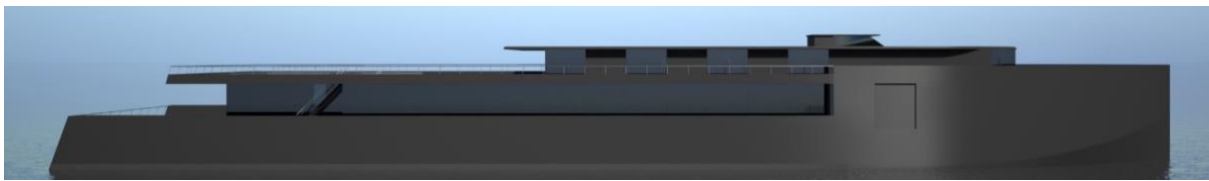


LIVING BANKSIDE

Covid 19 has thrown into relief how important it is for people to have access to natural space and particularly public realm, because not everyone is lucky enough to have a garden or balcony of their own. This new scheme at Swan Lane in the City of London seeks to create a bespoke privately-owned and privately-run pier with a paywall. For access to the Thames at Swan Lane Pier, you'd need to be a paying customer on Europe's biggest partyboat, the *Ocean Diva*, joint-funder of the project, which is the length of a football pitch, with a capacity of 1500 partygoers.



The Thames is London's biggest public realm and should belong to everyone. Let's not let it get commodified. Let's learn from Venice before it's too late and keep the mega-ships out of the heart of our city.

How to make a quick, effective objection to the *Ocean Diva* at Swan Lane Pier.

1. Please use the following document as source material.
2. The highlighted items should ideally be included to make this objection effective. But please adapt, write in your own words and supplement with your own ideas, or choose one thing to focus on, because cypasted/batch objections will be disregarded.
3. The deadline is July 13 2020, but please send your objection as soon as you can.
4. You must include your name and address for your objection to be considered valid. Don't forget to use the word 'objection'/'object' at the start or your email may be counted as neutral.

Email to: kurt.gagen@cityoflondon.gov.uk subject line: **OBJECTION TO 19/00116/FULL**

Dear Sir, **I object to the current application for the following reasons:**

1. Not a genuine mixed-use pier

This scheme is **not** for a policy-compliant reinstatement of Swan Lane Pier, which would mean a sustainably-built, responsibly-run, mixed-use pier providing public transport and healthy journeys, significant freight. As privately owned and run pier, it does not increase public access to the river.

The latest proposal for this private pier has removed public transport and water-sports.

The freight offering of one delivery a day is greenwashing, window-dressing to try to make the *Ocean Diva*'s City berth look like a mixed-use pier. After four years in development, there are still no freight customers – not surprising because the *Ocean Diva*, would always take priority and **cargo bikes could**

not feasibly share a steep narrow canting brow with 1000 partygoers. (Yet the applicants say their single daily freight drop would take 2600 delivery vehicles off City streets a year!).

2. Not a reinstatement but a reinvention

This is not a policy-compliant reinstatement. It is a massive new development, a reinvention of the old pier for a private partyboat monoculture. The applicants' pier is designed purely to service the biggest partyboat in Europe. The scheme's footprint is five times that of the old pier because they need to dredge a 'berthing pocket' for the 282ft *Ocean Diva*.

This scheme would occupy most of the shore between Cannon Street and London Bridge, colonising the City of London's public realm with partygoers into the early hours and congesting its highways with their taxis on a scale that the old pier never did.

3. Noise, congestion, crowd control inadequately addressed, burdening emergency services

The applicants have offered a 'concession' that parties of 1000 would be limited to four times a year. This effectively means no more than 999 the rest of the time. And 999 customers, up to twice daily, up to 365 days a year, could add up to 1.5 million partygoer journeys annually – a damaging invasion of a sensitive busy CAZ with limited access. Riverside Walk – and its international offices – would face noise, crowding, antisocial behaviour. Social distancing would only make queues worse.

The City's Environmental Officers recommend a closed pier by 11pm. The *Ocean Diva* insists on partying till 1 am.

The applicants misrepresent public transport available: at 1am, when the *Ocean Diva* would disgorge most of its passengers, more than half the tubes, trains and buses will have closed.

Ten marshals cannot control 1000 people and/or stop them from ordering taxis. So hundreds of taxis and Ubers would arrive at tiny Swan Lane where turning, let alone waiting, is impossible – leading to dangerous obstruction of the Red Route of Upper Thames Street

The applicants offer dream-scenarios instead of planning for how to deal with the way real partygoers behave *en masse* after drinking for many hours aboard. The applicants prefer not to mention the shouting, singing, vomiting, urinating and sometimes violence, which are known partyboat problems.

The applicants' Acoustic Report claims that noise from the boat and the colonised shore will be attenuated over the river. This contradicts the science, which is that cold water amplifies noise, and would transmit it efficiently into offices and homes both sides of the Thames.

Tellingly, the applicants have failed to offer any CGIs of the *Ocean Diva* in place at Swan Lane. Objections to the *Ocean Diva*'s appearance and massing are scoped out via a loophole in planning. The impact of its partygoers on City of London public realm is however material to any consent. The Police, the NHS, City cleansing services, Environmental Health Officers and the LPHA would be burdened with dealing with the behaviour of the customers that the *Ocean Diva* would have profitably filled with drink. This would be a private Pier, generating private profit, yet the true cost would be paid in damage to business and residential neighbours' amenity and incursions into the public purse.

4. Unsubstantiated claims for fully-electric co2-neutral operation

The Clean Marine Plan 2019 and the PLA both assert that electrical recharging of large vessels is ten years away on the Thames. There is still no credible technical substantiation that the *Ocean Diva* could function from day one as a fully electrical, co2-neutral vessel. And yet all issues of air quality and noise are simply dismissed on this very basis. This is unsafe, in every sense, because the alternative, marine diesel, is eight times as toxic as land diesel, rich in sulphur and particulates.

There are no renewables in the construction or running of the pier. The *Ocean Diva* claims with fanfare to be co2-neutral but it's very light on the detail. Is that off-set or actual? There's no Whole Life

Carbon assessment of the project. Plugged into the pier, the *Ocean Diva* would use electricity 39% derived from fossil fuels.

5. No biodiversity improvement offered

Despite the reframing as a 'green' and sustainable project, there's no biodiversity improvement offered to mitigate the dredging of 2200 cubic metres of toxic sediment for the *Diva's* berthing pocket.

6. Terror not designed out; inadequate emergency provision

The City is a Tier One Target. London Bridge has already suffered two attacks. Yet terror has not been designed out of this scheme, all responsibility falling on the City and emergency services.

7. No Service Management Plan

There is no Servicing Management Plan. The applicants now claim servicing would be at Royal Docks. Except delivery of food and flowers for up to 1000 people. Isn't that servicing? How many suppliers? How many vans clogging Swan Lane, competing with partygoers' taxis and Ubers?

8. Heritage and Archaeology impacts evaded

The site is within a Tier 1 Area of Potential for Archaeological Remains, includes several Protected Views and is within 250m of three Scheduled Monuments and six listed buildings. The applicants have failed to address the issues of protecting heritage views and archaeology at the site, despite their plan to massively dredge the very foreshore of Roman London.

9. Failure to address issues flagged when the Mayor called in this scheme

Most importantly, this new iteration does not mitigate any of the issues flagged when the Mayor called in the project. With their many pages of inconsistent reports, their unsafe baseline projections, and their rose-tinted scenarios, the applicants have failed to adequately address GLA report of 1.7.19 in terms of crowd management, highways, environmental, noise and amenity impacts.

Given those failures to mitigate its impacts as an Agent of Change, this development is not policy-compliant and must therefore be refused.

10. Permission now, variation later?

Finally, what's to stop the applicants coming back for a variation to de-spec the condition on fully-electric/co2-neutral usage when it emerges that their stated tech cannot be effected?

I also support the letters written by Richard Buxton Solicitors on behalf of Living Bankside.

NAME and ADDRESS (and check you've used the word 'objection/object' at the start)

**Please circulate to your friends and family: the Thames belongs to everyone
and needs protecting by everyone, everywhere.**

Please also sign the petition at [Change-org](https://change.org)

Living Bankside represents nearly 25,000 residents from the London Eye to City Hall. Our area includes elderly people and young children, the clergy of Southwark Cathedral, whose homes are on the river, and the Globe Theatre. Our aim is to support and promote considerate and sustainable regeneration projects, working with both residents and developers for the appropriate solutions.