Matter 5/1

**EXAMINATION OF THE PARTIAL REVIEW OF THE KENSINGTON AND CHELSEA CORE STRATEGY:**

**CONSERVATION AND DESIGN**

**ADDITIONAL WRITTEN STATEMENT OF THE**

**PORT OF LONDON AUTHORITY**



(Representor Reference REP/1)

Port of London Authority

London River House

Royal Pier Road

Gravesend

Kent

DA12 2BG

**Background**

1. Policy CR5 in so far as it relates to the waterways seeks to protect, enhance and make the most of waterways.
2. The adopted Core Strategy currently sets out at Policy CR5(h) how opportunities should be taken to improve public access to, and along the Thames and to promote its use for education, tourism, leisure and recreation, health, well being and transport.
3. Additionally wording has been added, without justification to the policy (part i) concerning residential vessels. The additional text reads:

*i resist permanently moored vessels on the River, except where they would not have*

*i a detrimental effect on the river as a transport route and its special character, including biodiversity,*

*ii an adverse affect on the character or appearance of the existing residential moorings at Battersea Reach;*

4. The Inspector’s questions relating to Conservation and Design include at matter 5, question 31:

*“Is the approach to resisting permanently moored vessels on the Thames (policy CR5 part i) justified, and is it consistent with the London Plan?”*

5. This Additional Written Statement sets out how the PLA considers that the Council’s approach to permanently moored vessels has not been justified and is not consistent with the London Plan. It recommends changes to the wording of the policy to make it consistent with the London Plan. Changes are also recommended in order that the approach taken to residential vessels on the River Thames is consistent with the approach the Council is promoting towards residential vessels on the Grand Union Canal.

**Discussion**

1. The Council states in its response to the PLA’s comments on Policy CR5 that duplication of London Plan wording is not required however the Council’s current approach to permanent moored vessels is only consistent in part with the London Plan’s approach to moorings. It fails to address what is, in the Port of London Authority’s view, other key elements – navigational safety and impact on river regime.
2. Paragraph 7.84 of the London Plan clearly sets out that the siting of residential vessels needs careful consideration so that the navigation, hydrology and biodiversity of the waterways are not compromised (emphasis added). With the current wording of Policy CR5, the biodiversity of the River Thames that would be taken into account. However, it is not clear what the Council means by “the river as a transport route” and whether this would adequately address issues relating to navigation and river regime.
3. In order to be in general conformity with the London Plan and for it to be clear what the Council is seeking through the policy, it is recommended that the wording is amended to read:

*i resist permanently moored vessels on the River, except where they would not have:*

*i a detrimental effect on the special character, including biodiversity, of the river;*

*ii a detrimental effect on navigation and river regime;*

1. Policy CR5 in so far as it relates to the Grand Union Canal requires residential moorings to have adequate services for permanently moored vessels and; for other canal users (both water and land based) to not be adversely affected. It is questioned why this is only a requirement for vessels on the Grand Union Canal. In the event that an applicant meets the Council’s requirements for permanently moored vessels on the River Thames it will be just as important to ensure that these vessels have appropriate services (electricity, fresh water, waste water) and for existing users to not be adversely affected. As such it is recommended that the wording is amended to make it clear that these requirements relate to all permanently moored vessels on the Thames and the Grand Union Canal.