuary 2100 (TE2100) implies major interventions that should be used to achieve multiple objectives in relation to flood defence, landscape and the environment etc.

The Vision has no goals set out in terms of heritage and this is a serious omission that needs to be addressed. On this it should be noted that Gravesend prides itself as a heritage riverside town, the fortunes of which have often been tied directly to levels of activity of the river itself.

#### 6. Community and Culture

The potential for increased visitor numbers to conflict with environmental objectives, in terms of protecting sensitive habitats from damage or disturbance, needs to be recognised.

Visitors need to be directed to areas which are designed to have sufficient carrying capacity to accommodate them without adverse environmental impacts.

GBC would welcome the opportunity to promote Gravesend's riverside heritage offer to visitors under the brand of Totally Thames.

## Kent County Council

The River Thames benefits Kent in a number of social, environmental and economic ways. The unique environment attracts tourism to the area, which in turn supports businesses and creates a number of employment opportunities. With a number of large scale developments planned in North Kent, it is vital that the river is utilised to its full potential as described in your vision document. The lack of crossing capacity of the



Lower Thames is a key inhibitor to economic growth and it is essential that Government deliver a new Lower Thames Crossing to the east of Gravesend. I therefore would be extremely grateful if the Port of London Authority responds to the current consultation by Highways England giving support for a new Lower Thames Crossing as this aligns with your vision for the River Thames.

Your proposed 'vision' identifies a range of aspiring, yet achievable opportunities to further enhance the services which the Thames can provide. I fully support the goals and actions proposed for a long-term vision for the Thames and further advocate a number of the emerging priorities.

The Port of Dover is the largest roll-on roll-off port in the UK. This results in a large number of freight vehicles using Kent's strategic road network for access to and from the Port. By increasing the amount of goods and materials moved between wharves on the river Thames, there is the potential to reduce the number of lorry trips on Kent's highway network. Sustaining a record level of freight carried by water and replacing 550,000 lorry trips would help to relieve congestion and reduce disruption caused by incidents such as Operation Stack and the ongoing problem of inappropriate lorry parking, something of which KCC is working closely with stakeholders to find a suitable solution.

As previously mentioned, KCC strongly supports a new Lower Thames Crossing located to the east of Gravesend, providing connectivity to Tilbury. KCC agrees that a new crossing would further support the expansion of the Port of London, resulting in more trade and increased employment opportunities. This would also reduce pressure on the M25 and the

existing Dartford Crossing by improving connectivity to the M2/A2 and help to better manage the predicted increase in freight traffic volumes.

Kent County Council will continue to provide support to the development of a long-term vision for the River Thames and is happy to work in partnership with the Port of London to ensure that mutually beneficial aspirations are achieved.

## London Borough of Barking and Dagenham

The London Borough of Barking and Dagenham welcomes this opportunity to provide our comments on the proposals set out in the Port of London Authority consultation on its 20-year vision for the river Thames. Our views primarily relate to the section of the river between the Thames Barrier and Southend.



### Thames Vision 2035

The Council is broadly supportive of the priorities and proposals outlined in the Vision document. We consider that there is enormous potential for all types of river use to grow in the future. However, this should be done in a safe and sustainable way and in close collaboration with a range of partners, including local authorities, businesses, developers and the wider public.

The Council harbours particular ambitions for greater use of the river Thames for transporting freight and passengers and to enhance cultural/recreational opportunities for the borough's wider community.

In respect of the emerging goals and proposed priority actions contained within the Vision document, we have the following comments to make:

#### 1. Port of London

With the forecast growth in trade in the Port of London, significant improvements to the transport infrastructure in east London will be required. Chief among these will be the requirement for new river crossings at Gallions Reach and Belvedere. However, the Council is of the view that these should be in the form of either a bridge or tunnel as these are likely to prove more resilient and will be able to cope with significantly greater volumes of traffic than ferries. They also provide the opportunity for new cross-river public transport links.

The Council supports the delivery of major highway improvements along the A13, including the provision of a tunnel at Castle Green and improvements to the busy A13/A406 junction, as a means of reducing congestion and delays on the road network. In addition, plans for a new road link for local traffic and public transport across the River Roding, from Creekmouth to Gallions Reach, are currently being explored by Transport for London as a means of connecting the 10,000+ homes being progressed at Barking Riverside with the significant employment opportunities planned for the Royal Docks and to help relieve some of the pressure on the A13.

## 2. Inland Freight

The Council strongly supports the case for more freight to be transported by river as a means of reducing congestion on the local road network, improving safety for vulnerable road users such as pedestrians and cyclists and reducing carbon emissions and improving local air quality. For example, as part of the proposals to extend the London Overground to Barking Riverside, there is likely to be a requirement for certain building and waste materials to be transported by river. In addition, there are a number of safeguarded wharves in the borough and the Council is keen to explore with land owners/developers the potential for bringing some of these back into use for the transportation of a variety of freight.

## 3. Passenger Transport

It is important to increase the use of the Thames for passenger transport to alleviate pressure on London's roads and improve air quality. The Council would like to see better use of the river made in this respect and supports the proposals in the Mayor of London's River Action Plan to extend passenger services to Barking, linking in with the development at Barking Riverside. We consider this could be achieved by 2025.

## 4. Sport and Recreation

The Council is broadly supportive of the plans to increase participation in sport and recreation on the river providing this is done in a safe and sustainable way and a commitment made to providing appropriate supporting infrastructure.

## 5. Environment and Heritage

Plans to clean up the Thames and to improve wildlife habitats are crucial if greater use of the river is to be made – particularly for sport and recreation. The Council therefore supports the building of the Thames Tideway Tunnel by 2023, although more needs to be done in the interim to stop the discharge of sewage and other waste material into the river network. In

addition, improvements to flood defences along the river are critical, particularly given the scope of development planned in the Thames Gateway area.

The Council is supportive of the idea of a continuous path along the north bank of the Thames and would be keen to work with the PLA and local landowners to establish how this could best be achieved in Barking and Dagenham.

## 6. Community and Culture

The Council welcomes the proposals outlined in the Vision document to attract more people to the Thames and its banks. Barking and Dagenham has a rich cultural heritage, particularly centred on the fishing industry and the Council is keen that any proposals for enhancing the cultural offer of the river in the borough reflect this."

## London Borough of Bexley

The Council welcomes this opportunity to engage with the PLA in developing its Thames Vision. The Council generally agrees with the emerging goals but adds comments on the emerging priority actions below.



**LONDON BOROUGH OF  
BEXLEY**

### Right Goals?

#### 1. The Port of London

The London Borough of Bexley is producing a growth strategy seeking to deliver approximately 24,500 homes and 10,500 jobs particularly in key growth areas in the north of the borough, near to the River Thames, over the next 15-20 years. A growth Direction of Travel document has been jointly endorsed by Bexley and the Mayor of London that seeks to deliver growth, premised on the delivery of new infrastructure and services, particularly transport infrastructure. The document is available at the following link - [www.bexley.gov.uk/index.aspx?articleid=19057](http://www.bexley.gov.uk/index.aspx?articleid=19057). Bexley looks forward to working with the PLA to help deliver growth and much needed infrastructure to Bexley Borough.

The London Borough of Bexley and neighbouring local authorities continue to lobby Government for an extension to Crossrail from Abbey Wood to Gravesend as part of a package of major transport infrastructure necessary for the delivery of projected growth in

the borough and sub-region. This scheme should be included in the “emerging priority actions”.

With respect to the proposed new river crossings, the Council supports, in principle, the Silvertown Tunnel. In addition, the Council is indicating a neutral stance on a Gallions Reach fixed crossing so long as it is part of a package of crossings including a fixed crossing at Belvedere which must be provided in advance of a crossing at Gallions Reach. The Belvedere crossing is strongly supported by the Council given its regeneration benefits subject to the effective mitigation of any negative impacts. Regarding the Lower Thames Crossing the Council supports in principle any of the location C options currently being consulted on.

## 2. Inland Freight

The Council supports, in principle, increased use of the river to transport freight. The safeguarding of wharves and encouraging the transport and accessibility functions of the river are reflected in the Council’s Core Strategy policies.

Taking freight movements off roads and on to the river would be very beneficial for areas in the north of our borough which have strong industrial usage which, whilst important, do cause issues for residential communities. Through interaction with local businesses, we also know that the levels of congestion can harm business profitability. By moving freight traffic on to the river, it would help ease congestion on our transport network and help revitalise our riverside communities.

What is currently missing from the Vision is a commitment by the PLA to work with local businesses on key areas of the riverfront as they are not only a key landowner in some places, but can also provide private investment for worthwhile maritime uses. The Council would also welcome a comprehensive study by the PLA and Transport for London (TfL) on the future uses of wharves along the Bexley riverfront, particularly in light of the significant changes that may occur as a result of Bexley’s emerging growth proposals. There are potential conflicts between the uses along the river and we would like to make sure that an assessment is conducted to identify these and propose potential solutions.

## 3. Passenger Transport

The Council supports, in principle, more passenger use of the river. Due to Bexley’s location far downstream, commuter-type services into central London are unlikely to find any significant market. However, as more riverside development goes forward and the Borough’s proposals for growth are delivered there could be a growing justification for more passenger

links along and across the river. The pier at Erith seems to offer an ideal opportunity for developing such links, although it will need major works to bring it up to the necessary standards or total replacement.

London Paramount may well introduce Thames-borne passenger services which could usefully stop off at Erith. To increase commuters on to the river we consider there are opportunities to bring river fares into line with other forms of London public transport run by TfL.

#### 4. Sport and Recreation

The Council notes that the priority actions do not include any specific proposals for improvements along the Bexley river frontage, which is a pity, particularly in light of Bexley's emerging growth proposals. The Vision Plan indicates a recreational area at the western edge of the Borough. Consideration should be given to extending this area eastwards to achieve the full leisure potential of the Borough's river frontage. The potential direct impact on biodiversity of the proposed recreational uses shown on the map to the east of Erith needs to be considered. Protected species such as bats, and water voles on the marshes could be impacted in addition to other species. Policy protection through the London plan and Bexley Core Strategy exists in relation to the biodiversity value of this area. The area is identified as (M031) River Thames and Tidal Estuaries Metropolitan site of nature conservation. In addition (M107) Crayford Marshes Metropolitan site of nature conservation is adjacent. Both of these sites are of London significance for biodiversity.

Further information on Bexley's SINCs can be found at:

<http://www.bexley.gov.uk/article/12495/Sites-of-Importance-for-Nature-Conservation-in-Bexley>

#### 5. Environment and Heritage

The Council notes that the priority actions do not include any specific proposals for improvements along the Bexley river frontage.

However, the need for securing a footpath route along the riverside and maintaining access to the riverside, and opportunities for improving the quality of the natural environment, are included in the Council's Core Strategy and saved UDP policies.

While the consultation document makes reference to flood risk and the Thames Estuary 2100, it is dismissed as being outside the time frame of this vision. It is clear that unprecedented climate events will continue to happen over the coming decades and

therefore flooding should be a component in the Thames Vision. Bexley is at risk from surface water flooding and the Port of London Authority should consider if there are any actions that can be taken to help mitigate this risk.

Sustainable development should be an underlying principle across all the priorities as we consider the next few decades. For example poor air quality is an important issue to Bexley and as transport emissions account for between 25% and 30% of all emissions the Port of London Authority can play a key role in helping to mitigate the problem. As well as providing an alternative means of transport there is the opportunity to integrate renewable energy into the activity on the river. The shipping industry is growing, and we would like the Port of London Authority to ensure as much as possible that its growth is as environmentally sustainable as possible.

Policy protection through the London plan and Bexley Core Strategy exists in relation to the biodiversity value of this area. The area is identified as (M031) River Thames and Tidal Estuaries Metropolitan site of nature conservation. In addition (M107) Crayford Marshes Metropolitan site of nature conservation is adjacent. Both of these sites are of London significance for biodiversity.

Further info. on Bexley's SINC's can be found at: [www.bexley.gov.uk/article/12495/Sites-of-Importance-for-Nature-Conservation-in-Bexley](http://www.bexley.gov.uk/article/12495/Sites-of-Importance-for-Nature-Conservation-in-Bexley)

An area within the Thames is classified as 'GLA 39: Erith Submerged Forest, Potential RIG' This is the best place on the Thames Estuary within Greater London for viewing the Neolithic / Bronze Age submerged forest. At low tides whole tree trunks are revealed amongst the root balls and occasional nuts and seeds can also be found. Further details can be found at: <http://www.londongeopartnership.org.uk/gla39.html>

## 6. Culture and Community

The Council notes that the priority actions do not include any specific proposals for improvements along the Bexley river frontage. Given the emerging proposals for growth in Bexley, particularly in the north of the borough, it would be beneficial to consider the potential for improvements in this regard and for the Council and PLA to co-ordinate future proposals.

## 7. Opportunity Map

The Council notes that as part of a recent exercise with the GLA and PLA on Safeguarded Wharves, Mulberry Wharf, Railway Wharf and Town Wharf have been proposed to be

released from safeguarded status, due to surplus capacity in South East London and the conditions at the wharves, including approaches to the berth. Details of the published report can be found at:

<https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/safeguarded-wharves>.

Bexley looks forward to working with the PLA to discuss its emerging growth proposals and how these would affect potential future designations and safeguarding of wharves.

## London Borough of Camden

### Right Goals?

The consultation document sets out a wide-ranging list of emerging goals:



- Port of London – More trade, more jobs The busiest ever Port of London, handling 60 – 80 million tonnes of cargo each year, on the doorstep of Europe’s biggest metropolitan consumer market
- More goods off the roads onto the river More goods and materials moved between wharves on the river – every year sustaining the record level of 5.5 million tonnes carried by water in 2014 – taking 550,000 lorry trips off the region’s roads
- Passenger transport– more journeys Double the number of people travelling by river – reaching 20 million commuter and tourist trips every year
- Greater participation in sport and recreation on the water
- Environment and heritage – improved tidal Thames environment The cleanest Thames since the Industrial Revolution, with improved habitats in the water and on adjoining land
- Community and culture A riverside which is a magnet for ramblers, historians, artists and others, whether living nearby, on the river or travelling from further afield

For Camden the first two of these are the most important as they promote sustainable economic development while reducing road traffic. Congestion and traffic dominance are important issues for Camden and central London; removing freight traffic from roads helps to improve local air quality while assisting road safety, particularly regarding reducing

casualties for cyclists (currently growing rapidly in Camden) and pedestrians. Camden can supply its statistics on cycle counts to the PLA.

### **Right Priority Actions?**

The Thames Vision will need to look more closely at the relationship between moving materials by water and rail in conjunction with one another and what infrastructure requirements may be needed.

The idea of a Thames brand for culture and heritage (p24) is intriguing. The lack of one place that shows what is on offer suggests that a River Thames website would be desirable, if not something like a River Thames museum as well. 'Joining up the offer' could be a useful marketing and promotional tool but should not be limited to attractions along the river. Some of London's most visited attractions are located in Camden (e.g. the British Museum and Camden Town markets). Tourist information about river transport should also provide information about onward travel by public transport to attractions within easy reach of the river.

### **Other Goals and Priority Actions?**

In taking the Thames Vision forward it would be helpful to understand which projects would have the greatest impact and returns on investment. This begs the question how should benefits be measured. It would be desirable that some form of multi criteria assessment is developed as a framework to compare the relative worth of schemes. It is suggested that these indicators should include but not be limited to the following:

1. The contribution to job creation.
2. The contribution to London's economic output. Consideration would be needed regarding particular sectors.
3. The change in the quantity of materials moved by sustainable means (water and rail) and the extent to which tonnage is taken off roads. Analysis will be needed for different freight sectors.
4. The number in passengers travelling on the Thames, by different sectors (commuting, leisure, etc.).
5. The contribution to reducing greenhouse gases and improving air quality by reducing key emissions, notably NOx and particulates.

6. The extent to which projects promote tourism in London, both at venues next to the river and also within easy reach.
7. The take up of sport and leisure activities associated with the river.
8. Measures indicating the quality of water in the Thames.
9. Measures showing improvements for wildlife and biodiversity.

Other important measures include social indicators (e.g. reducing deprivation, reducing inequality) and the assistance that the Thames Vision gives to London's house building programme.

The above framework, by focussing on outputs, would help to develop priority actions in a strategic sense.

#### Main location of interest

Camden's main concern is in the way water transport can help move freight off the road, and consequently of the three stretches of river the consultation material refers to Camden's key stretches of interest are Putney Bridge - Thames Barrier and Thames Barrier - Southend.

#### Timescale

It is intended that the Thames Vision covers a 20-year framework. While this may be sufficient for the immediate goals and priorities covered in the consultation material a longer timescale is needed to consider other infrastructure requirements such as a Thames Barrier replacement/enhancement and additional rail infrastructure and interfaces that may be required to support water freight activity. The Thames Vision should discuss and set out longer term requirements.

## London Borough of Hammersmith and Fulham

### Right Goals?

We agree in principle with the Goals set for 2035. It will be important for the PLA to work with relevant local planning authorities and the Mayor of London to achieve these goals, many of which will require the support of policies within local plans and the London Plan.



### Right Priority Actions?

In respect of actions required, there will be a need to develop these in more detail. Working with a wide range of partners on the actions will be even more important than agreeing the goals, and in many cases there will need to be specific site policies and new or enhanced topic policies within local plans. The council notes that specific reference is made to protecting and reactivating Hurlingham Wharf which is located in LBHF. The council will wish to work closely with the PLA on the future of this site which for the next 7 or more years is the location for a main shaft drive site for the Thames Tideway Tunnel.

### Other Goals and Priority Actions Needed?

Under the section Community and Culture, we consider that one of the Actions should be to increase connectivity between the river and its hinterland, thereby allowing more people to enjoy this multi-functional resource.

## London Borough of Hounslow

The London Borough of Hounslow supports the vision for the River Thames as highlighted in the PLA document particularly supporting the vision for greater use of the river for sport, recreation and cultural enjoyment.



## London Borough of Hounslow

Part of the London Borough of Hounslow is along the River Thames and the Council already actively supports the Thames Strategy Kew to Chelsea and the Thames Landscape Strategy: Hampton to Kew working with Partners to improve the river for people and its environment.

The emerging goals and priority actions are in line with our current priorities within our Cultural strategy particularly looking aligning with:

- Improving Environment and Heritage
- Increase participation in Sport and Recreation
- Improve the environment for people to enjoy the Thames and its banks

One of our present priorities is to develop one of our sites along the Thames, Dukes Meadows, an important sport and recreation hub along the river. Our aim is to improve facilities on site focusing on developing a state of the art water sport facility, increasing

success for users and young people. Dukes Meadows offers great opportunities and has incredibly good potentials to become a regional destination.

The Thames Vision is timely for the shaping of this project and matches our values and aspirations for the wider development of the river Thames in the London Borough of Hounslow. We consider PLA a key stakeholder for the implementation of our aspirations and I trust we can continue to work together to develop and improve our great river Thames for the benefits of London and Hounslow's residents.

## London Borough of Newham

### Right Goals?

Overall the London Borough of Newham is supportive of the development of the Thames Vision 2035 alongside the ongoing engagement between the Port of London Authority and the associated stakeholders at the Vision of the



Thames is developed. In particular recognising how the Thames Vision, can broadly develop in a range of areas in particular trade, travel, leisure and culture and environmental factors.

Our further comments are detailed below and support further ongoing consultation with the Borough's to ensure objectives are met. Please note that the above opinion represent Officer level commentary, offered without prejudice to all future formal Council decisions and accompanying procedures. The goals cover a range of subjects which seek to provide valuable contributions to economic growth, cultural and social enjoyment whilst ensuring the highest standards of environmental protection and enhancement. LBN support the aim to improve the growing river usage but key to this will be ensuring the goals set out provide valuable contributions to achieving sustainable development in London and aligned with aims set out by LBN.

### Right Priority Actions?

Sustainable development should be an underlying principle of all priority action areas. The consultation document seeks the reactivation of Peruvian Wharf (PW) into operation. The objectives (CS Policies S3, J1 and J2) for the area seek the consolidation and/or relocation of the four safeguarded wharves in the Royal Docks. The site in which the wharf sits is currently designated as SIL (E2 Thameside West for B uses and high technologies and

green industries). The CS outlines that the Council will work together with other public sector agencies to investigate further proposals for relocating or consolidating the four safeguarded wharves at Thameside West to facilitate a more efficient use of land. The basis in which the reactivation of Peruvian Wharf will need to be considered in context to the release of land in the vicinity, consolidation of others wharves and development activity in this area.

Consideration should be made in reference to the widening of the A13 (by 2018) in relation to the knock on traffic impacts along the section of the A13 within Newham, which is already identified as a busy road which forms a ‘major barrier to movement’. Primarily the impact is in relation to road capacity which may be predicated due to the lack of measures by surrounding Boroughs sections of the A13. LBN would welcome any traffic management measures i.e. through the control of traffic speeds, lane arrangements rather than physical civil work such as widening. This in turn may increase road usage along the A13 and would support sustainable measures to reduce congestion. LBN would therefore like to raise these points and to ensure sustainable development is achieved and for LBN to be kept informed on this progress.

## London Borough of Tower Hamlets

Tower Hamlets Council is keen to cooperate with the Port of London Authority and other relevant stakeholders to ensure that the River Thames is valued as an important asset and being promoted for its passenger, recreational tourism and freight uses. It’s also important that consideration is given for the natural environment, water quality and restoration of water spaces. Tower Hamlets Council supports the overall approach set out in the consultation document.



Tower Hamlets Council has commenced work to prepare a new Local Plan since 2015. The emerging 20-year Development Framework for the river will be a key evidence to support development of the Local Plan policies. In order that the new Local Plan is effective and compliant with national planning policy and guidance, the Council will seek assistance from your organisation during the preparation of the draft Plan in 2016. Therefore, we would welcome the opportunity to be more closely involved in any discussions around the emerging Framework. In particular, we would like to have better understanding of the

commissioned evidence studies and the implications to Tower Hamlets and its neighbouring boroughs.

## Royal Borough of Kensington and Chelsea

The four main issues covered within the Context section are: the population growth of London, the Thames Tideway Tunnel project which will clean the Thames, the effects of climate change and the fact that growing river use has to be achieved with high levels of safety. These are all very relevant issues which will affect Londoners now and in the future. However, the Council considers that the document has not addressed all these issues fully for the reasons given later on in this response.



THE ROYAL BOROUGH OF  
KENSINGTON  
AND CHELSEA

The Port of London trade forecasts, to the year 2035 paper (referred to in pages 5 and 11 of the consultation document) show different results for different types of cargo. It seems that trade will grow for export/import of vehicles, aggregates and cement, intra and inter port trade. Petroleum products and other cargoes (combination of individual forecasts of a number of dry bulk, liquid bulks and general cargoes) show variations between increased and decreased forecasts depending on the scenario chosen. It is understood that most of the information from the report has been withheld due to commercial confidentiality. However, from the results shown on this summary, it is not clear if there will be a net growth in port trade or not. This does not seem to correlate very well with section 2.1 of the document which sets a goal of between 60-80 million tonnes of cargo per year (the largest tonnage ever in the Port of London was 61.6 million tonnes in 1964). It is not clear why current tonnage figures have not been included to assess what is the goal's percentage increase in respect to the existing trade.

Thames Vision 2035: emerging goals and priority actions.

The vision for the Thames includes the intensification of the use of the Thames for trade, jobs, river transport for goods and passengers, sports and recreational use and community and cultural uses. Environmental improvements have also been included together with reference to the provision of new residential moorings at appropriate locations. The Council supports the goals included in the vision to achieve a sustainable intensification of the different river uses. In particular, we consider that the use of the river for transport of construction materials is extremely important. The Council has supported the use of the river

for major developments such as the consented Thames Tideway Tunnel. River transport will dramatically reduce the number of lorries on the already heavily congested roads, improve local air quality and reduce carbon emissions and noise. Another aspect of the vision the Council supports is the use of the river for sports and recreation. In many cases, the river is the closest 'open space' residents have and it is important that it can be accessible for recreation to more people. The joining-up of the Thames Path will also increase the opportunity to enjoy the river by residents and visitors.

However, the current vision seems to take into consideration only three of the four main issues referred to in the Context section. The significant increase in London's population has not been considered appropriately. The provision of new residential moorings in appropriate locations cannot, on its own, address in a meaningful way the dramatic shortage of housing that London is currently facing. An improved vision should include more flexibility on the use of the wharves to provide a mix of uses. The GLA's London Aggregates Assessment for London 2013 explains that population, and employment growth will increase the need of aggregates for construction within London. It acknowledges that, although wharves and railheads should be protected, they may come under increasing pressure to be released for residential development to meet the London Plan's housing targets. A study by Daniel Watney consultants in October 2015 ('Unlocking London's Safeguarded Wharves') explains that the combined wharves housing potential is over 29,000 units. The Council understands that not all of the wharves should be fully developed to provide residential uses alone. However, flexibility should be allowed to provide a mix of uses which could do both, boost the river use and provide new homes for London.

A strategic view of the wharves as a whole and particular consideration of each wharf separately should be considered when setting up the objectives and actions. The reactivation of the unused wharves should be implemented when there is a sufficient evidence base and business case for doing so. It is not just a case of "developers sitting tight, hoping that they (dormant wharves) can be turned instead into riverside housing development contrary to established policy" (section 2.2 of the consultation document). If the policy and vision are not flexible enough, dialogue will not take place and these wharves could lay dormant for many years to come. In many cases dormant wharves become eyesores, detracting from the natural and special character of the river. The Council considers that a way forward needs to be found in a timely manner to boost the use of these wharves. If it is unrealistic that they can be used as working wharves in the future then they should be released for other uses.

## City of Westminster

Overall, Westminster City Council supports the concept of a “shared vision” for the Thames.



## City of Westminster

However, the Thames Vision will need to assess the social, economic and environmental impacts associated with the Vision. We would wish to see a Strategic Environmental Assessment (SEA), and Habitat Assessment (HA) and Water Framework Directive Assessment (WFDA) for the proposed ‘Thames Vision ‘ which would help identify where and how conflicting values could be avoided, mitigated and managed or and benefits could be enhanced through an holistic approach to achieving the strategic goals.

With regard to the Thames Vision’s goals, we have the following comments

1) To be the busiest ever Port of London;

Any ambition for PLA for the River Thames ‘the busiest ever Port of London’ will need to take account of all the values and uses of the River Thames and Estuary. Any ambition to make River Thames the ‘busiest ever Port of London’ will need to be underpinned by the principles of Sustainable Development.

2) For more goods and materials to be moved between wharves on the river;

There are no riverside freight facilities in Westminster. However, the movement of more goods and materials by river is supported and the use of the River Thames as the default choice for transport of waste and construction materials for major construction projects (Northern Line Extension, Thames Tideway Tunnel, Garden Bridge, would greatly reduce freight traffic in Westminster.

We would suggest working in partnership with Business Improvement Districts in the city and across London to achieve this

One of the City Council’s two current disposal contracts includes some use of the River to transport residual waste via Cringle Dock Waste Transfer Station in Battersea to Belvedere Energy Recovery Facility in Bexley.

Opportunities could be sought to transport recyclable material on the River Thames. Our Waste and Parks department are currently preparing to re-let the waste disposal contract

with a view to a new contract starting in 2017. This may provide an opportunity to transport more waste by river, if the facilities are in place.

3. To double the number of people travelling by river, up to 20 million commuter and tourist trips per year;

Doubling the number of people travelling by river, up to 20 million commuter and tourist trips per year to make more efficient use of the piers will require that consideration be given to the likely impacts on the surrounding public realm.

Increasing berthing capacity and passenger capacity at Westminster and Embankment Piers will need to address issues such as pedestrian pressure on footways, security, access, visibility, health and safety, licensing and enforcement. These issues along with impacts on landscape and visual amenity, design, flood risk, heritage and setting will need to be addressed in advance of any proposed increases in capacity at the piers.

Management issues relating to the piers and licensing and management of adjacent street trading stalls will all need to be taken into account.

Any proposed extensions to the piers will need new signage and clear notices for life buoys as a minimum to minimise the impact on river services and transport, public realm and the listed Embankment Wall.

The PLA may wish to consider how it could work in partnership with Transport for London (TfL) on its priority upgrade schedule for any improvements in the vicinity of Westminster and Embankment Pier and seek opportunities to work in partnership with the North Bank BID to merge initiatives to improve public realm and the operation of all transport activities and passenger and pedestrian movement. Any initiatives will need to take into account the City Council's evolving Walking Strategy.

4. To have greater participation in sport and recreation on the water;

We support this goal which encourages increased boating and recreation on the water in Westminster.

5. To have the cleanest River Thames since the Industrial Revolution, with improved habitats in the water and adjoining land;

The PLA's goal "to have the cleanest River Thames since the Industrial Revolution with improved habitats in the water and adjoining land " is supported. This will be delivered in part by the completion of the Thames Tideway Tunnel, which will reduce the volume of

waste water entering the River Thames as a consequence of heavy rainfall events, thereby reducing the amount of pollution entering the river and improving water quality.

Westminster's current Biodiversity Action Plan was agreed in 2008 and can be found here: <https://www.westminster.gov.uk/biodiversity-action-plan>.

Westminster's adopted Open Space Strategy (published in 2007), is currently being refreshed and will be amalgamated with the Council's Biodiversity Action Plan, which is also being updated. These will complement the Thames Vision's goal to improve habitats in the water and adjoining land. We anticipate consulting on a draft Spring 2016.

The draft GLA's London Sustainable Drainage Action Plan (Dec 2015) will also help reduce the amount of pollution through run-off entering into the sewerage network and subsequently into the River Thames during heavy rainfall events. Any opportunities to work in partnership with London Lead Local Flood Authorities and Local Planning Authorities should be sought.

The City Council has prepared a draft Local Flood Risk Management Strategy and Action plan (2016) which sets out how Westminster will manage flood risk from surface water and ground water sources. These actions include

- Tackling flood risk through improved understanding of risk
- Tackling flood risk through asset management and maintenance
- Tackling flood risk through policy and development planning
- Tackling flood risk through partnership working and
- Tackling flood risk through flood alleviation schemes.

6. A riverside which acts as a magnet for ramblers, historians, artists and others, whether living near or travelling to the river.

The City Council supports the desire to attract people to the river by improving access and amenity.

The City Council is currently drafting a walking strategy which will be issued for public consultation in March 2016, the overarching principles of strategy complement the Thames Vision. These principles are to

- Invest in walking as a main mode of transport;
- Improve the attractiveness and safety of Westminster's streets;
- Encourage walking in Westminster in balance with all users of our public space and roads, and;
- Make any changes with the support of the community

The Council's vision for the draft Walking Strategy is:

“A world-class walking environment to transform the walking experience for all users and to enhance the quality of life and wellbeing of our residents, workers and visitors”.

## Wandsworth Borough Council, Putney Town Centre

Response by the Putney town centre manager

We are very keen in Putney to keep promoting the beauty of the Thames, and remind people how lucky they are to live, work, visit it etc. I have been working with British Rowing over the last few months on a campaign to build awareness of what Putney has to offer to the many rowers that compete in Putney. We worked out there was about 10,000 in just the



Head of River series of potential new customers to Putney. Secondly, to build awareness amongst Putney residents to the different rowing races that take part in Putney. We have produced the attached flier that hopes to serve both purposes. This is being emailed out to the entrants in the Head races, and delivered to Putney residents.

I am still trying to understand the impact of the Thames Tunnel on Putney but am looking at opportunities to encourage less formal water sports on the section of River Thames from the bridge to Craven cottage. Due to the Thames tunnel work I think it is not going to be achievable until 2019ish.

## Mayor of London

As set out in my London Plan and its blue ribbon network policies in particular, I value London’s waterways, with the tidal Thames at their centre, drainage and flood management, a source of water, discharge of treated effluent, a series of diverse and important habitats, green



infrastructure, heritage value, recreational opportunities and important landscapes and views. The tidal Thames also passes through London’s largest growth area where a large proportion of London’s future housing growth is expected to take place. It is essential that

the long term plans for the tidal Thames in east London are fully aligned with the London Plan.

My top priorities for the future of the tidal Thames are promoting:

- its use for the movement of people and freight;
- its use for recreation;
- its protection for the benefits of its habitats and for Londoners;
- appropriate development alongside the river; and
- closer integration between the future plans of the PLA with those of the GLA through the London Plan.

In order to achieve the above, I wish to maintain the existing good working relationships with the PLA and consider ways in which we can work together even more closely on long term strategic planning for the tidal Thames. The following issues are particularly important and will require both action and cooperation:

#### London Plan Review

- Work on the full review of the London Plan has now started and will continue over the next three years upon election of a new Mayor in May 2016. I hope the PLA will constructively engage and contribute to this process and in particular contribute to the review of the Plan's Blue Ribbon Network policies alongside broader policies relating to the future of east London.

#### Freight Transport

- We are now seeing increasing demand for freight transport by water in London. I will continue to safeguard a range of wharves to enable freight to be transported along the Thames in London and reduce in particular HGV traffic on the roads. It is important that these sites can fit into their localities and do not blight surrounding land, but it is equally important that surrounding development is designed to minimise any vulnerability to impacts from river freight operations.
- The Government confirmed – as part of last year's Budget commitments – plans to devolve planning powers over safeguarded wharves to the Mayor, releasing them from the Government's safeguarding Directions. We are discussing the devolution process with CLG. The resulting devolved powers will be reflected in changes to relevant London Plan policies as part of the full review of the London Plan. In connection with this the current safeguarding designations are likely to be re-assessed and re-considered. I would welcome constructive contributions and support

to inform this complex process going forward. With your emerging research on water freight trade a first step is being made, and my officers will carefully examine this work.

- In terms of the Thames Tideway Tunnel I am looking forward to seeing the majority of materials being transported by river. I am also keen to support Tideway's stated ambition of leaving a legacy of freight loading points, skilled staff and vessels that will be available for freight and potentially other uses once construction of the Tunnel is completed. I am also pleased that plans for the Thames Skills Academy are progressing so well, with the support of the PLA and TfL.
- The potential value of extending the River Concordat to promote freight movements by water should be explored further, and I have asked my officers to look into this.

### Passenger Transport

- Increasing the number of passenger using the Thames has been one of the key successes of the River Action Plan, and with 10 million passengers using the river in 2014/2015, we are now well on the way to achieving our target of 12 million by 2020. I am pleased that the PLA shares my ambition of increasing these figures even further in the longer-term.
- TfL and its partners are working to achieve this aim in a number of ways, including through new piers, including the recently-opened pier at Plantation Wharf, ongoing and planned pier extensions, marketing campaigns, the introduction of Oyster pay-as-you-go at River Bus piers, extended River Bus services and a simplification of the fares system.
- Beyond the current programme of the new piers and pier extensions set out in the River Action Plan, I agree that it will be important to establish a longer-term strategic plan for piers, and I have asked my officers to examine the benefits that this would deliver for both passenger and freight transport.
- I agree that the River Concordat will play a vital role in continuing this success in the future, and I greatly value the PLA's contribution to the Concordat. As I note above, I support the idea that the Concordat's remit could be widened to account for the increasing importance of freight on the river, and my officers are examining how this can best be achieved.
- I also feel that a key factor in continuing the growth of passenger transport will be improving the integration between river services and other models of transport. Improving links with Tube, bus and rail services, as well as with walking and cycling routes and infrastructure should be a focus for the future and my officers will work closely with the PLA to identify and deliver improvements in this area.

## Boatyards

- This does not appear to be recognised explicitly in the consultation document, but the PLA will be aware of the pressure on boatyard provision in London, and of the work outlined in the River Action Plan to provide a new boatyard facility in the capital. The disposal of GLA land at Albert Island provides an opportunity to pursue this aim, and my officers have been working with interested parties to progress proposals that include the provision of a commercial boat yard as part of the development work. The PLA has been supportive of this work through its membership of the Mayor's River Concordat, and this support will be important as the procurement process continues this year.

## River Crossing

- I am pleased that the PLA has offered its support for both the Silvertown Tunnel project and for further river crossings in east London, and to see this support reiterated in the Thames Vision. As the consultations documents points out, additional river crossings are vital if the Thames is to achieve its full potential for connecting communities and unlocking growth and development, and stakeholders in the port will be key beneficiaries of the improvements that new crossings will provide.
- As you know, at the end of last year I launched Connecting the Capital, which set out my vision for 13 new river crossings to be delivered throughout London by 2050. In the east, this work will continue with the Silvertown Tunnel, which, subject to funding, will be followed by two new river crossings at Belvedere and Gallions Reach. I am grateful to the PLA for the separate work it is undertaking with TfL on river movements, which will be an important factor in determining how this vision comes to be delivered, and I await with interest the conclusion of this work in the coming months. I think it is important we look afresh at some of the rules governing the operation of shipping in the Thames to create more flexibility for the introduction of additional crossings at lower cost. For example, lower level lifting bridges could be delivered at a lower cost than high bridges and tunnels and whilst I recognise the complexity of the issues with existing shipping movements, we need to work together on solutions that allow these kinds of crossing to come forward. This will help deliver the transport infrastructure that east London needs but also support the creation of high quality communities on the banks of the river.
- I am confident that TfL and the PLA can devise an approach to future river movements that will help to deliver vital new river crossings in the east, while allowing the port to continue to flourish. But this will mean we need to consider some

changes to the way the river operates and the next London Plan should deal with this.

## Culture

- My Deputy Mayor for Education and Culture, Munira Mirza, will be responding to the cultural aspects of your consultation documents in more detail, but I would like to echo her comments here.
- Munira and I feel that the PLA could take a stronger role in the cultural development of the river, beginning by providing all-year-round leadership for Thames cultural activities through the establishment of a Community and Culture Board. The Board could help to strengthen the PLA's role in events like the Totally Thames festival, ensure a high quality annual programme, and allow the PLA to provide greater leadership and support for ambitious projects like the London Lido and The Illuminated River, as well as helping to develop relationships with the full range of Thames cultural stakeholders. We would also encourage the PLA to develop a strategy for key Cultural Opportunity Zones where greater attention to cultural activation and participation can be focussed and finally to throw a spotlight on how cultural initiatives can help support a more vibrant night time economy.
- We would recommend that the PLA work with public and private sector partners to set up a Cultural Fund to provide seed funding for new initiatives. This would provide a huge boost to the cultural diversity of the river, and could be overseen by the new Community and Cultural Board.
- Great work is underway to advocate for and promote river culture, and we agree that the PLA could take a more central role in this work, especially regarding heritage, environment and the promotion of London's green credentials. This leadership role should include commissioning socio-economic research. My GLA and TfL officers have an important part to play in this regard, as do the many other stakeholders in the river, and the PLA's support and leadership would provide a huge boost to this work.
- Artists' workspace is on the decline across London, posing a serious threat to our status as a leading city of culture. We would therefore encourage the PLA to push for planning authorities and developers to take a pro-cultural approach, supporting and encouraging artists' living and workspace by developing capital and infrastructure programmes on and along the River Thames, helping to develop a creative life for the river.

## Surface Water Drainage

- Surface water flooding from heavy rainfall is one of the greatest climate risks to London. We are working with Thames Water, the Environment Agency and the boroughs to implement the London Sustainability Drainage Plan that will deliver a step change in how we manage rainwater, seeking to minimise the amount of rainwater going into the combined sewer. One sustainable means of disposal of rainwater is to discharge surface water directly to the River Thames, tidal creeks and docks. My drainage hierarchy, as set out in the London Plan (Policy 5:13), encourages the capture and use of rainwater, and ranks its discharge into a combined sewer as the least favourable option.
- A number of developers and the London Boroughs have raised the issue of the PLA's mechanism for charging for the discharge of rainwater into the Thames. Whilst it is understood that any such connection brings a certain degree of risk, management, maintenance etc., I feel that there is scope to review the current charging system and ensure that it is proportionate and that sustainable drainage solutions are not dis-incentivised.

#### Use of the Thames for energy Generation

- I am keen to develop more renewable and waste heat energy sources in London. I recognise that capturing the tidal energy of the Thames is difficult and to date no viable solutions have been found, however, I am maintaining an open mind about these ideas. Furthermore in 2013 I published my 'London's Zero Carbon Energy Resource: Secondary Heat Report' which assessed their potential. This identified that there are opportunities for waste heat from the River Thames to be utilised through the use of heat pumps and other technologies. A project is now moving ahead to capture the heat from the River at Greenwich and I would welcome support from the PLA in realising this project and the use of the Thames for energy generation elsewhere, as well as some recognition of this in your Vision.

#### Developments along / on the Thames

- It is important for us when considering strategic development proposals along the Thames that the process and criteria for the granting of any required River Works Licences for that / related development is transparent and clear. You may wish to consider recognising this in your Vision.
- There have recently been a significant number of proposals to permanently moor large vessels along the Thames. I would welcome a clear and consistent approach towards such proposals helping to manage the expectations of developers at an early stage.

- You recognise the demand for visitor and residential moorings, but I would welcome more clarity on the potential scope, scale, locations and implications of increasing provision.
- The PLA should work with relevant partners to ensure that all new port development and waterways infrastructure account for sea level rise and that other developments consider the opportunity to set back development from the flood defences and create compensatory habitat for foreshore being lost due to rising sea levels. Generally with regards to flood risk management continued cooperation with key partners to implement the Environment Agency's Thames Estuary 2100 Plan is essential.

### Opportunity Areas

- Much of London's growth is expected to be accommodated in Opportunity and Intensification Areas. 'City in the East' (<https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/opportunity-areas/city-east>) provides an overall direction of travel for the East London Opportunity Areas by integrating land use planning and the Mayor's transport investments and land ownership interests in a coherent sub-regional plan. Along the Thames in East London my activities are currently focussed on the following Opportunity Areas:
  - London Riverside – Planning Framework adopted in the autumn last year and implementation is underway
  - Royal Docks – work on Planning Framework is progressing in collaboration with LB Newham and a consultation draft is expected in the summer
  - Bexley Riverside – work on completion of Growth Strategy is expected to conclude with its adoption later this year
  - Isle of Dogs – currently being drafted with LB Tower Hamlets
- At London Riverside and the Royal Docks consolidation/ relocation opportunities for strategic industrial land and the safeguarded wharves are being explored.
- While I seek to facilitate the development of strategic planning frameworks, it is important that the PLA explicitly reflects these plans in the Vision and that we work constructively with the relevant London boroughs to address at an early stage any river-related issues that may arise.

### Thames Gateway Strategic Group

- Finally, I would add that as you know I am a member of the Thames Gateway Strategic Group, which represents stakeholders in the Thames Gateway. The group has recently produced a Prospectus on transport priorities for the Gateway, and it may be helpful in delivering the PLA Vision if officers from the TGSG met with the

PLA to ensure that our priorities remain aligned as these two parallel projects are taken forward.

## London Councils

### Right Goals?

The suggested goals cover a range of uses of the river, which seems to be comprehensive. However there are potential conflicts between the uses along the river and we would like to make sure that an assessment is conducted to identify potential conflicts between the different uses especially where personal safety issues may arise.



It is important to increase the use of the Thames for passenger and freight transport to alleviate pressure on London's roads and improve air quality. However the growth of freight should be informed by evidence on the effect of noise pollution has on river wildlife. New transport options on the Thames should be able to meet low emission and noise pollution criteria to balance long term growth.

### Right Priority Actions?

London Councils agree with the priority actions as identified in the consultation document. To increase commuters on to the river we consider there are opportunities to bring river fares into line with other forms of London public transport run by TfL. Consideration should be given to either extending the fare structure westward, or liaison with TfL with a view to extending the Clipper operations to these large visitor destinations West of Putney. The latter would of course be subject to other considerations, including noise and other environmental concerns from using this type of craft.

To enable seamless passenger transportation on the Thames the Port of London Authority should note the importance of pedestrian links such as the opportunities of linking bike docking stations with ferry travel so whole journeys can be car free.

### Other Goals and Priority Actions?

While the consultation document makes reference to flood risk and the Thames Estuary 2100, it is dismissed as being outside the time frame of this vision. It is clear that

unprecedented climate events will continue to happen over the coming decades and therefore flooding should be a component in the Thames Vision. London is at risk from surface water flooding and the Port of London Authority should consider if there are any actions that can be taken to help mitigate this risk, for example, by working with riparian boroughs and developers to promote direct discharge of surface water run-off into the Thames.

Environmentally sustainable development should be an underlying principle across all the priorities as we consider the next few decades. For example poor air quality is an important issue to London and as transport emissions account for between 25% and 30% of all emissions the Port of London Authority can play a key role in helping to mitigate the problem. As well as providing an alternative means of transport there is the opportunity to integrate renewable energy into the activity on the river. The shipping industry is growing, and we would like the Port of London Authority to ensure as much as possible that its growth is as environmentally sustainable as possible. This is an opportunity for Port of London Authority to develop new environmental standards for development along the Thames which should be explicit in the Thames Vision.

We consider that the PLA should explicitly mention a commitment to progressing work in line with adopted planning strategies of other stakeholders such as the London Plan and Opportunity Area Planning Framework as well as local plans and linked strategies of boroughs adjoining the river. These include policies about the use of the river and its environments and should support and complement the Thames Vision 2035.

## Transport for London

### Right Goals?



We appreciate the PLA's understanding that additional river crossings to the east are required and welcome the PLA's support.

We are supportive of Freight (goods and materials) being moved on the Thames, but wish to clarify the measurement unit being used, so that a consistent baseline can be developed to judge success.

We understand that the Thames acts as an artery for freight and passengers, but also brings a green heart to our City. We are therefore supportive of the Thames's use for leisure activities in defined areas and the ongoing development of the Thames Path.

As outlined in the PLA capacity study, we support the view that there is extra capacity on the river. We are continuing to work with the PLA on improvements to scheduling and berth management. We also support work on improving vessel standards.

Whilst we are supportive of increased leisure activity on the river, we would not be supportive of additional speed limits which impact the future efficiency of river services.

**Right Priority Actions?**

Recognition of the River Concordat, and its expansion to cover freight activity is supported.

We consider that developing a joint strategic pier/ wharf strategy for both passenger and freight traffic is key. We are supportive of the PLA’s view that this is an important piece of work to safeguard wharves and unlock future capacity.

As a founding member of the Thames Skills Academy, we are supportive of the work undertaken by the Thames Tideway Tunnel to enhance training and promote continued professional development and will be seeking to ensure this covers both freight and passenger boat crews.

**Other Goals and Priority Actions?**

There is the potential to make better use of the river by encouraging integration and connectivity with other modes. We welcome the opportunity to jointly work with the PLA to identify future opportunities.

We would like reference made to the joint effort being made by the PLA, GLA and TfL on promoting a new boatyard facility on the Albert Island.

Reference should be made to the importance of tourism on the river, including support for complementary GLA Cultural Team initiatives such as the bridge lighting project for London.

**Department for Transport**

It is encouraging to see that the PLA and Department have broadly compatible aims in many of these areas, and the complementary activities that both parties undertake will assist in delivering those aims.

Our ports are a vital economic asset for the UK, with 95% of goods arriving through these important



**Department  
for Transport**

gateways each year. London is set continue growing and so will its demand for goods. Having such a large concentration of consumers and business in the London and wider South East hinterlands is a positive opportunity for the PLA and the ports operating within its area. As such we welcome the ongoing investment by the ports and the PLA itself to ensure that they are best placed to benefit from the trade growth that you clearly forecast.

The close location of port of entry, and distribution facilities, to such a market can also provide benefits for consumers and the environment by facilitating efficient “local” distribution of freight. As such we are pleased to see your commitments to moving more goods and materials by river, noting the environmental and congestion benefits of moving freight in this way, and the reduction of impact on other transport networks.

We also recognise the importance of ports having good levels of connectivity with the wider transport networks, and the need for these to provide the efficient and effective transport of freight. You specifically highlight a number of wider transport infrastructure needs:

- Lower Thames Crossing. Highways England is currently consulting on options to take forward such a project and a consultation is currently open to gather views on the final short listed routes.
- A13 widening. The development of this scheme currently sits with Thurrock County Council, but final approval will be a matter for the Department. We will look to progress the approval of this scheme as quickly as possible and have preparations in place to ensure that when the final business is submitted we are in a position to turn it around quickly. On this basis we are already working with Thurrock Council now to understand the modelling underpinning the scheme, and consider drafts of the business cases, to ensure there are no surprises when the final version is available.
- Electrification of the Barking to Gospel Oak line. We are pleased to note that work on the main Gospel Oak – Barking route has been brought forward as a priority, and Network Rail has just announced electrification is now planned to complete on this section on 30 June 2017, some six months earlier than originally expected, despite a rise in costs.
- Whilst we remain committed to provide rail freight links to the ports and, at the other end of the route, to the Midland Main Line, we are reviewing with Network Rail when these links might be provided. Network Rail is currently developing revised cost and delivery estimates for these links taking account of its revised delivery plans for railway control period 5.
- Closure of level crossings. We welcome the PLA’s statement on the closure of level crossings affecting operational terminals by 2020 and recognise that their removal on

key strategic routes will enhance opportunities for freight to travel by rail as well as provide wider benefits to both rail, and road, networks. We would encourage the PLA to work in partnership with Network Rail and local highway authorities to identify candidates, and provide a supporting business case, for closure.

The 2015 Maritime Growth Study (MGS) recommended improvements to maritime training and skills activity necessary to ensure a larger, and long term professional skills base for the maritime industry. It is therefore positive to see that the establishment of a Thames Skills Academy is included as part of the Thames Vision priority actions.

This will usefully build on some of the existing activity, such as the schemes and opportunities offered by the Port of Tilbury, and we recommend that as the Thames Skills Academy is developed there is engagement with the wider maritime industry as they take forward their response to the MGS.

The Thames Vision is an important step for public and business users of the river, and its ports. We congratulate the PLA on bringing forward such a process and look forward to seeing further detail as the final Vision is developed.

## Marine Management Organisation

We agree that the goals outlined are right for the Thames and believe that priority actions would contribute to achieving the vision. We do recommend further consideration of the following points, on at least parts of the river, with regard to the Marine Policy Statement and forthcoming South-east Marine plans:

1. Ensuring that the Vision, which is a positive first step, adequately captures a “Spirit of place” for the Thames.
2. Where possible, providing the opportunity for natural processes to occur allowing wildlife to thrive and promote the natural history of the river.
3. Recognition of natural resources that define the Thames estuary e.g. eel fisheries, oyster beds etc.
4. Action or awareness of the risks invasive species pose to the economy and human health.



Marine  
Management  
Organisation

5. Enhancing physical and virtual access from river to land in addition to the Thames path and crossings.
6. Conserving and promoting access to heritage assets of importance to London/Thames not currently well “represented” in the Historic Environment Record.
7. Taking the lead on piloting sources of renewable energy generation (e.g. tidal and river flow) thereby further acknowledging the need to mitigate and adapt to a changing climate.

The following information relating to wider MMO function may also be of note in relation to the Thames Vision.

The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England’s marine area on behalf of the UK government. The MMO’s delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing European grants.

#### Marine Licensing

Activities taking place below the mean high water mark may require a marine licence in accordance with the Marine and Coastal Access Act (MCAA) 2009. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in England and parts of Wales. The MMO is also the authority responsible for processing and determining harbour orders in England, and for some ports in Wales, and for granting consent under various local Acts and orders regarding harbours. A wildlife licence is also required for activities that that would affect a UK or European protected marine species.

#### Minerals and waste plans and local aggregate assessments

If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend reference to marine aggregates is included and reference to be made to the documents below:

- The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England’s (and the UK) construction industry.
- The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply.

- The Managed Aggregate Supply System (MASS) which includes specific references to the role of marine aggregates in the wider portfolio of supply.
- The National and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period including marine supply.

The NPPF informed MASS guidance requires local mineral planning authorities to prepare Local Aggregate Assessments, these assessments have to consider the opportunities and constraints of all mineral supplies into their planning regions – including marine. This means that even land-locked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play – particularly where land based resources are becoming increasingly constrained.

## Member of Parliament for Bermondsey and Old Southwark

Some brief comments and questions about the consultation are provided below based on our meeting and issues raised by constituents.

### Ambitions for the environment

Despite the consultation’s focus on providing “the cleanest Thames since the Industrial Revolution”, there seems little detail in the environment and heritage section on improvements the PLA is specifically seeking to achieve.

My constituents are concerned about the impact of riverside construction projects, the access points used by river-based companies (e.g. at Cherry Garden Pier), and areas where waste products ‘naturally’ collect due to the tidal Thames (e.g. around Shad Thames and Dockhead).

The environmental goals listed do not seem ambitious or specific enough. One goal stated is that water quality should be increased to ‘good’. What is this from, how was ‘good’ selected as the ultimate aim for this period, and what measurable targets will help local people monitor whether the PLA reaches its goal?

### A river for all communities

The plan to utilise the Thames for leisure is welcome, but seems a little distorted to one end of the Thames. It would be good if there was consideration of leisure use right the way along the Thames and specifically in the Rotherhithe and Surrey Docks parts of my constituency.

### Putting more people on the river

Doubling the number of people travelling by river and increasing the use of freight is very ambitious from the rising levels that have been seen in recent years. For many local people, the river appears to be coming 'back to life' in a welcome way. For others the increased use has some downsides which the PLA must demonstrate it can monitor and tackle where appropriate.

I am glad to see the PLA seeking greater use of the Thames but hope it comes with full consideration of the impact on riverside dwellings and responsible use of the river.

Unsafe or anti-social use must be swiftly tackled – areas where the PLA have some responsibility. Emphasising with local authorities, like Southwark, which border the river their responsibilities to tackle noise or other problems which may be tackled through licensing or other systems would also be useful.

#### Jobs and trade

I welcome the PLA's efforts to increase employment on the river. Bermondsey and Old Southwark has higher than average youth unemployment and any support the PLA can offer in terms of apprenticeships and employment for young people on the river would be very welcome.

If the Vision document could lead specifically towards recruitment efforts that target disadvantaged, local communities it would help demonstrate and even greater commitment to ensuring the benefits of the river reach the people living closest to it.

The Vision consultation helpfully highlights the role the Thames can play in reducing heavy goods vehicles on London's roads. Having a more significant and specific commitment to further helping decongest Southwark's roads would be very helpful. Southwark has some large developments underway and more to come. I support the PLA to work in partnership with developers to advertise the benefits of river transport and encourage even greater numbers of HGVs coming off our roads.

The PLA are aware of the role the river will play in reducing road traffic for the construction of the Thames Tideway Tunnel and the Garden Bridge. Ensuring the PLA makes its role clearer to my constituents in tackling any river-based negative side effects of these construction projects would be helpful to people with concerns.

The Vision makes no mention of the new bridge that Sustrans are undertaking a viability study for, funded by Transport for London. This has stood out to some constituents as a significant omission. Is there a specific reason it is excluded? The new link between

Rotherhithe and Canary Wharf is linked to jobs and trade and should, I think, have been included. I hope future documents will include plans for a new bridge that I hope the PLA welcome.

Overlooking the overlookers?

The community and culture section does not have a huge amount of information for people living on the river. House boats, docks and marinas all accommodate people's homes as well as commercial and leisure usage.

Constituents would have liked more information specifically on how the Vision might affect them and their homes – as raised by house boat users.

Other constituents with properties overlooking the river are also keen for more information on how the Vision might affect them and feel, sadly, a little overlooked themselves in the Vision document. Perhaps the next stages could address their concerns in more detail.

## **Member of Parliament for Erith and Thamesmead**

As Member of Parliament for Erith and Thamesmead my proud boast is that, of all parliamentary constituencies, mine has the longest single stretch of the River Thames as its boundary.

As such I was very pleased to hear about the work that has been going on to focus forward over the next 20 years. The opportunity map is a good way of showing what might be achieved in various stretches of the river.

On my stretch of the Thames I am heartened to see the Thamesmead Pier featuring. For a good while now I have believed that a Pier at Thamesmead could be a real asset to the people who live there. For decades Thamesmead has existed in relative transport isolation, with many infrastructure promised made but few delivered. As the area develops there will be a growing commuter demand, and river links to Canary Wharf and beyond could be mutually beneficial to Thamesmead residents and businesses to the west.

One goal that might be explored a little further is how the river could inspire and be linked into educational activity. It strikes me that so many aspects of the river and its history have a natural link to learning. Many places along the river attract visitors, who learn something in the process of visiting, but I am thinking more of examining the potential of the river as a source for educational discovery in a wider sense. For example, in my constituency the

Crossness Pumping station in Thamesmead has the potential to be part of education programmes that explore history, the events and the life of Londoners leading to its building, science by means of the engineering that made it happen, the environment in how we have found modern day solutions to replace the Victorian ones. There are so many other aspects of the river that could inspire learning, and so it might be worth considering setting up some kind of learning trust to co-ordinate programmes of learning that schools could participate in.

## **Member of Parliament for Putney, Roehampton & Southfields**

As the local MP for Putney I wanted to share my views on the consultation goals and priority actions based on my experience of the area as the MP, and the views shared with me by residents from a survey about the Thames Vision which I undertook last year. My local community hugely values having the River Thames by our side and it's one of the reason people care about our area so much, so it is really important that all changes are worked through with our local community.

A large amount of respondents to the survey I carried out in Putney said that increasing the use of the river for public transport and commuting was important to them. Given that Putney is going through a period of significant development and therefore a subsequent increase in the local population, more access to the river for commuting would be welcome and would ease congestion on the local tube, train and bus networks. Obviously it is really important to ensure that as the river is used more, it is made safe for passengers and other river users.

As identified in the goals and priority actions document, Putney is already a hub for sport and recreational activity on the river. Almost 70% of respondents to my local survey wanted to see more events on the river at Putney, and slightly less wanted to see more water sports. The water sport provision has increased over the last couple of years and has become more accessible to the general public. The introduction of sports opportunity zones in this area, which already sees regular use of the river for water sports, should be carefully worked on with local residents and river users to ensure that any new sports and services maintain existing provision, but also don't fundamentally undermine the river for people who walk alongside it. I would very much encourage the consultation action point for the PLA to work closely with Sport England to see where there are opportunities for more participation in sport and recreation on the river but I do think it is important to strike the right balance with local communities who live beside it. The local community would not want to see the river turned into a noisy playground and so it is important to protect peace and quiet too.

Given the high use of the river at Putney for water sports, the tidal Thames environment at this part of the river is important. The Thames Tideway Tunnel is a great opportunity for us to have much improved water quality which is safer for river users, as well as the many different species of animals and plants that exist in the river and its banks. The use of the River Path at Putney is also high and I would encourage any work the PLA can do to ensure that this is maintained to a high standard whilst remaining as biodiverse as possible.

The use of the river for residential mooring was not an issue that seemed to resonate with many local residents in Putney. There may be some areas of the river where an increase in moorings is appropriate but I do not think there would be a local consensus for additional moorings at Putney. Ultimately, the river belongs to all of us and the views of local residents should come first and I would encourage the PLA to consult with local residents to ensure that there is demand for them. The development of a Thames brand for culture, heritage and quality of life is something that I think would be very much welcomed by the local community and came up at the first Thames Vision meeting at the London Rowing Club at Putney Embankment. I would be happy to help with this locally in any way that I can.

The Thames Tideway Tunnel project is something I have been working on with local residents, Thames Water and Tideway since the proposals were first brought forward and a lot of work has gone in to ensuring that residents are impacted by the work as minimally as possible. A huge part of this work was ensuring that as much of the construction materials as possible are brought by river rather than on lorries which would hugely impact local residents and the local road network. The Tideway Tunnel project will undoubtedly set a precedent for use of the river for construction materials locally, not just in central Putney but also in Wandsworth, and it would be good to see more housing developers considering the use of the river for transportation of construction materials. Any work that the PLA could do to encourage developers to use the river would be welcome.

I look forward to seeing the final Thames Vision document in due course. In the meantime, if there is anything I can do to help disseminate information to residents locally, do let me know. The close proximity of the River Thames to our community is a big part of what makes Putney a special place to live and I'd very much welcome continued engagements with myself and the Putney community so that we can continue to play a role in helping to make sure that people who live locally in years and decades to come can enjoy the Thames on their doorstep as much as we do, and hopefully even more.

## London Assembly Member for Merton and Wandsworth

### Right Goals?

Absolutely spot on. Well done.

### Right Priority Actions?

I believe so. Stay determined and focused.

### Other Goals and Priority Actions?

Passenger transport, freight use of the river, and water sports are the main priorities.

## Other Stakeholders

### Beckett Rankine

Response by the director of Beckett Rankine.



**BECKETT RANKINE**  
Marine Consulting Engineers

While I welcome the fact that the PLA is producing a Vision document I have to say that I am disappointed by the draft version - there seems to be nothing visionary about it at all!

The goals and actions that the document sets out are all about doing what is currently done but doing more of it, more freight, more passengers, more sport, more people on the riverbank, more improvements to the environment. This might make a reasonable basis for a business plan but simply doing more of what is currently done is not a 'Vision'.

I am aware that during the consultation you have received some suggestions that might for the basis for a true vision; ideas that, for example, might produce a step change in the quality of the river environment. Or ideas that might transform Londoners' relationship with the river. No such proposals seem to have made it through to the draft document.

Before you finalise the 'Vision' document I do urge you to reconsider its contents to see whether there is scope for including some visionary ideas.

### British Marine

British Marine is broadly supportive of the PLA's goals and priorities as outlined in the consultation.



#### 1. Passenger Transport

The target to increase passenger numbers and tourist trips on the tideway to 20 million will be challenging, however, following recent impressive figures of existing passenger numbers, British Marine believe this is a realistic objective.

We welcome more efficient use of piers and river space. It is important that the focus of this is at peak periods of the day, which are relatively short and not all year round. Pier space should be prioritised for services that operate to piers for the longest operating periods (early morning until late at night all year round), that are driven by timetables and punctuality.

The long term pier strategy should be focused on passenger transport and not try to make them multiuse. Leisure services and house boats should be separate to frequent commercial services that depend on direct, congestion free access.

Planning processes with riparian boroughs should be maximised to deliver new infrastructure moving forwards.

## 2. Sport & Recreation

British Marine fully support the growth in recreational activities on the River Thames. British Marine would welcome further dialogue with the PLA to promote such activities, in particular, through our own initiative "On The Water".

Our Regional Association, British Marine – Thames Valley, have also produced a smart phone app, which would be the perfect portal to help promote and raise awareness of all forms of recreational activities along the Tideway.

## 3. Environment & Heritage

British Marine supports any initiative to improve the quality of water in the River Thames. The livelihood of our members operating in the tourism industry and the future of the wider British Marine industry really does rely on well-maintained marine environment.

The proposed changes to Byelaws relating to the discharge of sewage will have the most significant impact on our members who operate Passenger Boats.

Recent industry calculations suggest that, following completion of the Thames Tideway Tunnel, a significant amount of sewage will continue to be discharged into the River Thames. There is a concern from British Marine members that the cost for passenger carrying boat companies to install the necessary infrastructure to remove the boat produced sewage will be disproportionate to the benefits when compared to the volumes that will enter the Thames through Sewerage Outfalls.

British Marine would welcome further evidence from the PLA which demonstrates the accumulative impact of all sewage discharges into the River Thames and how the banning of sewage discharge from Passenger craft will assist in achieving "good" water quality status.

## 4. Community & Culture

Some of our members have concerns regarding further development of residential moorings in the main river between Putney and the Thames Estuary. This is due to the large rise and fall of tides that in most cases result in the grounding of house boats in the main reaches,

which inevitably are going to be affected by wash from passing vessels. Every effort should be made to consolidate these residential moorings to specific areas. This with the development of better camp sheds and wash protection will have less effect on journey times from repetitive ease down and acceleration of commercial craft, which are delivering essential river transport and will need to grow significantly throughout all day parts in order to meet the growing demand as a result of the landside residential and commercial developments.

Some routes currently operating on the Tidal Thames between Putney and Woolwich have been commercially constrained and resulted in unattractive timetables / journey times, due to the sporadic development of residential moorings.

## 5. Conclusion

We trust that our comments are of benefit to the PLA and we look forward to supporting the Thames Vision going forward. In the meantime, please feel free to contact me where I will be pleased to provide any more evidence or information as required.

## Canary Wharf Group

### Right Goals?

Yes. However, there are key aspects missing. These are specifically related with biodiversity in urban environments. The Thames Estuary has a unique ecosystem and new and existing developments can have a key role in the enhancement of such environments. This is particularly relevant when features like Green and Brown roofs are considered. Such features will be key in the creation of robust green corridors across the river.



### Right Priority Actions?

More actions addressing the built environment should be mentioned. London will see in the next 10-20 years the rise of many new developments close to the river and these should have a role in the enhancement of the Thames Estuary Ecosystem as a whole. More systematic thinking and collaboration is needed.

### Other Goals and Priority Actions?

Creation of a developers and policy makers working group to facilitate the creation of a robust biodiversity and green corridor strategy to unify and enhance the Thames ecosystem.

## Essex Chambers of Commerce

### Right Goals?

I agree that these are the right goals for the Thames Vision



### Right Priorities?

I agree that these are the right priority actions for the Thames Vision

### Other Goals and Priority Actions?

I believe that all the appropriate priority goals and actions needed to achieve the Thames Vision are included in the document.

## BuroHappold & Farrells

The vision set out by the PLA in Thames Vision, Consultation on Goals and Priority Actions is very much welcomed by BuroHappold and Farrells, companies that are currently working together on initiatives to support the transformation of the communities both north and south of the Thames in east London.



We believe that the PLA’s document appropriately sets out the need for balancing a variety of important roles that the river plays: as conduit for freight traffic and shipping, to support our economy; as a source of open space and place for recreation, so important for the health and well-being of London’s residents; as a generator of economic development through community regeneration; and as an important connector of communities via the development of new passenger ferry services. All four of these goals – economic, recreational, community, and transportation – provide the canvas against which new investments and resources should be evaluated.

In response to the consultation document, we would like to highlight and elaborate on the goal we feel least well developed in the paper: community regeneration. We believe that

contributing to this goal is as much the job of those who safeguard and protect our river as it is of those who manage the banks and boroughs on either side of it. In that spirit, we would like to highlight the opportunity for the PLA to get more involved in the planning and development of both riverine ferry services and low-level bridges across the Thames. We believe the two are and should be linked, as a way to better connect east London communities to each other and to employment opportunities to the west, thus unlocking the value of these areas for housing and community development.

First, we encourage the Port to actively pursue, with TfL and the GLA, the idea of additional low-level crossings to the east of Tower Bridge. Low-level crossings in river cities around the globe have long served to knit riverine communities together; cities like Paris, Rome, or Salzburg embrace their bridges as part of their soul. In London, low-level crossings historically played an important role in the evolution of riverside communities to the west of London – in places like Hammersmith, Chelsea, and more recently Southwark. Their role as generators of local economic and recreational activity in these places is undisputed, and we believe that low-level crossings can do the same in the east of London.

The idea of encouraging development and connectivity through the provision of additional crossings is not ours alone. TfL has recently published its thinking about potential future river crossings: nine of them are to the east of Tower Bridge. Some of the proposed crossings are high-level strategic crossings; others, while not fully defined, appear to be low-level bridges that would likely be oriented more toward local pedestrian, bike, car, or bus traffic. Both ‘strategic’ and ‘local’ bridges will be needed in the future.

Strategic high-level bridges and/or tunnels are undoubtedly needed to bring resilience to a network of ‘strategic’ roadways in the east that is overtaxed and fragile at best. However, these types of crossings do not typically unlock land value; often they do the opposite, sterilizing the banks of the rivers they traverse. Low-level crossings, in contrast, stimulate local housing development and offer a way to celebrate the presence and views of the river as it flows toward the sea. They prompt landscape and waterfront restoration, supporting recreation, and animate the waterfront with shops, cafes, and public spaces for people to enjoy – echoing the goal stated in the vision of realizing the “riverside as a magnet for ramblers, historians, artists and others.”

We are well aware of the maritime challenges presented by low-level opening bridges in terms of co-existing with current and future river traffic. Manoeuvring ships on the wild, tidal Thames is not easy and further compromising sightlines with additional structures can make it harder to do so. Yet today community development and navigation can more easily co-exist thanks to increasingly reliable and efficient bridge-opening and ship navigation

technologies and real-time network management. On the roads, ITS technologies, including smart traffic and flow management systems, offer better opportunities than ever to communicate bridge opening times and alternative routes to the traveling public.

Low-level bridges alone will not revitalize communities. The communities on either side of the river need to be well-connected to other forms of transportation to access jobs and thus unlock the value so critical to housing development. While we commend and support the Crossrail and Overground extensions being planned for the East, a more robust and extensive Thames ferry service could be the spine knitting together these emerging waterfront places and connecting them to opportunities to the west. Using the water for passenger transportation also makes commercial sense: the costs of extending and operating a fast-ferry system in the east are a fraction of those associated with a fixed link and takes pressure off existing road networks.

The two concepts – low-level bridges and fast ferries – can also work together. The emergence of low-level bridges at suitable places along the eastern Thames makes a fast ferry service to the east more viable, potentially drawing users at ferry stops located at these crossings from both sides of the Thames. Together, the bridge-and-ferry system would function as a network, opening up an alternative means of travel and doubling the catchment area of a stand-alone ferry service.

Lastly, we feel that the ideas expressed both here and in the consultative document should be tied to a wider vision for the area. We see the Greater National Park City vision ([www.nationalparkcity.london/](http://www.nationalparkcity.london/)) developed by a coalition of planning, design, academic, and non-profit organizations and supported by Farrells as being complementary to and supportive of the goals outlined by the PLA: sport and recreation on the river, improved environment and natural resource, and greater utilization of the river's banks. By linking the Thames Vision to this earlier vision, and by incorporating a series of innovative connections designed to regenerate the once-active banks along the river, the PLA can be an important economic development partner – both on the river and along its banks – for decades into the future.

## **Hammond and Sons Shipping**

There should be more working berths, when you look at Rotterdam they are in a modern country yet they have not sold their berths and docks to developers. It's a very busy river and the Thames should be like this.

## Knicht Dragon Developments

Response from the Head of Planning.

Knicht Dragon are largely supportive of the key goals of the promotion of the Port of London which we agree will increase more trade and create more jobs and encourage more goods off the roads and onto the river; increasing the passenger trips by river; increasing greater participation in sport and recreation on the water; improving the heritage and environment and encouraging more community and culture along the riverside.



KNIGHT DRAGON

Knicht Dragon also note that reference throughout the document is made of the importance of the River Thames to support the capitals growth and you correctly point out that the a significant number of homes are to be created along the River Thames and also highlight Greenwich Peninsula as one such important location. I do not believe KD were consulted directly on this document and we would be grateful if you could add my contact details to your list of consultees and also consult on all future documents which are likely to have an impact on Greenwich Peninsula. In addition, I note that very few developers were included on the list of organisations that contributed to the Vision and hence this certainly must be one area that the PLA needs to work on?

I note that at page 14 that the Vision states that: 'Equally so, reactivating safeguarded wharves that are lying dormant, with developers sitting tight, hoping instead that they can be turned into riverside housing developments contrary to established policy.' This is, in my view, a slightly unnecessary comment to be included in a Vision document. As you may be aware many developers, like Knicht Dragon, are actually seeking to bring forward high quality development at the earliest opportunity whilst simultaneously providing much needed homes for London, improving riverside environments and also developing essential infrastructure such as river walls and walkways and landscaping and I believe more positive comments about developers role in development of the capital would have been more appropriate?

In terms of the right goals in reference to the 'More trade, more jobs and Inland Freight' sections, I believe that whilst the documents quite rightly highlights the importance of the wharves to London and seeks to 'bring back into use the remaining wharves' to meet the

forecast demand I believe it fails to highlight ways in which the existing wharves can be also be improved. We believe that the Vision should examine and encourage how the existing and future wharves can be improved both operationally; (ie more efficiently in terms of the quantities of goods handled and also the amount of land which they occupy) and environmentally in terms of the impacts they have on the immediate surroundings. We also consider that their visual appearance could also be improved whilst still maintaining their operational activities and elements such as improved river walk and cycle ways would enhance the general perception of the wharves and their associated activities to the wider population.

At Greenwich Peninsula we are acutely aware of some of the impacts of operating wharves on their immediate neighbours in terms of health and safety issues, noise, dust, lighting, drainage, traffic to and from the operations (including inadequate wheel washing) and other general pollution issues. In light of this experience we firmly believe that the Vision should acknowledge that due to the fact that in the near future many developments sitting will be sitting 'cheek by jowl' with the wharves (and the fact that it is also that development activity which is partly supporting the success of the wharves); that there may be ways which the wharves operations can be improved both operationally and also environmentally?

Turning now to the Passenger Transport and Sport and Recreation sections. Whilst it is acknowledged that the PLA seeks to encourage more passenger trips via the river and that the vision seeks to make more efficient use of the existing piers what I find a little frustrating is that when the 2015 Masterplan application was submitted (which included a proposal for new Pier at Greenwich Peninsula West) that it was met with objections on detailed matters (even though it was an outline proposal) rather than supporting and assisting and hence whilst the strategy make seek these elements in practice this certainly does not appear to be the case in practice.

In terms of 'other goals and actions', I note that both on Greenwich Peninsula and in close proximity to the Peninsula that there are several former industrial jetties and piers which have lain vacant and underused for many years which we believe could be brought back into use or improved rather than simply being left to deteriorate.

Knight Dragon has recent experience of trying to reactivate former industrial jetties which occurred when trying to secure planning permission for the re-use of the former East Coaling jetty both for temporary and permanent uses. Our initial proposals were met with objections with insistence that end use is to be primarily 'river related'. The result is that the proposals had to be amended with the addition of what have turned out to be significant obligations making the proposals both unviable and undeliverable, despite the fact that the proposals

would bring back to life a vacant and unused structure for community benefit. In addition the PLA require Licence fees for proposals which can often make even temporary proposals unviable which could be counterproductive to the Visions ambitions. In essence, we consider that the PLA needs to recognise and acknowledge that alternative uses for these redundant jetties which are not primarily ‘river related’ must not be considered appropriate at the outset as their re-use will often improve the river environment whilst simultaneously making the river more accessible for Londoners and also reconsider its approach to unviable Licence fees.

In summary, I believe that the PLA needs to acknowledge that the development of London and creation of new communities both supports the existing and future safeguarded wharves however it will result in developments living ‘cheek by jowl’. We believe that the PLA should become much more pro-active in working with developers seeking solutions to enable high quality developments to proceed. This we believe will still maintain the key Visions of increasing more trade and more jobs; encourage more goods off the roads and onto the river; increasing the passenger trips by river; increasing greater participation in sport and recreation on the water; improving the heritage and environment and encouraging more community and culture along the riverside.

## River Cycleway Consortium (Thames Deckway)

### Right Goals?

We believe the Thames Vision could be more ambitious in attracting new diverse stakeholders to the river as well as building upon the existing



communities and believe that the goals & priority actions can take a more active stance in mitigating climate change rather than simply promoting efficiency gains (such as the replacement of HGVs with river freight).

### Right Priority Actions?

We have identified three goals in which existing priority actions could be improved: - Community and culture Public access to enjoy areas of the Thames east of Tower Hill should be expanded. East London is home to the majority of London’s poorest residents. There are few immediate access opportunities for these residents to use to experience walking, cycling and other community orientated projects along the river. As a common good, the river Thames should be accessible to all without the need for taking expensive

journeys to central London. An approach to community and culture with an emphasis on inclusivity and accessibility would promote existing sailing clubs equally with other community orientated opportunities such as ecology parks, community arts festivals, riverside playgrounds and allotments.

- **Passenger transport** We agree that the Thames could be vastly improved upon in terms of passenger transport to take commuters and tourists off London's overburdened transport system. The PLA should however explore ways of facilitating the expansion of London river transport that do not contribute to rises in London's carbon footprint and poor air quality. Current emission data suggests that the Thames is one of London's few fresh air corridors in which air quality is not significantly hazardous. The PLA could ensure that it remains so by supporting the development of clean energy transport solutions. Also with river crossings the PLA could support the construction of cycling and pedestrian bridges over road bridges, particularly in East London, such as with the Rotherhithe-Canary wharf crossing.

- **Sport & recreation** The PLA should aim to diversify sport and recreation stakeholders. This can be done by encouraging alternative sport and recreational facilities and by supplying new infrastructure. Largely yes- although sustainable future cities initiatives could be an additional goal.

### **Other Goals and Priority Actions?**

Climate change mitigation - in view of London's population growth, sustainable future Cities initiatives could be a goal in & of themselves. The Thames Vision expressly states that its goals are long term, however there is little attention is given to the threat of climate change, not simply as increased flooding risk, but as a disruptive threat to larger systems which London is a part of and dependant upon. There is a new public understanding of the threats of climate change. For example we recently attended the first mayoral candidate debate for the upcoming elections in 2016. It was astonishing how many of the questions from members of the public were focused on sustainability & environmental themes. Moreover there was strong consensus from all candidates that these issues would need to be a top priority in any mayoral administration post-2016 specifically addressing London's poor air quality and We recommend that the PLA plays an active role in helping London meet its carbon footprint goals by incentivising and prioritising such projects that develop renewable energy on the Thames. This could be achieved by prioritising infrastructure projects that use or create renewable energy. As the International Renewable Energy agency suggests the cost of renewable energy projects greatly diminish if they are implemented as part of large infrastructure projects, i.e new bridge crossings and roads.

## Rolfe Judd

# Rolfe Judd

## Planning

Overall we agree that the River Thames is a significant and important asset to Greater London providing economic, environmental, leisure and transport benefits to the capital. This is recognised by the adopted strategic planning policy framework for London (as set out in the Further Alterations to the London Plan (FALP) (2015)) which highlights the potential of the River Thames and includes a series of policies (and policy objectives) designed to increase the use of the Thames for transportation, commercial, leisure and recreational uses.

It is important that the 'Vision for the Thames' also recognises and references other key strategic priorities for London which will inevitably influence both the use of the River Thames and the form/nature of new development occurring adjacent to the River. In particular, the FALP identifies the pressing need to deliver new housing within London as one of the most urgent and challenging issues facing London. The FALP is targeting the delivery of at least 42,389 new homes per annum within London against a target to provide a total of 423,887 new homes by 2025.

To support the delivery of new housing (alongside new employment growth), the FALP has identified a series of Opportunity Areas (identified on Map 2.4 of the FALP). As noted a number of the identified opportunities sit close to or on the banks of the River Thames and other parts of the Blue Ribbon Network. This acknowledges the changing nature and function of the River – with the historic river-side industrial areas (which have been in decline for some-time) now making way large-scale residential-led regeneration. This is particularly noticeable along the eastern section of the Thames (from Canada Water to Bexley Riverside) where the FALP has identified 10 Opportunity Areas capable of providing c. 80,000 new homes.

Added to this, the GLA has recently identified a number of housing zones many near the River Thames with the remit of delivering further housing. This designation further outlines the need for multiple different uses cohabitating together.

This has given rise to an inherent policy tension where the desire to retain London's longstanding industrial sites and wharf facilities (many of which are vacant) often conflicts with the urgent need to deliver new housing to serve London's expanding population. This policy tension has resulted in a patch-work of safeguarded wharf/industrial sites sitting immediately alongside (or close to) substantial designated residential development sites. In our view, the PLA's Thames Vision also needs to play a leading role (alongside the London

Plan) in providing guidance on how regeneration aspirations can be realised, whilst continuing to promote a working river.

We would urge the PLA to work proactively with developers, local planning authorities and the GLA to ensure that (where necessary) competing uses can be accommodated together. As this the PLA should:

- Consider whether all existing facilities which have been vacant for some time and have been little interest can be released;
- Recognise the opportunity for developers to contribute towards the required mitigation measures (regarding noise and dust) on operated sites;
- Adopt options for encasing wharfs to reduce their impact;

The success of this approach requires openness and sense of collaboration between developers, the local council, the GLA and the PLA. Blanket and unrealistic approaches to the allocation of sites creates conflict between users when demands for much needed development within these areas places pressure on unnecessary allocations. The release of unviable allocations is also supported by NPPF paragraph 22 which states that where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.

In adopting a joined up strategy for Greater London realistic goals must be set for the use of the River. The River Thames Vision suggests a substantial amount of new sites as being both appropriate and required for the ongoing operation of the area for freight activities. This recommendation is based on Port Of London Trade Forecasts To The Year 2035 prepared by the Stamford Research Group. However only a summary of this document has been and the key assumptions projecting underlying trade forecasts have not been made available.

However it is unclear on what the findings of the report are based on and how the Thames Vision has extrapolated the findings into a coherent strategy for London. The Thames Vision states that the PLA will seek to Protect and reactivate safeguarded wharves with at least Peruvian, Orchard and Hurlingham wharves brought into operation over the next decade. However the contribution of these wharves in helping achieve the demands set out in the trade forecasts is not identified. It is difficult to appreciate the appropriateness of the PLA Vision without the forecast report.

In addition, while clearly identifying three new wharfs to commence operation, the PLA continues to recommend safeguarding a substantial numbers of other sites. There is no justification as to the requirements of these sites in helping meeting the above targets, nor is there recognition of the options available to improve and upgrade existing infrastructure. The underlying factor behind the allocation is that they are suitable for wharf activities; however this should not be the underlying driver for the delivery of wharfs and should be based on the strategic needs of Greater London taking account of other priorities.

Between 2011 and 2013, the Mayor undertook a review of the safeguarding of wharves on London's waterways. This review - conducted by the Mayor with project partners Transport for London, the Port of London Authority and the Canal and River Trust - updated the 2005 London Plan Implementation Report on safeguarded wharves. The review considered long term water freight trade forecasts and associated wharf capacity requirements and distribution to 2031.

In March 2013 the Mayor published the 'Safeguarded Wharves Review – Final Recommendations' (SWR 2013) for submission to the Secretary of State. Comparing the SWR (2013) and the allocations map provided within the Thames Vision there is a clear disconnect between the protection of sites. A notable example of this Sunshine Wharf in the London Borough of Newham, with the Thames Vision states that it should continue being protected for reactivation and the SWR stating that it is no longer fit for purpose and should be deallocated.

It is difficult to understand without the full details of Port Of London Trade Forecasts To The Year 2035 document prepared by the Stamford Research Group the justification behind the change in stance on many sites within London. Given the discrepancies listed above it is considered that there is not enough robust evidence presented to justify the safeguarding of a number of sites and would suggest that further transparency is needed with regards to their protection.

There is currently a clear disconnect between the Thames Vision and the previous Safeguarded Wharf Assessment's and this must be resolved to help create an atmosphere of understanding regarding the need for very stringent land use constraints. This is especially pertinent considering the impending consultant on the draft Opportunity Area Planning Framework for the Royal Docks which is seeking to deliver substantial regenerative development along the River Thames in South West Newham.

Although we still consider that further work is needed to determine the viability and demand for new Thames-side activities, it is clear that operators of safeguarded wharfs along the

River Thames do have an important role to play in London and that the integration of these uses with other mixed use and often residential character of surrounding areas is important.

The Further Alterations to the London Plan with policy 7.26 states that new development should seek to minimise the disturbance caused by existing and proposed safeguarded wharfs through innovative mitigation measures. This is an obvious and essential criterion to ensure that the vitality of safeguarded wharves is not compromised by surrounding vulnerable uses.

However in working to this goal the Thames Vision must also promote innovative measures internally within safeguarded sites to ensure they do not compromise the ability to meet the ambitious targets set by the London Plan in meeting housing and economic goals. The Port of London Authority has already identified the proposed wharf sites, numerous of which are located in areas defined for new housing and wharf operators should be seeking to adopt clever mitigation measures to ensure that the potential negative impacts of the activities undertaken on site do not unduly compromise the surrounding environment notably for new development. Where these sites do not adopt mitigation approaches the wharfs activities on site jeopardise the ability for London to meet the needs of its inhabitants.

Overall we support the PLA's intent to create a vision document for the River Thames in helping achieve its economic, environmental and social potential. However, any such vision document must take account of and respect all strategic priorities for London such as those identified by the GLA and London Boroughs to deliver large areas of Housing on Brownfield lands adjacent to the River Thames.

Collaboration should be promoted between the between the relevant stakeholders during the allocation of sites. This should include careful consideration of the inter-relationship between more traditional commercial operations and the delivery of key strategic housing developments along the river and explore necessary measures to ensure that the potential for both can be maximised in a mutually beneficial way. We would welcome further engagement with the PLA in helping identify appropriate strategies to assist in achieving the targets set by the Further Alterations to the London Plan.

## **Thames Gateway Kent Partnership**

The Thames Gateway Kent Partnership is a public-private partnership promoting sustainable economic-led regeneration and growth in the local authority areas of Dartford, Gravesham,

Medway and Swale. Our interest therefore relates in particular to the “Thames Barrier to Southend” section of the river and estuary.

Port of London: more trade, more jobs (2.1)

The Partnership broadly concurs with the priority actions suggested. With regard to the Lower Thames Crossing, we will be responding to the Highways England consultation on the proposed route.



We suggest that this section, and the Vision document more generally, should acknowledge the relationship between the Thames and Medway Estuaries, and the importance of cooperation and collaboration to agree shared objectives between the PLA and Medway Ports, notably Peel Ports at Sheerness. Both estuaries and their Ports have roles to play in supporting economic growth in the south east of England and the commercial markets of Greater London in particular.

Inland freight: more goods off roads onto the river (2.2)

We concur with the PLA’s objectives for increasing the use of the Thames for freight and movement of other goods and materials. We note the proposal to establish a Thames Skills Academy and would welcome clarification as to its relationship with the North Kent College’s National Maritime Training Centre at Gravesend, which would be an obvious foundation for enhancing maritime training provision serving the Thames Estuary.

Passenger transport: more journeys (2.3)

We welcome the PLA’s ambition to increase usage of the Thames for passenger travel, both for commuting purposes and leisure. As well as the potential for river-borne passengers to access the proposed London Paramount Resort, there may be scope for shorter-term enhancement of cross-river services to enable Kent and Essex residents to access employment opportunities on the opposite side of the river: subject to viability and local public transport connectivity, this could provide travellers with an alternative to the congested A282 road crossing. We would welcome further engagement by the PLA with the North Kent authorities (Dartford, Gravesham, Medway and Swale), and our South Essex counterparts, in exploring potential opportunities.

Sport and recreation: more participants (2.4)

We recognise that participation in sports and recreation activity on the Thames is likely to be concentrated within the Greater London boundary, though sailing in particular is well-established further east in the Thames Estuary. Given the opportunities to promote sailing and other water-based activities in the Medway and Thames Estuaries, including at Gravesend, the Medway Towns and Queenborough on the Isle of Sheppey, we would welcome the PLA exploring with stakeholders in North Kent the possibilities for enhancing the offer and promoting greater participation. There may also be scope to explore whether there are any suitable sites on the North Kent bank of the Thames for provision of visitor moorings, perhaps linked to regeneration of waterside sites.

#### Environment and heritage: improved tidal Thames environment (2.5)

We welcome the PLA's commitment to improving the water quality of the Thames and objectives to maintain and improve the condition of the Estuary's many designated wildlife habitats.

We recognise the importance of the Thames Tideway Tunnel to the achievement of these goals and trust that the PLA will ensure, with Tideway, that tunnel spoil is, as appropriate, deposited in suitable receptor sites for restoration or habitat creation purposes, or utilised as primary aggregates.

We look forward to seeing more detail about the PLA's proposals regarding the joining up of a Thames Path reaching to the sea and urge positive engagement with local stakeholders to explore how this goal might be realised.

#### Community and culture: more people coming to enjoy the Thames and its banks (2.6)

We welcome the PLA's celebration of the cultural, historic and environmental assets along the Thames, both river and Estuary. We are keen to see how promotion and branding associated with the Thames might link with and complement the promotion of the Thames Gateway as an area of both economic opportunity and attractive quality of life, and we would welcome the opportunity to explore that potential further with the PLA.

We would also be interested to see more detail about potential opportunity zones for residential moorings: it is not clear whether the PLA considers there are any sites along the Kent side that could fulfil this role.

## Thames Water

Thames Water supports the goals and priority actions set out in the document. It is noted that the second goal is to move more goods off roads onto the river. The supporting priority actions refer to the Thames being the default choice for the transport of waste and construction materials, protecting and reactivating safeguarded wharves and establishing a Thames Skills Academy by autumn 2016.



Thames Water are seeking to utilise river transport for the removal of excavated materials and the delivery of construction materials for the Counters Creek storm relief sewer. A planning application for this development is due to be submitted later in the year.

Thames Water support the objectives of the safeguarded wharves policy and its current implementation. However, in future, a more flexible approach may be required to allow capacity to be maintained, but not necessarily at the same sites. There are some safeguarded wharves which are more suited to being developed into multi-modal transport hubs than others and it may be worth focussing on maximising the benefits at the most appropriate sites and removing safeguarding on others.

It is noted that the fifth goal is an “Improved tidal Thames environment” and that the first priority action towards achieving this is for the Thames Tideway Tunnel to be built and brought into operation by 2023. We support this reference to the Thames Tideway project. We have recently undertaken a major construction programme across our works at Beckton, Crossness, Mogden, Long Reach and Riverside to significantly reduce untreated discharges of storm sewage into the River Thames. We have also delivered the Lee Tunnel which will aid in preventing more than 16 million tonnes of sewage mixed with stormwater overflowing into the River Lee each year. The Lee Tunnel was recently opened by Boris Johnson.

## Tideway

As you know we are now into the delivery phase of the Thames Tideway Tunnel and main works construction is just beginning along the River. We are very supportive of the goals and priority actions set out in the document which support our own vision to reconnect London to the river.



We note that the second goal is to move more goods off roads onto the river. The supporting priority actions refer to the Thames being the default choice for the transport of waste and construction materials, protecting and reactivating safeguarded wharves and establishing a Thames Skills Academy by autumn 2016.

Through commitments in our River Transport Strategy we aim to remove 100% of the excavated materials for the main tunnel and main tunnel drives sites by river, and also significant proportions of construction materials. We are looking to further increase our use of the river to reduce the number of lorry movements and look forward to your support with that initiative over the next few months.

We are supportive of the objectives of the safeguarded wharves policy and its current implementation. We do suggest though that, in future, a more flexible approach may be required to allow capacity to be maintained, but not necessarily at the same sites. There are some safeguarded wharves which are more suited to being developed into multi-modal transport hubs than others and it may be worth focussing on maximising the benefits at the most appropriate sites and removing safeguarding on others.

Also, as you know Tideway is a major supporter and initial funder of the Thames Skills Academy. We are delighted with the leadership that the PLA has shown in being the catalyst for this crucial new organisation and we look forward to working with you to bring the expected benefits of the Academy into reality not just for the marine supply chain servicing Tideway, but for the wider river community as a whole and over the long term as a legacy beyond our project.

We note that the fifth goal is an "Improved tidal Thames environment" and that the first priority action towards achieving this is for us to build and bring into operation the Thames Tideway Tunnel by 2023. We support this reference to our project and look forward to your support to help us deliver the project safely and ahead of the original schedule.

## The Company of Watermen and Lightermen

We applaud the Port of London Authority (PLA) for taking up the challenge of forging a Vision for the tidal Thames for the next 20 years. Others including the Mayor for London have put together and are pursuing plans, policies and actions for parts of the Thames or for certain activities on the Thames. The Company has long felt there should be a single strategy supported by all



interested parties for the whole tidal Thames and for all activities that occur on its waters.

The Company has already contributed to the development of this Vision and will continue to do so, hence this response on the goals and priorities for actions.

### The Response

The Vision has to be supported by the many stakeholders who have contributed to it as they will be required to pursue some goals and actions themselves or support others in doing so as there is no legal statutory authority for the whole of the draft Vision. However it should still challenge untested theory and hypothesis, requiring those putting such views forward to present an evidence base.

### Developing the Vision

The Company supports that Vision should be that the tidal Thames plays an increasing part in the sustainable development of our World City. It should consider all users reflecting that development has to be paid for from commerce. The Thames is an open space that should be enjoyed by all and not just by direct users, part of that enjoyment is the activity that can be seen and heard on the Thames.

The context is growing use of the River for a growing City, part of that growth is the investment in the Thames Tideway Tunnel with the associated opportunities it brings and hopefully the legacy it will leave. The effects of climate change short and long term must guide decisions particularly building below the Thames Barrier in the Thames flood plain. Safe use of the Thames afloat or ashore is essential and must be at the root of any plan.

As highlighted above the Company believes the collaborative approach is essential for this voluntary Vision. The mixture of invited response and assisted responses through meeting and workshops should continue even after the Vision is adopted as it must be dynamic adapting as circumstances dictate. Previous work on this type of complex project (e.g. Blue Ribbon network) should be referred to and, if appropriate, utilized within the Vision or the strategy for delivery.

The Company believes the breath of uses identified provides a satisfactory framework for the Vision. The Company welcomes the PLA's initiative in commissioning external studies and has been pleasantly surprised by some of the data produced particularly the value to London and the country of the River as a public amenity, Of course, it is difficult to grow all River uses at the same time and place but we must use our imagination to manage and accommodate growth.

The emerging goals identified are supported with one more. The Company believes there must be provision for greater vessel and marine plant maintenance and repair facilities on the tidal Thames. We acknowledge the GLA's plan to promote a new facility on Albert Island but we question whether the facilities are sufficient to take account of the size of vessels over the next 20 years. The Company would in any event like to see a target of adding to the existing facilities within the 20 years' time frame of the Vision.

#### Emerging Goals and Priority Actions:

##### Port of London: More trade, more jobs

The busiest ever Port of London is an admirable goal. In addition to looking internationally, regional trade with Europe needs to be developed. There is too much road traffic coming from Europe many of goods carried could be afloat for more of its journey and more traffic travelling to Europe with good unloaded here.

To achieve the goal, the Port needs to be effectively marketed. This is a job that is part of the PLA's remit which should be reviewed in collaboration with other wharf and terminal owners to see whether this service can be further improved. This might be part of the work of the Port and Infrastructure Group whose formation is welcomed. The Watermen's Company Aims and Objectives include several that relate directly to developing and promoting a "healthy" River and watermen themselves have a part to play in berthing and moving shipping efficiently within the Port.

Growth of the Port of London will drive growth elsewhere in the port. The private sector will respond if there is public investment to provide the right facilities'

Whilst accepting freight must be efficiently moved on from the Port hopefully on the water but accepting roads and rail have a part to play improvements to the road network must not drive trade onto vehicles that could be carried by the River. We must all continue to press government to ensure through grants that transport by water is not paying privately for all its infrastructure whilst roads and rail continue to benefit from government funding.

River crossing by bridge and ferry must take account of the public right of navigation of vessels of and at least the current dimensions of vessels using the River,

##### Inland Freight: More goods off roads onto the river

The benefits of using barges to transport goods and materials must be sold to the construction industry, retailers and others. The examples like Blackfriars Station extension were an undeniable success. There should be web access to best practice and examples

perhaps on the PLA's website. (We believe A.I.N.A. did publish a best practice guide for freight). But greater use will require more and/or better strategically placed piers and wharves. Local Government can lead the way on waste transfer from road to water and build into planning policies recognition of facilities for water borne transport.

Whilst the current safeguarded Wharves policy is essential, there are many opportunities to trade some current underused wharfage for better strategically placed wharves at potential mixed usage transport hubs. As alternative uses blocks later use as a wharf for an eternity property developers must be resisted until suitable alternatives are found

The River Concordat provides a useful GLA supported forum it has limited membership and resources to be an adequate promotion body. Funding is needed to improve the Concordat or start up a body solely charged with promoting River freight transport.

The Company supports the establishment of a Thames Skills Academy (TSA) and will play its part to ensure the success of the Academy provided the Academy works with training scheme managed by the Company. There are lessons to be learnt from the past, starting with the MCA's decision not to require any structured training before candidates submit themselves for the BML examinations together with the struggle encountered by the Thames Training Alliance where the few apprentices it took on have, three or more years later, still to be become Boatmasters. Whereas the TSA will be better funded and government supported, it is still like TTA to be employer led. This means it must be acceptable to the overwhelming majority of employers on the River. Part of their judgment will be what legacy will it provide going forward after Tideway has completed its project. It has to prove itself by some early success which will mean limiting aims.

Thames Watermen's Local Knowledge Endorsement is vital to safe navigation. The Company has offered its support to the MCA and PLA is examining for the Endorsement.

Passenger transport: More journeys

The goal is achievable. The Company looks forward to seeing the publication of the Marico Marine study

Like wharves for freight, piers are essential to grow passenger trade. There is already limited capacity on some City piers, so more pier capacity is needed as well as introducing new piers where new development takes place. Timetabling can help provided this does not push some operators off the pier,

Pier use is governed by passenger requirements. It is difficult to see rush hours ceasing so building more pier space will need to feature in the Vision. New piers need to go alongside larger developments so the Vision needs to be flexible as to where the piers should be built. The further away from the centre the developments are the more advantage surface transport will have.

Marketing of piers and services has improved enormously but there is still more to do. The quality of facilities on pier has much further to go with better waiting areas, refreshments and wireless. The Underground service has shown the way LRS have to follow.

Sports and recreation: More participants

The Company supports the idea of sports opportunity zones as these can drive demand away from commercial traffic. As the Mayor's plan has shown targets can drive growth.

Visitor moorings can increase leisure use but they need to be positioned away from commercial traffic areas.

Environment and heritage: Improved tidal Thames environment

The challenge for Tideway is to deliver on its pledge for transport by water when the going gets tough. The Company would like to see their pledge added as a goal to be exceeded.

The Watermen's Company supports the principle of "no polluting matter to be discharged into the Thames from any vessel". To achieve this, it will be essential to provide such assistance as is required by all boat owners and operators to modify or convert their existing arrangements and to ensure the provision of a suitable number of accessible, affordable and well maintained polluting material disposal facilities.

The Thames path north and south is vital to persuade the average Londoner that this is a space to be enjoyed. Nature reserves both draw attention and increase the numbers of people visiting the River.

Community and culture: More people coming to enjoy the Thames and its banks

This is a laudable goal but to encourage more houseboats is likely to increase the difficulty of safe navigation at a time when wash is seen as a problem by houseboat owners.

For some time, the Company has felt a brand for the tidal Thames is essential. It has worked well with the EA on the upper Thames. Along with the brand should go integrated social media and a website that for a start should list all dates, times and places of Thames based activities. Totally Thames has been a great success and is to be encouraged.

## Members of the Public

This section is composed of responses by members of the public with no affiliations or from individuals at organisations who are replying with their own personal views.

### Response No.1

#### Right Goals and Priority Actions?

More focus on actual investment in recreational infrastructure is needed, as per below examples in the third question.

#### Other Goals and Priority Actions Needed?

My feedback for the PLA vision is greater actual and practical support could and should be provided to actually improve the recreational offer of the Thames.

In particular at Dartford and Crayford Creek the following support or assistance could be given to actually provide improvements to this used but neglected asset;

Key requests that I can think of for the two creeks that could be included some very low cost.

- An overall improvement of recreational navigation facilities along the two creeks
- Provision of Signage
- Waiting buoys in the Thames for the creek entrance
- Waiting posts at Bob Dunn Way Bridge both sides
- Air draft gauge on the flood barrier
- Air draft gauge on Bob Dunn Way Bridge
- Air draft gauges on the railway bridge at Crayford (both legs)
- Several winding holes to be dredged at key locations
- Improved slipway access (a bigger slipway could be located elsewhere)
- Improved mooring facilities, rings, posts, signage.
- Dredging in places
- Designated boaters parking
- Boat repair yards.
- Removal of cantilevered walkway to clear river wall for safe berth.
- Removal of faggot bundles from the boat berthing positions, e.g. where Pentargon Springer was berthed and neaped the Summer of 2015.

At Broadness Creek there is also need for this threatened facility to be helped, at the moment the creek is in desperate need of dredging and waiting buoys are needed, there

also needs to be a whole shift in the way the current boating community are viewed as this is clouding strategic thinking of what should happen there. Broadness Creek is a very, very, very valuable and rare facility on the Thames and should be helped, not neglected and lost.

Northfleet Harbour could help provide a lot of what the PLA are setting out to achieve, any help I am sure would be more than welcome from that charitable organisation.

Usable public slipways, there are none currently in North Kent, as a maritime nation we really should have a public slipway in every Riparian Borough if we are to see people regain their interest in boating (There is a reason why there is a shortfall of mariners joining the profession, it is the lack of facilities introducing new mariners to the waves).

The hugely successful public landing stage at Gravesend needs to be emulated in other towns, there really should be a public landing stage in every Riparian Borough to make the Thames a welcoming place.

## Response No.2

In your Environmental section you fail to have any vision for dealing with the harmful emissions from all commercial diesel vessels using the river.

MARPOL are just putting their 'toe in the water' when it comes to emissions.

London in particular has a Low Emission Zone (LEZ). Non Road Mobile Machinery (NRMM) operating within the LEZ has to retrofit a combination of catalysts, SCR, EGR and particulate traps.

With the increasing traffic using the river; it will be necessary when walking on the rivers edge to wear an industrial mask.

The PLA have a responsibility for improving the river environment. The PLA is also accredited to the ESPO Green Guide, but fails to support all its goals.

## Response No.3

### Right Goals?

I think they are excellent.

### Right Priority Actions?

Seem good and well thought through.

**Other Goals and Priority Actions?**

I am very concerned that the last functioning boat yard at South Dock Marina is under threat by a large housing development. The boat yard is widely used by commercial and leisure traffic and the proposal to build two tower blocks on the site needs to be viewed with extreme caution. Southwark Council are claiming that the boat yard will be enhanced yet they are fully aware that they would not receive planning permission if they asked to close the yard. Instead they have come up with a proposal that puts the boats under the tower blocks and leaves a tiny open yard. It will only be a matter of time before the residents complain of toxic dust and noise and the yard is forced to close. I think the PLA should investigate what is happening and make their views known. The Thames Vision can hardly happen without somewhere to haul out and maintain craft.

## Response No.4

**Right Goals?**

The document seems to contain a coherent and broad set of goals for the future, covering what seems to be all current uses of the river.

**Right Priority Actions?**

In my opinion, yes

**Other Goals and Priority Actions?**

No

## Response No.5

**Right Goals?**

I think the goals for the future of The Thames are right for now. However as the development of The Thames progresses the vision for the future will change. This will mean constantly revising the aims for the future.

**Right Priority Actions?**

I think we have the right priority actions for now.

**Other Goals and Priority Actions?**

The one big priority action for me is to ensure that everybody has access to the Thames at all times.

## Response No.6

### Right Goals?

Mostly; they would be improved if protecting current residential moorings, and developing more where possible, were a top level goal. Overall the tone is about right, but the priority should be higher.

### Right Priority Actions?

Your current and proposed actions to develop sport are laudable, but should include improving the seamanship of the coaching boats (which are often much worse than the rowers themselves). Your plans for sport will be challenged if climate change or bad weather results in floods of landwater.

### Other Goals and Priority Actions?

More participation in sport will require maintaining and expanding the locations where people can get on & off the river, boat and equipment included, close to where they can park.

## Response No.7

I have read the report in full and I am impressed with the depth and perception showed in the consultation process. I attended one of the early meetings at the Rooftop.

My contribution then and now relates to my views in respect to the elderly and disabled persons uses of the river and its views.

I called for the extension of recreational use of the east end and estuary of the Thames in relation to Essex and Kent.

The report has given some attention addressing this area of the Thames but is still lacking detail to flesh out the plan. I would like to see more reference to sightseeing/tourist facilities visiting the various attractions with the development of more piers and jetties culminating with destinations such as Southend and Isle of Sheppey, even more excursions to Margate and Ramsgate for example.

In addition, the development of general viewing areas along many parts of the river's banks to provide for the beneficial visual and informative enjoyment (I regularly drive to the jetty of the Tilbury Ferry and sit to watch the boats go by - at my age a bonus)

My main concern is for the elderly and disable use of such facilities in that such piers etc., need infrastructure to provide adequate accesses in the form of parking, public transport and stable ramps.

I wonder whether there is any representation from Age Concern or Mobility Advisors on your research groups? This is not a simple veneer that can be applied later; it needs to be incorporated in the strategic planning of these proposals.

## Response No.8

### Right Goals?

Yes

### Right Priority Actions?

Hard to say

### Other Goals and Priority Actions?

I think the joined up path should benefit cyclists as well as walkers

## Response No.9

### Right Goals?

Yes

### Right Priority Actions?

Yes but difficulties over river access not prioritised.

### Other Goals and Priority Actions?

Conflicting needs not addressed such as commercial and sporting. Currently lots of recreational activities between Chelsea and Greenwich but not reflected in document.

## Response No.10

### Right Goals?

Yes

### Right Priority Actions?

Yes

### Other Goals and Priority Actions?

If "Passenger Transport" both tourist and commuter is a serious proposal then it is imperative that the air draft for both Chelsea Bridge and Hammersmith Bridge are lifted.

If "Inland Freight" is a serious proposal both Chelsea Bridge and Hammersmith Bridge need to pass at least 2 levels of containers which is not possible now, tests by the PLA in the 1970's confirm that the river can not be developed unless each bridge is replaced. The recent debacle with the tourist boat, "Spirit of Chartwell" (The Queens Diamond Jubilee Pageant Barge) illustrates that work on London bridges needs to take place before commercial boats of any size can work up stream on the river.

## Response No.11

### Right Goals?

Yes

### Right Priority Actions?

Yes

### Other Goals and Priority Actions?

Keep the river free access for all without requiring a licence for Tidal Thames, byelaws are adequate.

## Response No.12

### Right Goals?

I agree with the goals but think it is essential that the environmental work considers both the quality of the water and air quality around the river, particularly if sport is to be encouraged on and around the river as well as for the benefit of London residents and workers.

**Right Priority Actions?**

Priority actions should include consideration of how the environmental impact of increased traffic can be minimised, particularly the impact of air pollution, perhaps by regulation on emissions and requirement of any large cruise liners to have shore supply power. noise and light pollution also needs to be considered if there is considerable traffic at night.

## Response No.13

**Right Goals?**

Yes

**Right Priority Actions?**

Yes

**Other Goals and Priority Actions?**

Clean Air and zero pollution on and around River Thames. All ships and river craft to have zero emissions of all polluting chemicals.

## Response No.14

**Right Goals?**

Yes

**Right Priority Actions?**

Yes

**Other Comments**

I agree with all points from here however I would like to respond directly to the point regarding the lower Thames Crossing.

I perfectly understand the need for an additional crossing however current preferred option from highways England will not meet the goals set and in addition will have a catastrophic impact on local residents. The route that needs to be taken is option C route 4. This will improve the local road network, improve congestion on m25 and Dartford crossing but also will ease congestion on the a13 and a127, both in desperate need for improvement. This route also has the least impact on local residents whilst also meeting the goals. Putting a crossing through the middle of Orsett would be a disaster. Instead use route 4 and improve the rest of the road network instead of ruining a village and making the local roads worse.

The health impacts on this route could also be incredibly damaging with the preferred route running closest to local homes.

## Response No.15

### Right Goals?

Yes

### Right Priority Actions?

Yes

### Other Goals and Priority Actions?

Temporary moorings for craft passing through London and needing to stop to wait for the tide, raise or lower masts, take on or drop off crew and purchase supplies, and clear information about where to find such berths and how to book them, e.g. buoys and parts of piers.

## Response No.16

### Right Goals?

Yes

### Right Priority Actions?

Yes

### Other Goals and Priority Actions?

- Proposed river crossings: Silvertown, Tilbury Gravesend tunnel.
- Opportunity for further flood barrier upstream for London Gateway.
- A DLR type light rail crossing for Woolwich/Greenwich – Bluewater/Lakeside (golden opportunity to ease commuter and shopping traffic).
- Deptford Creek: An opportunity for 'Gloriana'
  - Set in a lighter alongside the new bridge or other maritime anchorage.
- PLA welcome Cruise Ship Terminal but plan a visiting mooring for other visiting craft.
- Tall ship festival: No mention in Vision document.

## Response No.17

### Right Goals?

Regarding the passengers service, there are already many people who would like to use the boat service to commute but find that it is full at peak time already and therefore cannot rely on it to go to work on the morning (findings from the Greenland Pier area). Doubling the service by 2035 is not quick enough. Peak time boats should be much more frequent as soon as possible.

## Response No.18

### Right Goals?

Yes, they are wide-reaching and comprehensive, subject to my comments below about other goals.

### Right Priority Actions?

Yes

### Other Goals and Priority Actions?

In respect of leisure boating, much more encouragement (and funding assistance if possible) is needed to supply more leisure berths for visiting vessels, thus increasing the tourist pound income and employment, and not necessarily more permanent liveaboard berths. Many of the existing facilities are full, e.g. Imperial Wharf, Hermitage, St Katherine and Limehouse. There is plenty of scope for more berths at Greenland, West India, Millwall, Royal Group and

Gallions. A small amount of dredging of entry points to some locks could significantly improve tidal windows.

The single gates at Gravesend Marina make it virtually impracticable to use; a proper lock is needed. Assistance should be given to the proposed new marina development at Northfleet.

Leisure boat safety can be maintained or even improved, even with any traffic increase, by continued education, e.g. the excellent Tidal Thames Navigators Club, rather than any more formal training and testing.

## Response No.19

What is presently lacking in the Vision is any mention of Entertainment and Leisure

For centuries, the river Thames was, in every sense, London's Front Door.

In recent decades, that aspect of the river has been encouraged and thankfully so. But largely in it's commercial shipping guise...

Tfl regard the central London river as it's own and especially as a God given, cheap, 'overflow' to an already stressed land transport system. And, slap-bang through the center of the world's greatest city: Tfl are fortunate to have such an bonus...

Property developers have benefited greatly from sales enhanced by the 'views' of, and across, the wide-open spaces created by the all-giving river. But they fail so far, to see the attraction of joining the river to their luxury apartments by adding piers and connection...

The PLA used to allow property developers to fill-in slipways and shut off public access to the embankments. Thankfully, some of that has reversed and the Blue Ribbon is of increasing delight to increasing numbers...

It is all well and good to describe the Thames as "a riverside which is a magnet for ramblers, historians, artists and others, whether living nearby, on the river or traveling from further afield". But that is about as far from the truth as it is possible to get -in central London...

Of course, there are ramblers, historians, artists: but the city is a magnet for bankers, businesses, theatres, film makers, film stars and global 'fashionistas', heads of state, architecture, football, hotels, oligarchs, restaurants and bars, music –opera, 'pop' and the performing arts generally...

Airports and motorways now claim their rights as front doors to this great city. But that is no reason to treat the Thames in central London as it's secret garden...

Thames Clippers are a fantastic asset to virtually every aspect of London but not all want to 'fly-by' from A to B...

'Ferries' are among the earliest rights to exist in history, reaching way back before the Romans arrived. Reinstating these back-up facilities will add a faster, fresher, frequent service to aid the re-development of the riverfront as the destination it deserves to be in this ever-increasing city of growth and re-invention.

What is increasingly required is a smaller, integrated, perhaps (initially?) semi-private, floating travel option demanding inexpensive, multiple, piers with access to the public and riparian apartment owners alike.

[Cowes (Isle of Wight) and numerous coastal towns support river-taxis, available for advance bookings, and to flag/radio/phone. Organised on commercial licenses, they are profit-making and independent. For the benefit of members, the standard services are sometimes added to and supported by yacht clubs -here in London their equivalent would be the riparian developers.]

Perhaps the time is here, perhaps it is already overdue? But riverfront bars and restaurants will thrive and grow to serve resident Londoners and the multi-millions of multi-nationals who will live-in and visit this great, growing city...

There has always been a small group of adventurers and artisans who prefer to live on the river rather than next to it. Modern technology has now made this minute proportion of the population more comfortable and far safer than was previously possible. As a consequence, standards are rising and the quality of the vessels increasing in line with costs. New piers are being funded as a result of the limited but increasing demand for floating homes. But many riparian leaseholders and occupants erroneously feel they have a right to keep the waterway completely clear...

It is important to develop and add to existing waterside leisure facilities and traffic by actively promoting limited first class floating communities that complement their adjacent developments and bring an 'outdoor' element to the riverscape. These communities will promote private sector funding for new public access piers, more open access for mini-ferry and taxi services to existing piers, and new, smaller, ferries to travel across as well as along the river: a key factor in developing the embankment as the leisure destination it is already trying to be. But small, architecturally interesting floating communities supporting new public

access and encouraging an increased 'novel' transverse traffic, adding substantially to A to B, peak hours commutes, are viewed by many as thwarting the riverscape spectacle...

This new, exciting, efficient transport will increase business where it exists already and provide new entertainment opportunities to those who presently live by the river or travel it's length -as well as overseas visitors and Londoners generally.

Once established, this riverbank/entertainment model can ultimately be used in the exciting opportunities that will inevitably materialise with infrastructure to the east. Precisely as in the past, initial occupation of the waterfront will lead to penetration of the surrounding territory and –show me an oak tree that didn't come from an acorn- that is how development will naturally permeate along the east river and grow a more interesting, more river focused London.

## Response No.20

1. The Tideway is a navigable waterway for River and River-related use. It is NOT spare space for conversion to land-uses like football-stadium-grandstands (Fulham Football Club), floating football-pitches, floating cycle-tracks (Thames Deckway), or floating houses or blocks of flats. Do NOT be seduced by the huge amounts of money due in return for River Works Licences, into selling off navigable waterway for landside development uses.

### 2. What Can Be Achieved

Subject to my comment on 1, above, ensure that the PLA's Goals (primary aims) are for maximum River uses, and NOT for maximum financial profit. Of course the PLA has to make a profit in order to carry out its job, but NOT by selling off the River.

### 3. Goals.

The over-riding priority under every heading is for the PLA's work to be 'green' - environmentally sustainable.

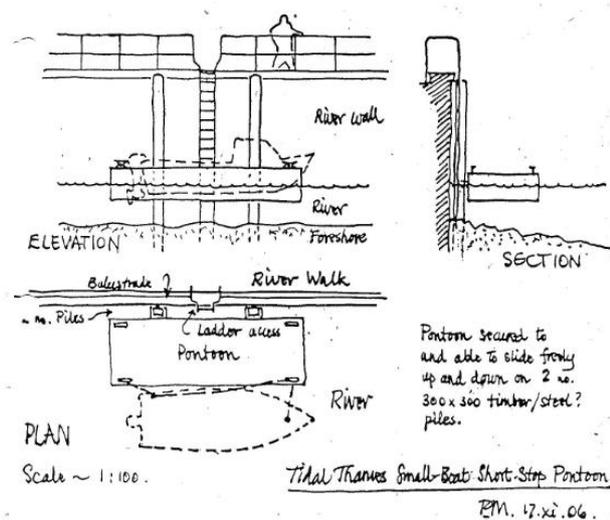


Figure 3- Sketch by the stakeholder

Of the PLA's six 'Goals and Priority Actions' headings, three miss out an essential component, the provision of practical (and affordable) stopping-places for small private boats. The attached sketch (see figure 3) illustrates one example of what I am talking about. Such a facility needs to be provided at every public Pier. This applies to 3. Passenger transport, 4. Sport and recreation, and 6. Community and culture.

## Response No.21

### Right Goals?

2035 is really too short a time horizon. Ensuring the river is used more extensively for transporting goods is essential to reduce congestion on the roads but it must be linked to increased use of canals also.

### Right Priority Actions?

They are a start.

### Other Goals and Priority Actions?

The vision is woefully short on addressing the inadequacy of TE2100. This needs immediate review with a need to update the projections and to start improving TE flood defences; this is an essential to do item.

## Response No.22

### Right Goals?

Generally yes, but they are incomplete, and they do not represent a holistic approach. They do not address the implications of the actions, e.g. increased river traffic causing significant air pollution

### Right Priority Actions?

Not entirely

### Other Goals and Priority Actions?

Air quality and emissions from the vessels - this is a huge unaddressed problem and will really impact on the health and quality of life of local residents. No impact calculations, no

plans on control or enforcement of existing regulation. Enderby wharf is the best example of how this issue has been ignored completely.

## Response No.23

The misery inflicted on riverside dwellers when rogue disco party boats go past after midnight with a DJ shouting out “Happy Birthday, Jo”. This is especially bad on hot summer nights when residents are forced to choose between opening their windows to let the breeze through or closing their windows to keep the noise out. If you do not resolve this issue before thousands of new homes are built by the river you may find one day enough political pressure is applied to strip you of your powers over this area. Could not find the word ‘noise’ in the documents.

Air pollution – given that air pollution is a major issue on London’s roads this should also be an issue on the river, why should boats / ships etc be treated differently to cars? Could not find the word ‘pollution’ in the reports.

Enderby Wharf cruise terminal – Potentially major impact on the river and surrounding residents. Most enlightened ports require cruise ships etc to use OPS rather than running their diesel engines 24/7 in order to avoid air and noise pollution. Is what Hamburg, Oslo, Seattle etc require not good enough for London?

Vanguard Heliport on Westferry Road, E14 proposing to build a landing pad out over the river– there seems to be a preference for helicopter operations next to rivers i.e. at Battersea. No mention in your consultation of the implications of this and whether heliports should be built out onto the river. The Thames also forms part of the CAA approved helicopter routes in central London.

Thames Deckway – a very interesting idea worthy of serious consideration

Floating houses – given Terry Farrell’s recent suggestion of building more bridges with floating homes in their lee, is that an idea you are considering?

River access protection – given the intense pressure of development on sites especially those close to rivers there are a number of key river access points that the PLA need to protect otherwise the risk is that new residential developments shut London off from the river. We are concerned by the river access opposite the Docklands Sailing and Water Sports centre on Westferry Road, E14 which is used by one of the river races as a starting point, we hear rumours that C&RT might be selling it.

New bridges especially cycle and pedestrian bridges over the Thames between Rotherhithe and Canary Wharf and Greenwich and Canary Wharf are part of the GLA Isle of Dogs & South Poplar OAPF.

## Response No.24

### Right Goals?

The right goals certainly to retain the heritage and trades of the river. To look after it and make sure it stays within the hands of the people of London. The proposed development at South Dock in SE16 is detrimental to maintaining the heritage and the ecosystems developed around the dock.

### Right Priority Actions?

The priorities are the right ones. Preserving and improving the Thames as a main transportation route will alleviate a city that is becoming more grid locked by the day. We need a working boatyard at South Dock not a small postage stamp that the developers are proposing.

### Other Goals and Priority Actions?

Developing the infrastructure that is already present on the River to develop the vision. For instance developing & expanding south dock boatyard so it can help maintain increased traffic on the river over the next 10 years -preserving it for the future of the river rather than building residences in it.

## Response No.25

### Right Goals?

Mostly.

### Right Priority Actions?

Maybe

### Other Goals and Priority Actions?

I believe that the river should be safe and accessible for everybody, and I'm led to believe you share the same view, yet residents living on the Thames itself are subjected to

uncomfortable levels of was daily from high speed passenger boats. It makes recreational use of the river extremely difficult if not dangerous. If you truly want to make the a real hub for everyone then this problem needs to be addressed.

## Response No.26

### Right Goals?

Yes - the river acts as an enabler for a huge variety of activities as well as being an environmental boost to London. The range of events the Thames supports is huge but sometimes there is limited information available in advance that reduces the public's ability to witness or interact with them.

### Right Priority Actions?

Yes, the goals focus on the 5 key elements and the actions seem realistic and achievable - key will be to secure public backing to help fight against vested interests that would prefer to see the plan fail so that areas can be exploited for other purposes.

### Other Goals and Priority Actions?

- 1) Need to encourage riverside Newham Borough to see the river as a beneficial resource not as just something to build flats next to.
- 2) Need to encourage those that look after the former dock areas to be more active in the maintenance and promotion of the water space and ensure the GLA safeguard the water areas to stop them being filled and subsequently lost for ever.
- 3) Alongside the skills academy encourage the development of marine engineering and support companies along the Thames to provide employment, maintain skills and provide services for local boat users.
- 4) Promote the maritime heritage of London (both sites and ships) as part of the overall heritage piece.
- 5) Encourage the development of extra commuter piers on the North bank of the Thames in East London - nothing East of Masthouse Terrace at this time.
- 6) Maximize inland freight (not just building materials & waste and encourage the full utilisation of safeguarded wharves.

7) Work to ensure that existing marinas are protected from closure by promoting great use - believe the Gallions Point Marina is under threat of closure. 8) Work with other agencies to improve the existing Thames path - some sections around Gallions Point are almost unusable.

## Response No.27

### Right Goals?

No - the biggest current issue is pollution and there seems to be no mention.

### Right Priority Actions?

No -it's pollution.

### Other Goals and Priority Actions?

Some current pollution related issues to deal with; Enderby Wharf cruise terminal; noise pollution from party boats; riverside heliports. None of these are mentioned.

## Response No.28

I think you're about right on the vision, but you seem to only look at the up-side of river traffic. There are costs associated with all river traffic and you'll need to factor those in. For example, the plan to allow cruise ships to moor at Enderby Wharf would initially sound like a good idea, but the level of pollution (NOX) created by a docked cruise ship can be as much as 850 idling HGVs. As such, any environmental benefits of the ship are lost and actually the damage done here to the environment is significant.

Equally, leisure on the river is to be encouraged, but not at all costs. I've had a number of great trips out on the river, but equally, the noise created by some of the party boats can be very significant.

In short, let's create the benefits that you're talking about, but let's also increase the level of monitoring of the environmental cost of using the river, i.e. measuring pollution created by docked ships and measuring noise pollution created by some of the more irresponsible party boats – removing licenses from those who abuse the river.

Finally, one detail. Using the river east of Greenwich for leisure such as sailing is going to be tricky as the river around Engerby Wharf will be highly congested during the summer when half of the river will be taken up by the new pier and a cruise ship forcing all of the traffic down a channel that was previously twice as wide. Encouraging leisure there will put people at risk.

## Response No.29

### Right Goals?

Yes. I am supportive of these goals.

### Right Priority Actions?

Yes. Priority actions should include the provision of bookable visitor moorings on the tideway for recreational boaters. Simple facilities such as the supply of potable water, rubbish disposal, recycling and disposal of, black water should be considered. For some, the provision of an electric shore supply is considered important.

### Other Goals and Priority Actions?

Continue with, and enhance, the excellent recreational boaters' website, the river users guide, safety bulletins etc. They are very useful to us all. Promote safe and enjoyable convoy cruising with an emphasis on safety briefings and mutual support when on the river. The work of the HM (Recreational) is invaluable.

## Response No.30

I am the principal of an architectural practice, which has been involved with designing moorings and waterside developments on the tidal River Thames and elsewhere in the UK for some 30 years. Throughout this time I have also owned, lived on and operated a narrow boat on the River.

I agree with the stated goals aimed at making the most of the River's potential: its function as a port, its use for carrying freight and passengers and for sport and recreation, its environment and heritage, and its community and culture. I also believe it is possible to achieve all these goals safely and sustainably.

It is clear from enquiries I receive and my experience of designing moorings that there is a substantial unfulfilled need and potential for residential moorings on the River. I also consider that residential boats and moorings, as well as having the potential to strengthen the river community and culture, can also contribute to the other goals of the Thames Vision.

My main concern about the consultation draft is that it does not properly address issues arising from the wash of high-speed vessels, mainly clippers and ribs. Since the 12 knot speed limit was relaxed, a fierce and often chaotic wash has become normal wherever these vessels operate, making the River dangerous and inhospitable for all other users except, possibly, heavy freight traffic. And it is not just the speed, but also the sudden acceleration and deceleration, which causes a surge.

The only acknowledgement of a problem existing is at Section 2.6 dealing with residential boats. Even here, the nature of the residential vessel and location and type of mooring, rather than the perpetrators of the wash, are seen as being the problem.

The reference at Section 2.6 to wave heights of up to 1 metre is unhelpful, because it does not recognise the nature of the problem. The point is that the wash generated by wind and tide on most stretches of this River has nothing like the force of the wash caused by vessels travelling at high-speed.

Furthermore, storm conditions take time to develop, making it possible to adopt safeguards or reschedule. Storms also eventually subside, allowing life to return to normal. The wash arising from high-speed vessels is remorseless and routine, occurring at frequent intervals every day and evening, causing sudden lurches and crashes.

Most residential boats and moorings can, and could always, cope with the natural elements experienced in this sheltered estuary. So, the problem is not the wind and tide, nor the residential boats and moorings, but the wash from vessels travelling at excessive speed.

Wash from high-speed vessels now routinely exposes River users to injury and loss of life and limb. The perpetrators of the wash and the regulators have a statutory duty to eliminate or mitigate this significant hazard. Both should be mindful of the provisions of the Corporate Manslaughter Act 2007 should a fatality ever occur through failure to exercise this duty.

The force of the wash from high-speed vessels is also causing migration of river bed material. It is difficult to predict with any certainty what effect this is having on bridge buttresses and abutments, embankments and flood defences, but the consequences could be catastrophic.

Organisms living in the inter-tidal zone are adapted to cope with normal storm conditions, which are invariably followed by periods of calm allowing recovery. It is likely that the routine and remorseless wash from high-speed vessels is having a serious long-term adverse effect on marine organisms in the River and the ecosystem of which they are a part.

Safety and sustainability are fundamental to the goals of Vision Thames. It is appropriate, therefore, to refer to the internationally endorsed Precautionary Principle: 'In order to protect the environment, the precautionary approach shall be widely applied by States according to their capabilities. Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation.' (Principle 15). Unless measures are taken to reduce substantially the adverse effects of excessive wash, not only will it be impossible to achieve many of the goals set out in Thames Vision, but the River is liable to become degraded. I trust you will take account of these points.

## Response No.31

### **Right Goals?**

Not only these!

### **Right Priority Actions?**

No.

### **Other Goals and Priority Actions?**

As a long term, more than 30 years resident beside the Thames on the Isle of Dogs there are two noticeable differences between when I started living here and now. There is much more traffic on the Thames, which is great, but there are problems with two of these increased activities. The first is increased helicopter noise and pollution from them, both overflying at low levels and also landing at the Vanguard site beside the Thames. The second is late night noise, after 23.00 from 'party boats', particularly at the weekends and in the summer when windows are open. Your vision should focus on the residents close to the Thames, not just the River itself.

## Response No.32

After reading through the consultation document I'm disappointed to see that there is no mention of party/disco boats being reigned in and controlled. They often go up and down the river, very often between 23:00 and 02:00 with very loud music and passengers, disturbing anyone living near the river (probably from Embankment to past the Isle of Dogs).

I live next to the Limehouse Reach and we are plagued by these boats during the build up to Christmas and throughout the summer months.

Please can you include something on how the PLA and relevant authorities can stop this misuse of the river?

## Response No.33

I am generally impressed with the goals and proposed actions, although I consider that the document understates the economic and cultural value of Thames heritage. My comments below potentially relate to most sections of the river.

2.4 Sport & Recreation, 2.5 Environment & Heritage. Recreation is defined in a somewhat limited way, equating it with sport on the river. The Thames' historic past has recreational and touristic value; the latter is touched on in a limited way in 2.3. Passenger Transport. This is evidenced not only by interest in river trips with an historical theme but also in the Thames-related exhibits of the Museum of London, especially those in the Museum of London Docklands; in the archaeological work of Thames Discovery; in the existence of local history societies with particular interests in the river, including the Docklands History Group; mudlark activity; historical themed walks along the river. Preservation of heritage and how best to reconcile this with other goals is a related issue.

2.6 Community & Culture. The suggested action, 'explore development of a Thames brand for culture, heritage and quality of life', is an excellent way forward, but has the best chance of success if it is not treated as separate from these other goals.

## Response No.34

1. The Strategy properly reflects the changing role of the Thames and the accumulating role of PLA into fields which would not have much concerned your predecessors. When we look at the 1968 Act, the PLA statutory remit lists the commercial port aspects of the PLA remit

as its responsibilities. The PLA is granted powers to intervene for recreation, amenity and 'conservation' but there are at the discretion of PLA . I suggest that some of the powers and of PLA should be changed by statute into duties to reflect the changing work it is increasing expected to carry out and seems increasingly willing and able to do.

As a resident of a riparian borough and Thames user, I would like it that a public authority has a responsibility, accountability - and a revenue stream - for clearing litter from the foreshore below the high tide mark.( Such as Deptford Creek's 'Waitrose' arm which is in a sorry state) The standards of access, cleanliness and verdure suitable for an industrial 20th century waterway are not good enough for those of a 21st century waterway with a mixed role which includes tourism, recreation and nature conservation .

2. For water quality, the new tunnels can not be seen as the ultimate answer. They will give us a once-only step change but strategically they are only buying us time for longer-term solutions within the strategy period to meet the needs of, in the extreme case, the Ten Million City. We will bequeath either a continuing problem or a sustainable change to the next generations. Some more definite way of expressing the targets should be in your strategy , such as treatment capacity , the number of continuing direct outlets and the number of new ones to be allowed ( such as Dragon Knight's on the Greenwich Peninsula). Some numbers for future use for bench-marking progress are helpful in tightening up the strategy from what can become a rather vague set of good intentions.

3. Cruise liners should be expected to dump their effluent well off-shore, including at the new facility in Greenwich. It should similarly be the policy that moored vessels should 'plug in' for their electricity as in New York and Amsterdam and Venice. It is dubious first to claim that water transport freighting helps for air pollution; and then to permit shipping to pollute the air by running their diesels for power generation whilst moored next to a mains electricity supply.

4. For public information on water quality "getting better" has to be good news. However, this is an age of information, with a public increasingly sophisticated and sceptical of cryptic un-evidenced public statements such as that. The underlying data are indeed specialised and complex – but this applies to economic data too and we still find ways to report trends, fears, surprises and aspirations in that field. We need to revive the published 'top ten indicators in ten locations' type of information formerly available on-line and to wrap it up into a single index of water quality as a rolling average for the past twelve months, recognising the importance of brief periods of high pollution as well as averages. I suggest a focus on what is healthy for fish gives a focus for achieving a technical consensus on how to set weights to the different factors to achieve a "RPI for the River".

Water quality information should be published at key points on the river bank in the upper river, as is done for seaside resorts. Whilst not swimming, people are often unsure as to whether it is risky to dip their hands in, paddle, or even to walk on the beaches.

5. For freight transport up-river, there should be a guaranteed service of perhaps three ships a week carrying containers on weekdays up to perhaps Battersea, from Dartford. This would be initially speculative but would establish how a modern service could operate using self-propelled vessels moving on the tide in daylight at normally regulated speeds. If regular and dependable, it would establish a market of known users. The service could be identified and specified by PLA and then shipping operators invited to become licensees or franchise holders for a medium period.

6. For the development of recreation, more stop-off points are needed in the middle river, for amenity and safety. Objections to new or expanded recreational slipways and pontoons on the grounds of river flow and preservation of fauna need to be met by improved design advice and a request for better justification as to whether wide stretches of tideway really have a flow problem. These structures can function as refuges for fish and crustacea.

7. For river safety 'Near Miss' reporting is a welcome innovation for river users but the lessons gathered should be more openly available. Accident Reports to PLA should be available on-line. (I saw last summer a motor cruiser at Greenwich which had suffered impact to its sun-roof, actually from above, from a large RIB travelling at speed coming up from behind it). Despite the spectacular and most unusual instance of an 'over-taking vessel', I could find no public on-line report of the incident.

8. Scouring of the shore by high-speed clippers is bringing scouring problems along the river in those sections where there is both an exposed shore at low tide and a dispensation granted for high speeds. This seems not to happen where there are obstructions to the wash along the shore, such as hulks or revetments. In these places mud and sand are retained and vegetation re-appears. We need some experiments in low-lying longitudinal under-water barriers such as could be provided by a line of concrete blocks chained together running parallel with the shore. Such places are not needed by shipping and the objects need not be a hazard to navigation. The implications of scouring for long-term structural damage are considerable (for example to the Old Naval College at Greenwich) and reaction to these would immediately curtail the development of passenger travel.

9. Bow Creek can expect a renaissance in 2016 with the opening of the Lea Tunnel in late January. Responsibility for the upper reaches seems unclear and there may be a case for transferring management responsibility to CRT for at least the waters above Bow Lock as

these are above the reach of most PLA vessels for most of the time. Bow Creek as a whole should be declared a nature conservation area in view of its limited physical access to commercial vessels, with a ban on speedboats, high-speed RIBs &co.

## Response No.35

### Right goals?

Yes

### Right priority actions?

Probably

### Other Goals and Priority Actions Needed?

More user friendly mooring facilities for private leisure boaters.

## Response No.36

On Monday I spoke to a group of primary school children doing some work on the Thames Path in Fulham - many questions and a lot of interest, but when I asked how many had sailed on the river, only a few hands went up.

This led me to think about the educational/learning aspect relating to the river and I couldn't find any reference in the Vision consultation papers.

There is a section on Community and Culture, but the emphasis is on adult visitors - no mention of children or education.

Are we missing an opportunity here?

We want Londoners to appreciate the river and what it offers, we encourage participation in water sports and visitors to "cultural sites", but I would argue that it's important to start doing this at an early age - through education.

There are a number of bodies with educational remits, some supported by the PLA - eg. Thames Learning Group, Thames Explorer Trust, Thames 21, Ahoy Centre, River Thames Boat Project.

As far as I'm aware only the last two groups offer trips for young people but with a limit of 12 passengers, not really of benefit to schools, who also generally can't afford to hire one of the commercial trip boats.

Suggestions - That the importance of education concerning the river is recognised in the Vision, with the PLA doing what it can to mentor/ facilitate existing and new providers and

That the importance of organised river trips for schoolchildren is recognised, again with the PLA seeking to facilitate new vessels and facilities for this purpose.

-END-