



Tabby ~ Westfields Primary School, Barnes

PART 2: PLANNING POLICY CONTEXT

PLANNING POLICY CONTEXT

The Strategy sets out strategic and local proposals for the study area taking into account the current and emerging planning policy context and opportunities identified during preparation of the strategy.

The national, strategic and local policy context provides a reference point to position the Thames Strategy – Kew to Chelsea strategic proposals and projects within. The Thames Strategy proposals are generated on an issues basis and are detailed in the sections that follow.

National Planning Policy Context

The national planning policy framework is provided by a series of Planning Policy Guidance Notes, White Papers and Government Circulars. Local planning authorities must take their content into account in preparing their Unitary Development Plans (UDPs). Sustainable development, mixed use and design are three themes that underpin the Government's approach to planning in the UK. Urban regeneration and re-use of previously developed land are important supporting objectives in creating a sustainable pattern of land use development. National

Planning policy also identifies the potential of inland waterways for transport (including freight) and recreation.

The Urban White Paper (Our Towns and Cities: The Future), published in November 2000, highlights the importance of urban renaissance and of getting the design and quality of the urban fabric right. Objectives for better planning and design include ensuring that we make the best use of land that is available and ensuring development is sensitive to the needs of people, while considering the impact that urban living has on the environment. The White Paper focuses strongly on the need to use space well and on the development of sustainable and well laid out urban areas and areas of open space. Development is encouraged, in particular, where brownfield sites and empty properties can be brought back into use, and where the provision of good public transport is viable and walking and cycling are made attractive options.

The Transport White Paper (A New Deal for Transport: Better for Everyone) published in July 1998 highlights the importance of extending choice in transport and securing mobility in a way that supports sustainable development as part of an integrated transport policy.

The following Planning Policy Guidance is of particular importance:

PPG3: Housing (2000) A key directive of the Government's policy is to maximise the re-use of previously developed land and to specifically

encourage more intensive housing developments in and around existing centres and close to public transport nodes. The guidance states that local authorities should promote developments which combine a mix of land uses including housing.

PPG13: Transport (2001) The Guidance emphasises the Government's commitment to the integration of transport and land use planning and encourages alternative means of travel to the private car. The Guidance highlights how the aim of reducing the need to travel can be achieved by influencing the locations of different types of development relative to transport provision. The potential for greater use of rivers for transport (including freight) and recreation is also highlighted.

The Guidance states that local authorities should seek to make maximum use of the most accessible sites in town centres and close to transport interchanges. Intensive development should be promoted in these locations together with a clear overall vision for development.

The Guidance promotes opportunities for freight generating development to be served by waterways and the protection of existing and potential sites and infrastructure. The re-use of disused wharves and basins, the retention of boatyards and other services used in connection with water-based recreation and the protection and enhancement of the waterway environment are promoted where these are viable options.

PPG17: Sport, Open Space and Recreation

(Consultation Draft, March 2001) The Draft Guidance provides a clear statement of the Government's intention to protect existing sport, open space and recreation facilities and create new ones. It complements the Government's commitment to minimise the development of previously undeveloped land (such as playing fields) especially in urban areas.

The Draft Guidance states that provision of new facilities should be promoted through development plans to meet identified needs and where appropriate, local planning authorities should plan positively to allocate sites for recreational use ensuring at the same time that these facilities will be brought into use and managed in a satisfactory way.

The Draft Guidance advises local authorities to:

- Promote accessibility;
- Avoid putting facilities where they will be visually intrusive or lead to a significant loss of amenity;
- Apply design criteria to maintain or enhance the quality of the public realm;
- Use previously developed sites wherever possible;
- Take into account the recreational needs of visitors and tourists and the economic advantages of providing facilities which will attract them;
- Promote social inclusion.

In planning for new open spaces, authorities should seek opportunities to improve the local open space network, for example by creating green chains and green links. The Guidance also states that authorities should consider the opportunities offered by rivers and that the amenity value of such facilities should be protected and enhanced which may entail the development of facilities in appropriate areas. The need for a strategic approach to waterways and for authorities to work co-operatively in planning for their waterways is highlighted.

The Draft Guidance states that local planning authorities will be justified in seeking planning obligations where a deficiency of recreational provision exists or is likely to occur as a result of proposed development. In particular, they may be used to secure recreational facilities as a necessary part of a broader development, helping to ensure that the standards or provision set out in a plan are achieved. The Draft Guidance states that it may be appropriate in some circumstances for the developer to make a contribution to the establishment or enhancement of a nearby sport or recreation facility.

Strategic Planning Context

The strategic planning context for the Thames Strategy - Kew to Chelsea Study comprises the current *Strategic Planning Guidance for London* (RPG3), and *Strategic Planning Guidance for the River Thames* (RPG3B/9B).

The Mayor, and recently formed Greater London Authority, will be reviewing all strategic planning policy including RPG3 and RPG3B/9B and will prepare a London Plan. Preparation of the London Plan is the responsibility of the Mayor of London and the River Thames is identified as one of its core policy areas. Initial proposals for the Mayor's London Plan were published in May 2001. The first draft is due to be published in early summer 2002.

Strategic Planning Guidance for London (RPG3)

In May 1996 the Government issued Strategic Planning Guidance for London Planning Authorities (RPG3). The overall strategic objectives of the guidance are to:

- Promote London as a world class city;
- Maintain and enhance the competitiveness of business;
- Encourage a pattern of land use and provision of transport which minimises harm to the environment and reduces the need to travel especially by car;
- Promote urban regeneration;
- Enhance the vitality, viability and character of town and other local centres;
- Maximise housing provision to meet the changing needs of the population;
- Maintain and improve the natural and open environment;

- Improve the quality and attractiveness of London's urban environment;
- Facilitate the development of transport systems which are safe and efficient, and which contribute to the achievement of competitiveness, regeneration and environmental quality; and
- Seek to improve air quality, to reduce waste, pollution and the use of energy and to encourage recycling.

The Guidance notes that the River Thames is one of London's greatest assets and makes reference to the (then emerging) Strategic Guidance for the Thames (RPG3B/9B). RPG3 will be replaced by the Mayor's London Plan.

Strategic Planning Guidance for the River Thames (RPG3B/9B)

Strategic Planning Guidance for the River Thames (RPG3B/9B) was issued by the Government Office for London in February 1997. The Guidance sets out the Government's planning policies for the River Thames from Windsor to the sea. The framework provided by RPG3B/9B gives the local planning authorities along the Thames formal guidance in preparing their UDPs and in formulating policy for managing and enhancing the quality of the River and the riparian environment.

The Guidance presents the Thames as one of the major natural assets of South East England and is

clearly focused on bringing the River and the riverfront 'back to life'.

It identifies five main functions for the River:

- Drainage and water supply;
- A setting for development;
- An open space and ecological resource;
- A transport artery; and
- A recreation, leisure and tourist facility.

The Guidance recognises that conflicts can arise between these different functions and that many of the River's functions and the planning issues they raise transcend local authority boundaries.

RPG3B/9B encourages riparian planning authorities, and other agencies involved in management of the River and its environs to:

- Recognise the strategic importance of the Thames and the functions it serves for the region as a whole;
- Reflect these in development and other plans, and in land use decisions affecting the River and its hinterland; and
- Collaborate to ensure a coordinated and cohesive approach to land use planning for and along the River.

The overall objectives set out in RPG3B/9B which should guide UDP policy in respect of the Thames are:

Built Environment:

- To secure a special quality for all new development on the River and riverside, appropriate to its context, and to improve the existing townscape;
- To protect and enhance historic buildings, sites, structures, landscapes, skylines and views of importance;
- To enhance the vitality of the river front by making best use of its potential attraction for a range of uses; by promoting the regeneration of redundant urban land and buildings; by promoting uses which enhance people's enjoyment of the River; and by discouraging development which neither contributes to, nor is appropriate for, a riverside location; and
- To protect important archaeological remains.

Natural Environment

- To improve the quality and provision of open space along the River;
- To conserve and where appropriate enhance the ecology of the River;
- To respect green belt, metropolitan open land and other recognised designations denoting areas of ecological, conservation or landscape importance.

Use of the River and Riverside

- To encourage and harness the transport potential of the River;

- To promote and increase the use of the River for recreational purposes;
- To safeguard land uses related to these functions; and
- To maintain and improve public access to, along and across the River, taking account of the needs of disabled people.

In order to achieve these objectives, the Guidance states that riparian planning authorities should adopt policies in their development plans in relation to the River Thames and its riverside to:

- Maintain and improve the quality of the built environment;
- Restore and promote the vitality of the riverside in areas of development opportunity;
- Conserve and enhance the character of the natural and historic environments; and
- Encourage and facilitate the use of the River and riverside for transport and recreational purposes.

Authorities are encouraged to review and revise or supplement existing or proposed development plans at the earliest opportunity to incorporate, and secure the implementation of the policies and objectives contained in this Guidance.

Regional Planning Guidance for the South East (RPG 9)

The Regional Planning Guidance for the South East (RPG 9) published in March 2001 provides a wider regional context for the Mayor's London Plan. RPG 9 places particular importance on sustainable development and the concentration of development in places well served by public transport and protection of the Region's diversity. Objectives include encouraging economic success, ensuring a higher quality of environment with management of natural resources, opportunity and equity for the Region's population and a more sustainable pattern of development.

Key development principles set out in the Guidance of relevance to London may be summarised as follows:

- The development of housing should be more sustainable, providing a better mix of sizes, types and tenures, having regard to the structure of households and people's ability to access homes and jobs;
- Development should be designed to enable a more sustainable use of the Region's natural resources in the effective management of waste, the promotion of renewable energy sources and to assist in reducing pollution of air, land and water;
- There should be continued protection and enhancement of the Region's biodiversity,

important nature conservation areas and enhancement of its landscape and built and historic heritage;

- There should be increased ability to meet normal travel needs through safe walking, cycling and public transport with reduced reliance on the car.

The Guidance states that future development in London should support and develop London's role as a world business and commercial centre and a centre of international and national importance for retailing, tourism, education, heritage, culture and the arts. The importance of maintaining London's attractiveness as a place to live and work is highlighted. A particular objective in meeting London's potential to accommodate growth will be to seek a balanced and mixed development consistent with the objectives of the urban renaissance and maintaining high levels of urban quality. Previously developed land within London is seen as having an important role in accommodating growth consistent with regeneration principles.

The London Plan (Spatial Development Strategy)

The current strategic planning context contained in RPG3B/9B highlights the importance of the River Thames in the life of London. With the evolution of the Greater London Authority, however, the planning policy context within which the River is addressed is changing.

The Mayor has been given responsibility for strategic planning in London and for producing the London Plan (LP). This will be prepared within the context of the European Spatial Development Perspective incorporating spatial planning rather than a purely landuse perspective. The LP will provide a strategic framework for all Boroughs' UDPs and will set out the spatial context for the Mayor's other policies and strategies. The Mayor is responsible for ensuring that the strategic planning interests of London as a whole are taken into account in the policies of central and local government and other relevant bodies. In accordance with the procedures set out in GOL Circular 1/2000, RPG3 and RPG3B/9B will remain current as strategic planning guidance for London and the River Thames until the LP is published.

The River Thames is identified as one of the core strategic policy areas for the LP. The Greater London Authority Act 1999 seeks to promote and encourage use of the Thames and the LP will be required to:

- Identify the strategic functions which the River Thames serves;
- Include policies for protecting and enhancing those functions;
- Identify the broad extent of a special 'Thames Policy Area' (TPA) and a mechanism for co-ordinating Borough UDP policies within this area;

- Develop the policies set out in the Government's Strategic Planning Guidance for the Thames (RPG3B/9B).

The LP will also address a number of other strategic policy areas which will be of direct relevance to development on or adjacent to the River Thames:

- The promotion of **sustainable development**;
- **Transport:** including the promotion of better integration between land use and transport planning and more sustainable transportation choices;
- **Economic development, regeneration and social inclusion:** including the creation of linkages between housing, transport and other infrastructure development and monitoring the availability of employment land and floorspace;
- **Housing:** including the need to make maximum use of previously developed land and the encouragement of more sustainable patterns of housing development and good design;
- **The built environment:** including promotion of the urban renaissance through good urban design and improvement of the public realm and protection of areas of historical or architectural interest;
- **The natural and open environment:** including the creation of green chains and the provision and enhancement of open space;

- **Waste:** the adoption of a strategic approach to waste management and the location of waste management and disposal facilities;

- **Cultural and community facilities:** including the identification of opportunities for the location of new facilities accessible by public transport and the promotion of tourism.

The timetable for preparation of the LP suggests that there will be a timelag before effective LP strategic policies relating to the Thames are adopted. LP proposals for initial discussion were published in May 2001, with a draft consultation LP due in early summer 2002.

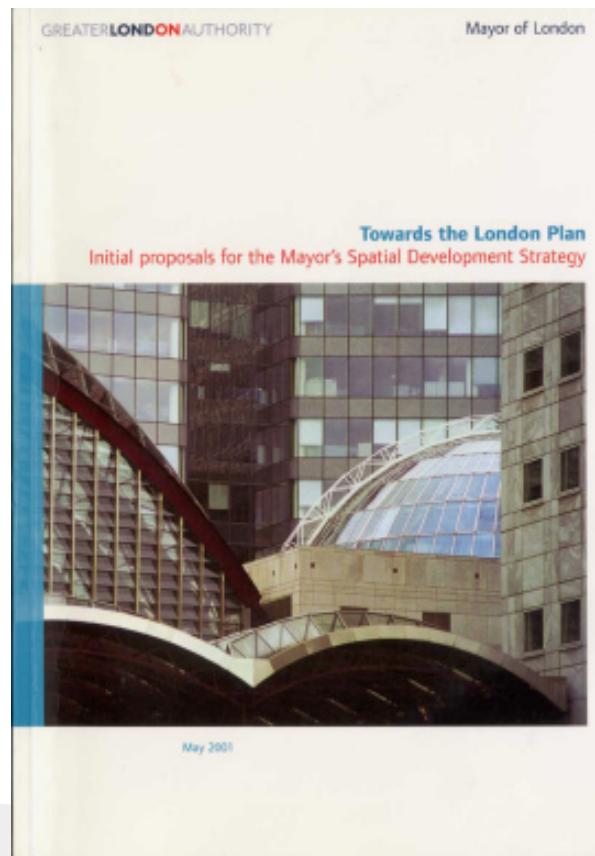
The Thames Strategy - Kew to Chelsea can contribute to the GLA's review of RPG3B/9B and to the preparation of the Mayor's LP which will include a strategy for the River Thames. The GLA is required to propose a suitable mechanism for taking forward the reviewed RPG3B/9B into Borough UDPs and proposals for the implementation of the Thames Strategy - Kew to Chelsea may assist in the development of this mechanism.

The Secretary of State for Transport, Local Government and the Regions will continue to exercise his statutory powers in relation to UDPs and planning applications through the Government Office for London, including the ability to call applications in for determination, and responsibility for the determination of planning applications.

As part of the new arrangements for strategic planning in London, the Mayor will be consulted on planning applications which raise issues of strategic importance and has powers to direct the refusal of applications.

Towards the London Plan (May 2001)

Initial proposals for the London Plan are set out in the document 'Towards the London Plan'



published for consultation purposes in May 2001. The document highlights the importance of the Thames and the need for a holistic approach which is to be promoted through the definition of a Blue Ribbon Network. The GLA and its functional bodies will work with the range of interest groups represented on its Thames consultative group to develop and integrate a strategy for the Thames.

The Blue Ribbon Network will be designated along the Thames and London's waterways. It will cover not just water, but banks and foreshore and related river/ canal-side land. The aim of the Blue Ribbon Network will be to recognise the special character of the River and canal corridors as both a strategic and a scarce resource and address the competing needs, uses and demands that are placed on them. The document recognises that because the River crosses administrative boundaries, policy approaches have often been fragmented. The Blue Ribbon Network is intended to create a common focus for ensuring the sustainable use and regeneration of the Thames and associated land along its route.

The document states that the London Plan will address a range of issues relating to the river and other waterways including:

- Improving the urban waterside;
- Protecting views and panoramas from the waterways;
- Enhancing public access along and across

the River and related safety issues;

- Safeguarding wharves and protecting waterside infrastructure to increase commercial and freight use;
- Maximising use of the Blue Ribbon network for freight and passenger transport, leisure and tourism including provision of riverside infrastructure;
- Protecting and enhancing the natural environment and biodiversity;
- Enhancing the profile of London's waterways as cultural and recreational spaces.

Two policy directions relating to the River Thames are proposed for inclusion in the London Plan:

Creating a 'Blue Ribbon' Network

- To enhance the use and value of the river and canals by increasing public access and safety and by encouraging the use of London's waterways for leisure and transportation (of people and freight);
- To ensure that any new development contributes to the character of the river and canal-side and achieves a high quality of urban design, especially improving public access to the riverside;
- To review the protection given to boatyards and all River-related uses and the application of the safeguarding process for wharves.

Protecting wildlife and natural habitats

- To protect and enhance the significant wildlife habitats of the Thames and London's other waterways and ensure that disturbance to wildlife is minimised with increasing use and public access.

The London Plan recognises the vital importance of transport provision to the development of London in the future and the need to tackle the challenges of London in an integrated way. The document identifies a number of regional corridors which are expected to be a focus of change including the Wandle Valley. Battersea/Vauxhall is identified as a key opportunity area. Proposed transport improvements are identified which could affect the study area, notably the Hackney South West Rail Scheme.

London Biodiversity Partnership 2000/2001: London Biodiversity Action Plan

The London Biodiversity Action Plan, initiated through the London Biodiversity Partnership, links the UK action plan with biodiversity plans produced at a local and organisational level. The approach taken for the London Biodiversity Action Plan targets habitat based rather than species based action, to enable organisations and local partnerships to form, to develop and implement local level actions.

The Mayor's Draft Biodiversity Strategy (2001)

Connecting with London's Nature: The Mayor's Draft Biodiversity Strategy was launched for public consultation in September 2001. This will be the first statutory strategy of its kind in the UK and it will complement the Mayor's other strategies for London and the principal functions of the GLA by addressing the contributions that biodiversity can make to social cohesion, health improvements and economic development.

The strategy draws on data presented in Volumes 1 and 2: The Audit of the London Biodiversity Action Plan (London Biodiversity Partnership 2000) and recognises the Thames as the most obvious and best known natural feature of London and its value to wildlife. In particular it recognises the importance of its Eyots, river walls and wharves for encouraging biodiversity and wildlife habitats, and the loss of wetland vegetation. The strategy aims to protect and enhance the natural habitats of London and their varied species, to demonstrate how London's biodiversity can be:

'Maintained as a crucial part of a sustainable world city'

The Draft Biodiversity Strategy presents specific policies and proposals for the River Thames and London's waterways that will mainly be driven through the London Plan. In particular these proposals include the establishment of the Blue Ribbon network and the restoration of London's rivers.

The London Plan and how it is interpreted in Unitary Development Plans, as well as the London Biodiversity Action Plan will be key mechanisms for implementing the Mayor's Biodiversity Strategy.

Additional Policy Advice

In addition to National and Regional Policy Guidance, there is a range of advice and guidance produced by other agencies such as: the former London Planning Advisory Committee, the Port of London Authority, Government Office for London, the Environment Agency and the Countryside Agency (formerly known as the Countryside Commission).

Many documents produced by other agencies and organisations are endorsed in RPG3B/9B and their consideration in the development of policies for the Thames Policy Area is important. These are reviewed below.

Government Office for London (1995) Thames Strategy: A Study of the Thames

The Thames Strategy study was undertaken in 1995 by Ove Arup for the Government Office for London.

The study identified a number of focal points of activity, both existing and proposed, key landmarks, areas with potential for increased river activity, locations where increased accessibility is desirable and important enhancement opportunities.

Specific recommendations for enhancement in the Kew to Chelsea Study Area are to:

- Improve the relationship of Duke's Meadow to the River by enhancing links and views;
- Upgrade riverside landscape at Mortlake;
- Make provision for riverside access as part of the new development at Corney Reach (now complete as Chiswick Pier);
- Improve existing landscape at Hammersmith and encourage positive links to centre;
- Maximise the nature conservation value of the former Barn Elms reservoirs;
- Implement selective management to improve the visual relationship of Fulham Palace Gardens to the River and riverside footpath;
- Consider improvement of discordant physical development, obsolete structures and access to River on the east side of Putney Bridge;
- Make provision for riverside access and strong landscape framework as part of new development at Gargoyles Wharf site;
- Improve discordant river frontage with discontinuous built environment at Fulham when opportunities arise;
- Improve discordant and variable built environment at Wandsworth when opportunities arise; and
- Improve discordant physical development at Nine Elms when opportunities arise.

In the Kew to Chelsea area, the report identifies existing focal points of activity at Kew/Brentford, Hammersmith and Putney/Fulham. A proposed focal point of activity is identified at Battersea/Chelsea.

The report also makes recommendations about the role of Strategic Planning Guidance for the River Thames, which was in a Draft form at the time the report was released.

Environment Agency (1999): Local Environment Action Plan (LEAP): Thames Tideway

The LEAP sets out the Environment Agency's commitment to protection and management of the Thames Tideway environment. The vision is presented as protection through partnership and the Environment Agency has sought to reflect the views of interested parties and organisations. Actions for the Thames Tideway are detailed, and form the core of the Action Plan. The actions are based on nine objectives that include water quality, biodiversity, landscape, heritage and use of the waterways among other issues. The actions are tabled and prioritised with estimated timescale and cost. The organisations involved in progressing the actions are also detailed.

Environment Agency (1996): Landscape Assessment and Design Guidelines

These Guidelines propose a methodology for evaluating the river landscape based on landscape and river channel types. The Secretary of State commends this approach and

recommends that adjacent and cross-river authorities collaborate in identifying such reaches and developing related policies. The Landscape Assessment and Design Guidelines are endorsed in RPG3B/9B.

London Planning Advisory Committee (LPAC) (1999) Supplementary Planning Advice on High Buildings and Strategic Views in London

The LPAC advice and RPG3A will be superseded by the London Plan when it is published. It should be noted that whilst the London Plan is being developed, the LPAC Advice still stands although the Mayor of London has issued *'Interim Strategic Planning Guidance on Tall Buildings, Strategic Views and the Skyline in London'* (October 2001) to provide clarification and to reflect the Mayor's recent thinking on these issues.

The Advice states that local planning authorities in conjunction with neighbouring authorities and with LPAC should:

- Undertake a character appraisal of the Thames Policy Area as the basis of the designation of areas appropriate for high buildings
- Identify Strategic Views and Important Local Views, Panoramas and Prospects on UDP Proposals Maps and include policies to protect and enhance them with regard to the need to maintain the Thames' open aspect
- Identify sites in the UDP where landmark buildings might be appropriate along the Thames-side

The LPAC Advice includes a section specific to the River Thames. The Advice summarises the area of the Thames between Hampton and Putney Bridge as comprising extensive open areas and domestic scale of buildings and as an area which in general is unsuitable for high buildings. Furthermore the Advice states that although there are a number of tall buildings and structures between Putney and Vauxhall Bridge, the predominantly small scale and residential nature of adjoining areas mean that the opportunities for high buildings are very limited.

The Advice states that high buildings can, because of the River Thames' serpentine form, have unexpected impacts. For this reason it is proposed that in bringing forward policies for the Thames Policy Area, both Strategic Views and Important Local Views, Prospects and Panoramas should be identified and adopted in UDPs to maintain an open aspect to the River Thames.

Interim Strategic Planning Guidance on Tall Buildings, Strategic Views and the Skyline in London (GLA, October 2001)

This Guidance is intended to remove misunderstandings relating to the LPAC advice, to reflect the Mayor's recent thinking on the subject matter, and to provide interim guidance whilst the London Plan is being developed. It is intended that the Guidance will form the basis of the draft tall buildings policy in the draft London Plan, which will be subject to consultation and be examined in public by a Government - appointed

panel. Some of the relevant policy guidelines are summarised below:

- The Greater London Authority (Mayor of London) Order 2000 requires local planning authorities to consult the Mayor on proposals for tall buildings of 75m or more and in the City of London (except on Thames-side), 25m or more elsewhere and in the Thames Policy Area and 30m or more elsewhere. These thresholds are taken from the LPAC Advice which also requires consultation with adjacent boroughs and agencies. The Mayor has indicated that a refinement of these consultation arrangements could be for English Heritage not to be consulted where heritage issues are not at stake.
- The Mayor supports LPAC's criteria-based approach to assessment of planning applications for tall buildings, but may develop additional criteria in the London Plan, for example, contributing to a cluster, an interesting group skyline or locations of civic or visual importance and forming objectives of long-distance views
- All tall buildings, should be of the highest possible architectural quality, with particular attention to publicly accessible ground levels, varied and interesting elevations, well-articulated building tops, a public realm suitable for pedestrian movement and acceptable wind impact
- Subject to other strategic planning requirements the Mayor will encourage tall buildings that enhance London's changing skyline, but oppose those that damage the setting of particularly sensitive buildings of architectural or historic interest. It is recognised that tall buildings can be seen more readily from the Thames, its banks and larger open spaces than elsewhere.
- The Mayor has commissioned a full review of the ten Strategic Views, including the view from Richmond Park to St Paul's Cathedral, set out by the Government in Supplementary Guidance for London on Strategic Views (RPG3 Annex) in 1991. The draft London Plan will introduce appropriate policies and the Mayor may seek changes to the statutory Directions following consultation. In the meantime, the existing Directions will apply.
- Boroughs should continue to follow LPAC Advice for identification of Important Local Views, Important Local Panoramas and Important Local Prospects. The Mayor has commissioned a review of existing policies and new guidelines will be produced for other potential views.

Countryside Commission (1998): Development Plan Policies - A Good Practice Guide

This document recommends practical guidelines to assist local planning authorities in formulating policies for the Thames Path National Trail. The objective of the Countryside Agency for the

Thames Path National Trail is to provide continuous access along the River Thames. The Guide includes model policies for the Thames Path itself as well as for development along the River Thames Corridor.

The Countryside Agency has produced design guidelines for the Thames Path which are encouraged to be adopted as Supplementary Planning Guidance.

Port of London Authority (1996): Steps, Stairs and Landing Places along the Tidal Thames

A Port of London Authority (PLA) report based on a survey that identified 246 publicly available landing places - steps, stairs, causeways, drawdocks and slipways - and assessed their condition, access, usage, safety and ownership. Based on this information, the PLA has detailed proposed future policy and action which is grouped under themes of: navigation; foreshore; other access points; and funding.

The key objective is to continue to make available appropriate access to the River and foreshore, to offer choices where this is practicable and to provide redress in the sense of alternative access points. PLA acquisition of ownership and responsibility, repairs to infrastructure and the provision of gates are identified as possible measures.

The PLA believe that access to the foreshore should be permitted where it is suitable for public use, but recognises that some areas of foreshore are inhospitable, unsafe or of ecological significance.

Port of London Authority (1998): Development Strategy for Cargo Handling in the Port of London

This document provides recommendations as to the use and capacity of Port sites, including wharves. Recommendations in the Strategy seek to provide a secure land use context for Port operations, including the safeguarding of suitable related industrial land against development that could preclude its future use for Port related purposes. The Royal Borough of Kensington and Chelsea and London Boroughs of Hammersmith and Fulham and Wandsworth have sites safeguarded under Secretary of State directions. The Strategy states that these should be protected at a local level through UDP policies.

The Strategy provides criteria to assess the need to safeguard sites for strategic transport and Port purposes. The PLA takes a site specific approach to safeguarding, based on long-term Port function. Assessment criteria include: navigational characteristics; geographical location; availability of comparable sites; market forces; road and rail access; amenity; sustainable alternative transport; and relationship with other Port sites.

Port of London Authority (1997): Planning for Aggregates

This PLA document provides recommendations as to the use and capacity of Ports sites, including wharves. The document recommends, inter alia, that UDPs;

"Ensure that the efficient and viable operation of wharves should not be unduly constrained by proposals for neighbouring development and that sensitive new development in the vicinity of existing or potential aggregates facilities does not result in imposition on the aggregates operation of planning or other controls restricting the otherwise acceptable activity".

As to the wharves' future use, the PLA lists the Wandsworth/Fulham area as one of five main geographical sectors for aggregates handling, contributing four operational terminals (and two other terminals that have ceased operation but are potentially available for aggregates handling). Opportunities in this area are listed as Pier Wharf, Wandsworth; Hurlingham Wharf, Hammersmith & Fulham. The Wandsworth UDP includes a policy to safeguard sites associated with aggregates handling. LB Hammersmith & Fulham identifies three wharves as safeguarded for freight activities.

LPAC (1990): Planning Guidelines for Permanently Moored Vessels and Structures on the River Thames in Greater London

These LPAC guidelines are concerned with permanently moored vessels, floating structures, other buildings or structures in and over the river including jetties and piers.

The Guidance incorporates 19 guidelines, each of which is given brief justification. The guidelines cover issues such as acceptable uses, scale and

design, safety, traffic generation and access among others. The guidelines contain more detail than UDP policies and recommend, for example, that consideration be paid to colour schemes and the effects of floodlighting. The guidelines do not however, provide quantification; and details such as maximum heights are not prescribed. The guidelines incorporate flexibility to fit decision-making to the local environment.

Environment Agency Tidal Thames Habitat Action Plan

The Tidal Thames Habitat Action Plan was published in January 2002 as part of Volume 2 of the London Biodiversity Action Plan. It includes the area of the Thames Strategy - Kew to Chelsea within its remit.

The Action Plan includes an overview of existing habitats along the Thames and identifies key species of birds, fish, plants and invertebrates. It looks at some of the threats and problems facing biodiversity conservation in this area and sets out a series of objectives and actions to protect and enhance the ecology of the river.

Commission for Architecture and the Built Environment, English Heritage: Guidance on Tall Buildings (Consultation Draft, June 2001)

Draft Guidance has been published for consultation purposes on the way in which both the Commission for Architecture and the Built Environment (CABE) and English Heritage evaluate proposals for tall buildings.

The approach is based on locational and qualitative considerations but no rigorous definition is provided of what is and what is not a tall building. The guidance states that buildings which are substantially taller than their neighbours and/or which significantly change the skyline will be considered in the light of the following criteria:

- The relationship to context, including the effect on the skyline
- The effect on the whole existing environment, including the need to ensure that the proposal will conserve or not damage or detract from listed buildings and their settings, conservation areas, historic parks and gardens and important views;
- The relationship to transport infrastructure including the quality of links between transport and site and the feasibility of improvements;
- The architectural quality of the building;
- The contribution that the development will make to external and internal public spaces and facilities in the area including a mix of uses;
- The effect on the local environment including microclimate, overshadowing, night time appearance, vehicle movements and the environment for those in the vicinity of the building;
- The contribution made to the permeability of a site and the wider area including the

opening up or effective closure of views to improve the legibility of the city and the wider townscape;

- Function and fitness for purpose;
- The sustainability of the proposal.

It is proposed that English Heritage will adopt a sequential approach to evaluating proposals in the light of these criteria. The overriding consideration will be whether the location is suitable for a tall building in terms of its effect on the historic environment at a city-wide as well as local level. Only if it can be demonstrated that the location and context are appropriate will other factors including design quality be addressed.

For CABE, the over-arching principle will be that any new tall building should be of first class design quality in its own right and should enhance the immediate location and wider setting. Great importance is attached to the opportunities for all major building projects to enrich the public realm.

Commission for Architecture and Built Environment/English Heritage (2002): Building in Context-New Development in Historic Areas

A joint publication by CABE and English Heritage demonstrates through 15 case studies the range of intelligent and imaginative architectural approaches that can be applied to new buildings to enrich historic environments. These case studies illustrate the regenerative capacity of contemporary good design in areas of historic character and how design quality can bring a

combination of aesthetic, economic, social and environmental benefits to these areas. As each historic area is unique and presents its own challenges, this publication provides a range of design considerations for a project to be successful. These are that the building will:

- Relate well to the geography and history of the place
- Sit happily in the pattern of existing development and routes through it
- Respect important views
- Respect the scale of neighbouring buildings
- Use materials and building methods which are as high in quality as those used in existing buildings
- Create new views and juxtapositions which add to the variety and texture of the setting

For each case study the project, site, problems, solutions and lessons learnt are promoted and the studies have been drawn together to derive a range of specific conclusions and objective criteria for those involved in appraising development proposals in historic contexts. The report is intended for architects, clients and planning officers to encourage a sense of vision and commitment to release the skills required to achieve good design in historic areas.

Local Planning Context

Unitary Development Plans (UDPs) are the principal vehicle to deliver planning policy at a local level and hence the content of the UDP is critical to promoting the objectives of the Strategic Planning Guidance, to managing development and the protection and enhancement of the Thames Policy Area and elements within it.

Unitary Development Plans

The five riparian local planning authorities within the Study Area have adopted Unitary Development Plans (UDPs) and are currently progressing reviews of their UDPs. The UDPs used for the purpose of this analysis are the most current versions and comprise:

- London Borough of Richmond upon Thames *Adopted UDP and May 1999 First Review Deposit Draft*
- London Borough of Hounslow *1996 Adopted UDP; September 1999 Review Deposit and January 2001 2nd Deposit*
- London Borough of Hammersmith and Fulham *1994 Adopted UDP and June 2000 Revised Proposed Alterations*
- London Borough of Wandsworth *1994 Adopted UDP; First Deposit June 1999 Draft Revised UDP; Second Deposit October 2000 Draft Revised UDP*

- Royal Borough of Kensington and Chelsea *1995 Adopted UDP; First Deposit August 1999 Draft Revised UDP; Second Deposit January 2000 Draft Revised UDP*

The interpretation of the guidance contained in RPG3B/9B varies significantly between the five riparian local planning authorities and this highlights the current lack of a consistent and coherent approach to planning policy relating to the River Thames.

Key issues relating to the interpretation of the Regional Planning Guidance (RPG3B/9B) in UDPs may be summarised as follows.

The UDPs adopt a number of aspects of the guidance in particular:

- The designation of a Thames Policy Area;
- A commitment to enhancing urban design in keeping with context and where appropriate, encouraging a mix of uses;
- The requirement for developers to prepare a Design Statement;
- Acknowledgement of the significance of the River as an archaeological resource and the need to consider the relationship of new development to listed buildings;
- The promotion of extended green chains and corridors;
- The protection and enhancement of the River as a wildlife habitat;

- Support for use of the Thames for passenger transport, freight transport and recreation;
- Protection of safeguarded wharves for freight related activities;
- Encouragement of use of the River for recreation;
- Maintenance and enhancement of access to and along the River;
- Support for the provision of segregated cycleways and footpaths;
- Support for the retention and provision of facilities and infrastructure that facilitate the use of the River for river-related activities (other than for transport and recreation).

However, a number of aspects of RPG 3B/9B are not generally reflected in UDPs and there is an evident lack of consistency in the interpretation of some of the guidance, in particular:

- While all five UDPs identify a Thames Policy Area (TPA), the expression of policy relating to the TPA differs markedly across the Boroughs;
- Detailed appraisals and Supplementary Planning Guidance relating to the River Thames are limited and predate RPG3B/9B;
- The detail and extent of planning and design controls and guidance varies between Boroughs;

- There is wide variation in the identification of major development sites and opportunities and preparation of Design Briefs. Developers are required to prepare Design Statements, but Design Briefs are not generally used as a tool to guide sustainable development;
- There are differences in the approach to archaeology which does not foster consistent management of the archaeological resource;
- The identification of important views and landmarks in UDPs do not represent exhaustive lists and the identification of important structures associated with the River's history is limited;
- There is a requirement for a more consistent use of designations within the TPA;
- None of the UDPs identify potential alignments for additional river crossings;
- The River Thames is not generally identified as a strategic open space;
- Not all of the UDPs contain a specific reference to the need to discourage the encroachment of development into the River and foreshore;
- There is not a consistent requirement for the preparation of ecological assessments in respect of proposed development within the TPA;
- There is a limited commitment to facilitating and providing integrated transport and for the

development and encouragement of interchange between river services and other transport modes;

- There is potential for greater co-ordination in the maintenance and provision of river related infrastructure such as piers;
- UDPs do not generally identify sites with potential for water based and river related recreation;
- There is limited design guidance for the riverside walkway.

City of Westminster UDP and Proposed Thames Policy Area Supplementary Planning Guidance

Although outside the study area, future development and change on the northbank of the River between Chelsea Bridge and Vauxhall Bridge will be of significance and may impact upon the opposite side of the River and influence strategic policy objectives. This area is located within the City of Westminster and subject to the policies and proposals set out in the City of Westminster UDP. The City of Westminster UDP is currently under review, with the First Deposit of the Draft Revised UDP in September 2000 and the Second Deposit in October 2001.

Westminster City Council has published 'Proposed Thames Policy Area Supplementary Planning Guidance' which identifies those elements that contribute to the character of the Thames Policy Area (TPA) and identifies

opportunities for enhancement. The City Council will seek to protect and improve the character and appearance of the TPA, build on its existing strengths and characteristics to take suitable opportunities for enhancement and new development and to introduce appropriate new uses.

The City of Westminster UDP (Second Deposit) includes a range of policies which seek to make better use of the Thames as a River that unites rather than divides London.

The Deposit Plan recognises that the role and character of the River Thames and its surroundings are of both strategic London-wide and local importance. A number of Thames Policy Area-wide policies are included relating to:

- The design of development and public access to the waterfront;
- Protection of views from, of, across or along the River Thames;
- Environment, open space and wildlife;
- Encouragement and retention of water-dependent and waterfront enhancing uses.

The City Council states that it does not want to prevent good modern design from being put forward for Thames-side developments and acknowledges that there is a place for challenging and innovative designs along the River and for variations in scale and height. The policy states that landmark buildings may be appropriate in

certain cases. The City Council will draw up design briefs for sites where major development is expected.

The need for measures to mitigate the effects of development upon features of nature conservation value is highlighted. The City Council will take opportunities to improve the number and quality of wildlife habitats and open spaces, such as the inclusion of links between the River and other open spaces.

The City Council will seek to encourage a mix of activities that either depend on a river location or help to draw people to the waterfront including waterdependent uses such as riverbus stops and watersports centres and waterfront enhancing uses such as cafes, sporting facilities and parks.

A number of other policies are included in the Deposit Plan relating to river development including control of encroachment into the River and foreshore, the provision of new or replacement river crossings and the provision or improvement of pier facilities to encourage the use of the River for transport. The plan states that the City Council will not normally approve proposals for houseboat moorings as it wishes to use opportunities for moorings on the River to benefit the public in general.

There will be a requirement to ensure coordination between policies contained in the UDPs of adjoining local planning authorities covered by the Thames Strategy: Kew-Chelsea and the City of Westminster UDP.

Supplementary Planning Guidance

The Thames Strategy - Kew to Chelsea is intended to form Supplementary Planning Guidance (SPG). However, adoption of the Thames Strategy as SPG should not preclude the adoption of further detailed appraisals and SPG related to the River, where issues of local importance justify further guidance.

Three of the Boroughs within the study area have produced comprehensive SPG that provides an appraisal of the River's reaches and addresses issues of environmental enhancement and appropriate development. While all three SPGs provide a level of detail and guidance beyond what is embodied in the UDPs, they were all published prior to the release of Strategic Planning Guidance for the River Thames. The current SPG is detailed below:

RB Kensington and Chelsea: Thames Conservation Area Proposals Statement (1983)

This Proposals Statement sets out a detailed historical context for development and protection in the Thames Conservation Area. The core section of the Statement comprises detailed policies relating to development that will change the physical appearance of the area. General alterations, walls and railings, new development and enhancements form the focus of the guidance. Other developments such as change of use and residential conversions are not addressed in the Statement.

Polices are detailed under three main headings:

- Buildings and Open Spaces
- The Embankment
- Street Surfaces and Street Furniture.

Specific polices for Buildings and Open Spaces provide guidance for alterations, additional storeys and front elevation alterations, and identify where landscaping and other improvements could be carried out. These policies are based on four sub areas of the Conservation Area which are appraised to a very high level of detail. Comprehensive design guidance is based on preserving and enhancing the existing style of the built environment.

The Embankment is highlighted as a dominant feature of the Thames Conservation Area, and a series of proposals are included to improve the embankment. These proposals concentrate on trees and planting, the bridges, extending the riverside walk westwards and traffic.

Street surfaces and street furniture are given direction through policy .Issues of street and footway surfaces are addressed, as well as street sign and lamps provision and maintenance. The document includes a Design Brief for houseboats in Battersea Reach.

LB Hounslow: Hounslow's Waterside Strategy (1993)

The Hounslow Waterside Strategy provides a detailed appraisal of the stretch of the River Thames within the Borough and aims to provide a

basis for comprehensive proposals for improvements to the waterside, to achieve a safe, accessible and attractive environment and encourage increased use of the waterways for transport and recreation.

The Guidance addresses issues of access, urban design, street furniture, landscaping, nature conservation, recreation, safety, tourism and transport. The main objectives have been incorporated into the Borough's UDP and include:

- Enhancement of the riverside frontage through building design
- Identification of opportunities for landscape/environmental improvements
- Enhancement of areas of conservation value and promotion of green chains/corridors
- Identification and protection of views, vistas and landmarks
- Provision of public access
- Retention of water related uses encouraged

The Guidance identifies reaches and detailed proposals (including proposals for implementation) in respect of access, design/landscape improvements, tourism, transport, moorings and recreation.

The Brentford Town Centre Action Plan (1997) and the Chiswick Town Centre Strategy (1998) both also emphasise the important role of the Thames water frontage to the character and vibrancy of these areas.

LB Wandsworth: Guidelines for Thames Riverside Development in Wandsworth (1990)

These Guidelines are primarily intended for use by developers and architects. The Guidelines specifically relate to new development opportunities and address issues of form, layout and detailed design of buildings and how the riverside walk can complement and support public activity and interest and provide opportunities for both informal and formal recreation.

The Guidelines apply the policies and principles later incorporated in the UDP in respect of riverside sites. The document provides general guidelines relating to:

- public access
- layout and form
- views
- uses
- building design
- landscape and lighting
- conservation.

For the purpose of the Guidelines, the River within Wandsworth is divided into five reaches and guidance is provided for each reach in respect of assets and amenities, listed buildings, views and building heights. The Guidelines are relatively comprehensive in their content and address a wide range of issues relevant to redevelopment of the Riverside and provide a clear picture of the Council's requirements in relation to how new riverfront developments are designed. There are no specific guidelines relating to River-related uses.

KEY POLICY ISSUES

An appraisal of the planning policy context, including current UDP policies, has highlighted three key areas to be addressed in preparation of the Strategy:

- The need for **cross boundary and cross river coordination**, particularly regarding issues of river transport and the protection of views;
- The **level of policy detail**, including site specific detail, which is required to reflect local character and unique environments;
- The need to **integrate strategic policies with plans for management and redevelopment** and;
- The need to establish a framework for **implementation** and monitoring of policies and proposals.

Cross Boundary and Cross River Coordination

Key issues may be summarised as follows:

- The Strategic Planning Guidance for the River Thames seeks a more consistent approach to policy formulation and supporting guidance than is currently incorporated in the Boroughs' UDPs.
- Cross-boundary and cross-river management needs to be explored thoroughly and mechanisms put in place to facilitate this.

- There are particular issues that need to be identified and targeted as critical for a cross-boundary and cross-river coordinated decision-making. These issues include river transport and the identification and protection of views.
- A consistent approach to policy development does not imply that all the UDPs should adopt the same policies, but that a consistent approach is applied whilst recognising the local context.
- The use of dual area designations for the TPA needs to be addressed in a coordinated way and where appropriate standardised. For example the definition of the TPA as a Conservation Area in one UDP, and as Largely Metropolitan Open Land in another does not provide a consistent approach to planning of the River and riverside.
- The way in which reference is made to key issues in UDP policy varies significantly to the extent that in some UDPs the policy statement itself does not cover a key issue, but rather the issue is included as part of policy explanation. This could be more consistent across the Boroughs.
- A level of detail is required to achieve the objectives of RPG3B/9B, that is lacking in most of the UDPs. These include lists of local landmarks, views and structures associated with the River's history. Such lists, and the identification of the items on a map, are required to assist policy implementation.
- There is a tendency in the UDPs to base policies relating to the river on very broad stretches of the River and as a result, there is a limited 'sense of place'. Focusing on Character Area reaches facilitates a vision for the future use and design of development and open space in the TPA.

Level of Policy Detail

Key issues may be summarised as follows:

- The river and riverside undoubtedly differ in character throughout the Study Area and it is to be expected that policy emphasis, and the level of detail, will differ from Borough to Borough. RPG3B/9B provides guidance and embodies flexibility to develop meaningful policy that considers local constraints and opportunities.
- A best practice approach requires an understanding of RPG3B/9B in the context of local issues and local character. LB Wandsworth contains a total of 32 policies specific to the River and environs. These policies are supported with appropriate background and justification.

Integration of Strategic Policies

Key issues may be summarized as follows:

- The need to achieve a greater level of integration between strategic policies and plans for the management and redevelopment of individual sites. This will assist in the promotion of strategic planning objectives;
- The need to ensure that a consistent approach to strategic policies is adopted in development control decision making;
- The potential benefits of linking policies to projects and of considering issues relating to implementation as part of the UDP review.

Policy Implementation

- Design Briefs for major sites and important opportunities, Supplementary Planning Guidance, and developer-prepared Design Statements are tools to aid implementation of UDP policy. The Boroughs do not currently take full advantage of these tools to guide sustainable development.
- A significant issue relates to the weight given to Supplementary Planning Guidance in practice when applications within the TPA are determined. A commitment is required to support any guidance adopted in the future.

- Government Guidance contained in PPG 12: Development Plans, discourages local planning authorities from developing over-detailed plans. This is where Supplementary Planning Guidance provides the opportunity to develop a more detailed vision for the River.
- The five Boroughs' UDP policies and existing SPG includes guidance that is not necessarily current nor enforced. Effective use of SPG requires commitment beyond adopting a set of Guidelines or a Strategy. Cross-referencing of SPG in the UDPs must be explicit. SPG should be reviewed on a regular basis to acknowledge changing circumstances and changing policy context.
- Much of the non-statutory guidance produced by agencies such as LPAC, GLA, the Countryside Agency and the PLA contain informed, well-researched and useful guidance. However, very few of these documents are referred to in the five UDPs as Supplementary Planning Guidance. Reference to these documents as SPG should be consistent across the riparian boroughs in order that their usefulness is maximised.
- LB Hammersmith and Fulham, following alterations in June 2000, provide a useful example of cross-referencing to additional

guidance and reference to other organisations for the purposes of consultations and gaining permissions. UDPs and Supplementary Planning Guidance should contain references to the use of sustainability checklists as a means of controlling development and providing appropriate development guidelines. Reference should also be made to other relevant regulations (eg: EIA Regulations) which should be taken into account in the determination of planning applications.