

Westminster City Plan – Local Plan Review Examination June 2020

The Port of London Authority (ID.9) Hearing Statement

Matter 6: Connections

1.1 This hearing statement from the Port of London Authority (PLA) addresses matter 6 of the “*Connections of the Westminster City Plan 2019-2040 Examination: Matters, Issues and Questions identified by the Inspectors*” document, specifically the following question:

6.2: “*Do Policies 25-32 effectively deal with the full range of issues?*”

1.2 This statement addresses the PLA’s position with regard to policy 32 “*Waterways and waterbodies*” of the City Plan and the need for the policy to specifically include a reference to the vital need to provide riparian lifesaving equipment (such as grab chains, access ladders and life buoys) along the riverside to a standard recommended in the 1991 Hayes Report on the Inquiry into River Safety as part of any riverside developments.

1.3 The PLA requested such a change to policy 32 in its response as part of the regulation 19 consultation on the City Plan publication draft on the 24 July 2019, but this has not been taken forward as part of the proposed modifications for the examination stage. The PLA considers that in order for the plan to be deal with the full range of issues for the City it must recognise the issue of safety alongside riverside areas and include specific wording in policy 32 to clearly highlight to developers and other stakeholders of the essential need to provide this essential infrastructure, where required.

1.4 The River Thames is a challenging river, with a twice daily tide which sees water levels rise and fall by up to 7 metres and river flows reaching speeds of up to 5mph. In 2018 105 people ended up in the tidal Thames with 30 of those having lost their lives, which accounts for 8% of drowning related deaths nationally. In May 2019 the Tidal Thames Water Safety Forum, which comprises the PLA, RNLI, Met Police, London Fire Brigade, HM Coastguard and the NHS, published the Drowning Prevention Strategy for the Tidal Thames. The purpose of the document is to prevent accidental and self-harm drownings in the Thames by working in partnership to ensure consistent guidance for safe enjoyment and management of activities in, on and around the water. The document includes a number of strategic objectives including to engage with riverside developers and riparian boroughs to improve the provision of public life-saving equipment along the banks of the Thames and fill in any gaps. It is therefore vital that steps are taken to put in place appropriate measures to reduce risk. A specific requirement in policy 32 for the installation of riparian lifesaving equipment as part of future riverside developments would play an important role in achieving this aim to prevent accidental and self-harm drownings in the Thames.

1.5 It is noted that supporting paragraph 32.5 of policy 32 refers to the provision of “*appropriate safety features*” as part of improvements to existing riverside paths. It is the PLA’s view that this reference must be made expanded upon in the City Plan by explicitly stating the need for appropriate Riparian Life Saving infrastructure to be provided as part of any riverside developments. This will help provide a stronger link to the associated City’s Infrastructure Delivery Plan (IDP) (Document Reference Ref: EV GEN 007) which includes in paragraph 3.1.5 (River Transport) a reference to the provision of Riparian Life Saving Equipment along the banks of the Thames. Given that this is referenced in the IDP the PLA considers that there must also be a reference included within policy 32.

1.6 With regard to adjacent boroughs which have a border to the River Thames, the PLA note that this issue has been recognised within other Local Plan documents. The City of London in both its Thames Strategy Supplementary Planning Document and (SPD) and Riverside Walk Enhancement Strategy SPD make references to the need for appropriate Riparian Life Saving Equipment (such as life buoys, grab chains and escape ladders) alongside the riverside walkway. The London Borough of Lambeth, in its Proposed Submission Version of the Local Plan (Jan 2020) there is a specific reference in policy Q24 (River Thames) to the need to provide appropriate riparian lifesaving equipment (grab chains, access ladders, life buoys) where the proposal has a river frontage.

Given that within the City Plan, it is noted that in paragraph 1.17 there is a significant opportunity to reconnect the city to its water boundary, the PLA considers that it must be ensured that any proposed enhancements recognise the need for such vital infrastructure and that this is taken into account specifically in the City Plan.

1.7 The PLA therefore recommends the following amendments to policy 32 and its supporting text, in order for the policy to be found sound and shown to effectively deal with all relevant issues:

*Policy 32: “B: Development along waterways or adjacent to waterbodies and within the Thames Policy Area must address their waterfront location in terms of access and design. Water-related and waterfront enhancing uses will be encouraged and the loss of such existing uses resisted. Access for pedestrians and cyclists will be improved through enhancements to waterside towpaths and footpaths. **Any enhancements to waterside towpaths and footpaths must ensure the provision of appropriate riparian lifesaving equipment (grab chains, access ladders, life buoys)”***

*Supporting text paragraph 32.5: “If development detrimentally affects the usability and accessibility of the associated water spaces, such as where there is an existing riverside path or canal towpath, development will facilitate the extension, widening, ~~extension~~ and improvement of these paths including the provision of appropriate safety features **such as riparian lifesaving equipment.**”*

1.8 The PLA recommends that these proposed amendments are taken forward as part of the adopted City Plan for Westminster to ensure policy 32 on waterways and waterbodies are clear and robust.