

Thames Vision Consultation

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Date: Friday, 12 February 2016 at 10:27 GMT

Dear Sir/Madam.

I write in a personal capacity and as the tidal Thames representative of the RBOA in response to your December 2015 Consultation.

1. I am the principal of an architectural practice, which has been involved with designing moorings and waterside developments on the tidal River Thames and elsewhere in the UK for some 30 years. Throughout this time I have also owned, lived on and operated a narrow boat on the River.
2. I agree with the stated goals aimed at making the most of the River's potential: its function as a port, its use for carrying freight and passengers and for sport and recreation, its environment and heritage, and its community and culture. I also believe it is possible to achieve all these goals safely and sustainably.
3. It is clear from enquiries I receive and my experience of designing moorings that there is a substantial unfulfilled need and potential for residential moorings on the River. I also consider that residential boats and moorings, as well as having the potential to strengthen the river community and culture, can also contribute to the other goals of the Thames Vision.
4. My main concern about the consultation draft is that it does not properly address issues arising from the wash of high-speed vessels, mainly clippers and ribs. Since the 12 knot speed limit was relaxed, a fierce and often chaotic wash has become normal wherever these vessels operate, making the River dangerous and inhospitable for all other users except, possibly, heavy freight traffic. And it is not just the speed, but also the sudden acceleration and deceleration, which causes a surge.
5. The only acknowledgement of a problem existing is at Section 2.6 dealing with residential boats. Even here, the nature of the residential vessel and location and type of mooring, rather than the perpetrators of the wash, are seen as being the problem.
6. The reference at Section 2.6 to wave heights of upto 1 metre is unhelpful, because it does not recognise the nature of the problem. The point is that the wash generated by wind and tide on most stretches of this River has nothing like the force of the wash caused by vessels travelling at high-speed.
7. Furthermore, storm conditions take time to develop, making it possible to adopt safeguards or reschedule. Storms also eventually subside, allowing life to return to normal. The wash arising from high-speed vessels is remorseless and routine, occurring at frequent intervals every day and evening, causing sudden lurches and crashes.
8. Most residential boats and moorings can, and could always, cope with the natural elements experienced in this sheltered estuary. So, the problem is not the wind and tide, nor the residential boats and moorings, but the wash from vessels travelling at excessive speed.
9. Wash from high-speed vessels now routinely exposes River users to injury and loss of life and limb. The perpetrators of the wash and the regulators have a statutory duty to eliminate or mitigate this significant hazard. Both should be mindful of the provisions of the Corporate Manslaughter Act 2007 should a fatality ever occur through failure to exercise this duty.
10. The force of the wash from high-speed vessels is also causing migration of river bed material. It is difficult to predict with any certainty what effect this is having on bridge buttresses and abutments,

embankments and flood defences, but the consequences could be catastrophic.

11. Organisms living in the inter-tidal zone are adapted to cope with normal storm conditions, which are invariably followed by periods of calm allowing recovery. It is likely that the routine and remorseless wash from high-speed vessels is having a serious long-term adverse effect on marine organisms in the River and the ecosystem of which they are a part.

12. Safety and sustainability are fundamental to the goals of Vision Thames. It is appropriate, therefore, to refer to the internationally endorsed Precautionary Principle:

'In order to protect the environment, the precautionary approach shall be widely applied by States according to their capabilities. Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation.' (Principle 15).

Unless measures are taken to reduce substantially the adverse effects of excessive wash, not only will it be impossible to achieve many of the goals set out in Thames Vision, but the River is liable to become degraded. I trust you will take account of these points.

Yours faithfully

Clive Wren

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