

THE REGENTS NETWORK

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A WATERWAYS RESPONSE TO FURTHER ALTERATIONS TO THE LONDON PLAN

April 2014



Only the blue bits!

We have been told strictly by GLA that only the 'blue bits' of text in the FALP draft can be considered in the consultation. This is ill-conceived, and unnecessarily pedantic, as well as sounding a bit despotic.

The guidelines are clear, but certainly cannot be taken as a strict decree where additional 'errors and omissions' may be flagged up, or sound improvements are suggested by people who are using the London Plan on a regular basis and finding that they cannot fulfil the Mayor's requirements and aspirations in his London Plan unless the text is revised. It's the people on the ground who should be listened to.

This is also common sense, and it should not be beyond the wit of the GLA and the experience of the Inspectorate to recognise where any limitations should be agreed.

Excuses, excuses

One reason put forward by GLA for limiting alterations being dealt with other than the blue bits of text, is that it is only the blue bits that went out for consultation. They were certainly flagged up to be looked at and considered, but the reality is that the whole of the London Plan went out for consultation - all the pages were there.

Every page of the London Plan, every paragraph and section, is under scrutiny, and has been for a long while as it has been in daily use. It would be very surprising if over all that time a number of corrections, improvements and additions had not been noticed!

A wide enough remit

When introducing the FALP, the GLA made it quite clear what the purpose was of the Further Alterations, which (in summary) are to cover:

- The 'London expression' of the NPPF
- Housing issues to address substantial increase in population
- Support of the recession recovery
- Minor changes
- Support the Mayor's strategies
- Address advice to the Mayor from various sources

This seems to be quite focused and sensible, and sufficiently broad to encourage a wide range and variety of views and suggestions, as well as dealing with some very serious concerns.

It works both ways

Worryingly, there are sections and paragraphs where there are no blue bits of text, but where there should be blue bits. It works both ways, and because there are no blue bits might flag up that something may have been overlooked and the text should be scrutinised in the consultation.

Perfection?

The London Plan is a very good document, but there are certainly some rough edges, and some unsatisfactory issues and circumstances that need to be addressed. Also, some of the drafting is clunky, and is not a patch on the quality of drafting of the original 2004 London Plan, which was heard to be described as bedtime reading, which is perhaps exaggerating a bit.

A well ordered scrutiny of the London Plan will take place, and to good effect. But the Mayor should expect a detailed and thorough job, and not just the blue bits.

FURTHER ALTERATIONS

Chapter 7 The Blue Ribbon Network

1. A very good start

The BRN section begins optimistically by identifying London's waterways and water bodies to be strategically important. The water space is 'prioritised'. A great introduction.

When the **implementation** of the London Plan is finally taken seriously and the Mayor gets round to promoting his strategic plan and ensuring that it is fully taken into account when development is considered, then this paragraph 7.71 will be a sound starting point for considering how the waterways and waterside development is dealt with. The starting point is the water! If only one paragraph is implemented - then this is the one, so long as in the meantime it is not toned down (see Note 1 below).

Para 7.71

The Blue Ribbon Network is multi-functional. It provides a transport corridor, 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 starting point for consideration of development and use of the Blue Ribbon Network and the land alongside it must be the water. The water is the unique aspect and consideration must *initially*¹ be given as to how it can be used, maintained and improved (see Policy 2.18, Para 2.86,² and Map 2.8³).

¹ A get-out clause for property developers. No second thoughts should be allowed. This does not preclude property development along the waterways, but the text should be strengthened to make certain that the right sort of development results. It is far too often the wrong building in the wrong place on the waterside rather than the fact that there is a development.

² Cross reference. It is useful that water space in Chapter 2 is considered along with green spaces and open space. This could improve people's perception and mind-set of the waterways.

³ Below the open spaces map 2.8 there is a cross reference to the Blue Ribbon Network, but there is no reciprocal cross reference in the BRN sections to open space.

Open space value

The key Para 7.71 is weakened with the inclusion of 'initially', as 'must' should prevail. But the cross referencing to Chapter 2 is also crucial as the waterway open space has great importance. No one would readily consider constructing a 36 storey bulky tower, let alone a group of towers, on the border of a park. Yet developers get away with it beside the Thames and canals without the planners or GLA turning a hair. Why?

Rather than just cross referencing the BRN policies to Chapter 2 and the open space issues, more direct reference to open space is needed in the BRN policies themselves. An additional sentence here and there could remove any doubts, nor opportunities for the waterways to be exploited - and degraded.

West London threat

There is a serious threat that the open space value of the canal in West London from the Mayor himself with his so-called 'vision' for the development of Old Oak Common, his Opportunity Area 7 (Page 307). The blue bits of the text mention the canalside, but somehow omit to mention the canal itself. The use of the canal is not considered, but the canal will be degraded by the overbearing and bulky development. The London Plan needs to be strengthened for the greater benefit of its waterways, and it must be seen that the policies are **implemented**, and not sidelined, even by the Mayor himself.

The recommendations from the London Waterways Commission in their response to the FALP for strengthening the value and characteristics of open space is strongly supported.

2. The Water Freight Industry

Policy 7.26 INCREASING THE USE OF THE BLUE RIBBON NETWORK FOR FREIGHT TRANSPORT

Planning decisions

B Development proposals

d close to navigable waterways should maximise water transport for bulk materials, particularly during demolition and construction phases (see Policy 5.18).¹

¹ A cross reference to a similar policy reinforces the content of the policy, which could make it work more effectively - providing that Policy 5.18 is first revised so that it does not contradict.

The following policy does not match the above policy 7.26 and could be used by a developer to contradict 7.26

Policy 5.18 CONSTRUCTION, EXCAVATION AND DEMOLITION WASTE

Planning decisions

B Waste should be removed from construction sites, and materials brought to the site by water or rail transport ~~wherever that is practicable~~¹ close to navigable waterways or rail heads² (see Policy 7.26).³

¹ This get-out clause should be deleted. It could work to contradict Policy 7.26 above. There is no need to add any further qualifying clause, for the inclusion of the word 'should' implies that water transport has to be used unless there are any special circumstances. The onus is on anyone who disagrees to make out a solid case for not following the policy to the letter.

² It is helpful to state the obvious so that the reader is not left to ask the question.

³ A cross reference should be included.

Paragraph 7.75

Using water based transport on London's waterways¹ for freight is fully in line with the NPPF, in particular paragraphs 29, 30 and 41, promoting sustainable modes of transport and paragraph 143 specifically referring to the safeguarding of wharfage to facilitate minerals handling. This contributes to the provision of the opportunity of modal shift from road transport.² Water transport is recognised as one of the most sustainable modes, particularly for ~~low value~~,³ non time-critical bulk movements.

¹ Added to give better focus, rather than generalising.

² This replaces the important notion of 'modal shift' that was deleted in a previous 'alteration'. It specifies the shift from road, to highlight the significance of modal shift.

³ Words are deleted as this is an incorrect point. For instance, recyclates are not all 'low value', container contents need not be 'low value', a load of construction steel is not 'low value' whereas a lorry load of potato crisps could be described as low value. So what point is being made by inclusion of the phrase in connection to water freight? Negativity is not welcome.

3. Demolition waste

The London Plan is failing to satisfactorily resolve the lack of use of water freight for waterside development sites, or for 'sites close to navigable waterways' as said in Policy 7.26 Para Bd (see above).

The Planning Decisions wording is sound enough as it states that the waterways 'should' be used for the building phase of the developments. Perhaps planners and developers are relying on the get-out phrase in Policy 5.18 (see above) which is recommended for deletion. This loophole must be closed.

However, it seems likely that it is also a matter of the **implementation** of the London Plan not being carried out by the GLA, and that a careful eye is not being kept on the local authority and the planning consent conditions.

Feasible but rejected

Some local authorities (including LB Camden) are going as far as recommending that a feasibility study is carried out to see if water freight is viable for waterside developments, through planning conditions or s106 requirements. However this is not resulting in a positive outcome, and in Camden there has been a nil result in the mega Kings Cross Central Development over the (many) years. In one recent phase of the KX development over 1,000 lorries could readily have been taken off the highly congested local streets. The strongest support for use of the Regents Canal came from the cycling lobby who experience the threat from heavy lorries. They were certainly more helpful than the London Plan and the GLA, but unfortunately the proposal was not agreed by LB Camden who accepted the contractor's version of the water freight feasibility study.

- Very often the feasibility study is weak and flawed and water freight is said not to be viable – the viability criteria need to be tightened with the assumption that water transport is used unless proved otherwise (as in the LB Camden case).
- Sometimes water freight is said to be viable, and the contractors ignore it (such as with Crossrail at Paddington).
- Sometimes the feasibility study is not carried out at all, and no one bothers to chase this up (recently three times in Hackney, including a development at Rosemary Works).

Basically water freight is sidelined, and for the likes of Regents Network to be able to challenge such situations we need a strong lead from the London Plan, and the Mayor.

4. Infrastructure

Paragraph 7.80

In order to make the maximum use of the Blue Ribbon Network, particularly for effective transport, a range of supporting infrastructure is required. The infrastructure includes, but is not limited to: boatyards, jetties, **moorings**, slipways, steps and waterside paths/~~cycleways~~.¹ Their need and provision should be assessed by local authorities, and the facilities provided where required.²

¹ Deleted as whether a waterside path or towpath is suitable for use by cycles has to be assessed carefully under separate criteria rather than it being an assumption. The paragraphs that follow in the Plan deal in more detail with facilities directly related to the waterways themselves, so the passing mention of cycling is inappropriate and not relevant in that context.

² Added as it is no good assessing the need without doing something about it. Unless the wording is more positive, it only serves as a get-out clause for a developer, say, who does not want to retain a boatyard, and who can say he has assessed the need but does not have to do anything about it. It is important that the London Plan states that the facilities should be provided, and a more positive lead should be given by the Mayor. No qualifying wording should be added such as 'if convenient' and the like which the London Plan is full of.

5. Permanence of moorings

Paragraph 7.84

A¹ ~~The~~ range of ~~permanently~~² moored vessels, for example residential barges, restaurants, and³ ~~bars and offices~~,⁴ can add to the diversity and vibrancy⁵ of waterways and London in general. However, their siting needs careful consideration so that the navigation, hydrology and biodiversity of the waterways are not compromised. **Consents** for new moorings should be ~~managed in a way that~~ respects⁶ carefully managed in order to respect⁷ the character and requirements⁸ of the waterways and the needs of its users. The BRN should not be used as an extension of the developable land in London nor should parts of it be a continuous line of moored craft.⁹

¹ The indefinite article sounds more general.

² Promoting permanently moored vessels for commercial uses is unacceptable and directly opposes the last sentence of this paragraph 7.84 that “the BRN should not be used as an extension of the developable land in London”.

³ Added

⁴ Floating offices and business barges are alien craft. You get the daft situation of Paddington Basin with over 2.4 million sq ft of new offices advertised, and a huge area of water in what is left of the basin is then taken over by a dozen or so business barges for a land based use. The pressure for business barges has now abated as the proposals have not been very successful. (a very expensive specially constructed business barge *Brunel* was decommissioned and towed away from Paddington Basin having been a failure, with a financial loss of over £100,000).

⁵ Rather than the overworked and erroneous notion of ‘animating’ our waterways, the London Plan should be promoting the calm nature of the waterways, and some sort of haven of quiet and peace, just as might be appreciated in other open spaces or parks. If there is a spot on the waterways where nothing is ‘happening’ then this in itself is worthwhile, especially in contrast to the over-crowded bustle of London. Open water is very attractive.

⁶ The key issue is not how the moorings are managed, the important matter is whether there should be consent for a mooring in the first place.

⁷ Strengthens the issue of consent for a mooring, without getting into too much detail at this stage.

⁸ Added to give more emphasis on the waterways rather than individual users.

⁹ An excellent last sentence, and important that it is retained.

Limiting the number of moorings?

General promotion of a wide range of permanently moored vessels on London’s waterways (paragraph 7.84) is not welcome, as the introduction of land based uses can detract from the charm, openness and environmental qualities of the waterways, especially when it begins to become the dominant feature of a waterside location. The negative impact is generally more troublesome on the canals and smaller waterways.

A certain number of permanent residential boats may be acceptable, and have become part of the waterway scene, and of course there are riparian mooring rights and the like. However, the introduction and promotion of permanent floating restaurants, bars and offices is contradictory, especially floating offices (business barges).

London has hundreds of thousands of restaurants and bars and millions of offices, yet water space is limited, and introduced in the London Plan as being unique and that it should be used for water related purposes, particularly for navigation and transport.

Permanent moorings, particularly for commercial uses, should be treated as a special case rather than a general preference, and a valid justification should be made for the ‘exception’ to be agreed. After all, permanent structures can be provided on the land around the waterways if their presence is thought to be a benefit to the use and pleasure of the waterway, rather than risking detracting from the water environment itself.

It is often instructive to compare the open space value of waterways with other open spaces such as parks, where general commercial use is very limited for obvious reasons. The notion that parks and open spaces should be ‘animated’ is not generally accepted (especially on a permanent basis), so why should it be thought to be necessary and acceptable for London’s waterways? Commercial interests should not be able to dominate our waterways and environment in our city at the expense of the general pleasure and well-being of Londoners - and visitors. There appears to be some sort of impression that the waterways, especially the canals and River Lea, are available to all-comers, but this must not be countenanced.

I suppose that navigation and transport also suggest a comparison with roads, and it is certain that the ‘vibrancy’ of a few A roads or back streets would not be improved by permanently parked vehicles of all types. Why are waterways singled out?

Dealing with mooring issues is a very big subject that cannot be resolved (or regulated) with a few alterations to the London Plan. But some measure of constraint can be introduced rather than the general promotion of permanent moorings which can so easily be taken as encouragement that the waterways, especially our canals, are up for grabs.

It needs to be indicated in the London Plan that there is a measure of control and reasonableness when considering moorings (especially permanent ones) before things get out of control. The policies must convey that at least there should be limitations.

5. Strategic Industrial Locations SILs

Loss of employment space

A comment by GLA at launch event of FALP on 31 January 2014 flagged up the disposal of industrial land without providing any justification or reasoning for its disposal, and there was speculation from the floor as to where the next disposal would be.

To add to the negative treatment of employment space, the Mayor is pushing for residential developments to take over employment locations close to transport hubs. This would displace industrial and commercial sites. - which also need to be near transport hubs, obviously. These are the centres that provide employment - so people need not travel and commute to work if the opportunity is based close to residential areas.

Mixed development

Nowhere in the London Plan does it clarify the meaning of mixed development, and it is too often interpreted unreasonably as a residential development of 1 and 2 bed flats with a few 3 beds thrown in. But of course it is intended to be a mix of residential with commercial and retail, and the like. Planning authorities (as well as the GLA) know that, but they let it pass. A reference to it in the FALP would be welcome, and a definition of mixed development.

Reduction of commuting

Transport is the ruination of London (and many other great world cities). Improvements in transport are necessary (and welcome), but this should go together with reducing the necessity for commuting by providing much better opportunity for people to find a wide range of work in their locality.

There should be pressure for genuinely mixed developments, and this seems to be skewed by the Mayor's emerging policies to dispose of as much industrial and commercial land as possible exclusively for housing. A balance has to be struck.

Planned dereliction

The Mayor and other authorities should take the trouble to notice what has been going on for a while with developers buying up industrial land (at a cheap rate) and allowing it to stand empty and perhaps become a bit derelict for years until it can be developed for residential.

This land grab and planned dereliction has been widespread, for instance at Commerce Road in Brentford, in East London including the Olympic area, in Paddington, and currently at Hackney Wick and Bow, for instance.

A true definition

What is the definition of 'surplus industrial land'? There is no clear definition provide in the London Plan, which is a serious omission. It seems it can be whatever anyone wants it to be.

SILs Strategic Industrial Locations are major commercial hubs which attract a more balanced assessment although even then there is no direct protection. What chance have other industrial and commercial locations spread across the city of reliable and serious attention.

Release of 'surplus' industrial land

It is doubtful that there is a great surplus of industrial and commercial land in London. Where have any figures been supplied?

There is certainly not the requirement for the wholesale disposal of huge swathes of this important asset as is implied in various quarters, including in the Mayor's London Plan.

Restraints are needed similar to those used in the Safeguarded Wharves policies, with strict conditions that are in favour of continuing commercial use rather weakening to subversive practices of profit-making residential use. The **implementation** of the policies should favour Londoners rather than financial gain.

Policy 4.4 Para 4.23

Redevelopment of surplus industrial land ~~should~~ could¹ address strategic and local objectives particularly for housing, and social structure such as education, emergency services and community activities. ~~Release of surplus industrial land should, as far as possible, be focussed around public transport nodes to enable higher density redevelopment, especially for housing.~~² In locations **within or** on the edges of town centres, surplus industrial land could be released to support wider town centre objectives.

¹ Change to could, which is also used in an even-handed way in the third sentence. To deliberately use 'should' is a certain directive to do what you like to grab the industrial land, and makes it sound like a perverse policy of the Mayor for wholesale disposal of industry and commerce in London. It sounds like it is for the benefit of property developers, and what could be the motive for that?

² This sentence is better deleted altogether, unless the Mayor can come up with something more even-handed and beneficial to the residents and Londoners. He can begin by providing a sound definition of 'surplus' industrial land.

Mystery reference

There is a note at the bottom of Page 136 that refers to 'Industrial Land Demand and Release Benchmarks in London. GLA 2011' which sounds ominous and needs investigating. Copies and reference to this should be provided, to fulfil openness and accountability requirements.

Waterside SILs

It should be noted that a large percentage of the SILs lie in close proximity to the River Thames and the Lee Navigation, as well as the canals especially in West London.

See **Appendix 1** and the Map 2.7.

This points very positively to the opportunity of water freight being usefully involved in the operation and viability of the Strategic Industrial Locations. Direct reference should be made in the SILs policies and management to draw attention to the benefits of including water freight in their operation and development. Positive thinking please.

6. Implementation

All that effort, inspiration, brain power, and months (or years) of work, as well as extensive resources poured into a wonderful London Plan to lead our capital city into a worthwhile and successful future. In its ten years of life, has it thrived and been a great success?

A serious message

On day one when the London Plan was first published in April 2004, the Regents Network sent a message to the Mayor to ask about the promotion and publicity for his impressive new strategic plan in which the Regents Network had been involved for years in its inception and drafting. Back came the curt reply that the London Plan did not need publicity as it will be firmly established by way of its status and authority. How weak this has proved to be.

Latent not redundant

There is no doubt that the London Plan is a very profound and well structured master plan, and takes a central role in the development of London, its communities and its economy, which attracts great admiration from around the world - well, much of it.

The weakness of the London Plan is that it has very reduced credibility and influence where most of the key decisions are made in London - at local authority level.

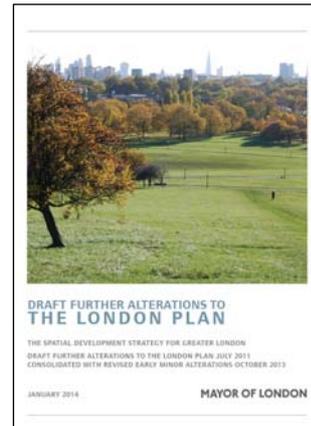
Mind the gap

There is a yawning gap between the lofty domains of City Hall and the more mundane and every-day situation at the local level where the focus is on the Londoners themselves. Great statements and policies are made by the Mayor, yet there is a very weak process to ensure that these filter through to the local level and are carried out for the advantage and advancement of the people and communities.

Reluctant to go there

Local authorities and planning departments are not up to speed with the London Plan. They are well aware of the London Plan, of course, but it is very firmly placed second (or third) to the local plans and policies. Engagement and discussion with local planners and officers takes a downturn when the London Plan is mentioned, with a nod of recognition and a change of subject. They are just reluctant to go there.

When it gets around to referring to the Blue Ribbon Network policies, then this all too often draws a blank. A spot check in a local authority to gauge the familiarity with the London Plan would have a disappointing result, and at best there may be one or two well thumbed sections with the majority of the plan remaining a mystery.



In reports to borough planning committees, a list of selected London Plan policy numbers (numbers only) now regularly appears, and some may be relevant to the application. It is very rare that the policies are spelled out, and they are not usually referred to.

Implementation of implementation

There was a committee in the process of being set up by GLA over a year ago with the slick title of 'Implementation Committee for the Implementation of the London Plan'. This at least indicates that GLA may be conscious of the lack of implementation, while outwardly being in denial. However, that committee seems to have faded into the background.

More than a token

The Mayor and his innumerable staff must do a lot better, rather than making token gestures to implementation. Direct engagement with local authorities is necessary (and not just an edict from on high), and it would be effective for starters to arrange meetings or work shops for borough planners, officers and members.

The effort would be worthwhile, the London Plan is that good.

Del Brenner
Regents Network and
a member of the London Waterways Commission

April 2014



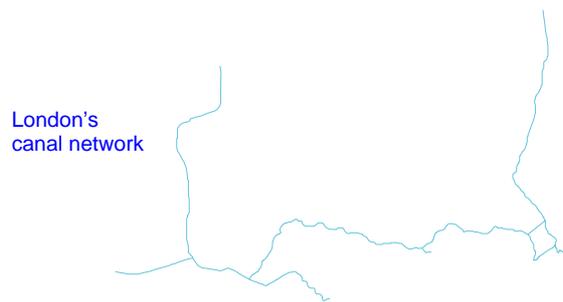
APPENDICES

APPENDIX 1

STRATEGIC INDUSTRIAL LOCATIONS SILs

A Regents Network leaflet featuring the potential connections of the waterways with London's industry.

As Para 2.80 refers directly to the proximity of some of the SILs to the waterways including the canals, then the canal network should be added to Map 2.7, as has been done on the leaflet.



APPENDIX 2

THE FORGOTTEN BLUE RIBBON NETWORK

A well distributed Regents Network leaflet revealing some of the shortcomings of the London Plan regarding the Blue Ribbon Network, and giving a warning of the potential degrading of London's fine waterways with the construction of inappropriate (and greedy) property development.

THE REGENTS NETWORK

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STRATEGIC INDUSTRIAL LOCATIONS (SIL) on London's canal network

THE LONDON PLAN July 2011

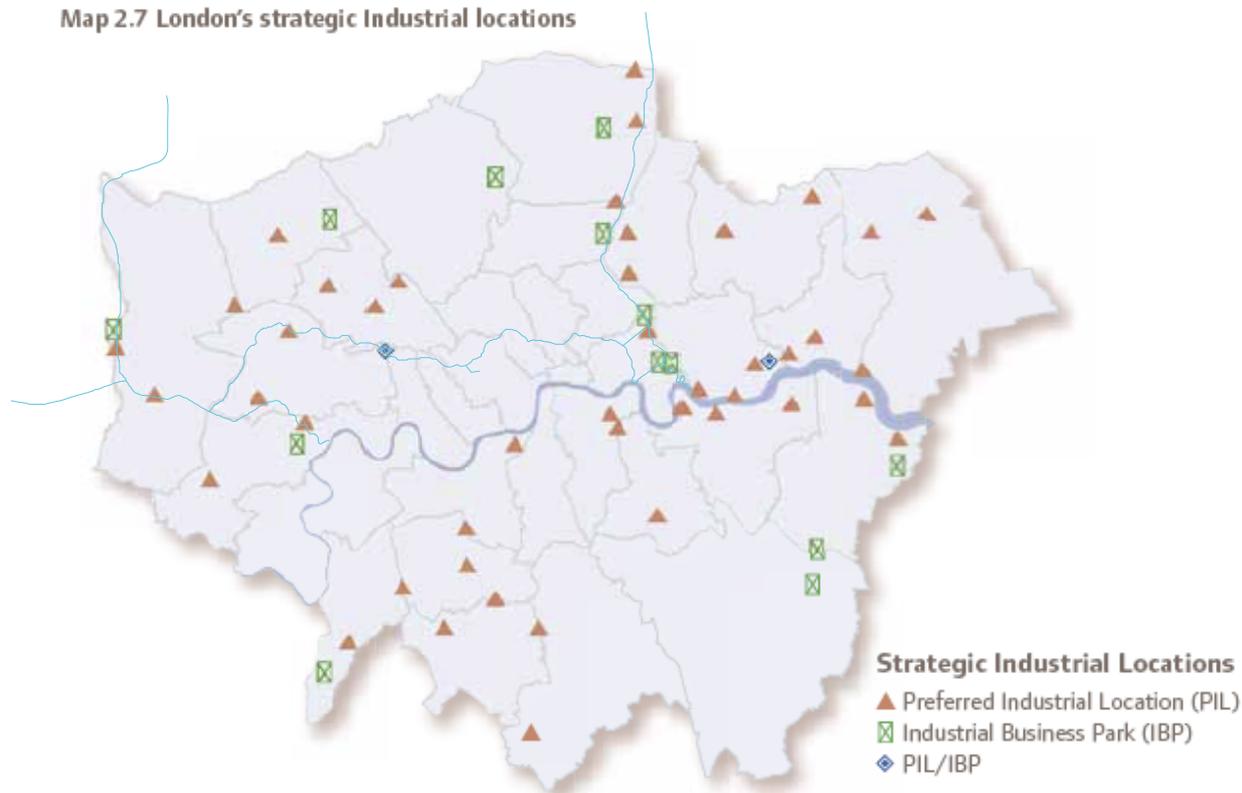
POLICY 2.17 Strategic Industrial Locations SILS

This key policy deals with the promotion, management and protection of the designated strategic industrial locations (see map). The policy is not mentioned in the Safeguarded Wharves Review 2012.

The recent Safeguarded Wharves Review does not refer to and take into account that a large percentage of the SILs lie in close proximity to the River Thames, the Lee Navigation, as well as the canals especially in West London.

[— the Lee Navigation and canals are superimposed on the London Plan map below].

Map 2.7 London's strategic Industrial locations



Source GLA: © Crown copyright. All rights reserved. Greater London Authority 100032216 (2011)

The policy points out that SILs are located close to rail, river and canals and safeguarded wharves, and mentions transport and modal shift, and that waterways could “provide competitive advantage” (Para 2.80). Also it is stated that transport considerations should “maximise use of rail and water based infrastructure” (Para 2.82).

It is mentioned that “it will be particularly important to secure and enhance strategic provision in West London, especially at Park Royal” (Para 7.82). The canal runs right through the centre of Park Royal.

The Policy 2.17 does not ignore the role of the waterways, and the Safeguarded Wharves Review should take London's industrial enterprises into consideration and recognise their importance in the future use of water freight. (DB)

THE LONDON PLAN 2011 (Extract)

ANNEXE THREE STRATEGIC INDUSTRIAL LOCATIONS (SIL)

A3.1 For the avoidance of doubt, this annex forms part of the London Plan and therefore of the statutory development plan.

A3.2 Policy 2.17 of the London Plan addresses Strategic Industrial Locations (SIL). Table A3.1 below identifies each SIL in London, distinguishing between Preferred Industrial Locations (PIL) and Industrial Business Parks (IBP).

Canal locations highlighted

Table A3.1 Strategic Industrial Locations

Ref.	Location	Borough	SIL Type
1	Barwell Business Park	Kingston upon Thames	IBP
2	Beckton Riverside	Newham	PIL /IBP
3	Belvedere Industrial Area (part)	Bexley	PIL
4	Bermondsey	Southwark / Lewisham	PIL
5	Beverley Way Industrial Area	Merton	PIL
6	Blackhorse Lane	Waltham Forest	PIL
7	Brentford (part) – Transport Avenue	Hounslow	PIL
8	Brimsdown	Enfield	PIL
9	British Gas Site/ Cody Road (part)	Newham	IBP
10	Bromley Road	Lewisham	PIL
11	Central Leaside Business Area (parts)	Enfield / Haringey / Waltham Forest	PIL
12	Charlton Riverside (part)	Greenwich	PIL
13	Chessington Industrial Estate	Kingston upon Thames	PIL
14	Dagenham Dock / Rainham Employment Area	Barking and Dagenham / Havering	PIL
15	East Lane	Brent	PIL
16	Empson Street (part)	Tower Hamlets	IBP
17	Erith Riverside (part)	Bexley	PIL
18	Fish Island / Marshgate Lane (parts)	Newham / Tower Hamlets	PIL /IBP
19	Foots Cray Business Area	Bexley / Bromley	IBP
20	Freezywater / Innova Park (part)	Enfield	PIL
21	Great Cambridge Road (part)	Enfield	IBP
22	Great West Road (part)	Hounslow	IBP
23	Great Western (part)	Ealing	PIL
24	Greenwich Peninsula West	Greenwich	PIL
25	Hackney Wick (part)	Hackney	IBP
26	Hainault Industrial Estate	Redbridge	PIL
27	Harold Hill Industrial Estate	Havering	PIL
28	Hayes Industrial Area	Hillingdon	PIL
29	Honeypot Lane, Stanmore (part)	Harrow	IBP
30	Kimpton Industrial Area	Sutton	PIL
31	King George Close Estate, Romford	Havering	PIL
32	Lea Bridge Gateway	Waltham Forest	PIL
33	London Industrial Park	Newham	PIL

Ref.	Location	Borough	SIL Type
34	Marlpit Lane	Croydon	PIL
35	Morden Road Factory Estate and Prince George's Road	Merton	PIL
36	Nine Elms (part)	Wandsworth	PIL
37	North Feltham Trading Estate	Hounslow	PIL
38	North London Business Park, Brunswick Road	Barnet	IBP
39	North Uxbridge Industrial Estate	Hillingdon	IBP
40	North Wimbledon (part)	Merton	PIL
41	Northolt, Greenford, Perivale (parts)	Ealing	PIL
42	Park Royal (part)	Brent/Ealing/Hammersmith & Fulham	PIL /IBP
43	Purley Way and Beddington Lane Industrial Area	Croydon / Sutton	PIL
44	Rippleside	Barking and Dagenham	PIL
45	River Road Employment Area	Barking and Dagenham	PIL
46	Southend Road Business Area	Redbridge	PIL
47	St Marys Cray	Bromley	IBP
48	Staples Corner	Brent	PIL
49	Stonefield Way / Victoria Road	Hillingdon	PIL
50	Surrey Canal Area/Old Kent Road (parts)	Lewisham / Southwark	PIL
51	Thames Road, including Crayford Industrial Area	Bexley	IBP
52	Thameside East	Newham	PIL
53	Thameside West	Newham	PIL
54	Tottenham Hale (part)	Haringey	IBP
55	Uxbridge Industrial Estate	Hillingdon	PIL
56	Wealdstone Industrial Area	Harrow	PIL
57	Wembley (part)	Brent	PIL
58	West Thamesmead / Plumstead Industrial Area	Greenwich	PIL
59	Willow Lane, Beddington and Hallowfield Way	Merton	PIL

THE REGENTS NETWORK

T H E F O R G O T T E N

BLUE RIBBON NETWORK POLICIES *“the best thing to happen to London’s many waterways for decades”*



Blue Ribbon Network
 7.70 The Blue Ribbon Network (BRN) is London's strategic network of waterspaces (see Map 7.5) and covers the River Thames, canals, tributary rivers, lakes, reservoirs and docks alongside smaller waterbodies. The network is of cross cutting and strategic importance for London; every London borough contains some element of the network – 17 border the Thames and 15 contain canals. The nature of waterbodies is that they are linked, natural or semi natural systems, therefore the concept of the network is of vital importance.

POLICY 7.24 BLUE RIBBON NETWORK

Strategic
 A The Blue Ribbon Network is a strategically important series of linked spaces. It should contribute to the overall quality and sustainability of London by prioritising uses of the waterspace and land alongside it safely for water related purposes, in particular for passenger and freight transport. Regard should be paid to the Thames River Basin Management Plan.

7.71 The Blue Ribbon Network is multi functional. It provides a transport corridor, drainage and flood management, a source of water, discharge of treated effluent, a series of

241

diverse and important habitats, green infrastructure, heritage value, recreational opportunities and important landscapes and views. The starting point for consideration of development and use of the Blue Ribbon Network and land alongside it must be the water. The water is the unique aspect and consideration must initially be given as to how it can be used, maintained and improved.

7.72 The Environment Agency has published the first Thames River Basin Management Plan. This covers all the waterbodies within London. It includes actions, which aim to improve their ecological status and potential (see paragraph 5.58).

POLICY 7.25 INCREASING THE USE OF THE BLUE RIBBON NETWORK FOR PASSENGERS AND TOURISM

Strategic
 A The Mayor will seek to increase the use of the Blue Ribbon Network for passenger and tourist river services, and supports the principle of additional cruise liner facilities on the Thames.

Planning decisions
 B Development proposals:
 a should protect existing facilities for waterborne passenger and tourist traffic. Applications which remove existing facilities should be refused unless suitable replacement facilities are provided
 b which provide new facilities for passenger and tourist traffic, especially on the central London stretch of the River Thames, will be supported
 c which provide improved facilities for cruise ships in London will be supported.

London's best kept secret?

Even these days there are far too many people who consider the Blue Ribbon Network Policies in the Mayor's London Plan to be a mysterious concept.

This lack of 'enlightenment' is often worryingly held by the authorities and decision makers, who come up with resolutions and propositions about our waterways in complete ignorance.

Pay more attention

It would be a surprise to many of them to know that the Blue Ribbon Network Policies have been around for about ten years. Perhaps there are a lot of officials who should know better who are not even familiar with the term 'Blue Ribbon Network' which defines London's strategic complex of rivers, canals, lakes and waterspaces.

This is not to say that most people do not care about our waterways. There

is certainly no ill will against rivers and canals, and of course something as important as the River Thames, one of the most famous rivers in the world, holds everyone's attention and approval. It is just that the continuing quality and benefits of these waterways and their long-term future is not secure unless more attention is focussed on actively caring for their unique environment and on protecting them from exploitation by unsympathetic development and inappropriate uses that have a negative impact.

No support for the BRN Policies?

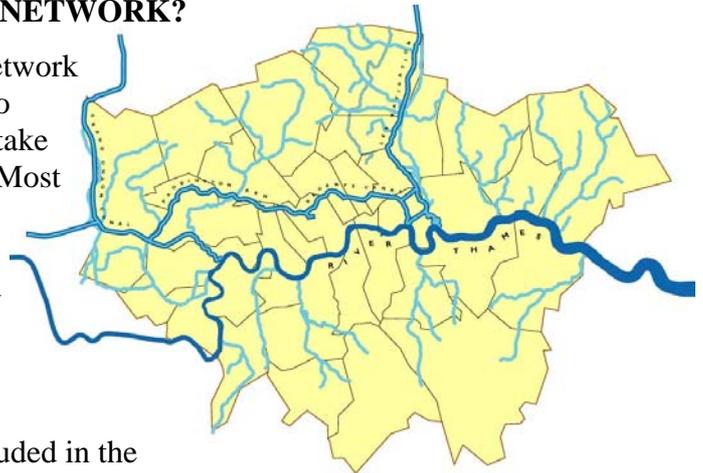
The Blue Ribbon Network Policies could very effectively provide all the attention and protection that our waterways need, but who is there to ensure that these important policies are better known and to insist that they have to be followed. The policies have been neglected for ten years, and who has done anything about it?

Are London's waterways in good hands?

The responsibility for the waterways lies with the Mayor and GLA, Local Authorities where the decisions are made, as well as with other authorities such as PLA and Canal and River Trust, but where does the incentive come from to take an active interest.

WHAT IS LONDON'S BLUE RIBBON NETWORK?

The BRN is the River Thames, the canal network and numerous rivers and tributaries. Add to that all the reservoirs, lakes and docks - or take a look at the London Plan pages 241-251. Most of the waterways and tributaries are named in Map 7.5, but unfortunately there is no itemised listing of all the BRN assets, nor a detailed survey of the extent of the surface area of London's water spaces.



Open space features

At last the Thames and canals are now included in the London Plan Open Space hierarchy (Diagram 7.2) and described as linear open spaces. They sit at the bottom of the listing although the Thames is a bigger open space than Richmond Park. However, this inclusion does give some measure of protection as the waterways can be compared with other open spaces such as parks. Just being given a mention at the bottom of the open space hierarchy does not seem to result in this important characteristic and advantage of London's waterways being greatly noticed.

THE BLUE RIBBON NETWORK POLICIES

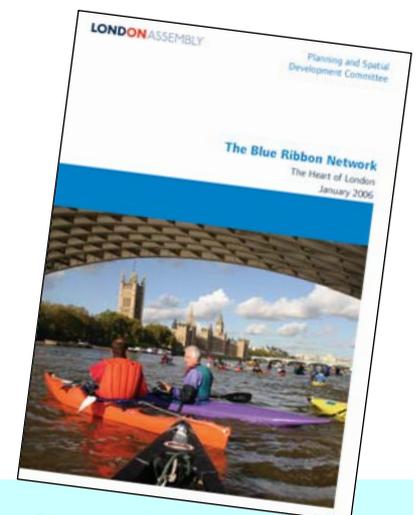
A Strategic BRN Network

The London Plan describes the network of the capital's water spaces as "strategically important" to London (Para 7.70), and provides a number of key policies. Originally, in 2004, there were 34 BRN Policies, but this has been whittled down to six key policies with greater impact, with many related issues now dealt with under diverse headings in the London Plan. The net result would be a great improvement of the consideration and protection of our waterways if only there was an effective cross referencing system in the London Plan.

- Policy 7.25** Use of BRN for passenger and tourist facilities
- Policy 7.26** Increasing the use of waterborne freight
- Policy 7.27** Supporting infrastructure and recreational use
- Policy 7.28** Restoration and biodiversity improvements
- Policy 7.29** The Thames and Thames Policy Area
- Policy 7.30** Canals, rivers and waterspaces

More than good intentions?

A few upbeat remarks from the Mayor in the London Plan does not provide sufficiently firm command for the BRN Policies and London's waterways to be given full consideration, rather than being exploited and mis-treated. It was recognised less than 2 years after the great London Plan was launched that the waterways were not being carefully protected as can be seen in the Assembly's 2006 Report (above right), now in urgent need of updating.



"The Blue Ribbon Network element of the London Plan, containing policies for London's river, canals and other waterways, received almost universal praise when it was published. There is however a belief that progress on this has been neglected, which is borne out by the fact that the Mayor in 'reviewing the London Plan', published in December fails to mention the network at all!

"My Committee has revisited the proposals to see how they can be implemented to place the waterways of London at the heart of planning policy in the Capital"

Chair of the London Assembly Planning and Spatial Development Committee in 'The Blue Ribbon Network, The Heart of London' (January 2006).

