

The City of London's draft Local Plan – City Plan 2040 (the Plan) MAIN MATTERS, ISSUES AND QUESTIONS (MIQs)

FR03 – Fred Rodgers Statement re Main Matter 15 – Transport and Servicing (Policies S9 and VT1 to VT5)

- 15.1 Are the requirements for Transport and Servicing justified by appropriate available evidence, having regard to national policy and guidance, local context, and are they in 'general conformity' with the London Plan?
- 15.2 Are the policies relating to Transport and Servicing positively prepared 'in a way that is aspirational but deliverable'?
- 15.3 Do the policies give clear direction as to how a decision maker should react to a development proposal?

My responses to the above for consideration are in respect of both paragraph 10.3.4 of the Plan under VT2 and S17.3.

1. Paragraph 10.3.4 states:

In order to decrease freight vehicles in the City, the Transport Strategy aims to encourage freight into the City with rail. The City will work with Network Rail to explore opportunities for inward freight into mainline rail stations and encourages developers to support this.

Although welcome as an ambition, with five mainline stations including three termini, one suburban station and two Elizabeth Line stations within the Square Mile, City Corporation should already have been working with Network Rail to provide rail a sustainable rail freight service.

As anticipated, the move of the two wholesale markets to Barking Reach has been abandoned but rail transport would still be the most sustainable method of bringing foodstuffs into the City. In the meantime, Network Rail has announced plans to develop Bow Goods Yard into London's largest integrated rail-freight logistics hub. However, Network Rail doesn't operate rail services but enables them until it's replaced by Great British Railways in 2026, so City Corporation should be in discussions with the Office of Rail and Road and the rail freight operating companies as well as TfL, to ensure a sustainable rail freight service. As a result, paragraph 10.3.4 of the Plan should be amended to read as follows:

*In order to decrease freight vehicles in the City, the Transport Strategy **will champion the transport of freight into and out of the City by rail**. The City **Corporation** will work with Network Rail **[until replaced by Great British Railways]**, the **Office of Rail and Road, the rail freight operating companies and Transport for London to develop both existing and future** opportunities for **the transport of freight into and out of the City by rail and require** developers to support the strategy **when and where possible**.*

2. S17.3 states:

Promoting the use of the River Thames and its environs for transport navigation and recreation, particularly through [inter alia]:

c. retaining Blackfriars Pier, and access to Tower Pier, and encouraging the reinstatement of Swan Lane Pier and the use of these facilities for river transport. Applications to remove these facilities will be refused unless suitable replacement facilities of an equivalent or higher standard are provided;

The above mirrors Core Strategic Policy CS9 - *Thames and the Riverside* - of the Local Plan 2015:

4. *Promoting the functional uses of the River Thames and its environs for transport,*

navigation and recreation, particularly through [inter alia]:

iii. retaining Blackfriars Pier, and access to Tower Pier, and encouraging the reinstatement of Swan Lane Pier and the use of these facilities for river transport. Applications to remove these facilities will be refused unless suitable replacement facilities of an equivalent or higher standard are provided;

However, on 05 November 2020, City Corporation issued a refusal notice for 19/00116/FULL, which was for the:

Erection of a new pier within the River Thames at Swan Lane, to comprise a refurbished landside access platform; new canting brow and pontoon; dredging and filling of river bed; repair and reinstatement of campshed and riverbank; replacement of mooring pile and installation of additional mooring pile.

The reasons for refusal were:

1 The proposed pier would not provide for a multi-use pier and would result in a pier which has not been designed to accommodate and provide for a sustainable freight offering for a variety of users contrary to London Plan Policy 7.24, 7.25 and 7.27, Draft London Plan Policy SI15 and T7, Local Plan Policy CS9, CS16 and DM16.8, Draft Local Plan Policy VT4 and S17 and the aims and objectives of the NPPF.

2 The impact of the proposal in respect of the embarkation and disembarkation of a number of passengers and their dispersal from the site would result in significant noise, disturbance and inconvenience arising from increased pedestrian and vehicular movements and would have a detrimental impact on the amenity of nearby occupiers and the safety of pedestrians and other road users contrary to London Plan Policy 6.3, 7.15, Draft London Plan Policy T4, Local Plan Policy DM 15.7, DM16.1 and DM 21.3, Draft Local Plan Policy HL3, SA2, S3, S9, VT1, HS3 and the aims and objectives of the NPPF.

The site of the derelict pier belongs to the Port of London Authority (PLA) and, although the application was by Thames Leisure Limited and an intended use of the new pier was for embarking on and disembarking off *Oceandiva*, a luxury party superyacht, on 10 September 2020, PLA proposed conditions for a planning permission to City Corporation. These included only permitting electric powered boats to use the pier and, in addition, referred to a *Freight Management Framework* dated 26 May 2020 which set out *how the proposed use of Swan Lane Pier for freight services will be operated and managed. It can be reviewed and finalised once an agreement has been reached with a freight operator. This could be DHL/Amazon/DPD/Hermes/UPS/FedEX or any other operator.*

Context - River Freight Strategy – GLA and CoL Policy:

As well as setting out how the freight operation might work there is a reference to:

Packages will be transferred to a light freight Zero Co2 emissions vessel, which will transport the freight to Swan Lane Pier via the river. This indicates that the light freight operation will be utilising green vessels and again the PLA would like to work with the Applicant and City to discuss the exact wording of any conditions to secure this aspect of the proposed development.

Thus, City Corporation created a bizarre situation, almost five years ago, particularly as the reasons for refusal seem to pre-empt the future use of a reinstated pier for freight. For instance, there would be *increased vehicular movements*.

It will be interesting to see how City Corporation intends to progress S17.3.c in respect of encouraging the reinstatement of Swan Lane Pier in the light of the previous refusal. That was made at the time City Corporation was considering the planning application for the adjoining Seal House in Swan Lane (18/01178/FULEIA). Despite that application's site plan showing a rebuilt pier between the existing dolphins, accessed from Swan Lane, there doesn't seem to have been any joined up thinking in requiring a reinstated pier as a public benefit of that application.

Copies of the site plans for both applications are attached which show the viability of both reinstating

and replacing the Pier's remains but it is unlikely that either can be achieved without similar proposed uses to those City Corporation has already refused. Certainly, an increase in the amount of freight sustainably carried on the River Thames is vital but City Corporation must join with PLA in ensuring, rather than encouraging this.

City Corporation planning application, 24/00938/FULL::

Site Address: River Foreshore adjacent to Riverbank House, EC4

Repair the campshed adjacent to the River Wall at Riverbank House, including:

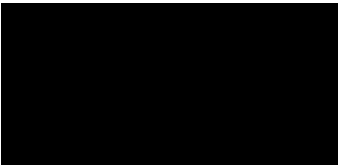
Removal/cutting down to bed level of the existing campshed timbers; removal of gabion baskets and steel tie rods between the existing campshed and its anchor posts; and installation of retaining structures formed of Rock Bags, rock mattresses and loose infill material. Reinstatement of the bed level in a smaller area of erosion to the west of the site to match the top level of the sheet piles.

was validated on 11 September 2024. A plan of the proposal, which is still under consideration, is also attached. As the application was apparently submitted without any prior reference to the PLA, achieving City Corporation's aspiration in respect of Swan Lane Pier may be even more remote, whether it approves its own planning application or not.

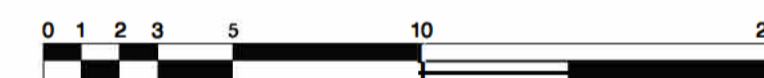
02 March 2025

Fred Rodgers

Fred Rodgers



1388 words



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ARCHITECTS + DESIGNERS

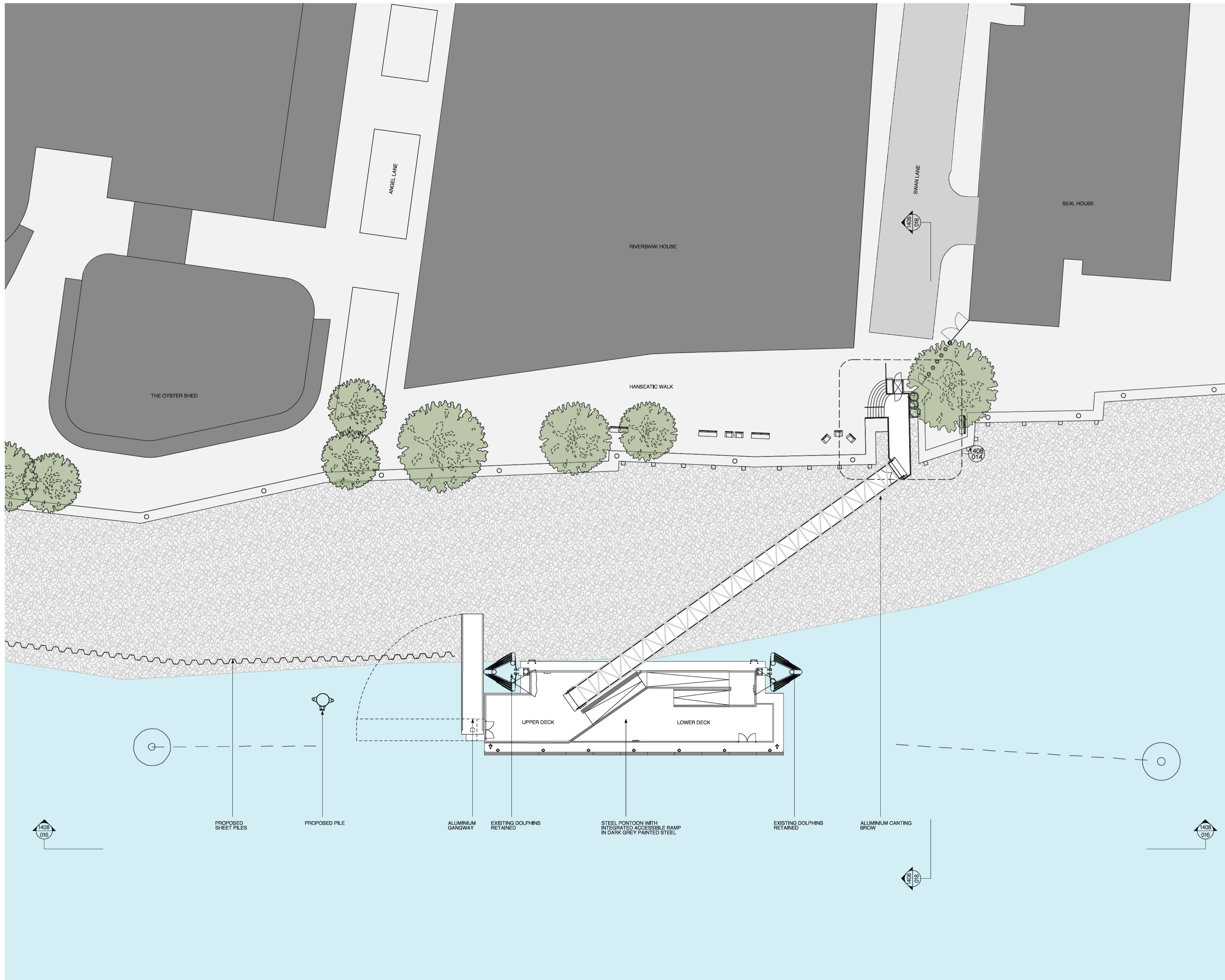


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Revision	Date	Drawn	Checked	Notes
/	29/01/19	CC	BM	GENERAL UPDATES

Status	
PLANNING	
Project SWAN LANE PIER	
Drawing EXISTING PLAN	
Scale 1:200 @ A1 / 1:400 @ A3	Date JAN 2019
Drawing number 1408_012	Revision A

CAD FILE: 1408_PLOTFILES/1408_012.DWG



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ARCHITECTS + DESIGNERS

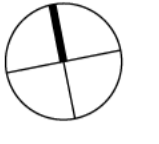


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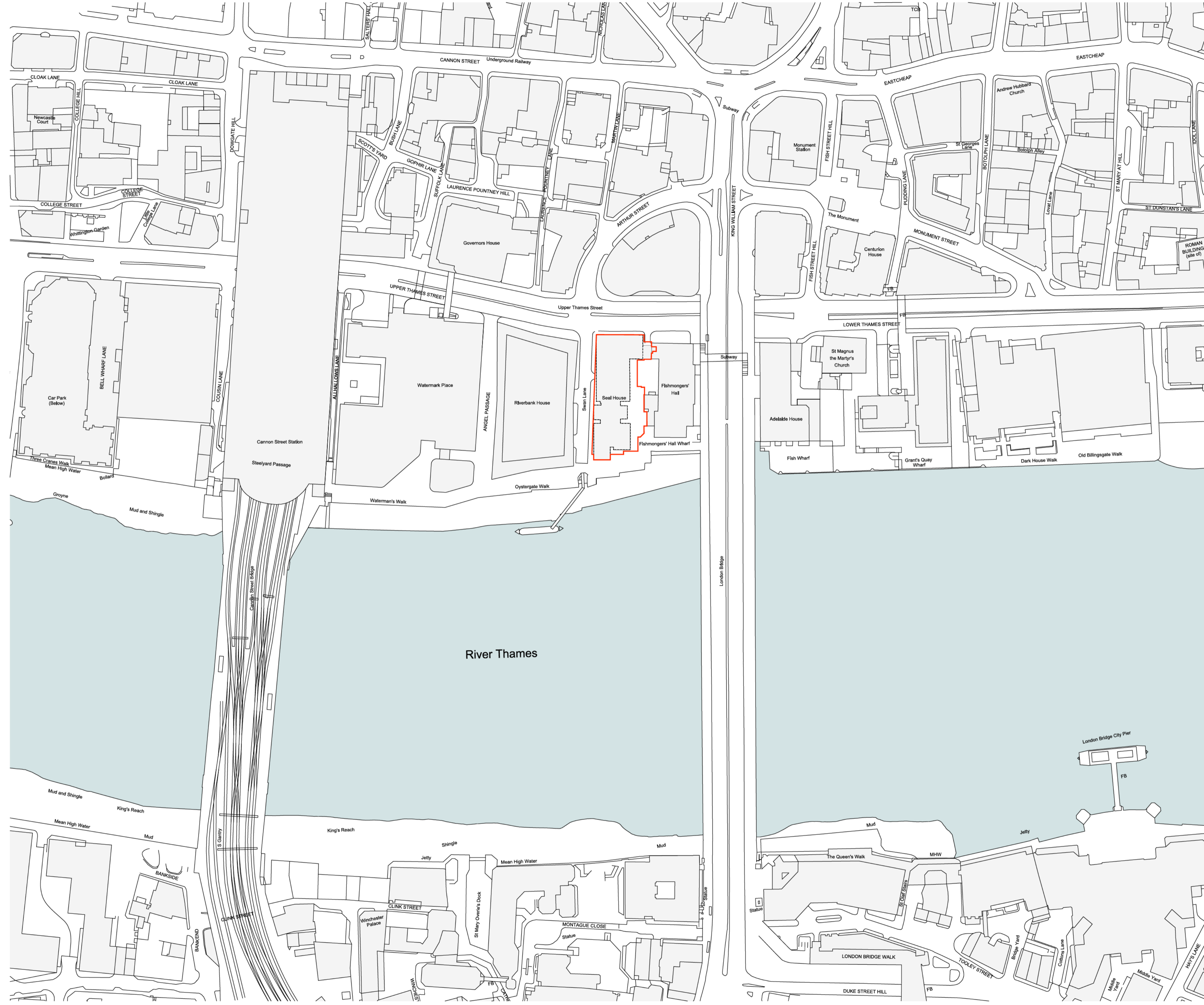
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PLANNING				
Project				
SWAN LANE PIER				
Drawing				
PROPOSED PLAN				
Scale				Date
1:200 @ A1 / 1:400 @ A3				JAN 2019
Drawing number				Revision
1408_013				A

CAD FILE: 19/00116/FULL_013.PDF

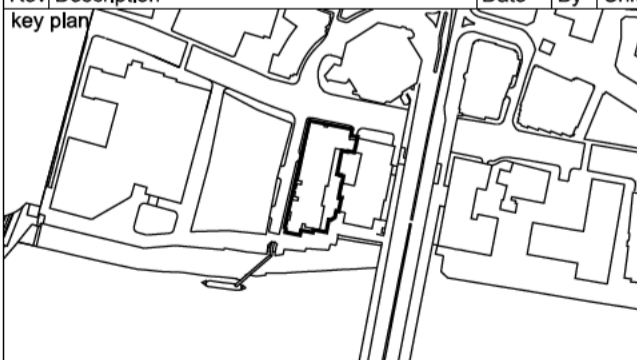
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Key



Rev	Description	Date	By	CHK
P03	Updated following consultations	17.10.16	TJH	PBA
P02	Site boundary amended to include FHM Interventions	14.09.16	TJH	PBA
P01	Minor updates for Planning Application	05.09.16	TJH	PBA
P00	Pre planning application	19.12.17	TJH	PBA
	Previously issued as EPA-SEH-06-060	27.11.17	TJH	PBA

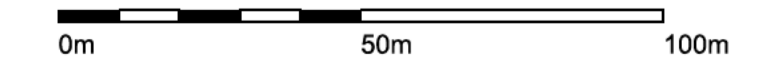


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 client
 Sellar Property Group
 project
 Seal House

drawing title
 Location Plan
 scale
 1 : 1250
 @ A1

drawing no
 EPA-SEH-05-1-001
 revision
P03



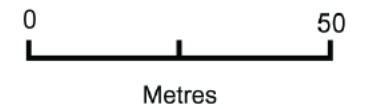
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24/00938/FULL



Planning Portal Reference: PP-13351971v1



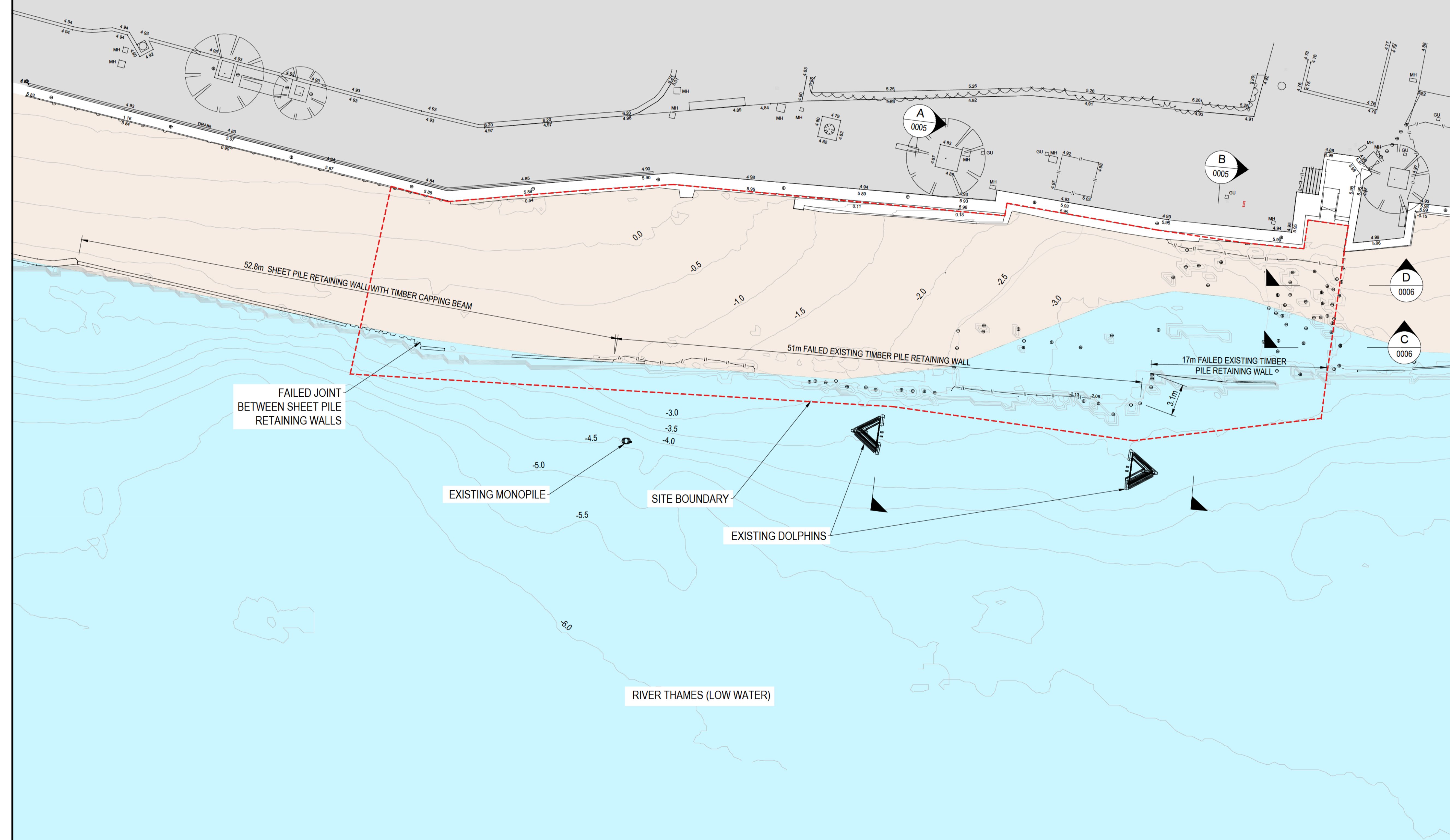
24/00938/FULL

NOTES:

- ALL COORDINATES ARE IN METRES TO THE OSGB36 GRID SYSTEM.
- CONTAINS OS DATA © CROWN COPYRIGHT AND DATABASE RIGHT 2015.
- ALL ELEVATIONS ARE IN METRES AND ARE TO ORDNANCE DATUM.
- ALL DIMENSIONS ARE IN MILLIMETRES or METRES U.N.O.
- TIDE LEVELS:

HR	+8.46m CD	=	+5.41m OD
HAT	+7.50m CD	=	+4.45m OD
MHWS	+7.01m CD	=	+3.96m OD
MHWN	+5.78m CD	=	+2.73m OD
MLWN	+1.39m CD	=	-1.66m OD
MLWS	+0.52m CD	=	-2.53m OD
LAT	+0.00m CD	=	-1.98m OD
- TIDE LEVELS IN CHART DATUM WHICH IS +1.98m BELOW ORDNANCE DATUM.
- TIDE DATA TAKEN FROM PLA CHART No.312, MARCH 2014.
- EA STATUTORY FLOOD DEFENCE LEVELS:

2015-2065	+7.52mCD	=	+5.54mOD
2065-2100	+7.93mCD	=	+5.95mOD



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REV	DATE	DRN	DocChk	EngChk	APP	DESCRIPTION
T01	24.06.24	MK	GD	GD	GT	ISSUED FOR TENDER
REVISION						



TITLE: RIVERBANK HOUSE EXISTING SITE PLAN

PROJECT DRAWING No.	SCALE	S. CODE	REV
2401-BRL-02-XX-DR-C-0003	1:200	D2	T01