

London Borough of Richmond upon Thames – Local Plan Examination 2017

Statement of Common Ground – London Borough of Richmond upon Thames and Port of London Authority

PLA submitted a number of responses to the Publication Local Plan consultation (15th February 2017). This Statement of Common Ground seeks to establish areas of agreement between the London Borough of Richmond upon Thames and PLA and also proposes resulting minor changes to the Submission Local Plan prior to the public examination. The Inspector is asked to consider these changes, which are acceptable to both parties. The Statement also identifies those areas where further discussion and agreement may be required during the examination itself.

We are pleased that agreement has been reached on LP18, LP19 and LP44 and hope the explanations below serve to allay any fears and answer points raised.

Text proposed to be inserted in **bold underlined**

Text proposed to be removed in ~~red strikethrough~~

Section/Policy	PLA's Representation	LBRuT's Response	Reason for Change	Common Ground Agreed?
<p>Policy LP18 River corridors Public Access C. Pages 64 – 68 Paragraph 5.7 to 5.8.2</p>	<p>Previous representation from the PLA advised that we would wish to see the evidence base that supports providing new public access to the foreshore. The PLA has not has sight of this yet. The Council will be aware there are health and safety issues associated with accessing the foreshore such as rapidly rising tides and accessing the foreshore can have an adverse impact on its environment- contrary to the Council's desire to protect and enhance the natural environment.</p>	<p>Comments noted. The Council is seeking through the policy for opportunities to gain access to the riverside, and only where appropriate to the foreshore. It is acknowledged that there are health and safety issues associated with access to the foreshore. To address the PLA's concerns in relation to safety, the following minor change is proposed to LP18:</p>	<p>The Council has a long standing strategy to provide a continuous public riverside walk along both sides of the River Thames. See para. 5.7.9 of the Local Plan London Plan Policy 7.27 Blue Ribbon Network: supporting infrastructure point b specifically states that proposals should protect and improve existing access points to (including from land into</p>	<p>Agreed</p>

Section/Policy	PLA's Representation	LBRuT's Response	Reason for Change	Common Ground Agreed?
	<p>It is questioned whether the Council is seeking (via Policy LP 18) for any member of the public to walk from the riverbank onto the foreshore or rather whether it is seeking through the policy for opportunities for organised activities such as rowing, stand-up paddle boarding etc. to be realised.</p> <p>I presently cannot see where these (previous) comments have been incorporated into the next draft, and where justifications have been requested, I cannot see where and if these have been given.</p>	<p>- Public Access C. c to read as follows: "Provide new public access to the riverside and the foreshore where possible, <u>and maintain existing points of access to the foreshore subject to health and safety considerations.</u> There is an expectation that all major development proposals adjacent to the borough's rivers shall provide public access to the riverside and foreshore."</p>	<p>water such as slipways and steps) or alongside the Blue Ribbon Network (including paths). New access infrastructure into and alongside the Blue Ribbon Network will be sought.</p> <p>Supporting text 7.96 "As part of major development proposals for sites with a Thames frontage, consideration should be given to the need and desirability of having facilities to enable access to and from the river, both for boats and for pedestrians. This may include the retention, refurbishment or reinstatement of existing or former access points or the provision of new facilities."</p> <p>It should be noted that the EA support policy LP18.</p>	

<p>LP18 River Corridors cont.</p>	<p>The submitted draft report still has not made reference to the need to encourage riparian lifesaving equipment (e.g. grabs chains, access ladders and life bouys) as part of future riverside developments.</p>	<p>The Council is also willing to consider adding a new criterion C.d. to read as follows: "Provide riparian life-saving equipment where required and necessary."</p>	<p>The Council is also willing to consider a change adding a new criterion C.d. to LP18: - Public Access C.</p> <p>Add new criterion d. to read as follows: "<u>Provide riparian life-saving equipment where required and necessary.</u>"</p> <p>We do not regard it as feasible to require all development proposals i.e. extensions, to provide life-saving equipment all the way along the riverfront. They should be delivered in those locations where the greatest potential risk is identified.</p>	<p>Agreed</p>
<p>LP18 River Corridors cont. Riverside uses E.</p>	<p>The Council's approach to riverside use is welcomed, it is however considered that the policy should set out its support for riverside development to seek to utilise the river for the transportation of construction waste and materials wherever possible.</p>	<p>With respect to the transportation of construction waste and materials, policy LP 24 on waste management requires development proposals, where appropriate, to make use of the rail and the waterway network for the transportation of construction, demolition and other waste. No change required.</p>	<p>N/A</p>	<p>Agreed</p>

<p>LP19 Moorings and Floating Structures</p> <p>Pages 64 - 68</p> <p>Paragraph 5.7 to 5.8.2</p>	<p>In addition, the evidence box appears to suggest that there is a need to ensure that any proposal for houseboats, moorings and other floating structures safeguard the character/openess of the River, this is not reflected in Policy LP 19 (which has a presumption against houseboats).</p> <p>Still require definitions for houseboats, residential moorings, temporary and permanent moorings.</p>	<p>Comments noted. No changes required. The policy sets out a presumption against new or extensions to existing houseboats. Part B safeguards the character, openness and views of the river. The definitions would be those used in common English parlance and meaning associated with "Houseboat", "Residential mooring", "temporary" and "permanent" as set out in the Oxford English Dictionary.</p>	<p>The River Thames is designated as MOL and therefore the openness and character of the river will be safeguarded from inappropriate uses. Policy has to be in conformity with London Plan Blue Ribbon Network (BRN) policies 7.24 - 7.30, in particular Policy 7.27 point c. which states that proposals should protect and enhance waterway support infrastructure such as boatyards, moorings, jetties and safety equipment etc. New infrastructure to support water dependent uses will be sought. New mooring facilities should normally be off line from main navigation routes, i.e. in basins or docks. The supporting text goes on to say "Consents for and the use of new moorings should be managed in a way that respects the character of the waterways and the needs of its users. The BRN should not be used as an extension of the developable land in London</p>	<p>Agreed</p>
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<p>LP44 Sustainable Travel Choices</p> <p>Pages 143-148 Paragraph 11.1.12</p>	<p>The Council's approach to riverside use is welcomed, it is however considered that the policy should set out its support for riverside development to seek to utilise the river for the transportation of construction waste and materials wherever possible.</p>	<p>Noted. Policy LP 44, E and para. 11.1.12 (River Transport) specifically refers to the encouragement of the use of the River Thames for freight transport. In addition, policy LP 24 on waste management requires development proposals, where appropriate, to make use of the rail and the waterway network for the transportation of construction, demolition and other waste. No changes required.</p>	<p>Major developments or those likely to generate large amounts of waste are required to produce site waste management plans, LP24. “More by water” may be an option but the protective designations on the Arcadian Thames, MOL and Thames Policy Area could preclude the possibility.</p>	<p>Agreed</p>

Both parties consider that these amendments address the concerns raised by Port of London Authority in their representations and their written statements on the **London Borough of Richmond Upon Thames – Local Plan Examination 2017**

Signed on Behalf of the London Borough of Richmond upon Thames		
Name and Position	Signature	Date
Andrea Kitzberger-Smith Policy and Design Team Manager London Borough of Richmond upon Thames		31 August 2017

Signed on Behalf of the Port of London Authority		
Name and Position	Signature	Date
Michael Atkins Senior Planning Officer Port of London Authority		31 August 2017