

Appendix B

Engagement and Consultation Summary Thamesmead and Abbey Wood OAPF

December 2020

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Introduction

1. Name of Guidance Document

1.1 Thamesmead and Abbey Wood Opportunity Area Planning Framework (OAPF)

2. Purpose of OAPF

2.1 The Thamesmead and Abbey Wood Opportunity Area Planning Framework (OAPF) is a long-term planning framework to support and guide emerging development in the Thamesmead and Abbey Wood Opportunity Area. The OAPF was prepared jointly by the Royal Borough of Greenwich (RBG), London Borough of Bexley (LBB), Greater London Authority (GLA) and Transport for London (TfL) to guide development as a guidance to the London Plan up until 2041.

3. Persons/groups/bodies consulted in connection with preparation of SPG

3.1 Public consultation occurred on the draft OAPF in line with Bexley and Greenwich Council's Statement of Community Involvement (SCI). The project team went beyond the requirements of the SCI as detailed below and has worked closely with the local community and local stakeholders in the area to produce the draft OAPF.

4. How were people consulted?

4.1 Prior to formal public consultation, engagement events including 1-2-1- meetings and workshops were held with identified stakeholders from across the Boroughs, internally within the GLA and external bodies between 2018 - 2019.

4.2 The formal consultation process for the draft OAPF adhered to the both Council's adopted Statement of Community Involvement and the statutory requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012. Formal Consultation took place between 16 Dec 2019 – 10 Mar 2020. Those consulted (as detailed in Paragraph 5.1) were informed of how they may access the document, the date and location of consultation events, along with the date by which representations must be made and where they should be sent.

Public Consultation

5. Public consultation publicity

5.1 Publicity for consultation was undertaken via the following activities:

- Emails and/or letters were sent to Statutory Consultees and stakeholders (including community centres, churches, religious institutions, and local schools) to inform them about the consultation process.
- Emails were sent to persons on the Talk London database across Greenwich, Bexley and Newham Council (in line with General Data Protection Regulations).
- Councillors and local Residents Associations (where in line with the General Data Protection Regulation) were informed of the consultation period.
- Local Council press release, social media and e-newsletters were used to inform local residents and businesses of the consultation period.
- Posters and leaflets providing the consultation website address, details of the consultation events and methods for submitting representations online were displayed and distributed to all local libraries, schools, communities' centres and religious institutions in the OA.
- Physical copies of the draft OAPF were available to view at all local libraries within the OA.
- GLA's OAPF website page was updated to reflect the consultation period and inform persons about the consultation events and how to make a representation.
- Social media platforms were used to inform readers of deadlines and events (including sponsored Facebook posts, Twitter, and LinkedIn)

6. Consultation comprised of the following:

- An electronic version of the draft OAPF was made available for download from the GLA's website.
- An online consultation platform was set up using Commonplace.
 - <https://thamesmeadandabbeywoodhome.commonplace.is/>
- Hard copies of the draft OAPF were available to view at all local libraries in the OA.
- Six public consultation events on the draft OAPF were held across both boroughs during the consultation period and staffed by the OAPF team and members of the GLA Planning Department. Consultation material at events included:
 - hard copies of the document
 - consultation boards with components of the document displayed
 - A large A0 map to demonstrate key proposals for the five places in the OA
 - Consultation questionnaires and a board to pin and display comments
 - Project staff on hand to answer questions regarding the document or development of the draft OAPF
- Consultation questionnaires were provided at events for consultees to leave their comments. Pamphlets describing how to leave comments online were distributed and provided in all local libraries in the OA.

Photos from Public Consultation



Consultation event at Sainsbury's Abbey Wood



Thamesmead Leisure Centre



Questionnaire's by 'themes' and 'places'



Sports Club Thamesmead

ABBEY WOOD

THAMESMEAD & ABBEY WOOD OAPF

Please note your comment will be made public, including on the website at thamesmeadandabbeywoodframework.commonplace.is
Please don't mention any personal details in your responses.

1. How do you feel about the emerging vision and proposals for the Abbey Wood area?

😞 😟 😐 😊 😄

Please tell us why?

2. What is your top priority for the Abbey Wood area? Tick your top 3 priorities.

<input type="checkbox"/> Community spaces	<input type="checkbox"/> Flood management	<input type="checkbox"/> Better walking/cycling
<input type="checkbox"/> Connection to water	<input type="checkbox"/> Parks and public spaces	<input type="checkbox"/> Night-time activities
<input type="checkbox"/> Affordable housing	<input type="checkbox"/> Better public transport	<input type="checkbox"/> Job opportunities
<input type="checkbox"/> Less traffic	<input type="checkbox"/> Shops and retail	<input type="checkbox"/> Broadband and Wi-Fi

1. How do you feel about our key priorities around education, health, community centres and parks & leisure? (circle)
See board 4, or page 105

😞 😟 😐 😊 😄

Please tell us why?

2. Thinking about the future of social and community uses in Thamesmead and Abbey Wood, what is most important to you?
For example, more opportunities for being healthy outdoors, more places to meet local people, easy to reach facilities and services...

3. Have we missed anything important to do with social and community uses?

I would like to sign up to receive email updates from the GLA and Commonplace to keep informed about the project's progress.

Name: Postcode: Email:

Example of questionnaire forms

7. Public Consultation Boards

1 THAMESMEAD AND ABBEY WOOD OAFP

PROJECT OVERVIEW

The Thamesmead and Abbey Wood OAFP is a strategic framework for the future development of the area. This includes housing, public transport, education and social and community uses.

This work is being prepared jointly by the Uxbridge Local Authority, Transport for London, Greenwich and Abbey Wood.

The OAFP introduces the Mayor of London's approach to Good Growth to set out the direction for what is being planned to be delivered and the benefits it will bring.

It summarises 2019 engagement with local communities and stakeholders and has been developed in consultation with the OAFP. It will be published in summer 2020.

WHAT CAN THIS OAFP DO?

- Help guide where new homes, jobs, and infrastructure will be built in 2031.
- Improve future local air quality.
- Help to plan where and when new planning applications will be made in the area.

HOW TO GET INVOLVED

This plan aims to be developed over 17 days and is open to all comments. You can see how to get involved on the website www.thamesmeadabbeywood.org.uk

KEY OBJECTIVES OF THIS OAFP

- Improve public transport connections based on the local transport network.
- Support the creation of new homes and jobs, and ensure the area remains a mixed and inclusive place. This includes supporting the creation of new jobs and businesses.
- Encourage more development around transport hubs so that people can live and work in the same area.
- Support local businesses to plan for good quality infrastructure and amenities that can be easily reached for people on foot, by cycle, on bus, and by train.
- Provide safe, well-lit and accessible connections to the Thamesmead and Abbey Wood.
- Make better use of land, especially in and around the Thamesmead and Abbey Wood.

MAJOR OF LONDON

4 SOCIAL AND COMMUNITY USES

SUPPORT COMMUNITIES BY PLANNING FOR SOCIAL INFRASTRUCTURE

EXISTING

- Primary schools
- Secondary schools
- Community centres
- Public houses
- Health centres
- Libraries
- Post offices
- Police stations
- Fire stations
- GP surgeries
- Day care centres
- Community centres
- Public houses
- Health centres
- Libraries
- Post offices
- Police stations
- Fire stations
- GP surgeries
- Day care centres

PROPOSED INTERMEDIATE GROWTH BUS TRANSIT

- Primary schools
- Secondary schools
- Community centres
- Public houses
- Health centres
- Libraries
- Post offices
- Police stations
- Fire stations
- GP surgeries
- Day care centres
- Community centres
- Public houses
- Health centres
- Libraries
- Post offices
- Police stations
- Fire stations
- GP surgeries
- Day care centres

PROPOSED HIGH GROWTH BUS TRANSIT AND DLR

- Primary schools
- Secondary schools
- Community centres
- Public houses
- Health centres
- Libraries
- Post offices
- Police stations
- Fire stations
- GP surgeries
- Day care centres
- Community centres
- Public houses
- Health centres
- Libraries
- Post offices
- Police stations
- Fire stations
- GP surgeries
- Day care centres

KEY PRIORITIES FOR THE FUTURE

- Education: Provide a range of educational facilities to meet the future needs of the local community.
- Health: Provide a range of health facilities to meet the future needs of the local community.
- Community: Provide a range of community facilities to meet the future needs of the local community.
- Parks and Recreation: Provide a range of parks and recreation facilities to meet the future needs of the local community.

2 TRANSPORT AND GROWTH

UNLOCKING GOOD GROWTH WITH TRANSPORT

1 INTERMEDIATE GROWTH: BUS TRANSIT

2 HIGHER GROWTH: DLR AND BUS TRANSIT

KEY BENEFITS

- Supports the Mayor of London's Good Growth strategy.
- Helps to create a more inclusive and sustainable community.
- Supports the creation of new homes and jobs.
- Improves the quality of life for people living in the area.

NEXT STEPS

The OAFP will be used to guide the development of the area. It will be updated regularly to reflect changes in the local community and the Mayor of London's Good Growth strategy.

3 TOWN CENTRES AND EMPLOYMENT

CREATE VIBRANT, WELL-CONNECTED CENTRES

BETTER USE OF INDUSTRIAL LAND

WEST THAMESMEAD INDUSTRIAL LAND

VERIDON PARK INDUSTRIAL LAND

KEY BENEFITS

- Supports the Mayor of London's Good Growth strategy.
- Helps to create a more inclusive and sustainable community.
- Supports the creation of new homes and jobs.
- Improves the quality of life for people living in the area.

5 CULTURE AND HERITAGE

ENCOURAGE AND CELEBRATE CULTURAL AND HERITAGE OFFERS

CULTURE

HERITAGE

KEY BENEFITS

- Supports the Mayor of London's Good Growth strategy.
- Helps to create a more inclusive and sustainable community.
- Supports the creation of new homes and jobs.
- Improves the quality of life for people living in the area.

6 ENVIRONMENT, ENERGY & UTILITIES

CREATE AN ENVIRONMENT THAT SUPPORTS GOOD HEALTH & QUALITY OF LIFE

GREEN INFRASTRUCTURE

WATER AND FLOOD RISK

AIR QUALITY

ENERGY

DIGITAL CONNECTIVITY

WASTE AND RECYCLING

KEY BENEFITS

- Supports the Mayor of London's Good Growth strategy.
- Helps to create a more inclusive and sustainable community.
- Supports the creation of new homes and jobs.
- Improves the quality of life for people living in the area.

8. Consultation Website Views

- Over 3,100 unique visitors to the consultation website.
- 417 contributions (over 1670 unique comments).

9. Consultation Event Attendees

8.1 Total number of comments received during events: 115

- Weds 26 Feb 2020, 10am - 5.30pm, Thamesmead Information Hub, DA18 4BW
- Tues 25 Feb 2020, 5pm - 8pm, Sports Club Thamesmead, Mead Bar, SE28 8NJ
- Thurs 20 Feb 2020, 5pm-8pm, Thamesmere Library, SE28 8DT
- Sat 15 Feb 2020, 1pm - 4pm Sainsbury's Abbey Wood, SE2 9NU
- Sat 1 Feb 2020, 10am - 1pm Sainsbury's Abbey Wood, SE2 9NU
- Thurs 30 Jan 2020, 5pm-8pm, Thamesmere Library, SE28 8DT

A summary of the comments received from local residents and businesses have been detailed in Section 10 (page 7).

10. Representations received

9.1 As part of the consultation, Statutory consultees were invited to make a representation on the draft OAPF. Stakeholder responses received have been detailed in Part 4 Public Consultation Responses (page 21 – 153) of this statement along with the response. Responses were received from:

1. Environment Agency
2. Highways England
3. Historic Buildings and Monuments Commission for England (Historic England)
4. Natural England
5. Sport England
6. Network Rail
7. Moorings Neighbourhood Forum
8. Port of London Authority
9. LB Newham
10. LB Bexley
11. MP Abena Oppong
12. Councillor Ann-Marie Cousins
13. Councillor Daniel Blaney
14. National Grid
15. Savills on behalf of Thames Water
16. London City Airport
17. Peabody Housing Association
18. Montagu Evans on behalf of Aberdeen Standard Investments
19. Collective Planning on behalf of Sabreleague Ltd
20. Gerald Eve on behalf of Berkeley Homes and Peabody
21. L&Q
22. St William Homes LLP

- 23. Barton Willmore on behalf of Aitch Group
- 24. JLL on behalf of Ministry of Justice
- 25. Lendlease on behalf of Thamesmead Waterfront JV
- 26. Individual respondents

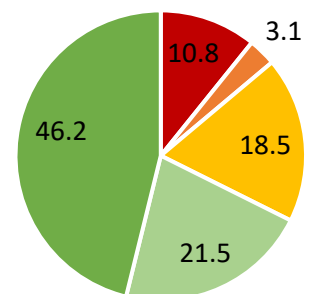
11. Feedback from local people

10.1 The following paragraphs provide a summary of the main issues raised by local residents and businesses. The comments have been organised by themes that reflect that chapters in the OAPF.

10.2 Transport and Growth

How do you feel about the two potential transport schemes, and the number of homes and jobs they may bring?

- ❖ **Positive - 46.1%**,
- ❖ **Somewhat positive - 21.5%**
- ❖ Neutral - 18.5%
- ❖ Somewhat negative – 3.1%
- ❖ Negative 10.8%



What is most important to support growth in the area? Select your top 5 priorities (out of over 15 choices with the option to include additional priorities)

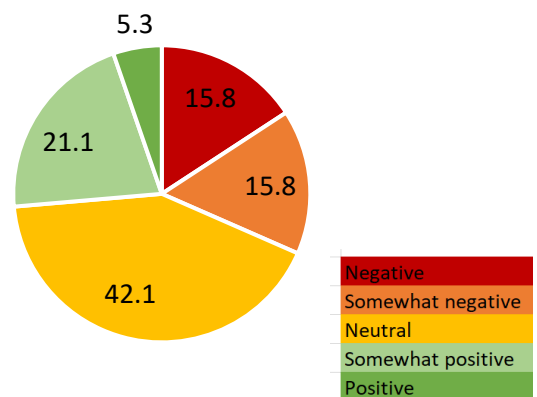
- 1) **Better public transport**
- 2) **Community uses (recreational, young people, family)**
- 3) **More shops & retail (local conveniences, restaurants)**
- 4) **Job opportunities**
- 5) **Better walking and cycling (lighting, safety)**
- 6) Park and public spaces
- 7) Less traffic
- 8) Affordable homes
- 9)



10.3 Social and Community Uses

How do you feel about our key priorities around education, health, community centres and parks and leisure?

- ❖ Positive - 5.3%,
- ❖ Somewhat positive – 21.1%
- ❖ **Neutral – 42.1%**
- ❖ **Somewhat negative – 15.8%**
- ❖ Negative 15.8%



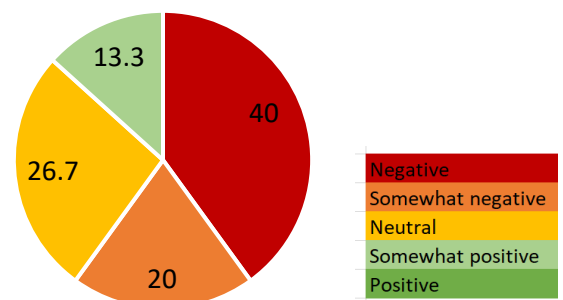
Key comments received

- More housing but not enough community provision, particularly in West Thamesmead, between Plumstead/AW and Belvedere (e.g. church, places to socialise, pubs etc)
- Lack of evening, weekend and outdoor activities (for families and young people)
- Thamesmead Leisure Centre is well used and needs better facilities
- Existing community centres don't feel safe to go to
- Consider libraries, rather than community centres that get neglected
- Lots of green spaces, but lack of amenities (bins, exercise equipment, walking/cycling)
- More nurseries needed

10.4 Town Centre and Employment

How do you feel about our overall approach to town centres, local businesses and employment?

- ❖ Positive - 0%,
- ❖ Somewhat positive – 13.3%
- ❖ Neutral – 26.7%
- ❖ Somewhat negative – 20%
- ❖ **Negative 40%**



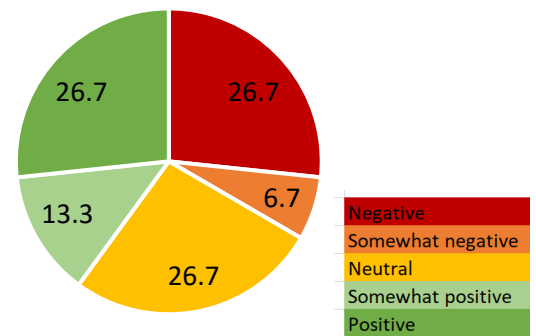
Key comments received

- Lack of information on town centre improvements, emphasis is on industrial businesses
- More local jobs is positive, however local transport networks need to be considered
- 'I work in central London because the pay here is so low'
- Lack of proposals in Belvedere
- Abbey Wood TC – poor mix of shops and F&B, lack of amenities, leisure activities, conveniences (post office, bank etc).
- Eynsham Drive and Grovebury Road (AW) highlighted as in need of investment

10.5 Environment, energy and utilities

How do you feel about our overall approach to the future of the **environment, energy and utilities** in the area?

- ❖ Positive – 26.7%,
- ❖ **Somewhat positive – 13.3%**
- ❖ **Neutral – 26.7%**
- ❖ Somewhat negative – 6.7%
- ❖ Negative 26.7%



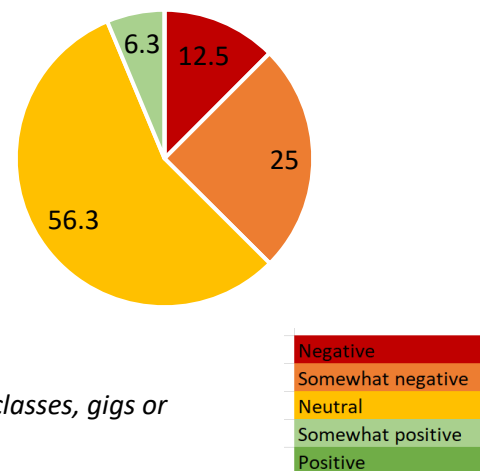
Key comments received

- Lots of green spaces but lack of accessibility, amenities, public furniture, and maintenance
- Lack of information on water shortage in the area
- Mainly oriented towards new housing, rather than existing
- More outdoor spaces for children and families
- Concerns over safety at night
- Concerns over Cory Riverside expansion

10.6 Culture and Heritage

How do you feel about **culture and heritage** in Thamesmead and Abbey Wood?

- ❖ Positive - 0%,
- ❖ Somewhat positive – 6.3%
- ❖ **Neutral – 56.3%**
- ❖ Somewhat negative – 25%
- ❖ Negative 12.5%



Where should spaces for evenings and night time activities (evening classes, gigs or theatre etc) be? (out of a choice of 5 places in the OA)

- 1) **Abbey Wood**
- 2) **Thamesmead TC & Waterfront**
- 3)

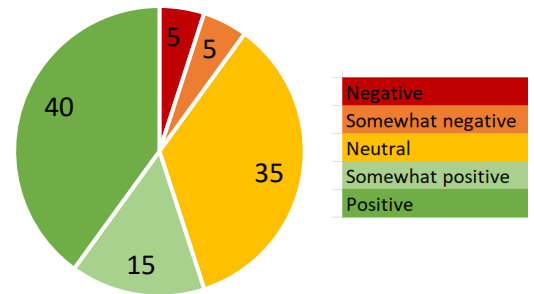
Key comments received

- Improvements to Lakeside centre is positive
- More affordable and volunteering activities (young & older people, adult learning classes)
- North Kent College media based courses are popular with young people
- Pubs are being closed due to overheads and business rates

10.7 Thamesmead Town Centre

Key comments received

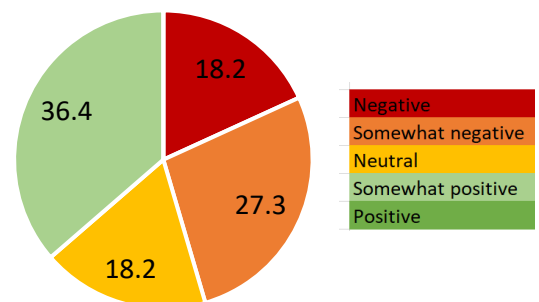
- More places to socialise
- Better quality shops and restaurants
- Leisure activities for families (cinema, theatre)
- More shop front business spaces for B1 rather than A1
- Not clear how river will be used (leisure, accessibility)



10.8 North Thamesmead and Moorings

Key comments received

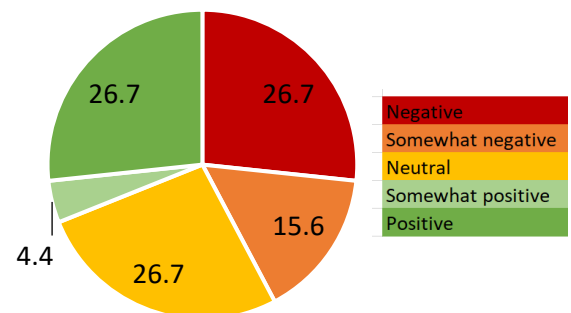
- Anti-social behaviour, poor perception of safety
- Training & employment opportunities for young people
- Bus transit doesn't adequately serve Crossway
- Nature reserve is a positive improvement
- Lack of local conveniences (corner shop, post box)
- Poor Wifi



10.9 Abbey Wood

Key comments received

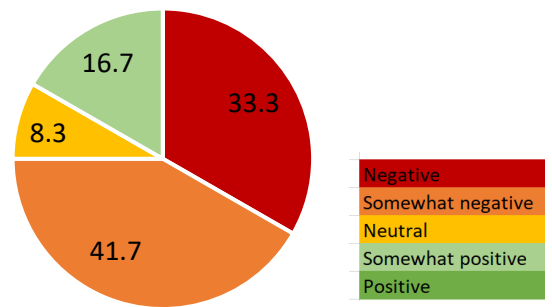
- Abbey Wood estate is excluded (Co-op & AW estate)
- Lack of understanding of Abbey Wood
- Proposals are vague and lack detail
- New station is disconnected from AW village. Concerns proposals are shifting activity north of the station, away from AW village.
- Poor perception of safety at night (better lighting, night-time activities)
- Improvements to Harrow Manorway needed (crossing dangerous/confusing, more shopfronts and trees towards Southmere Lake)
- Concerns over new Peabody development (housing affordability)
- Proposal for bus transit would be beneficial
- Walk from station to Thames Path is poor
- Cycle/walking path improvements good, but lack of secure cycle parking
- Safer crossings under Easternway/Westernway needed



10.10 West Thamesmead and Plumstead

Key comments received

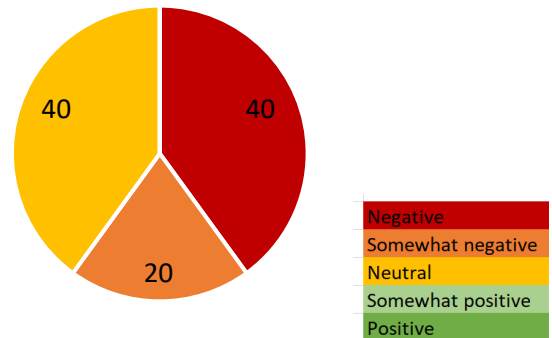
- West Thamesmead and Plumstead are distinct areas. Community provision in Plumstead does not meet the needs of those in W. Thamesmead
- Lack of proposals
- Ridgeway poorly maintained, lack of lighting (SINC)



10.11 East Thamesmead and Veridion Park

Key comments received

- Lack of proposals
- Poor perception of safety in Belvedere, especially at night
- Better public transport needed
- Dangerous to walk and cycle along Abbey Road
- Poor access to play spaces for young children



Early Engagement Events

12. Early engagement

11.1 Effective and ongoing engagement with local communities, landowners, strategic stakeholders and hard-to-reach groups was key to informing the preparation of this OAPF. Prior to formal consultation a series of early engagement events took place from 3 August – 15th August 2019. An online platform to respond to the draft OAPF was made available throughout the engagement period until 25th October 2019. The purpose of the engagement events was to share emerging findings and vision contained within the OAPF and gather local opinions and knowledge.

13. Consultation comprised of the following:

- An online engagement platform that was open for 6-weeks from August to October 2019. The online platform was set up to share information on baseline analysis, key priorities, potential transport options and overall vision for the area with local communities and businesses.
- A project webpage which detailed future engagement events and how to comment on the OAPF work.
- An Open House event on 14 August 2019 and 2-week exhibition at the Thamesmead Information Hub.
- Two public events at the World Music Festival in Birchmere Park and Southmere Sunday market.
- A community workshop at Abbey Wood Community Centre on 17 September 2019 at which responses from earlier engagement work informed the format and content of the workshop. Participants discussed the challenges and opportunities in the area and came up with a range of proposals, from quick-wins to longer term solutions that address key issues.
- 1-2-1 meetings and workshops with key stakeholders such as Peabody and London Gypsy and Travellers.
- Engagement with public bodies such as Heritage England, Environment Agency, London Fire Brigade and London Metropolitan Police.

14. Engagement Website Views

- Over 200 unique visitors to the engagement website
- 128 contributions

15. Engagement Event Attendees

Total number of comments received during events: 43

- Sat 3 Aug 2019, 2pm – 5pm, Thamesmead Music Festival, Birchmere Park
- Sun 11 Aug 2019, 12pm – 4pm, Southmere Sunday, Southmere Lake Binsey Walk
- Weds 14 Aug 2019, 11pm – 4pm, Information Hub, Yarnton Way DA19 4DR
- Tues 17 Sept 2019, 7pm – 8.30pm, Abbey Wood Community Centre SE2 0YS

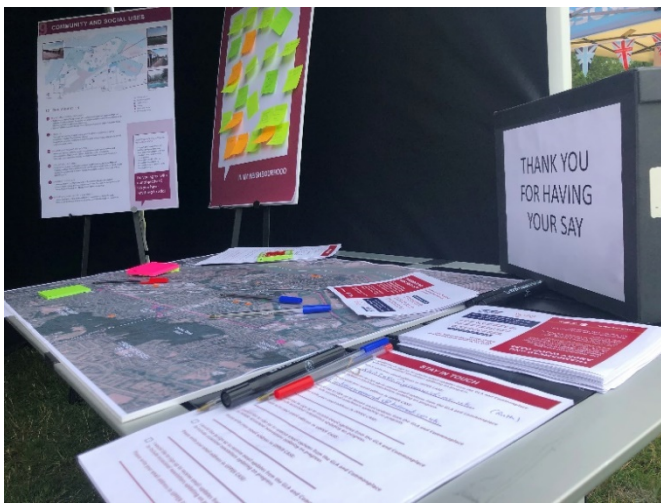
Photos from Early Engagement Events



Consultation event at Southmere Lake during Southmere Sunday



Thamesmead Music Festival summer 2019



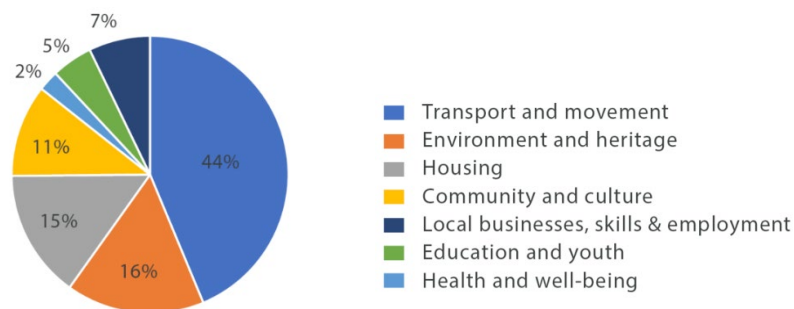
Consultation boards and maps



Exhibition at Peabody's Thamesmead Information Hub

16. Feedback from local people

15.1 The scope of the OAPF, baseline analysis and draft vision and objectives were presented during the engagement events. From these events it was gathered that a majority of respondents felt positive about the 20-year vision for Thamesmead and Abbey Wood presented in the engagement material. The response to increasing the delivery of new homes and jobs, accompanied by improved transport, was generally positive.



Percentage of comments received by theme

15.2 The top three priorities for the area were to:

- 1) Build strong and inclusive communities
- 2) Create a healthy city
- 3) Deliver new and affordable homes

15.3 Three new themes emerged from the responses that were gathered and have informed the preparation of this consultation draft. They are:

- 1) Support local businesses, skills and employment
- 2) Provide opportunities for education and youth
- 3) Promote health and well-being

15.4 Transport and Movement

- Strong desire for walking and cycling improvements. Concerns over cul-de-sacs and severance caused by major roads and roundabouts that make it difficult to cycle or walk between areas.
- Pedestrian crossings are frequently used but many are in a poor state. Concerns over removal of footbridges over Yarnton Way making it unsafe to cross.
- Desire for more frequent bus services and routes that serve local residential areas. North Thamesmead is poorly served by public transport.
- Desire for signage and wayfinding improvements to key destinations
- Desire for public transport improvements to central London (train and river services).
- Concerns about accessibility and safety on Thames Path, including mopeds driving on footpath.
- Concerns over illegal parking, poor crossings, unsafe conditions around Plumstead gyratory.

15.5 Environment and Heritage

- Thames Path, green spaces and waterways are highly valued.
- Desire for better access to and links between green spaces and the riverside.
- Concerns over poor management of open spaces and canals.

15.6 Housing

- Desire for genuinely affordable housing.
- Fears of gentrification and residents being displaced.
- Desire for consideration to be given to refurbishment before demolition.

15.7 Communities and Culture

- Desire for more cultural, social and night-time places for communities to meet.
- Desire for more waterfront activities.
- Ensure long-standing communities are maintained.
- Desire for on-going engagement and consultation with residents.
- Community facility for youths and elderly residents needed.
- Desire for improvements to Abbey Wood estate.

15.8 Local Businesses & Employment

- Lack of banks or post offices.
- Desire for a mix of spaces for independent businesses and well-established businesses.
- Desire for more affordable places to teach and hold classes for learning groups.

15.9 Education and Youth

- Need for better training options and adult education centres.
- Need for safe, clean parks and playgrounds.
- More social, sports and children facilities especially outdoors near green spaces.

16.0 Health and Well-being

- Need to ensure public services keep up with level of growth.
- Desire for better access to and quality of healthcare and sport facilities.
- Ensure new developments provide communal facilities and places to socialise.

17. Engagement boards

THAMESMEAD AND ABBEY WOOD OAPF

HOW TO GET INVOLVED

You can help shape your area. We want to hear your views.

This community engagement event will run from 2nd August to 10th September 2016. Views will be shared with the Information Hub from 15th to 16th August.

Submit the process online [here](#) or by email to info@thamesmeadabbey.org.uk

WHAT IS AN OAPF?

The Mayor of London Draft London Plan identifies Thamesmead & Abbey Wood as an 'Opportunity Area'. There are places in London that have significant opportunities for new housing and jobs. The OAPF helps partners work together to develop the area for the future.

WHAT DOES THIS MEAN FOR THAMESMEAD AND ABBEY WOOD?

- Thamesmead and Abbey Wood is one of the largest Opportunity Areas (OAs) in London.
- It forms one of four identified OAs in the Thames Estuary, where the Mayor of London is working with partners to promote investment in the estuary, both within and outside London.
- Thamesmead and Abbey Wood has been identified as being the potential for 4,000 jobs and 4,000 jobs - and with transport improvements this could be even more.

WHAT WILL THIS FRAMEWORK DO?

It will:

- set out strategic planning, regeneration and design guidance.
- set a plan for emerging development in the area.
- provide a plan for fortifying local public services.
- be a strategic consultation to housing partners that will set boundaries. It does not establish new jobs and must be used in the context of the London Plan and the overall Transport for London (TfL) strategy.

NEXT STEPS

2016: Strategic consultation and public engagement
2017: Draft OAPF
2018: Final OAPF

OPPORTUNITY AREA BOUNDARY

The Thamesmead & Abbey Wood Opportunity Area boundary is shown in red on the map below. The map also shows the London Plan Opportunity Area boundary in blue.

MAYOR OF LONDON | TRANSPORT FOR LONDON | ROYAL GREENWICH | BEXLEY

2. WHAT COULD HAPPEN AROUND YOU?

WHAT IS HAPPENING IN YOUR AREA?

- Highly visible London Councils (Greater London Authority, TfL, and Greater London Authority) and the local boroughs. Each option provides different benefits to the area and could address different needs.
- New housing opportunities and ongoing regeneration in parts of the Thamesmead Estate by Housing for London (Greater London Authority and TfL).

WHAT WILL THIS FRAMEWORK FACILITATE?

- Improved public transport connections.
- Up to 10,000 new and affordable homes in London. This is dependent on significant public transport investment.
- More development around rail and DLR stations.
- More jobs and opportunities for the local workforce in the area.
- Better use of industrial land and more local jobs.
- Helping new growth is supported by enough infrastructure like transport links.

What do you think about these improvements? What other improvements would you like to see?

3. A 20 YEAR VISION

Thamesmead and Abbey Wood will grow into a place for mixed and balanced communities to thrive, offering the best of both the city and nature, with close transport links to central London and an abundance of green space.

How do you feel about the 20 year vision which principles are most important to you?

GOOD GROWTH PRINCIPLES IN THAMESMEAD & ABBEY WOOD

- BUILDING STRONG AND INCLUSIVE COMMUNITIES**
 - Ensuring local people have a say in the future of their area.
 - Ensuring developments are planned to be accessible and inclusive for all.
 - Enhancing the existing local character.
- MAKING THE BEST USE OF LAND**
 - New and enhanced transport connections could support a range of different residential uses.
 - Consistent social infrastructure close to community, town and neighbourhood centres.
- CREATING A HEALTHY CITY**
 - Encourage walking and cycling.
 - Create a mixed-use environment that links to low density areas, the green space, public transport and other local destinations.
- DELIVERING NEW AND AFFORDABLE HOMES**
 - Provide a mix of new and affordable homes for Londoners.
 - These homes should be supported by transport and social infrastructure.
- GROWING A GOOD ECONOMY**
 - Create more jobs and increase existing industrial uses.
 - Consider potential facilities for further education and training.
 - Invest in walking, cycling, high streets, and employment centres.
- INCREASING EFFICIENCY AND RESILIENCE**
 - Protect and improve the quality of green and blue spaces, as well as enhancing biodiversity.
 - Contribute to London becoming a greener city.
 - Improve access to natural and historic assets.
- OVERCOMING VERGEANCE**
 - Improve the way the Thamesmead and Abbey Wood.
 - Better transport and public transport.
 - Improve walking and cycling along and across major road corridors.
- CREATING USEFUL AND ATTRACTIVE NEIGHBOURHOOD CENTRES**
 - Support the Thamesmead town centre through new public transport and transport connections.
 - Improve smaller centres and retail parks to make convenience shopping better and easier to access.
- MAKING BEST USE OF INDUSTRIAL LAND**
 - Protect jobs and industrial areas, and ensure efficient use of site employment.
 - Support transport and public transport connections, and improve pedestrian and cycle experience along the River Thames.

4. POTENTIAL TRANSPORT OPTIONS

Improved public transport connections and capacity are needed to make travel to and from Thamesmead and Abbey Wood easier and more convenient, and to support the delivery of new housing and employment opportunities.

The framework supports a range of transport options for consideration. These options have been identified through work by Transport for London (TfL) and Greater London Authority (GLA) and the local boroughs. Each option provides different benefits to the area and could address different needs.

POTENTIAL PUBLIC TRANSPORT OPTIONS

Work to date shows that a bus transit corridor connecting Thamesmead to and from the rest of the city and from Abbey Wood, along with bus network improvements to improve access to the Elizabeth Line when it opens, would be able to support an intermediate level of growth in the Opportunity Area.

A package identified as being able to support a higher level of growth in the Opportunity Area is shown below. This package includes a new bus transit corridor connecting Thamesmead to the rest of the city, supported by the bus and improvements to the Elizabeth Line when it opens. More detail about potential public transport options will be covered in the OAPF consultation later this year.

INTERMEDIATE GROWTH: BUS TRANSIT

- Potential for up to 10,000 new homes
- New bus transit corridor
- New interchange opportunities with the Elizabeth Line
- High frequency service
- Secure, accessible stops and clear vehicles

HIGHER GROWTH: DLR + BUS TRANSIT

- Potential for up to 15,000 new homes
- New bus transit corridor
- New interchange opportunities with the Elizabeth Line
- High frequency service
- Secure, accessible stops and clear vehicles
- Convenient access to the Elizabeth Line services

KEY FEATURES & BENEFITS

FOR BUS TRANSIT:

- Potential for up to 10,000 new homes
- New bus transit corridor
- New interchange opportunities with the Elizabeth Line
- High frequency service
- Secure, accessible stops and clear vehicles

FOR DLR + BUS TRANSIT:

- Potential for up to 15,000 new homes
- New bus transit corridor
- New interchange opportunities with the Elizabeth Line
- High frequency service
- Secure, accessible stops and clear vehicles
- Convenient access to the Elizabeth Line services

NEXT STEPS

Delivering a major new public transport scheme in the area will depend on the level of growth to be supported. The options identified are currently under consideration. More information on the options identified and the potential level of growth will be shared in the OAPF consultation later this year.

Do these options reflect your aspirations for the area?

5. HOW WE SEE THE FUTURE...

DO YOU AGREE?

THAMESMEAD TOWN CENTRE AND WATERFRONT

- A diverse waterfront town centre with a mix of housing, retail and leisure.
- Potential new transport interchange (bus transit and DLR) with improved walking and cycling connections.
- Combined retail assets such as the Clock Tower.
- High footfall in the town centre and along the waterfront.
- Attractive temporary uses during construction phases.

WEST THAMESMEAD AND PLUMSTEAD

- Access to the town centre, high street, industrial and residential areas.
- Integrating industrial uses to bring economic growth and more jobs.
- Attractive neighbourhood parks.
- Improve walking and cycling along and across major road corridors.
- Develop a range of public services through walking and public walkways to support complete level changes and the dominance of walkways.
- Facilitate a new growth in the area between the Thames and the Riverbank.
- Development around Plumstead station to integrate with the Riverbank regeneration area.

THE MOORINGS AND NORTH THAMESMEAD

- Re-use of existing public infrastructure to convert to transport interchanges in Thamesmead, Abbey Wood and Plumstead.
- Improve walking and cycling links.
- Attractive neighbourhood parks.
- Improve walking and cycling.
- Build on existing community assets and character.

SOUTH THAMESMEAD AND ABBEY WOOD

- Improve transport links with the arrival of the Elizabeth Line (Dorset House and Crossrail).
- Abbey Wood becomes an attractive gateway into the Thamesmead and Abbey Wood.
- A local centre located around the station.
- Encourage opportunities for local businesses and a range of employment.
- A new street layout through Abbey Wood.
- Improve walking and cycling along and across major road corridors.
- Improve transport links to the town centre and the waterfront.

EAST THAMESMEAD AND VERDION PARK

- New industrial facilities at Verdion Park to create new job opportunities.
- Re-use of existing public infrastructure to convert to transport interchanges in Thamesmead, Abbey Wood and Plumstead.
- Improve walking and cycling links.
- Attractive neighbourhood parks.
- Improve walking and cycling.
- Build on existing community assets and character.
- Development of a sports and recreation hub located between the Sporting Club Thamesmead to the north and Verdion Park to the south.
- Re-use of existing public infrastructure to convert to transport interchanges in Thamesmead, Abbey Wood and Plumstead.

Do you agree with how we see the future of your area? Do you have anything to add?

6. EXISTING TRANSPORT

EXISTING CONDITION

FOUR RAIL CONNECTIVITY

- Public transport connectivity varies greatly.
- Area around Plumstead and Abbey Wood is well served by rail with journey times to central London around 30 minutes.
- However most of the opportunity area is more than 30 minutes walk from Abbey Wood and Plumstead stations, and the Elizabeth Line will not improve this.
- Most public transport connections are 15-20 minutes from public transport services.

Do you see public transport with a cycle? What are your opportunities for your local area? How do you think this can be improved?

BARRIERS TO MORE WALKING AND CYCLING

- Residents, job users and visitors to the area find it difficult to walk and cycle to work. They are often forced away from streets making it hard to find your way around.
- Physical barriers to walking, cycling and access to public transport - such as major roads, narrow lanes, waterways, cut-off roads and inaccessible green spaces.
- This leads to a high number of short distance trips made by car rather than by walking and cycling.

What would encourage you to use the bus service more? How do you think this can be improved?

LIMITS TO BUS NETWORK COVERAGE

- The bus network plays a vital role in connecting northern parts, however bus routes are unable to reach some residential areas, for example Thamesmead North, Plumstead and Verdion Park. Long distances to bus stops and long waiting times are also a barrier to using the bus.
- Long waits to bus stops and long times discourage local people from using existing buses.

OBJECTIVES FOR THAMESMEAD AND ABBEY WOOD

- Improve connectivity and access to opportunities and services.
- Improve the quality of the environment.
- Provide more routes of active and accessible travel such as walking and cycling.
- Connect communities by overcoming physical barriers.

Do you agree with our objectives? Are there any other transport challenges that we've missed?

7 CENTRES AND EMPLOYMENT



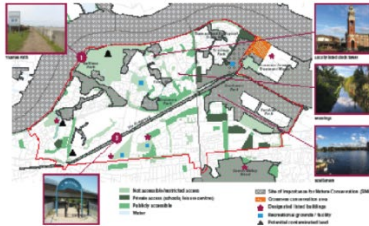
EXISTING CONDITION

- THEMEYAT TOWN CENTRE**
 - The main town centre is a dispersed area centring on the wider Opportunity Area.
 - A small cluster of shops and services along the main road through the town.
 - The local convenience store and a small number of other shops.
 - A small number of shops and services along the main road through the town.
 - A small number of shops and services along the main road through the town.
- ABBEY WOOD LOCAL CENTRE**
 - There are a number of shops and services along the main road through the town.
 - A small number of shops and services along the main road through the town.
 - A small number of shops and services along the main road through the town.
- PLUMSTEAD HIGH STREET**
 - There is a small number of shops and services along the main road through the town.
 - A small number of shops and services along the main road through the town.
 - A small number of shops and services along the main road through the town.
- LACK OF LOCAL AMENITIES**
 - There is a general lack of high quality local amenities and services, especially in the rural areas.
 - Local and rural centres, including shops and services, are generally small and limited in range.
 - There is a need for a wider range of services and amenities, particularly in the rural areas.
- WELL-USED AND COMPETITIVELY PRICED INDUSTRIAL SPACES**
 - The main industrial area is well-used and provides a range of services and amenities.
 - There is a need for a wider range of services and amenities, particularly in the rural areas.
 - There is a need for a wider range of services and amenities, particularly in the rural areas.

OBJECTIVES FOR THAMESHEAD AND ABBEY WOOD

- Create a mix of well-used, vibrant and distinctive local and town centres, including shops and services.
 - Support and encourage vibrant and distinctive employment areas and provide for a range of services and amenities.
- Do you agree with our objectives? Do you have anything to add?

8 ENVIRONMENT AND HERITAGE



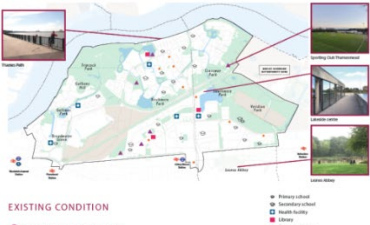
EXISTING CONDITION

- ABUNDANT, BUT UNDER-USED OPEN SPACES AND WATERWAYS**
 - The area has a high amount of open spaces and waterways.
 - Many of these are under-used, especially in the rural areas.
 - There is a need for a wider range of services and amenities, particularly in the rural areas.
- BIODIVERSITY HOTSPOTS**
 - The area has a number of biodiversity hotspots, including the main road through the town.
 - A small number of biodiversity hotspots, including the main road through the town.
 - A small number of biodiversity hotspots, including the main road through the town.
- THE RIVER WIFE**
 - The River Wife is a well-used and vibrant waterway, providing a range of services and amenities.
 - There is a need for a wider range of services and amenities, particularly in the rural areas.
- FLOOD RISK**
 - There is a risk of flooding in the area, particularly in the rural areas.
 - There is a need for a wider range of services and amenities, particularly in the rural areas.
- CONTAMINATED LAND**
 - There is a risk of contamination in the area, particularly in the rural areas.
 - There is a need for a wider range of services and amenities, particularly in the rural areas.

OBJECTIVES FOR THAMESHEAD AND ABBEY WOOD

- Improve the quality and accessibility of green spaces.
 - Support and encourage vibrant and distinctive employment areas and provide for a range of services and amenities.
 - Support and encourage vibrant and distinctive employment areas and provide for a range of services and amenities.
- Do you agree with our objectives? Do you have anything to add?

9 COMMUNITY AND SOCIAL USES



EXISTING CONDITION

- SPORTS AND LEISURE FACILITIES**
 - There are a number of sports and leisure facilities, including the main road through the town.
 - A small number of sports and leisure facilities, including the main road through the town.
 - A small number of sports and leisure facilities, including the main road through the town.
- LIBRARIES**
 - There are two existing libraries in the area, one in the town and one in the rural areas.
 - There is a need for a wider range of services and amenities, particularly in the rural areas.
- PRIMARY AND SECONDARY SCHOOLS**
 - There are 2 primary schools, one in the town and one in the rural areas.
 - There are 2 primary schools, one in the town and one in the rural areas.
 - There are 2 primary schools, one in the town and one in the rural areas.
- HEALTHCARE FACILITIES**
 - There are a number of healthcare facilities, including the main road through the town.
 - A small number of healthcare facilities, including the main road through the town.
 - A small number of healthcare facilities, including the main road through the town.
- COMMUNITY CENTRES**
 - There are a number of community centres, including the main road through the town.
 - A small number of community centres, including the main road through the town.
 - A small number of community centres, including the main road through the town.
- ISOLATED COMMUNITIES IN THE NORTH**
 - There are a number of isolated communities in the north of the area.
 - There is a need for a wider range of services and amenities, particularly in the rural areas.

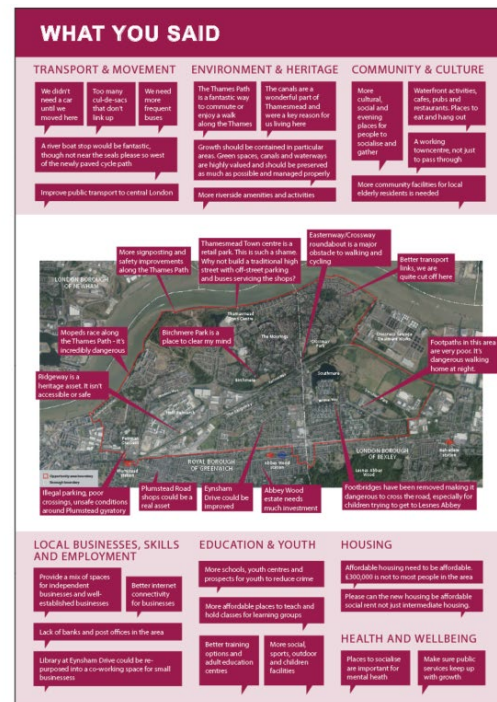
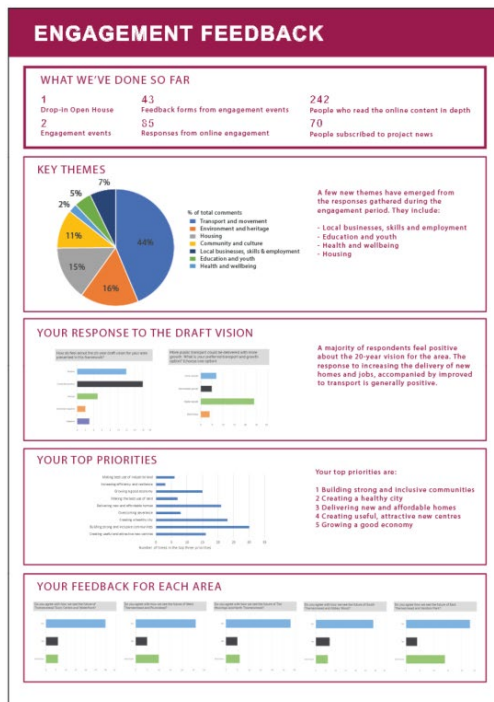
OBJECTIVES FOR THAMESHEAD AND ABBEY WOOD

- Support existing community facilities and promote new ones.
 - Support and encourage vibrant and distinctive employment areas and provide for a range of services and amenities.
- Do you agree with our objectives? Do you have anything to add?

I WANT

IN MY NEIGHBOURHOOD

18. Engagement feedback boards



19. Community Workshop

18.1 A community workshop was held at Abbey Wood Community Centre on 17 Sept 2019. Engagement boards detailing findings from earlier engagement work was displayed.

18.2 Participants discussed challenges and opportunities in the area and came up with a range of proposals, from quick-wins to longer term solutions. The workshop was structured around five key themes:

- Community and Culture
- Environment and Heritage
- Movement, Health and Well-being
- Education and Youth
- Local Businesses, Skills and Employment

20. Summary of Community Workshop

19.1 Community and Culture

Opportunities/assets:

- Thamesmead is multi-cultural
- Pro-active community networks amongst residents and businesses that want to improve the area (e.g. community-established Abbey Wood Market and Neighbourhood Forum)
- Emerging music scene

Challenges:

- Lack of affordable activities
- Many events but publicity is poor
- Abbey Wood estate is neglected
- There are hard-to-reach groups with different needs and considerations, such as Gypsies and Travellers
- Differences between the services offered to those living in Greenwich and Bexley

Proposals:

- More cultural, one-off events such as an outdoor cinema or live performances
- More affordable cultural and sports activities that bring people together.
- More waterfront activities
- Improved signs to key destinations (e.g. Crossness Pumping Station)
- Better communication to advertise events in the area

19.2 Environment and Heritage

Opportunities/assets:

- Lots of green spaces, lakes and canals
- Abbey Wood ruins, Crossness Pumping Station and Lesnes Abbey

Challenges:

- Anti-social behaviour in open spaces
- Unwelcoming public spaces and lack of amenities (e.g. toilets)
- Poor lighting in parks. Thames Path is isolated at certain times of the day.
- Flood risk

Proposals:

- Better lighting and improvements to build a sense of security in open spaces
- Developments should achieve the highest environmental standard
- Dedicated area for bikers and skaters
- More attractions in parks and lakes
- Ecology area by the old golf course

19.3 Movement, Health and Well-being

Opportunities/assets:

- Bus services are better than before
- Lots of green spaces and canals
- Thames Path is a useful connection and amenity

Challenges:

- Poor lighting is a major concern, especially along key routes from the stations
- Construction work has negatively impacted accessibility around Abbey Wood station
- Poor management of paths
- Poor access to community centres and other local destinations
- Lack of signs for runners and walkers
- Birchmere Park is well used but there are no amenities
- Lack of seating around basketball courts
- Perception of crime increases at night. Illegal activities are a problem in quiet open spaces
- Lifts to stations break down causing accessibility problems

Proposals:

- Better lighting along key routes
- Improved links to North Greenwich, Abbey Wood and Woolwich
- Attractive destinations and facilities for running groups and other community groups to meet
- Reroute the proposed DLR to link with Woolwich
- More evening amenities and more local independent spaces
- Low cost activities (e.g. fishing, canoeing)

19.4 Education and Youth

Opportunities/assets:

- Churches and charities work with youth
- Good schools and education in the area, some outstanding local primary schools
- Children's Centres are a useful, multi-functional hub for families

Challenges:

- Poor lighting and routes reduce the sense of security and ability for the young and elderly to move around or use public spaces
- Lack of funding (e.g. a learning centre for adults has closed)
- Existing facilities can be hard to find/reach

Proposals:

- Better lighting in street and public realm
- Better connections between neighbourhoods
- Cross-generation activities and learning
- More networking facilities
- Better mobility for young people to move around the area
- Sports activities and outdoor cinema
- Make bus 180 a 24-hour service

19.5 Local Businesses, Skills and Employment

Opportunities/assets:

- Entrepreneurial population exists
- Food-related businesses
- Cluster of workspaces at the Moorings

Challenges:

- Lack of spaces for small, independent businesses (laundrettes, beauty salons)
- Lack of evening/lunch time amenities (restaurants, pharmacy, bank)

Proposals:

- More opportunities to live/work locally
- Ways to connect businesses and spaces
- Creative corridor to central London
- One-time events (e.g. food festival)
- Heart of business activity (high street)

21. Public consultation stakeholder responses

15.1 Responses received during the consultation period were reviewed by the project team and have informed the final adopted OAPF. An action (none, acknowledged, amended, addition, deletion) has been assigned to the comments to indicate the changes that have been made to the content of the OAPF.

Organisation	ID	Comments	Action (None, Acknowledged, Amended, Addition, Deletion)
Barton Wilmore on behalf of Aitch Group	1	<p>On behalf of our client, Aitch Group, thank you for providing us with the opportunity to comment on the draft Thamesmead and Abbey Wood Opportunity Area Framework, published by the Mayor of London in conjunction with Transport for London, RB Greenwich and LB Bexley on the 17th December 2019.</p> <p>Our client wish to formally support the proposed Option 2 – Veridion Park SIL Intensification as per Part 4.1, Pg. 101 of the draft OAPF document, and considers there is potential to expand the scope of the Opportunity Area boundary.</p>	None

Barton Wilmore on behalf of Aitch Group	2	<p>Aitch Group is a London developer (established in 1995) who specialise in mixed-use regeneration projects. They have a diverse property portfolio that comprises employment space (offices and warehouses) and residential homes. Currently they have no less than 20 central London developments sites in their programme, with close to 2,000 homes and over 350,000 sqft of commercial space under construction or in the development pipeline across London and the South East.</p> <p>Aitch Group have been heavily involved with development in various regeneration areas which have previously been designated as industrial, similar to the opportunities in the Bexley Growth Strategy. These areas include Fish Island / Hackney Wick in the LLDC, where Aitch are delivering 360 apartments and 120,000 sqft of commercial space. Within the Old Kent Road regeneration zone they are delivering 400 apartments and 50,000 sqft of commercial and in the Bethnal Green regeneration zone a further 150 apartments and 60,000 sqft of commercial.</p> <p>The experience gained by Aitch across these projects has enabled them to acquire the knowledge and expertise necessary to deliver successful regeneration projects. Aitch Group understand the importance of working with the council to make positive change in these boroughs creating a sense of place, community and ultimately a place people desire to live and work.</p>	None
Barton Wilmore on behalf of Aitch Group	3	<p>The draft Thamesmead and Abbey Wood OAPF identifies a number of spatial strategies for the area, including linking into sites within the neighbouring Bexley Riverside OA incorporating Belvedere Station. A draft OAPF for the Bexley Riverside has not yet been released however we understand it will be in the near future. Our client owns an industrial land holding, 'land off Crabtree Manorway South' and positioned 400m to the east of Belvedere Station, refer to Image 1, below. It is bounded by the A2016 Bronze Age Way to the north and east, the B253 Picardy Manorway to the west and the existing rail line to the south. This site is captured by the Bexley Riverside OA designation.</p>	None

Barton Wilmore on behalf of Aitch Group	4	<p>This site is also part of the Belvedere Industrial Area SIL designation, however it occupies a unique position nearby the railway station and cut-off from the larger part of the SIL via Bronze Age Way. It is captured within the larger strategic vision for the area, as per LB Bexley’s published Growth Strategy (December 2017) which sets out the following: “The Vision for Belvedere:</p> <p>Belvedere will accommodate up to 8,000 new homes and 3,500 jobs, made possible by a step change in connectivity and other essential infrastructure provisions. A new neighbourhood will be created around the station providing a range of improved residential accommodation and served by a new town centre offering a variety of local services and facilities. The employment offer will be broadened and improved, with new and emerging facilities, including a major outlet retail location, attracted by improved east/west and cross river links as well as a growing population. Connections to existing high quality open space will be created and new local open space will be provided.”</p> <p>Following on from the Growth Strategy, the Council published their Reg 18 Local Plan Preparation document in Feb 2019, which continued to evolve the above vision. The Reg 18 document states that: “ Good growth will be secured by focussing new residential development on a series of well-connected public transport nodes, making the most of Bexley’s riverside location and industrial heritage. These include parts of Erith, Belvedere, Thamesmead, Abbey Wood, Slade Green and Crayford that hold significant development potential given the right conditions (most importantly the delivery of key infrastructure), and around other town centres across the borough...”</p>	None
Barton Wilmore on behalf of Aitch Group	5	Given the proposed DLR and Crossrail extensions to Belvedere Station, the Reg 18 document sets out the intention to transform the area around Belvedere Station to a district centre.	None
Barton Wilmore on behalf of Aitch Group	6	Around Belvedere Station, the Reg 18 document sets out land use proposals maps allocating a number of sites for residential redevelopment (blue) and demarcating the intended centre area (orange):	None

Barton Wilmore on behalf of Aitch Group	7	<p>Identified site BV008 (Hailey Road Industrial Estate) is considered as suitable for residential redevelopment, with the site assessment noting that it could represent “a substantial opportunity to establish a new neighbourhood in close proximity to Belvedere Station...redevelopment of the site should provide new homes ...a new primary school and local park”. Identified sites BV011/BV12, which covers our client’s land holding, has been recommended for release from its Primary Employment Area designation for residential redevelopment, due to its links to established residential development surrounding and the potential to establish new pedestrian connection to Belvedere Station. The natural boundary created by Bronze Age Way to the north ensures that residential uses would be separated from heavy industrial use and forms the boundary to further residential development.</p>	None
Barton Wilmore on behalf of Aitch Group	8	<p>Part 4 – Spatial Strategies of the published draft OAPF Framework identifies the social, community and environmental infrastructure required to support the target growth in the OA. The identified objective of this section is to:</p> <p>“Make the best use of land close to transport stations to provide opportunities for high-quality, affordable homes and improved public realm by intensifying and making more efficient use of industrial land in the OA” (Pg. 90).</p>	None
Barton Wilmore on behalf of Aitch Group	9	<p>Part 4 seeks to do this by identifying spatial strategies, including looking to intensify the Veridion Park SIL area. Given the anticipated Crossrail and DLR extensions through the area and the expectation for the Thamesmead and Abbeywood and Bexley Riverside Opportunity Areas to accommodate a considerable proportion of new homes and jobs, we strongly agree with this objective and consider that these two adjoining OA’s can in some instances link to provide mutual benefits.</p>	None

Barton Wilmore on behalf of Aitch Group	10	Two potential options for intensification of the Veridion Park SIL have been identified (P4.1, Pg.98). Option 1 looks to intensify only the vacant industrial sites in Veridion Park and create a flexible (B1c/B2/B8) hybrid space to accommodate a wider variety of services here. Option 2 identifies the opportunity to intensify industrial sites in Veridion Park in general, as per Image 4, facilitate SIL consolidation (1), to then allow the residential and mixed-use redevelopment of sites around Belvedere Station (2)	None
Barton Wilmore on behalf of Aitch Group	11	Our site forms only part of the identified release sites as indicated by the red line in Image 4, above. As part of our own site options development, we have already undertaken extensive pre-application consultation with the Council, and have explored several master planning and feasibility studies in line with the intentions of the Growth Strategy and Reg 18 Local Plan Paper. Through this process we have demonstrated that on its own, our site can bring forward circa 1,250 new homes. On this basis we have prepared an Outline Planning Application package for submission over our site. However, we understand the need for a plan-led approach and as such are awaiting LB Bexley to publish their Reg 19 Draft Local Plan (circa October 2020) to demonstrate compliance with draft London Plan Policy E7 (Industrial Intensification, Co-location and Substitution).	None
Barton Wilmore on behalf of Aitch Group	12	Having demonstrated that our site could accommodate 1,250 homes, the release of the entire identified site areas could therefore support a considerable amount of the housing targets for the Bexley Riverside OA, whilst also supporting the 8,000 new jobs expected to be delivered within the Thamesmead and Abbeywood OA. In line with the Reg 18 Land Use Proposals Maps, release of this land could also deliver a new primary school and local park land, further supporting the expected economic and population growth in the area.	None

Barton Wilmore on behalf of Aitch Group	13	Importantly, it would appear that development in the manner identified in Option 2 could adhere to the principle of no net loss in accordance with the draft London Plan (E7). It would concentrate a high volume of employment in an appropriate location close to the highway network, and would provide new housing around supporting local infrastructure (improved station, new district centre) and employment.	None
Barton Wilmore on behalf of Aitch Group	14	We therefore consider that Option 2 presents the most viable and sustainable option to support local growth, making the best use of the existing land supplies and existing and projected local infrastructure. This option would allow SIL consolidation and improvements whilst also allowing new homes in the area, supporting the OA's aspiration of a considerable uplift in homes and jobs and tying in with LB Bexley's Growth Strategy and creation of a local centre around Belvedere Station. To this end, we consider that the sites presented for release in Option 2 should be incorporated into the Thamesmead and Abbey Wood OA boundary, as follows: [map]	None
Barton Wilmore on behalf of Aitch Group	15	The amended boundary would deliberately exclude the majority of Belvedere Riverside SIL to the north of Bronze Age Way, and Belvedere Station and local centre area to the south, to enable these to come forward as part of the Bexley Riverside OAPF. The inclusion of the sites within the Thamesmead and Abbey Wood OA would still enable them to support the creation of a District Centre around Belvedere, whilst helping to consolidate industrial land and release housing within the Thamesmead and Abbey Wood OAPF.	None

Barton Wilmore on behalf of Aitch Group	16	<p>Whilst we appreciate that Option 1 seeks to allow a mix of business and employment uses, we consider that it presents a missed opportunity for housing gain, strategic redevelopment and the ability for nearby and neighbouring sites to build on the framework for growth and improve the local offering. In comparison Option 2 achieves this, and the intensification achieved could still allow for the intended flexible (B1c/B2/B8) hybrid space referenced in Option 1. By bringing the two sites identified in Option 2 into the OA boundary, it would allow a clear way forward for these sites and would constitute a formalised plan-led approach, allowing them to come forward and deliver much needed housing sooner.</p>	None
Barton Wilmore on behalf of Aitch Group	17	<p>Furthermore, it is important to reinforce that the proposed Option 2 and the incorporation of the sites into the Thamesmead and Abbey Wood OAPF boundary would continue to support the larger vision for the Belvedere area, as outlined in the Bexley Growth Strategy and Reg 18 Local Plan Paper. This vision is the creation of a new neighbourhood around Belvedere Station, providing an improved residential offering served by a new district centre with a variety of local services and facilities. It is also worth noting that the draft London Plan states that Belvedere is recognised as having potential as a future District centre (para. 2.1.56).</p>	None

Barton Wilmore on behalf of Aitch Group	18	The unique position of the identified release sites in Option 2 means their development would be key in helping LB Bexley realise their vision for a new district centre area and providing a substantial uplift in the residential offering here. As they form the border of the SIL area with the surrounding established residential and community uses, the identified sites would serve as a transition between the heavy industrial nature in the north of the OA's and the established residential environment to the south. Bronze Age Way would form a border/barrier between the two uses to ensure that neither the residential nor industrial sites would be compromised and adequate separation would be achieved.	None
Barton Wilmore on behalf of Aitch Group	19	We consider that pursuing Option 1 would result in limited overall benefits for the OA and would not achieve the overall desired outcomes for the wider area. The development of the identified Option 2 would have considerable benefits for the Opportunity Area, and would link in with the strategic vision for the surrounding localities (particularly the neighbouring Bexley Riverside OA). It would support the improvement and intensification of identified underused SIL sites, whilst also facilitating sustainable and well serviced residential development. It would link in with LB Bexley's Growth Strategy including encouraging the emerging centre area around Belvedere Station, making best use of the railway station (including the planned rail enhancements) and allowing the diversification of the locality.	None
Barton Wilmore on behalf of Aitch Group	20	We therefore wish to make clear our support Option 2 going forward, including the release of our site for residential and mixed use redevelopment and its inclusion within the Thamesmead and Abbey Wood OAPF boundary.	None

<p>CBRE on behalf of Peabody</p>	<p>21</p>	<p>On behalf of Peabody, CBRE is pleased to submit representations to the Draft Thamesmead and Abbey Wood Opportunity Area Planning Framework Consultation, hereafter the 'OAPF.'</p> <p>As acknowledged in the OAPF, Peabody has significant land interests within the Thamesmead and Abbey Wood Opportunity Area (hereafter the 'OA') and therefore has a key role in delivering the potential growth and place making objectives identified in the OAPF. In October 2019, Peabody and Lendlease formalised their Joint Venture partnership for the delivery of the Thamesmead Waterfront opportunity. The Thamesmead Waterfront Joint Venture has independently submitted representations on the Draft OAPF.</p>	<p>None</p>
<p>CBRE on behalf of Peabody</p>	<p>22</p>	<p>Peabody welcomes the preparation of this OAPF and its role in setting out a strategic vision for the area's future development for key partners – including RB Greenwich, LB Bexley, TfL – to build upon in the preparation of their local plan documents and infrastructure plans, and are pleased to note that their long-term commitment to Thamesmead and its residents, both existing and future, is recognised throughout the document.</p> <p>Peabody's comments are largely structured to reflect the format of the OAPF, except in relation to certain topics, such as culture and Metropolitan Open Land (MOL), as these topics do not currently have a dedicated strategy in the document.</p>	<p>None</p>

<p>CBRE on behalf of Peabody</p>	<p>23</p>	<p>Strategic Context This section of the OAPF states that “the emerging London Plan identifies that - with transport and other infrastructure investment - this OA has the capacity to accommodate 15,500 new homes many of which would be for families (35% estimated for three to four-bedroom units) and 8,000 new jobs”. Peabody has not been able to identify these references within the emerging London Plan, and does not consider it appropriate for the OAPF to introduce unit mix targets. Instead, such specific policies should be introduced via the local plan making process, or through individual scheme planning considerations, where they can be properly informed by a comprehensive ‘local’ evidence base, including an assessment of housing needs and a viability assessment which would test the deliverability of the proposed policies in combination. Peabody considers that Thamesmead has a high proportion of ‘family housing’ at present and has ambitions to introduce a more varied unit mix across the OA.</p>	<p>Amended</p>
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CBRE on behalf of Peabody	24	<p>Growth Scenarios</p> <p>Thamesmead has suffered from inconsistent investment and management and still suffers from poor connectivity and accessibility, exacerbated by a historic lack of transport infrastructure investment in comparison to other areas of London. This poor provision of transport infrastructure has constrained the development potential and the vitality of existing communities and employment areas.</p> <p>Given this context, Peabody acknowledges the need for multiple growth scenarios given the uncertainty surrounding key transport infrastructure delivery in the area at present. In order to comment more comprehensively on the different capacity levels identified for new homes and jobs, Peabody would need to understand the development assumptions that underpin these figures, both in terms of the density of development anticipated, and its spatial distribution across the OA. The latter will be particularly relevant for boroughs to understand the proportion of growth anticipated within their boundaries, and to plan for this accordingly.</p>	Amended
CBRE on behalf of Peabody	25	<p>The case for a DLR extension from Beckton to Thamesmead is strong. It represents a relatively inexpensive, long term investment in a mass transport system, sufficient for the needs of the area and with the potential to extend further into neighbouring areas.</p>	None

CBRE on behalf of Peabody	26	<p>Peabody notes that the Intermediate Growth Option (which will be relevant in the event that a bus transit route is introduced but DLR extension is not) identifies the potential for 3,000 more homes and 1,500 more jobs in Thamesmead than the baseline position. Whilst Peabody supports the bus transit route in principle, as it will improve mobility opportunities for Thamesmead residents, it does not consider that this particular transport investment would unlock any new growth opportunities on land within its ownership – this includes Thamesmead Waterfront. The bus transit may help to accelerate delivery of a small amount of development at Thamesmead Waterfront whilst the DLR extension is being designed and constructed, but such development would only come forward if/when the DLR extension is formally committed through the submission of a TWAO. Given this, the document should make clearer the link between delivering growth above the baseline scenario outlined and the extension of the DLR to Thamesmead.</p>	Acknowledged
CBRE on behalf of Peabody	27	<p>Regarding the Higher Growth Option, Peabody considers that the development potential of the OA is greater than the 15,500 new homes and 8,000 new jobs currently identified, with Thamesmead Waterfront alone having the potential to deliver at least 11,500 homes, with potential capacity for over 15,000. Peabody acknowledges that at this stage the OAPF figures are only potential projections but considers the OAPF to be an appropriate opportunity to test more ambitious levels of growth; Peabody would welcome the opportunity to support the Mayor in this exercise.</p>	Acknowledged

CBRE on behalf of Peabody	28	As work to assess potential DLR routing options is ongoing, Peabody would expect any land use plans developed for Thamesmead at this stage, including the Thamesmead and Beckton Riverside OAPFs, to retain sufficient flexibility to respond most effectively to the outcomes of this work. To help inform the preparation of local plans, including infrastructure delivery plans, Peabody recommends that the OAPF applies some broad phasing and/or timescales to the identified growth options.	Acknowledged
CBRE on behalf of Peabody	29	Potential Areas of Change Peabody has interests in a number of the 'Potential Areas of Change' identified in the OAPF and welcomes the recognition of these sites as having the potential to contribute significantly to the OA's growth, objectives and transformation.	None
CBRE on behalf of Peabody	30	With regards to the Lesnes Estate in LB Bexley, the site is shown as a Potential Area of Change in some diagrams but not in others – Peabody requests that this is amended in the final version so that it is identified in all diagrams showing the Potential Areas of Change.	Amended
CBRE on behalf of Peabody	31	With regards to Thamesmead Waterfront, Peabody believes that the Potential Area of Change should cover a wider area than that currently shown on the OAPF diagrams, to reflect the red line boundary of the Thamesmead Waterfront Joint Venture (as per the plan below):	None
CBRE on behalf of Peabody	32	Land is currently safeguarded for the Thames Gateway Bridge at Gallions Reach and this is identified on Fig. 2.1. Peabody is committed to working with the relevant statutory authorities to eventually lift this designation on the basis that, when approved, the DLR extension would achieve the objective of providing a public transport led connection across the River Thames in this area. Peabody would welcome explicit acknowledgment of this in the OAPF.	Addition

<p>CBRE on behalf of Peabody</p>	<p>33</p>	<p>Design-led Approach to Development Capacity The draft document currently states the following: “‘This OAPF uses a design-led approach to determine the optimum capacity of potential development sites. This approach considers urban design principles to determine an appropriate form of development that responds to a site’s context and its capacity for growth. This means taking into account building forms, height, and proximity to local amenities when figuring out the scale and type of development a site can accommodate”.</p> <p>The provision of additional detail and evidence around the methodology utilised by the GLA for the ‘design-led approach to determine the optimum capacity of potential development sites’ within the OA would be welcomed by Peabody.</p> <p>Peabody recommends that the OAPF makes clearer that, in order to meet the area’s capacity for growth, new development will need to be of a higher density than much of the existing development in the area, and in some cases significantly so, in order to make the most efficient use of land and to make the most of increased connectivity and accessibility. In particular, to enable the development potential unlocked by the DLR extension to be maximised, and in accordance with the OAPF’s emphasis on transport interventions serving to enable development and growth and making the best use of land, Peabody would expect to see high residential densities promoted in the areas best served by a new DLR extension.</p> <p>This requirement for a step change in the density of development is implicit within the higher growth option and should be clearly stated in the OAPF to ensure transparency.</p>	<p>Addition</p>
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<p>CBRE on behalf of Peabody</p>	<p>34</p>	<p>Berkeley Homes were selected as Peabody’s development partner in autumn 2017, to bring forward development proposals for the Plumstead – West Thamesmead site which sits within the WestThamesmead SIL. The site is of a significant scale and forms a large part of Peabody’s landholdings within the OAPF area. Accordingly, the implications of the OAPF on both Peabody’s landholdings and the joint venture proposals for the Plumstead – West Thamesmead site have the potential to be significant.</p> <p>Upon review, Peabody support the inclusion of Option 3 for the off-site intensification of SIL within the West Thamesmead SIL. Option 3 enables the intensification of industrial sites in the wider SIL to provide additional industrial capacity and facilitate the process of SIL consolidation and release at the southwest corner of the West Thamesmead SIL which fully aligns with the proposed strategy for the Plumstead – West Thamesmead site as submitted as part of the planning application</p> <p>We would, however, suggest a softening of the language under point (2) regarding the buffer between the prison and the residential development so that this reads as follows: “create a buffer or adopt appropriate design mitigation measures between the prison and residential development to manage land use adjacencies.”</p>	<p>None</p>
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CBRE on behalf of Peabody	35	<p>Veridion Park SIL</p> <p>At this stage, Peabody has not prepared any new, detailed plans for this SIL and therefore supports the OAPF’s identification of multiple potential development options for the site which provide flexibility and allow the site to respond to changing circumstances. However, to ensure flexibility as Peabody continue to explore options for the site, it would be helpful if the OAPF acknowledged that any of the ‘flexible (B1c/B2/B8) hybrid space’ options for the site detailed within the OAPF could be accompanied by suitable ancillary or public facing facilities. Peabody note that the diagram for Option 2 shows an additional mixed-use development area to the south-west, at Harrow Manorway – it is assumed that this is a mistake as it appears to follow the same shape as one included on the West Thamesmead SIL diagram and if so, it would be helpful if this could be rectified in the final version.</p>	Amended
CBRE on behalf of Peabody	36	<p>Social and Community Infrastructure</p> <p>To provide a more comprehensive overview, it is requested that this section is amended to also include cultural infrastructure. Moreover, it would be helpful if social, community and cultural assets could always be grouped and displayed together on plans.</p> <p>As per the comments made in relation to the various growth scenarios, understanding the spatial distribution and level of anticipated growth across the OA would be helpful for the planning of new social, community and cultural infrastructure, as this should as far as possible be located in proximity to the areas where demand would exceed capacity, and it should come forward at the time when it will be needed. Peabody would welcome access to the OAPF’s growth assumptions in order to comment in more detail on the area’s infrastructure needs and the proposed solutions included in Figure 4.11, both from a spatial and a phasing perspective. In the interim, Peabody makes the following comments on Figure 4.11:</p>	Acknowledged

CBRE on behalf of Peabody	37	¾ Broadwater Dock – as set out in our representations to the RB Greenwich Site Allocations Preferred Approach Consultation (2019), Peabody does not consider that the provision of a new school at the site is justified.	None
CBRE on behalf of Peabody	38	¾ Thamesmead Waterfront – new infrastructure is identified as coming forward here as part of the ‘Intermediate Growth Option’. As outlined above, any development across the Thamesmead Waterfront site (including social infrastructure) would only come forward if/when the DLR extension is formally committed to by the submission of a TWAO.	Amended
CBRE on behalf of Peabody	39	¾ Lesnes Estate – Peabody has been preparing proposals for the Lesnes Estate since 2018 and is now at a very advanced stage in the preparation of a planning application for redevelopment, which is entirely comprised of new housing. The OAPF includes reference to a new school in this location which is not currently being planned for.	Amended
CBRE on behalf of Peabody	40	Peabody has undertaken its own work to identify future infrastructure needs for the OA and welcomes the opportunity to discuss these as part of further engagement with the Mayor/boroughs. Peabody is committed to a strategic approach to ensure appropriate infrastructure is provided to serve the existing and future population, and this is consistent with their Whole Place philosophy.	Acknowledged

CBRE on behalf of Peabody	41	<p>In general, Peabody supports the broad principles and ambitions outlined for green infrastructure within the document.</p> <p>Section 4.3 acknowledges that Peabody are preparing a green and blue infrastructure strategy. This Green and Blue Infrastructure Framework builds on the principles outlined in the document and will provide a greater degree of granularity to the broad aspirations for Thamesmead’s green spaces identified within the OAPF; Peabody would welcome the inclusion of a statement acknowledging this within the OAPF, alongside a commitment from the GLA to work in partnership over the long-term to deliver this vision for high quality green space in Thamesmead.</p>	Acknowledged
CBRE on behalf of Peabody	42	<p>As the document acknowledges, many of the roads in Thamesmead contribute towards the high degree of severance across the OA, especially Eastern Way, and Peabody would welcome the inclusion of more detail on how this could be addressed. Addressing the severance caused by roads through the provision of bridges and underpasses is not always the most effective solution, and Peabody would welcome the document including a commitment to look at more innovative and comprehensive solutions.</p>	Acknowledged
CBRE on behalf of Peabody	43	<p>Peabody would advocate that the document considers the opportunities which the Ridgeway could present for Thamesmead, should the connections to it be improved, in greater detail. A useful comparator project for what may be achievable would be the Greenway in Stratford.</p>	Acknowledged

CBRE on behalf of Peabody	44	Peabody has reviewed Figure 4.12 and has identified that land to the east of Gallions Hill has inaccurately been designated as public space rather than private space. Similarly, there are a number of instances where land has been identified as a Site of Importance for Nature Conservation (SINC) in Figure 4.12 but is not identified as SINC in RB Greenwich's Proposals Map – again Gallions Hill is an example of this. Peabody requests that the information illustrated in Figure 4.12 (and other diagrams within the OAPF) is double checked and updated accordingly.	Amended
CBRE on behalf of Peabody	45	A key aspect of future green infrastructure provision in the OA is the approach to be taken to MOL, which is discussed further in the MOL section below.	None
CBRE on behalf of Peabody	46	The former Golf Course site is identified as an area for 'open space improvements' in Figure 4.13 and a 'potential wetland location' in 4.16. Peabody supports improvements to green and blue infrastructure in the OA and has already brought forward significant improvements in and around Southmere Lake which illustrates its commitment.	None
CBRE on behalf of Peabody	47	The site (The former Golf Course site) is currently designated as Metropolitan Open Land. From studies already undertaken of the site, it is apparent that landscape interventions alone (such as those being suggested in the OAPF) will be unlikely deliver the open space benefits being sought. The existing built form acts as an abrupt boundary to the open space and does not assist in providing a sense of enclosure or security to the space.	None
CBRE on behalf of Peabody	48	The land (The former Golf Course site) is within Peabody ownership and they have undertaken feasibility investigations for potential future uses of the site, in addition to exploring temporary meanwhile uses to help test the feasibility of potential future uses. Meanwhile uses will help to complement and activate an end use for the site and could be focussed around cultural or nature uses, health and wellbeing facilities or outdoor activities, beyond traditional sports facilities.	None

CBRE on behalf of Peabody	49	Residential development along the western edge of the site would provide necessary overlooking of several existing dead-end roads, which are currently rarely used by pedestrians, and in doing so help to solve problems presented by the fragmented street pattern in this part of Thamesmead. Residential development of a portion of the site could also help to fund activities and nature improvements to the site itself.	None
CBRE on behalf of Peabody	50	Plans for the site would include changes to the public realm and reconfiguration of the landscaping to transform connectivity across the area and access to Crossness by improving pedestrian and cycle routes. Such changes could significantly improve north-south pedestrian and cycle movements, which are currently extremely poor in this part of Thamesmead, and create new connections to what are currently isolated parts of north-east Thamesmead	None
CBRE on behalf of Peabody	51	Whilst Peabody acknowledge the qualitative enhancements that can be made to open space in this area, it should be acknowledged that some built form may be appropriate to ensure that the wider objectives for this space are met.	None
CBRE on behalf of Peabody	52	Flood Risk and Drainage Peabody's current plans for Broadwater Dock include a publicly accessible linear park, the exact form of which will be further defined after more detailed design work. It therefore requests that the Figures 4.13 and 4.16 are updated to reflect these plans and would welcome additional discussions with the GLA to clarify exactly what is meant by a "wetland location." Peabody supports the potential canal reconnection proposed in Figure 4.16, subject to feasibility work to further test this.	Amended

CBRE on behalf of Peabody	53	<p>Utilities</p> <p>To ensure factual accuracy, Peabody would advocate that the first paragraphs of text under Electricity at Section 4.3 are updated as follows:</p> <p>Peabody have secured sufficient electrical capacity for future developments at Southmere Phase 2 and Coralline Walk, from the existing UKPN network. Beyond this, network upgrade and reinforcement will be required to serve major developments in the OA. The following upgrades may be required to service growth of utility networks in the Opportunity Area:</p> <ul style="list-style-type: none"> • A new primary substation at Sewell Road or within Peabody land. • Associated upgrading of high voltage network. <p>Similarly, the first paragraph under Water could be amended as below:</p> <p>Drainage infrastructure in the OA is split into foul and surface water sewers, with the latter discharging into the lake and canal system for a large part of the OA. In some areas the surface water discharges into the trunk sewers.</p>	Amended
CBRE on behalf of Peabody	54	<p>Places – What this OAPF means for Connecting North Thamesmead and the Moorings</p> <p>Additional clarification on the “potential improvements to existing connections” detailed at point 6 would be welcome. Byron Close has been identified as the key route requiring improvements for people walking and cycling from the A-bridge up to the new Moorings Community Hub (point 5); GGF will support these improvements. In this context, the link shown at point 6 is slightly unclear and perhaps not the most effective linkage in this location.</p>	Amended
CBRE on behalf of Peabody	55	<p>Delivery Structures</p> <p>As the Draft OAPF document states, Peabody’s role as major landowner and developer in Thamesmead offers a ‘unique position to improve the area in a considered and co-ordinated way’. Peabody looks forward to further close collaboration and partnership working with the GLA, TfL, RB Greenwich and LB Bexley to realise the OA’s full potential.</p>	None

CBRE on behalf of Peabody	56	Peabody welcomes the OAPF's recommendation to establish a Strategic Delivery Board for the OA. A collaborative and effective Board of the nature suggested in the OAPF is key to ensuring coordination across the OA between all partners and, ultimately, the delivery of the shared long-term vision for the area. Peabody would welcome additional clarity from the GLA in relation to their role in such a Board.	Acknowledged
CBRE on behalf of Peabody	57	Similarly, Peabody would support the designation of a specific officer level contact at each public body for the co-ordination of matters across the OA. For panels and forums of the nature suggested in the OAPF to be effective, there will need to be sufficient commitment and resource allocated from all relevant partners, with ownership of related administrative duties and clear governance processes and mandates.	Acknowledged
CBRE on behalf of Peabody	58	Ongoing Studies The provision of additional evidence to provide greater clarity around the quantum and phasing of infrastructure across the OA would be beneficial. Peabody would welcome partnership working with the GLA, TfL, LB Bexley and RB Greenwich to achieve this; in particular, Peabody, through the Thamesmead Waterfront Joint Venture with Lendlease, is committed to working closely with stakeholders to help progress the DLR extension to Thamesmead.	Acknowledged
CBRE on behalf of Peabody	59	Peabody fully supports Recommendation 2 of the OAPF which lists a number of studies which will be prepared to better guide and inform growth in the OA and also suggests that a MOL review is added to this list of studies – this is discussed further in the MOL section below.	None

CBRE on behalf of Peabody	60	<p>Monitoring Reports</p> <p>Peabody supports Recommendation 3 of the OAPF which seeks to continually monitor the delivery of growth in the OA in terms of job creation; housing delivery; industrial capacity; open space; infrastructure funding and triggers; and demographic changes. For monitoring to be successful/have a purpose, the OAPF should set clear targets/benchmarks for progress to be assessed against and additional information from the GLA, when available, of the methods being developed by them to monitor the development changes across the OA would be welcomed.</p>	Acknowledged
CBRE on behalf of Peabody	61	<p>Metropolitan Open Land (MOL)</p> <p>Paragraph 135 of the NPPF (2019) is clear that ‘the planning of larger scale developments or major urban extensions’ may constitute exceptional circumstances to review Green Belt (in this case MOL) boundaries. In our view, the OA – and Thamesmead Waterfront in particular - represents a development of significant scale consistent with Paragraph 135 of the NPPF with the potential to constitute exceptional circumstances to review MOL boundaries in this specific location.</p> <p>Furthermore, the extent of Peabody’s landownership, some of which comprises land designated as MOL, allows a holistic approach to be taken to strategic issues such as MOL. In considering MOL boundaries, it is important that quantitative and qualitative provision is considered, to crucially ensure that it appropriately responds to areas of identified space deficiency. Paragraph 9.2 of the RBG Green Infrastructure Study (2017) identifies Thamesmead as having one of the greatest deficiencies in access to a range of open space. Critically, the identified deficiency in this specific location is access, not quantum.</p> <p>The principle of ‘compensatory improvements’ to Green Belt (or MOL) is included in the PPG following its update in July 2019. This sets out a clear approach for how local authorities can positively plan for the addition of new or enhanced green infrastructure as part of a compensatory approach to releasing Green Belt (or MOL) in other areas.</p> <p>The OAPF notes that areas of land currently designated as MOL can act as a barrier to movement and Peabody feel that greater flexibility in the</p>	None

		<p>configuration and treatment of MOL across some areas of Thamesmead, such as in the vicinity of Veridion Park and its “edges” with neighbouring uses, would be beneficial to contributing towards the OAPF’s place-making and connectivity objectives. Therefore, the document should acknowledge that an opportunity exists to review current MOL boundaries, given the potential benefits and development opportunities that could be realised through doing so. Peabody would be happy to commit to ensuring no net loss of MOL in terms of a quantitative figure.</p> <p>As seen in examples across Thamesmead, the existing MOL includes previous development land and/or land that is in private ownership that does not contribute to MOL purposes.</p>	
CBRE on behalf of Peabody	62	<p>Cultural Strategy</p> <p>Peabody’s aim is to ensure that culture becomes a vital part of daily life in Thamesmead and, as such, feel that the importance of culture should be further emphasised in the Executive Summary of the document. This could be achieved by revising the OAPF objectives as below:</p> <ul style="list-style-type: none"> • Ensure social, cultural and community infrastructure is planned to meet the needs of existing and future residents and businesses. • Create vibrant, well-connected neighbourhood and town centres that support local business, commercial activity, and encourage local employment and culture 	None

CBRE on behalf of Peabody	63	The description of the symbol at Figure 1.3 as “Improved hub for leisure, community, health and sports facilities” should be amended to include cultural facilities too.	None
CBRE on behalf of Peabody	64	The challenges and opportunities outlined for Culture and Heritage (section 1.4) state that it will be important to explore further opportunities for worklive housing for artists and low-cost accommodation for touring artists. Further clarity on this statement would be welcome, especially around the intention as to whether this is affordable housing for artists in general and not specific to the performing arts. This section would also benefit from the inclusion of a reference to tethered housing; the distinction here is important, with the focus on the provision of different spaces for working and living.	Amended
CBRE on behalf of Peabody	65	The wording providing further detail on the objective of building strong and inclusive communities at 2.1 could be amended to recognise the role of culture in this: This OAPF will ensure that local people have a say in the future of their area and that it continues to be welcoming and diverse. It will ensure that social and cultural infrastructure is planned to meet the needs of residents and is accessible and inclusive for all.	Amended

CBRE on behalf of Peabody	66	<p>Peabody also suggest that the wording under ‘Connect and Strengthen the Local Economy’ at Section 4.1 could be amended as follows:</p> <p>Promoting the night-time economy, particularly in town centres that are served by public transport at night, as well as extending the opening hours of existing daytime facilities such as shops, cafes, multiuse art centres, libraries, galleries and museums should be Town Centres, Local Businesses and Employment encouraged building on the Mayor’s vision for 24 hr city.</p> <p>The ‘key priorities’ identified at Section 4.2 of the document should include priorities for cultural facilities too, and Peabody suggest that the following priorities are included:</p> <ul style="list-style-type: none"> • Creating a network of cultural venues and facilities that are easy to reach, and which create jobs for local people; • Adapting empty or under-used spaces and buildings for cultural uses, including artists’ studios, pop- up shops, exhibition venues and cultural event locations; and • Making provision for culture and artists in our master planning, green and blue infrastructure and development schemes. 	Amended
CBRE on behalf of Peabody	67	<p>The draft OAPF recognises that a green and blue infrastructure study is being prepared for Thamesmead by Peabody. Similarly, Peabody have worked with the GLA, alongside other stakeholders, to produce A Home for Culture (a Cultural Infrastructure Plan for Thamesmead) and would welcome a statement being included within the OAPF that this document will help to guide and shape the nature and form of the provision of Cultural Infrastructure across Thamesmead.</p>	None

CBRE on behalf of Peabody	68	The “potential local connections” identified for West Thamesmead and Plumstead at Section 5.2 outline the ‘opportunities to celebrate the pier at West Thamesmead as one of a series of interventions and points of interest along the Thames Path. This could take the form of public art or lighting.’ If the document is to include details of public art commissions, it could identify other potential locations for significant public art commissions, such as Southmere Village, and provide additional detail on the type of public art which would be supported, for example: site specific, high quality, integrated with the existing environment and public realm.	Addition
CBRE on behalf of Peabody	69	The vision for Abbey Wood as outlined within the document should include acknowledgement of, and detail around, existing culture in the area; for example, the Lakeside Centre is a key cultural marker.	Amended
CBRE on behalf of Peabody	70	Peabody notes that work is currently underway on both the Bexley Riverside and Royal Docks and Beckton Riverside OAPFs. Given the geographical proximity and relationships between these OAs and the Thamesmead and Abbey Wood OA, it will be essential to ensure a co-ordinated approach and policy context as this work progresses.	None
Cllr Ann-Marie Cousins - Abbey Wood Ward	71	In Abbey Wood, some residents have and are still experiencing the impact of the Cross Rail development, living with water logged gardens which also flood during torrential rains. Due to cracks in properties some feel that their properties might have subsided but with no way of confirming this unless they take on the costs themselves. As a consequence, it is therefore vital that lessons to learn from this major infrastructure are taken on board and that the fact that historic rivers need to flow, with underground culverts not being cut-off or incorrectly diverted being an integral part of any development plans.	Acknowledged

Cllr Ann-Marie Cousins - Abbey Wood Ward	72	A lot of very mature willow trees were also cut down to make way for Cross Rail. Another reason why low lying gardens and parks are flooded. A developer cannot be allowed to come into an area and leave residents with the aftermath of the negative consequences of their work like this. Mature trees should be replaced and not with inappropriate saplings either.	Acknowledged
Cllr Ann-Marie Cousins - Abbey Wood Ward	73	Cost effective transportation is required and the extension of the DLR through Thamesmead, Abbey Wood all the way to Erith is long overdue...along with enhancements of the green spaces.	Acknowledged
Cllr Ann-Marie Cousins - Abbey Wood Ward	74	The demographics of this area has also changed over recent years. Under s149 of the Equality Act 2010 a Public Authority must give due regard to the interest and needs of those sharing protected characteristic using sufficient knowledge and evidence. It is noted that the theory of what an Impact Assessment is and entails is one of the documents on your website link and so it is hoped that a thorough 'due regard'assessment will be taken.	None
Cllr Ann-Marie Cousins - Abbey Wood Ward	75	It is hoped that some local residents will also respond to your consultation that expires on 10 March 2020. I have today posted information about it on our Ward Councillors Face-Book page. However, for effective consultation to take place there needs to be face:face meetings held at strategic locations around the area. There should also be regular / continuing update / follow-up meetings.	None
Cllr Daniel Blaney - East Ham North Ward and Chair of Strategic Development Committee at LB Newham	76	I am the chair of the Strategic Development Committee at the London Borough of Newham, and write in a personal capacity. I welcome a public transport orientated plan for a new crossing between Gallions Reach and Thamesmead. I also welcome the planned investment in rapid bus transit south of river.	None

<p>Cllr Daniel Blaney - East Ham North Ward and Chair of Strategic Development Committee at LB Newham</p>	<p>77</p>	<p>My consultation response focuses on my suggestion the rapid bus transit network envisaged for the south of the river be extended to the north of the river via the crossing you suggest is a Docklands Light Railway crossing.</p> <p>The DLR began in the 1980s for a much smaller area, and has become a huge and fundamental network. In areas of the Royal Docks, it is now heavily congested and has severe capacity tensions. Further when the DLR is suddenly suspended there is little resilience because alternative public transport is inadequate. Further connectivity between areas served by the DLR (Woolwich to Stratford or Poplar for example) is good, connectivity between areas heavily reliant on the DLR and non-DLR destinations can be convoluted and an unattractive combination of modes, compared with unsustainable car trips along an extensive dual carriageway network. East London desperately needs a new rapid transit network that does not rely on the DLR.</p>	<p>None</p>
<p>Cllr Daniel Blaney - East Ham North Ward and Chair of Strategic Development Committee at LB Newham</p>	<p>78</p>	<p>The suggestion of yet another DLR extension in this consultation suggests an over reliance on the DLR for this area which needs to end. This should be considered in the context of TfL currently consulting in withdrawing bus services in the Royal Docks, specifically Gallions Reach. This is entirely the wrong way around, the route being withdrawn from the 262 and 101 is a dual carriageway with no bus priority facility. No wonder passenger numbers are low. Buses get stuck in congestion behind too many cars. Newham's Royal Docks need to starting planning for a rapid bus transit network just as is being planned for the south of the river, and a new crossing should facilitate this and link to it. It could in due course also better link the Royal Docks to the north east of the borough, and provide resilience should the DLR network fail through suspension or severe delays as well as ad hoc events leading to overcrowding that requires displacement.</p>	<p>None</p>

<p>Cllr Daniel Blaney - East Ham North Ward and Chair of Strategic Development Committee at LB Newham</p>	<p>79</p>	<p>We have a network of dual carriageways in the south of the Borough and around the Docks in particular. The space devoted to cars is unconscionable and it would fit with the Mayor of London's Transport Strategy to hand a lane over to enhanced, rapid or guided busways, which may in due course be upgraded to a tram network were resources in future decades to allow. This is far preferable to overreliance on the DLR for all rapid transit and light rail services on the north side of the Thames. I was sceptical about rapid bus transit, but the Cambridge Guided Busway has proved what can be a success and I'm pleased the GLA is promoting it as a way to develop Thamesmead and Abbey Wood south of the river. I think north of the river needs to start being planned with a rapid bus transit network here too, and the proposed crossing is an ideal way to facilitate this and migrate thinking away from DLR extensions which will be insufficient for the modal shift required in this area.</p>	<p>None</p>
<p>Collective Planning on behalf of Sabreleague Ltd</p>	<p>80</p>	<p>Sabreleague Ltd is a property development company and major landowner in London. It is the freehold owner of Lyndean Industrial Estate, that makes up a significant proportion of draft Site Allocation T6. Sabreleague Ltd has a particular interest in bringing forward a planning application for a mixed use, residential-led redevelopment of Lyndean Industrial Estate. Our client undertook an initial pre-application meeting with LB Greenwich in May 2019.</p>	<p>None</p>

<p>Collective Planning on behalf of Sabreleague Ltd</p>	<p>81</p>	<p>Potential Site of Change Key proposals in the Thamesmead and Abbey Wood OAPF are set out within the spatial framework. This includes identifying Lyndean Industrial Estate as a potential site of change, a designation that is welcomed by our client. However, our client would request that this allocation is strengthened further in order to acknowledge the potential that the Lyndean Industrial Estate offers. It is requested that the 'potential site of change' designation is amended to read 'site of change'. This amended designation will reflect the capacity that the site holds to accommodate both residential and industrial growth in the area.</p>	<p>None</p>
<p>Collective Planning on behalf of Sabreleague Ltd</p>	<p>82</p>	<p>Housing Zone The site was originally designated within a Housing Zone in the Mayor's 2016 Housing Zones SPD. This designation is reaffirmed in the Intend to Publish London Plan Policy SD1 which states that Housing Zone status will improve the quality of the environment of the Thamesmead and Abbey Wood OA and bring new housing opportunities. To support the growth of the Opportunity Area, interventions such as the redevelopment and intensification of employment sites to enable a range of new activities and workspaces to be created in parallel with new housing development are required. The Intend to Publish London Plan also states that the creation of a new local centre around Abbey Wood station will further support the regeneration aims of the OAPF. Sabreleague Ltd strongly contend that the Lyndean Industrial Estate is an appropriate site to help deliver the regeneration objectives of the wider Opportunity Area.</p> <p>The Mayor of London's provision of £50 million to build new and affordable homes through the Housing Zone fund demonstrates regional support for Housing Zone designations, and our client welcomes the inclusion of Lyndean Industrial Estate within this designation. As part of the 20 year vision for Thamesmead and Abbey Wood, the OAPF identifies the potential to deliver 15,500 homes to supplement a strong existing community. Sabreleague Ltd fully supports this identification and will seek to contribute towards the delivery of these homes through a residential-led mixed use planning application.</p>	<p>None</p>

<p>Collective Planning on behalf of Sabreleague Ltd</p>	<p>83</p>	<p>Efficient Use of Land</p> <p>The first objective for the Thamesmead and Abbey Wood OA is to support the delivery of homes and jobs, and ensure the area remains a mixed and inclusive place. The objective identifies the potential for 15,500 new and affordable homes. Sabreleague Ltd strongly supports this objective. In order to achieve the aims of this objectives, development proposals will be required to make best use of land close to transport stations to provide opportunities for highquality, affordable homes and improved public realm by intensifying and making more efficient use of land in the opportunity area.</p> <p>Policy GG2 of the Intend to Publish London Plan supports the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. The arrival of the Elizabeth Line will further enhance Lyndean Industrial Estate’s accessibility of modes of public transport and unlock socially and economically inclusive growth. The Elizabeth Line will also allow for higher density development to be delivered by a redevelopment proposal. Baseline estimations made in the OAPF indicate that the arrival of the Elizabeth Line will support the delivery 5,000 new homes in the Abbey Wood area and it is strongly considered that Lyndean Industrial Estate is a suitable site to contribute to the delivery of these new homes.</p>	<p>None</p>
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Collective Planning on behalf of Sabreleague Ltd	84	Intend to Publish London Plan Policy E7 supports mixed use or residential development proposals on Non-Designated Industrial Sites where industrial floorspace is provided as part of mixed use intensification. Policy D3 of the Intend to Publish London Plan seeks to promote a design-led approach to optimising the capacity of development sites. The design-led approach must respond to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity. With the site's location within 200 metres of Abbey Wood Station, and the imminent arrival of the Elizabeth Line, Sabreleague Ltd strongly contends that Lyndean Industrial Estate is an appropriate site for a high density, mixed use development that co-locates industrial and residential uses.	None
Collective Planning on behalf of Sabreleague Ltd	85	Paragraph 123 of the NPPF seeks to ensure that developments make optimal use of the potential of each site. Minimum density standards for city and town centres that are well served by public transport are expected. Policy GG2 of the Intend to Publish London Plan requires development to proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities. The policy further requires the application of a design-led approach to determine the optimum development capacity of sites.	None

Collective Planning on behalf of Sabreleague Ltd	86	Given the location of our client’s site within 200 metres of Abbey Wood train station, and the imminent arrival of the Elizabeth line, it is considered that a mixed use development would make for a highly efficient use of an otherwise underused site in a key location within the wider potential area of change. It is therefore requested that, in line with NPPF and London Plan requirements, the OAPF is explicit in its development requirements for the area, stating minimum densities and heights that would be expected in this key location within the Opportunity Area. We would suggest that, based on the initial pre-application meeting, the site has the ability to accommodate tall buildings of 20+ storeys and deliver circa 600 units. It requested there is explicit reference to encourage tall buildings and optimum density for Lyndean Industrial Estate,	Acknowledged
Collective Planning on behalf of Sabreleague Ltd	87	Sabreleague Ltd strongly supports the inclusion of Lyndean Industrial Estate as a potential site of change as well as its inclusion within a Housing Zone.	None
Collective Planning on behalf of Sabreleague Ltd	88	Our client accepts the requirement to ensure that there is no net loss of industrial floorspace capacity. Through intensification of industrial sites, development proposals can be brought forward that not only re-provides the existing industrial floorspace but can also deliver additional housing throughout the Opportunity Area. Our client requests that the designation of ‘potential site of change’ is amended to read ‘site of change’. The Lyndean Industrial Estate is both deliverable and developable and our client, Sabreleague Ltd, is keen to progress with a mixed use residential-led application for the redevelopment of the site and optimise the quantum of industrial and residential floorspace across the site.	None

Environment Agency	90	<p>We welcome the environmental ambition within this draft opportunity area planning framework (OAPF). Whilst most of our areas of interest are well covered in this draft document we have suggested some amended wording, in our detailed response. Given the declaration of climate emergency by the Mayor, London Assembly and the majority of London Boroughs, it is vital that this framework is strong and integrates mitigation and adaption measures into placemaking. We have outlined areas where we feel it could be strengthened. It is also positive to note that a number of our comments made to the draft IIA Scoping Report have been reflected in the supporting Integrated Impact Assessment.</p>	None
Environment Agency	91	<p>The length of Thames frontage within this Opportunity Area presents a significant opportunity to integrate the River Thames with Thamesmead and its surroundings. We would really like to see the multifunctional benefits of Green Infrastructure within the opportunity area realised. We also want to work with you and others on this waterfront site and Thames Path improvements to enhance the frontage and the defences.</p>	None

Environment Agency	92	<p>The Thames Estuary 2100 Plan (TE2100) is government's plan to manage tidal flood risk in the Thames Estuary to the year 2100. Current projections show that the flood defences along the Thames at Thamesmead and Abbey Wood will have to be raised by 0.5 m in and around 2065 and around 1m in 2100, subject to monitoring and the decision taken on the Thames Barrier. This area presents a real opportunity to embed TE2100 objectives with placemaking to manage increased tidal flood risk as a result of climate change. It is important that these raisings are incorporated into the master planning so that they can form part of the landscaping and place making and not form a barrier to people's enjoyment of the river, as has currently been identified. This will help to deliver the good growth objectives. We welcome the OAPF stating that plans for future updates to defences should be designed into waterfront development plans and local masterplans and incorporate green infrastructure and place making.</p>	Amended
Environment Agency	93	<p>Maintaining flood protection in a changing climate and providing the increased flood defence heights required is essential. We welcome this being done in a way that opens up the riverside and improves access. We have shared the requirements for the defences in the Thamesmead policy unit in our detailed response attached.</p>	None
Environment Agency	94	<p>We are pleased to be working with you and others to embed Thames Estuary 2100 riverside strategy objectives in Thamesmead and Abbey Wood. The OAPF should reflect the importance of riverside strategies being driven by the opportunity for development as well as the flood risk, in line with our detailed response comments.</p>	None

Environment Agency	95	Given the history of the area, it is positive that the opportunity area planning framework recognises that the area is likely to have soil contamination. This contaminated land is also likely to have contaminated groundwater. We would strongly encourage a strategic approach to the remediation of contaminated land. This will also help to deliver environmental net-gain at an opportunity area level as per the (Draft) London Plan commitment.	None
Environment Agency	96	We, along with other key stakeholders, are pleased to positively contribute to development of Peabody's Green emerging Infrastructure Strategy for Thamesmead. We believe the OAPF could be improved by aligning more closely with the strategy	None
Environment Agency	97	It is good to see the OAPF including flood risk, water use and wastewater in a holistic way for resilience and that it has a good link to the Charlton to Bexley Riverside Integrated Water Management Strategy, April 2017, published by the GLA.	None
Environment Agency	98	We are keen to work closely with you and others in delivery, particularly with the complex water environment within the opportunity area. We want to be represented appropriately on the officer level forums, to provide advice to enable the delivery of sustainable development in Thamesmead and Abbey Wood.	None
Environment Agency	99	Mayor's Foreword Managing this growth requires a plan, to manage the impact of growth, establish a framework for future delivery, and promote the use of Green Infrastructure and water management. [We are pleased to see that promoting Green Infrastructure and water management are included in the Mayor's foreword.]	None

<p>Environment Agency</p>	<p>100</p>	<p>1.4 Environment Page - Challenges and opportunities Flood Risk</p> <p>A majority of the OA is designated by the Environment Agency as Flood Zone 2-3. This means it is particularly vulnerable to tidal and fluvial flooding. Thamesmead and Abbey Wood benefits from flood defences and would be very vulnerable to tidal flooding should the network of defences fail.</p> <p>[This should be changed to mainly Flood Zone 3. When using flood zones we refer to the highest risk zone. Some areas are located in Flood Zone 2. It is important to distinguish between tidal residual and fluvial flooding when looking at risk and using the sequential test to allocate certain sites for certain types of development. For areas at risk of tidal flooding only, it is important that they focus on areas at risk of flooding in a breach of the Thames Tidal flood defences (a large part of the OA).] amended</p> <p>Defence measures were originally put in place to minimise the impacts of flooding. These measures however have created a physical divide from the river that has, in part, contributed to poor visual and physical access to the Thames.</p> <p>[Given that it is likely that defences will need to be raised further in the future it is important that these raisings are incorporated into the master planning so that they can form part of the landscaping and place making and not form a barrier to people’s enjoyment of the river, as has currently been identified. This could be achieved through raised land behind the defences gradually ramping up.] added to Places section</p> <p>Many buildings have raised living accommodation above flood levels with parking and servicing at ground level. This has resulted in distinctive features of high level walkways designed to allow people to safely escape flooded areas, but also creates large areas with inactive or blank frontages.</p> <p>[The Thamesmead area is very low lying which means that, in the event of a breach of the tidal defences, flooding can be as high as first floor (in places over 3 m deep). It is therefore important that the most vulnerable uses, where flooding could cause the greatest impact, are set at a level that would remain</p>	<p>Amended</p>
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		dry. We recommend that at a minimum all sleeping accommodation is set at the modelled breach level, to minimise the risk life. This means that split level residential and commercial unit could be situated at ground floor subject to adequate emergency planning.] added to Places section	
Environment Agency	10 1	<p>RIVER THAMES IS AN IMPORTANT ASSET</p> <p>While the River Thames is closely tied to the character of the area, there are limited opportunities for access and enjoyment of the river bank. Buildings and spaces along the river are poorly integrated with inland areas, with concrete flood defences allowing for very limited access to the water edge.</p> <p>[Could this section be expanded on to also reflect that there is a need to increase these heights in future and integrate into improved riverside placemaking?] added</p>	Addition

Environment Agency	10 2	<p>CONTAMINATED LAND</p> <p>A number of sites within the OA have been identified as potentially having soil contamination, partly due to its history as a munitions storage and landfill site. Contaminated land assessments and associated remedial strategies will be needed to assess development suitability.</p> <p>[We are really pleased to see and support that the OAPF picks up on contaminated land and identifies broad locations of potential contamination. We would also like the OAPF to acknowledge and reference that this contaminated land is likely to have contaminated groundwater. added</p> <p>This is one of the few places contaminated land is referenced and we think the OAPF should be strengthened to promote a strategic approach to remediation of contaminated land. This will also help to deliver environmental net-gain, at an opportunity area level. added</p> <p>For example, rather than saying ‘contaminated land assessments will be required’ etc., which places the onus upon developers, we would expect the OAPF to reflect the IIA Scoping Report (para. 26.8) and highlight the opportunity to advocate a strategic approach to land remediation and improving water quality. amended</p> <p>Perhaps it could state, a contaminated land assessment required by the GLA? Or at minimum the OAPF could advocate the cost and environmental effectiveness of a partnership approach. added</p>	Addition
Environment Agency	10 3	We are pleased to see the links made to green spaces and the river with health and wellbeing.	None

Environment Agency	10 4	<p>6. Increase efficiency and resilience</p> <p>An integrated approach to the design and management of green space and waterways will contribute to adaptation to climate change, including flood resilience, as well as enhancing biodiversity. New developments in the OA should contribute towards London becoming zero carbon by 2050 and support London’s status as the world’s first National Park City. Developments along the river should incorporate flood defence measures that improve the waterfront environment.</p> <p>[We support these objectives and it is good to see this feature as a primary objective.</p> <p>This objective would, however, be improved if it also referred to seeking development which is resource efficient (water / energy), which embeds circular economy principles and promotes ‘urban cooling’ (noting that all these matters feature in the topic specific sections that follow). This would support the London Plan and reflect the London Borough of Greenwich’s declaration of ‘Climate Emergency’.] amended in objectvies</p>	Amended
Environment Agency	10 5	<p>RESILIENCE AND ENHANCE ACCESS TO AND QUALITY OF NATURAL ASSETS</p> <p>The Mayor of London has set out aspirations for London to become a zero carbon city by 2050, with energy efficient buildings, clean transport and energy - RB Greenwich have pledged to be carbon neutral by 2030.....</p> <p>[We support this text. Is there opportunity to make reference to the ambition to achieve environmental net-gain here and set that ambition from the outset?] added to objective 3 make best use of land</p>	Addition

Environment Agency	106	'Opportunities' focuses on transport. We recommend that this section also focusses on environmental and other opportunities in addition. Or, if not, simply re-title to 'Transport Opportunities'. For example, there is a long held aspiration to form a new cut linking Plumbsted Lake (Lake 5) to Thamesmere Lake (Lake 4). This would remove the need for lake 5 pumping station which would lead to more of the water discharged to the Thames by gravity and make the system more sustainable. It would also provide connectivity for wildlife along the river corridor.	Amended
Environment Agency	107	Pages 58-62 It is unclear how these relate to the high level objectives under the Thamesmead and Abbey Wood 'Vision'. Objectives have been consolidated We are glad to see that water ways and green spaces are listed in OAPF objectives. It would be positive if 'improvements to water quality' referenced or featured here, which may also pick up objectives for tackling contamination. This would tie in with what follows in Section 4.3 GI, page 118,'...tackle the sources of pollution to improve water quality...' etc.	Amended
Environment Agency	108	4.3 Environment energy and utilities Support 4.3 including flood risk, water use and wastewater in a holistic way for resilience. Suggest objective one be amended to reference the ambition to deliver environmental net-gain as per the London Plan aspiration	Addition
Environment Agency	109	p. 117 Could this be amended slightly, we have suggested alternative text below: Address flood risk, water use and wastewater infrastructure in a holistic and resilient way and improve resilience to the impacts of climate change. amended	Amended
Environment Agency	110	Green Infrastructure Support climate change impacts dealt with e.g. contribution of green infrastructure to urban cooling.	None
Environment Agency	111	Green Infrastructure: an integrated approach... We welcome this integrated approach.	None

Environment Agency	11 2	<p>4.3 section 4 Objective: Improve the quality, functionality and accessibility of existing green spaces. Integrate more greenery into parts of the OA, where possible.</p> <p>We support all of these objectives. Again, as per previous points, this could be improved by referencing the ambition to achieve environmental net-gain.</p>	None
Environment Agency	11 3	<p>An Integrated Water Management Strategy (IWMS) We are pleased to see the OAPF has a good link to the Integrated Water Management Strategy (IWMS). Key water (quality and quantity) issues are covered by the Charlton to Bexley Riverside Integrated Water Management Strategy, April 2017, published by GLA. This is our main evidence work for water needs and planning influence around these.</p>	None
Environment Agency	11 4	<p>Page 122, P4 4.3 flood risk and drainage. Reference to natural flood management (NFM)</p> <p>This section would benefit from being clearer about whether this is actually talking about natural flood management (NFM) or SuDS as we are not certain that there are large opportunities here for what we might define NFM as.</p> <p>There is, however, some potential for south of the railway line for the Wickham valley watercourse.</p>	Deletion
Environment Agency	11 5	<p>Support the use of language referencing the opportunity to open up the riverside and improve access whilst managing flood risk.</p>	None

Environment Agency	11 6	<p>Page 122 Flood risk The entire OA is in Flood Zone 2-3. Amended</p> <p>[This should be changed to mainly Flood Zone 3. When using flood zones we refer to the highest risk zone. Some areas are located in Flood Zone 2.</p> <p>It is important to distinguish between tidal residual and fluvial flooding when looking at risk and using the sequential test to allocate certain sites for certain types of development. For areas at risk of tidal flooding only, it is important that they focus on areas at risk of flooding in a breach of the Thames Tidal flood defences (a large part of the OA).</p>	Amended
Environment Agency	11 7	Page 122 Support the reference to TE2100.	None
Environment Agency	11 8	<p>Page 122 We are pleased to see the reference to Riverside Strategies but could the text be amended to reflect the importance being driven by the opportunity for development as well as the flood risk. Could it also reference the future raisings requirements, maybe in a diagram?</p> <p>The future defence raisings are outlined below, for your information. They will differ depending on what future high level option is decided on.</p> <p>Requirements for defences downriver of the Thames Barrier are:</p> <ul style="list-style-type: none"> • Minor raising of some crest levels in about 2040 to achieve a level of 7.2 m AOD (Above Ordnance Datum); • Raising of all defences by up to 0.5 m in 2065; • Raising of all defences by up to 1.0m (total) in 2100. <p>This allows for projected increases in sea level to 2135.</p> <p>The actual dates of defence raising will depend on the rate of sea level rise. These dates may be revised when the TE2100 Plan is updated. Defence heights will also depend on whether or where we decide to build a new Thames Barrier.</p>	Amended

Environment Agency	119	<p>p. 122 Plans for future updates to defences should be designed into waterfront development plans and local masterplans and incorporate green infrastructure and placemaking. Even with good flood defences there remains a....</p> <p>[We support the inclusion of this text but could it be amended to reflect the fact that the updates are required to help adapt to increased flood risk and a higher Thames as a result of climate change. Plus the future heights as referenced above.]</p>	Amended
Environment Agency	120	<p>Figure 4.14 This is not the clearest of figures, due to the overlapping of the layers used. We would be happy to help by providing some clearer layers or data. We could send you a layer showing the areas at risk of flooding during a breach in the flood defences, which is currently missing. This could be a better indication of flood risk in this opportunity area. Without the definitions of flood zones 2, 3 and hot spots it could be misleading or misinterpreted by people reading the document.</p>	Amended
Environment Agency	121	<p>Figure 4.15 This is an unclear diagram and we are not clear where you are getting this data/map from. Perhaps you would be better using the surface water flood mapping you will have.</p>	None
Environment Agency	122	<p>Page 123. We note that the OAPF does not force developers to reuse water, but does ask them to maximise opportunities for reuse.</p>	None
Environment Agency	123	<p>Page 124, P4 4.3 P4 4.3 Flood risk and drainage sustainable management of water and flood risk We suggest that this heading is unclear. Maybe rename it as: Flood risk, drainage and sustainable water management. Amended</p>	Amended

Environment Agency	12 4	<p>SUDs hierarchy - We support this section and also promote the use of the ditch network and Thames in preference to disposal to the sewer network.</p> <p>[It is a positive chapter, we support all of the intentions of this section and aims and objectives but could it be 1) firmer 2) less generic for the area. May also be beneficial for a strategic surface water management plan to be carried out for the area and link to Peabody Living in the Landscape. Is there scope within the Opportunity Area to pilot/contribute to the Mayors ambition in the transport strategy to remove permeable roads/surfaces by 50,000 sq. metres per year?]</p>	None
Environment Agency	12 5	<p>Page 125 We support the linking of the key opportunities and environmental issues i.e. waterfront and TE2100 and improved riverside access. Also, the reference again to Riverside Strategy Approach and TE2100, is welcomed. However, it should reference TE2100 and not TE100. (Typo). amended</p>	None
Environment Agency	12 6	<p>Page 125 Riverside developments: Suggest re-write ... some suggested proposed amended text below: Riverside developments The OA sits within the TE2100 action zone 4. Thames Estuary 2100 (TE2100) - GOV.UK Flood risk management should be factored in to all developments, particularly riverside developments. Land may have to be set aside for future flood defence upgrades as a result of increased flood risk as a result of climate change. Defence upgrades should seek to maintain the standard of protection from flood risk, improve the waterfront environment and provide better opportunities for public access and use of the riverside. Access should be maintained to enable long term maintenance and future upgrades to the flood defences. amended</p>	Amended

Environment Agency	127	Page 126 - 127 Air Quality Could this section also cross reference green infrastructure and discuss the air quality benefits that realisation of the well planned green infrastructure (GI) strategy will have.	None
Environment Agency	128	Page 128 Energy and utilities Could this approach be broadened to include environmental infrastructure? I.e. flood defence raisings but also using green infrastructure to replace traditional grey infrastructure.	None
Environment Agency	129	Page 133 Water and waste water We are happy with the summary of water and wastewater objectives. We support these objectives and the designing space for future retrofit of better water efficient systems. Links to the IWMS and more detail could be added for specific recommendations and any next steps. Added	Addition
Environment Agency	130	Page 134 Waste and Circular Economy Support this section but there is more opportunity here to strategically manage construction waste as well as waste from occupied new developments. A strategic approach could help contribute towards the Mayors ambition to be net self-sufficient for waste by 2041.	None

<p>Environment Agency</p>	<p>13 1</p>	<p>Page 134 P4.3</p> <p>This section could be made more inspirational. It should say more about integration of building design, enhancing the street scene so that residents have opportunities to move waste up the waste hierarchy and also reducing impacts from construction activities. This section basically relies on the guidance that the Mayor will be producing on circular economy statements. It could be more proactive and pre-empt some of that by having some overall policies that would state that there should be high standards of data recording for all waste movements during construction.</p> <p>It would be good if a pink box of action points were used in a similar way to the Digital Connectivity section.</p> <p>E.g. in addition to the circular economy statement as required under the London Plan Policies Architects/Designers should include a detailed waste management strategy for developments, giving detailed consideration to the amount of waste and recyclables produced in each unit, and the transport and storage of recyclables and the within the development. Consideration should be given to how this will integrate with the adopted collection methodology that will be employed for removing wastes and recyclables from the development.</p> <p>Opportunities to maximise the collection of recyclable materials in the public realm should be adopted where practicable and measures to enhance the avoidance of wastes such as the integration of drinking water fountains/water bottle refill stations included as appropriate.</p> <p>In densely trafficked areas consideration should be given to the design of access for collection vehicles such that there is minimal interface between pedestrians and collection vehicles.</p> <p>The design of access and egress to buildings should consider the types of waste collection vehicles employed by the waste collection authority or those typically employed by private sector contractors, to ensure sufficient headroom, and turning circles for safe operation.</p> <p>Contractors must provide a detailed oversight of the destinations of waste movements off site, particularly where wastes are collected by a sub-contracted 3rd party. Details of the end destination of all waste movements should be provided on request by all</p>	<p>Amended</p>
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		contractors and sub-contractors as a requirement, to the developer.	
Environment Agency	13 2	<p>It would improve the 'Places' spatial framework to add in more environmental infrastructure improvements to the currently mapped 'place-making' improvements. There is a focus on transport and improving connectivity currently.</p> <p>Are there any recommendations that could be brought through from the on-going Peabody green and blue infrastructure strategy, or from the Integrated Water Management Strategy? For example, strategic SUDs, improvements to water bodies, healthy streets and the 'green' network.</p>	Amended

Environment Agency	133	<p>VISION FOR THAMESMEAD TOWN CENTRE & WATERFRONT</p> <p>This place seems to be key in delivering the improved flood defences to protect the new place and the existing communities to the south. We support the opening up of the riverside and improved access but this must be done in a way which provides the increased flood defence heights required. It would be sensible to plan these into the streetscape now and knit them into the placemaking for the new town centre and waterfront.</p>	None
Environment Agency	134	<p>Vision for north Thamesmead and the Moorings- We strongly support the link to green infrastructure (GI) and planning with sustainable water management in mind and being key to placemaking here.</p>	None
Environment Agency	135	<p>If land contamination is an issue for water quality (see Fig 4.12) in the west of Thamesmead and Abbey Wood, what are the plans to tackle this? Will this be addressed in the recommended 'Waste management and circular economy study?</p> <p>How will the evidence studies' recommendations be incorporated in the OAPF in future? Suggest commitment to review, and the review process be made clear.</p>	None
Environment Agency	136	<p>We would want to be represented appropriately on the officer level forums due to the complex water environment within the Opportunity Area (OA).</p>	None
Environment Agency	137	<p>We are pleased that Riverside Strategy and waste and circular economy are recommended.</p> <p>There is also an opportunity to take a strategic approach to remediation of contaminated land and could be included as a future study. This could help to realise environmental net-gain but also reduce emissions by remediating land efficiently.</p>	Addition

<p>Gerald Eve on behalf of Peabody and Berkeley Homes East Thames</p>	<p>13 8</p>	<p>We write on behalf of our clients, Peabody Land Limited (Peabody) and Berkeley Homes East Thames (BHET), in response to the recently published Thamesmead and Abbey Wood OAPF.</p> <p>Our clients welcome the publication of the OAPF for consultation, and the opportunity to provide comments on this up until 10 March 2020. Peabody have significant landholdings within the Thamesmead and Abbey Wood OAPF area which have the potential to be affected by the aspirations and objectives of the OAPF.</p> <p>BHET were selected as Peabody's development partner in autumn 2017, to bring forward development proposals for the Plumstead — West Thamesmead site. The site is of a significant scale and forms a large part of Peabody's landholdings within the OAPF area. Accordingly, the implications of the OAPF on both Peabody's landholdings and the joint venture proposals for the Plumstead — West Thamesmead site have the potential to be significant.</p>	<p>None</p>
<p>Gerald Eve on behalf of Peabody and Berkeley Homes East Thames</p>	<p>13 9</p>	<p>Upon review of the consultation draft OAPF, both BHET and Peabody are generally supportive of the aspirations and objectives of the document. The proposed development at Plumstead — West Thamesmead will help the Greater London Authority (GLA) achieve the objectives of the OAPF, providing a significant quantum of homes, as well as jobs, in an accessible location, whilst also helping to improve public transport connectivity and access opportunities in the area. The proposed development at Plumstead — West Thamesmead will also help to plan for efficient use of employment land and safeguard protected industrial capacity to ensure that the Opportunity Area (OA) continues to play an important economic and industrial role in London.</p>	<p>None</p>

<p>Gerald Eve on behalf of Peabody and Berkeley Homes East Thames</p>	<p>14 0</p>	<p>Notwithstanding the support generally for the consultation draft OAPF, our clients specifically support the following elements of the draft OAPF:</p> <ul style="list-style-type: none"> - The identification that the SIL area closest to Plumstead station is a prominent location with potential to improve the arrival experience into the wider SIL and the opportunities to consolidate industrial land to support the release of land for non-industrial uses at this location; - The anticipated vision for West Thamesmead and Plumstead; - The North Plumstead transit hub proposals; - The Pettman Crescent gyratory and highway works to improve the transition between Plumstead station, existing residential areas and new sites; - Nathan Way upgrades; and Improvements to Ridgeway accesses. 	<p>None</p>
<p>Gerald Eve on behalf of Peabody and Berkeley Homes East Thames</p>	<p>14 1</p>	<p>Our clients support the recognition that the Plumstead - West Thamesmead site is an 'Area of Change' as identified within several of the images within the draft OAPF. However, there is some inconsistency within the document in this regard, with certain images failing to identify the site as an 'Area of Change' or 'Potential Area of Change'. Now that the planning application for the Plumstead - West Thamesmead site has been submitted, it is considered that all references within the document should identify the site as an 'Area of Change' or 'Potential Area of Change'.</p>	<p>Amended</p>

<p>Gerald Eve on behalf of Peabody and Berkeley Homes East Thames</p>	<p>14 2</p>	<p>Our clients also strongly support the inclusion of Option 3 for the off-site intensification of Strategic Industrial Locations (SIL) within the West Thamesmead SIL. Option 3 enables the intensification of industrial sites in the wider SIL to provide additional industrial capacity and facilitate the process of SIL consolidation and release at the southwest corner of the West Thamesmead SIL which fully aligns with the proposed strategy for the Plumstead - West Thamesmead site as submitted as part of the planning application. We would, however, suggest a softening of the language under point (2) regarding the buffer between the prison and the residential development so that this reads as follows "create a buffer or adopt appropriate design mitigation measures between the prison and residential development to manage land use adjacencies".</p>	<p>None</p>
<p>Gerald Eve on behalf of Peabody and Berkeley Homes East Thames</p>	<p>14 3</p>	<p>Peabody own a vast area of land and buildings within the Thamesmead area. A single land ownership of this scale is a unique situation and creates a key opportunity for a coordinated master planning approach. Accordingly, Peabody have produced a Commercial and Industrial Masterplan (CIM) which covers approximately 122.5 hectares of land within the Thamesmead area. This sets out the objectives of Peabody over the next 20 years to bring forward significant new industrial accommodation over the short, medium and long term through a coordinated masterplan and investment approach. It identifies the ambition to provide a range of different sizes and forms of industrial accommodation to create a varied portfolio that is complementary and is only possible due to this wholly unique position of Peabody's significant land holdings in this location.</p>	<p>None</p>

Gerald Eve on behalf of Peabody and Berkeley Homes East Thames	14 4	<p>Option 3 and the proposed strategy for industrial delivery and the redevelopment of Plumstead - West Thamesmead is considered to better align with the objectives of the OAPF, as follows:</p> <p>In total, over the short, medium and long term, the Masterplan Strategy proposes an additional 145,892sqm GEA of industrial floorspace, increasing the existing industrial accommodation within the West Thamesmead SIL from 154,299sqm GEA (or 22% plot ratio) to 300,191sqm GEA (or 43% plot ratio). In total this could deliver 2,690 new jobs.</p>	None
Gerald Eve on behalf of Peabody and Berkeley Homes East Thames	14 5	<p>Option 3: The proposals will deliver not less than 55,000sqm of additional Industrial floorspace and nearly 1,000 jobs in the short term (circa 5 years) and, subject to market demand, will deliver not less than 145,000sqm of additional industrial floorspace and nearly 2,700 jobs over the next 20 years, ensuring the efficient use of employment land and safeguarding protected industrial capacity.</p>	None
Gerald Eve on behalf of Peabody and Berkeley Homes East Thames	14 6	<p>Option 3: The proposals will also deliver the maximum quantum of affordable housing equating to circa 700 homes (equivalent to 40% of the total homes and 43% by habitable room) with circa 560 homes being delivered in the first phase of development (equivalent to 50% of the homes in the first phase or 53% by habitable room). The proposals ensure that the area remains a mixed and inclusive place.</p>	None
Gerald Eve on behalf of Peabody and Berkeley Homes East Thames	14 7	<p>Option 3: In addition, local connections and linkages will be improved and the new roads within the development and improved pedestrian and cycle routes adjacent to the development, including improved access to the Ridgeway, seek to overcome obstacles to promote safe, accessible route for active travel.</p>	None

Gerald Eve on behalf of Peabody and Berkeley Homes East Thames	148	Option 3: The redevelopment of this important site, in close proximity to Plumstead station and Plumstead District Centre, is a key catalyst for change within the area offering the opportunity to create a new gateway to Plumstead and, through the creation of new industrial products on site, begins to change the market perception of the area with a view to increasing market demand and supporting the opportunity for intensified industrial products to be delivered in the wider SIL area.	None
Gerald Eve on behalf of Peabody and Berkeley Homes East Thames	149	Option 3: The proposed development performs well in terms of energy efficiency and will create significant areas of new public and private open space, with flood risk being appropriately mitigated.	None
Gerald Eve on behalf of Peabody and Berkeley Homes East Thames	150	Option 3: Delivery of community uses as part of the proposals supports growth and the proximity of the flexible commercial uses proposed, to Plumstead District Centre, seek to support, rather than compete with, local business, commercial activity and local employment.	None
Gerald Eve on behalf of Peabody and Berkeley Homes East Thames	151	The Site represents the first phase of the short-term Masterplan Strategy which will be delivered immediately upon the grant of planning permission. The Site is a key catalyst for change, creating the first phase of industrial units to act as the interface with the wider West Thamesmead SIL area and fully supports the aspirations and objectives of the draft OAPF in accordance with Option 3 for the off-site intensification of SIL.	None
Gerald Eve on behalf of Peabody and Berkeley Homes East Thames	152	On this basis, our clients support the draft OAPF and look forward to the adoption of the final Thamesmead and Abbey Wood OAPF in the summer of 2020.	None

Highways England	15 3	Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and, as such, Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs, as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case, particularly the M25 in the vicinity of junctions 2 and 3. This includes access to the SRN via either A206, A225 or the A20, as these routes experience congestion.	None
Highways England	15 4	Following our previous response to the associated Thamesmead and Abbeywood OAPF IIA Scoping Report (Highways England Ref. # 8971), dated 03 December 2019, we have examined the draft Thamesmead and Abbey Wood OAPF, in particular the Appendix E Transport Strategy. We note the OAPF will become Supplementary Planning Guidance to the Intend to Publish London Plan and will give a more detailed interpretation and intent of Policy SD1 in the Intend to Publish London Plan. We encourage policies and proposals which incorporate measures to reduce traffic generation at source and encourage more sustainable travel behaviour. We are therefore satisfied that the OAPF will not materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT C2/13 para 10 and DCLG NPPF para 32). Accordingly, Highways England does not offer any comments on the consultation at this time.	None

Historic England	15 5	<p>Thank you for the opportunity to comment on the Draft Opportunity Area Planning Framework for Thamesmead and Abbey Wood. As the Government's statutory adviser on the historic environment and a statutory consultee for the Strategic Environmental Assessment process Historic England is keen to ensure that the protection and enhancement of the historic environment is fully taken into account at all stages and levels of the planning process.</p> <p>Accordingly, we have reviewed the consultation documents in light of the National Planning Policy Framework (NPPF) which requires, as one of its core principles, that heritage assets be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.</p>	None
Historic England	15 6	As a high level strategic framework we consider the document should have a positive impact on the historic environment consistent with the requirement set out in the NPPF for plans to set out a positive strategy for heritage. With this in mind we can offer the following observations and recommendations.	None
Historic England	15 7	Historic England supports the objectives of the OAPF to deliver coordinated and sustainable growth within the OAPF and to provide a framework for mixed use growth which will deliver greater accessibility, homes, jobs, and community and cultural facilities.	None
Historic England	15 8	We are pleased to note the objective of celebrating and promoting existing heritage destinations, while encouraging both existing and new offers. The Scoping Report effectively maps both the designated and local heritage. The Greater London Archaeology Advisory Group has been consulted on the proposed OAPF and we welcome the initiative to develop an archaeological framework for the area (page 241). GLAAS will continue to liaise in the production of the framework and this should feed into the wider approach for protecting and enhancing known and unknown heritage across the site.	Addition

Historic England	159	<p>As acknowledged, the original grand vision for Thamesmead was one of the boldest housing developments planned by the LCC/GLC and as such it must be considered to have local historic and architectural interest. However the older elements of the planned estate have been reviewed for designation but are not considered to have sufficient completeness to meet the high bar set for C20th post-war listing. As recognised in the draft document subsequent changes have further eroded the architectural interest and the car dominated planning and isolated nature of the area undermines the overall quality of the environment. Historic England therefore supports the stated vision to revitalise the areas ambition and to improve local and regional connectivity. The local community is in the process of developing a neighbourhood plan for Thamesmead Moorings and we would encourage the GLA and other partners to work with the Neighbourhood Forum to developing a vision which sustains and enhances those positive elements of local character and identifies those areas and topics that require updating or further analysis, and to consider how the historic environment can support that vision.</p>	None
Historic England	160	<p>A key element of delivering sustainable development will be ensuring that the framework supports local economic growth and provides key cultural and social infrastructure. Heritage can help support this through strengthening local identity and cultural access. We therefore support the aim to link local centres and destinations. Considering the role Thamesmead and Abbey Wood can play within the wider context of Thameside town regeneration and investment in other local centres such as Woolwich, Plumstead High Street etc. will help deliver a stronger network of amenities and opportunities. For example Woolwich is the focus of considerable investment in both the historic environment and cultural activity and we are pleased to note the intention to promote creative activity across both centres.</p>	None

Historic England	16 1	A key consideration must be how substantial growth can be delivered within a concentrated number of locations facilitated through transport improvements and how this will inform the built form and scale of new development, and consequently how this will shape the impact of the wider visual amenity and setting of heritage assets and the environment. In setting out a spatial framework it would be helpful to ensure that further design analysis and visualisation is a key requirement of local authority plan-making and to ensure this is sufficiently resourced to deliver an accurate and robust framework which will deliver the key strategic requirements. This should include visual impacts of options and a requirement to avoid harm to heritage assets based on a thorough understanding of their architectural and historic significance and the contribution of setting.	Acknowledged
Historic England	16 2	As set out in the plan, the wider area encompasses a number of designated and undesignated assets which are identified in the Spatial Framework, including the exceptional Crossness Pumping Station complex and the grade II Swing Bridge which is currently “at risk”. NPPF Policy 185 states strategy should set out how these assets and the positive aspect of their setting can be sustained and enhanced. With this in mind we would welcome a commitment to addressing those factors which contribute to risk and securing long term repair and enhancement of the bridge, including through initiatives to improve interpretation and way-finding and the proposed green link (page 153). This can be linked to the healthy streets and good growth policies to encourage health and well-being and access to the wider historic environment.	Addition

Historic England	16 3	Finally, we should like to stress that this advice is based on the information provided by yourselves. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals which may subsequently arise and where we consider that these would have an adverse effect upon the historic environment.	None
JLL on behalf of Ministry of Justice	16 4	<p>I write on behalf of the Ministry of Justice ('MoJ') to submit representations to the emerging Thamesmead and Abbey Wood Opportunity Area Planning Framework.</p> <p>This letter has regard to the prison facilities of HMP Thameside, HMP Belmarsh and HMP Isis, which together occupy a single wider site between Western Way and the West Thamesmead Business Park, in the Thamesmead area of RB Greenwich. In holding those committed to custody by the Court, these prison facilities fulfil a vital function within the UK penal system. It is of paramount importance that these facilities are able to provide a safe and secure environment, in order to both protect the public, and to provide prisoners with the appropriate path to reform. Given the nature of the facilities, the relationship they have with their immediate physical environment is particularly sensitive.</p>	None
JLL on behalf of Ministry of Justice	16 5	In summary, it is therefore vital that as these establishments are located within the OAPF boundary, any proposals within the OAPF must not have a detrimental impact on the prisons' operations.	None

JLL on behalf of Ministry of Justice	16 6	<p>HMP Thameside</p> <p>HMP Thameside is a Category B men’s local resettlement prison (comprising the second highest tier of prison security). It opened in 2012 and now has a capacity of approx. 1,232 prisoners and holds both convicted and remand male prisoners. The prison (operated by Serco) has two house blocks, one built on a five-spur radial design, comprising 10 individual living units and 600 cells and a newer house block with 332 cells. Vehicular access to HMP Thameside is provided via Griffin Manor Way, which runs through / adjacent to the subject site and in turn connects to Western Way and the wider Pettman Crescent Gyratory system.</p>	None
JLL on behalf of Ministry of Justice	16 7	<p>HMP Belmarsh</p> <p>HMP Belmarsh, immediately to the north of HMP Thameside, is a Category A men’s prison (comprising the highest tier of prison security). The prison opened in 1991, and has a capacity of approx. 900 prisoners, with cells distributed mainly across four residential units, each with a four-spur radial arrangement. In addition to its commitment to the Category A estate, the facility operates as a local prison serving primarily the Central Criminal Court and magistrates court in south east London and south west Essex. As part of its Category A role, high-risk prisoners are accepted from across the UK.</p>	None
JLL on behalf of Ministry of Justice	16 8	<p>HMP Isis</p> <p>HMP Isis is located within the perimeter wall of HMP Belmarsh and comprises a Category C Young Offenders Institution (although is built to Category B standard). It opened in 2010, with a capacity of approx. 630 prisoners housed across two buildings.</p>	None

JLL on behalf of Ministry of Justice	169	<p>As development with the Framework boundary could impact on the operation of the prisons, it is important to highlight the following key concerns:</p> <p>Highways and Transport</p> <p>The transport and access requirements of the prisons must be fully taken into account throughout the design of traffic infrastructure and/or any mitigation that will be incorporated as part of the Thamesmead and Abbey Wood Opportunity Area. The Framework document proposes that Western Way is to become a Bus Rapid Transit route. The design of this route should minimise any adverse impacts on the operation of the prisons, in particular the impact upon the Prisoner Escort and Custody Service ('PECS'). This service is engaged with the movement of high-profile and high-risk prisoners to and from the prison facilities. With this, it is important to consider the implications of increased traffic flow on the operation of the prisons as a matter of national security, i.e. there must not be any delay to services. TfL must therefore engage with the MoJ and prisons moving forward to ensure that the traffic flows to and from the prisons are accounted for in the wider assessments of traffic movements in the area.</p>	Acknowledged
JLL on behalf of Ministry of Justice	170	<p>West Thamesmead SIL Preferred Options</p> <p>Within the Framework document, a number of options are presented in relation to future development opportunities for the West Thamesmead Strategic Industrial Land ('SIL') site.</p> <p>Option 1 proposes that the industrial Land within the West Thamesmead Strategic Industrial Location (SIL) is intensified and that residential and light industrial uses are co-located next to Plumstead station. Whilst residential development is proposed, this is further away from the prisons' boundary and would be less likely to impact on operations.</p>	None

JLL on behalf of Ministry of Justice	17 1	Option 2 proposes the intensification of the industrial land along the edge of West Thamesmead SIL with the potential for introducing residential and mixed use functions near to the prisons' boundary and further away towards Plumstead Station.	None
JLL on behalf of Ministry of Justice	17 2	Option 3 finally looks to introduce more of a focus on residential and mixed use functions to the south west corner of the West Thamesmead SIL and towards the station. This option appears to have the least industrial intensification within proximity of the prisons' boundary.	None
JLL on behalf of Ministry of Justice	17 3	It should be noted that the key considerations in bringing forward any development options close to the prisons' boundary are the potential for overlooking/lines of sight and traffic/ highways. In respect of the above options, it is generally considered that industrial low rise uses would be expected to have less impact on the prisons.	Addition
JLL on behalf of Ministry of Justice	17 4	In relation to views, views into the prison could compromise not only prisoner safety creating a breach of security but they could also enable prisoners to be able to see the occupants of any new development. In terms of traffic, the key consideration is to maintain a functional and unimpeded vehicular access to the prison facilities.	None
JLL on behalf of Ministry of Justice	17 5	We understand that a current planning application for residential-led development by Berkeley Homes on the area bounding the prisons' site to the south/south west is pending with RB Greenwich and MoJ are involved in making representations on this also.	None

JLL on behalf of Ministry of Justice	17 6	<p>Prison Utilities</p> <p>The utilities of each prison facility must not be compromised if any development is to occur in the area as this could impact the level of security and safety of individuals. Any temporary cessation of electricity, gas, water would cause a state of emergency. Any works around the prisons must ensure all utilities functions are accurately identified to avoid this happening.</p> <p>We therefore request that as a matter of national security the above comments are fully considered.</p>	None
L&Q	17 7	L&Q welcome the GLA's vision for Thamesmead and Abbey Wood Opportunity Area (OA) in creating a mixed and inclusive community with improved local and regional transport connections across the plan period to 2041. We believe the OAPF should be updated regularly during the plan period to ensure it is relevant and up to date.	None
L&Q	17 8	We also encourage the progression of a Bexley Riverside OAPF and Royal Docks and Beckton Riverside OAPF to ensure a joint-up and co-ordinated plan to deliver the objectives for the Thames Estuary area.	None
L&Q	17 9	We strongly support the need for improved transport connections within the OA itself and to and from other town centres in London to ensure that housing and job targets can be realised. This will also support the creation of sustainable communities.	None
L&Q	18 0	L&Q support the six objectives for the Thamesmead and Abbey Wood OA. We particularly support Objective 1: Support the delivery of homes and jobs, and ensure the area remains a mixed and inclusive place and we suggest the OAPF housing policies should be flexible so that homes can come forward on sites that are available and deliverable.	None

L&Q	18 1	We note the objective to improve transport accessibility (Objective 2) and believe the introduction of the Elizabeth Line at Woolwich should be used as a catalyst for further transport improvements in the area. We realise how this links to Objective 7: Create vibrant, wellconnected centres that support local business, commercial activity, and encourage local employment by enabling town centres to grow and local economies to be supported.	None
L&Q	18 2	We support the principle of Objective 6: Plan for efficient use of employment land and safeguard protected industrial capacity and would encourage policies that proactively manage the release of Strategic Industrial Land (SIL). We support the consolidation of industrial uses as a way of releasing land for housing but raise concerns about the viability of any residential/industrial colocation schemes which is discussed later in this letter.	None
L&Q	18 3	We also agree with the objectives to create safe and sustainable communities by supporting existing and new social and environmental infrastructure (Objectives 3, 4, 5, 9 and 10) to ensure the OA offers a desirable place to live and work.	None
L&Q	18 4	L&Q support the delivery of strategic public transport connections to support housing and employment growth in the OA. We also support the GLA consulting on two transport options which support 'intermediate growth' and 'higher growth'; we would encourage the 'higher growth' option to be pursued in order for the OA to realise its growth potential.	None
L&Q	18 5	The OAPF notes the potential to introduce new river bus services at Thamesmead and a further DLR extension from Barking to Belvedere. L&Q strongly support the principle of these future DLR extensions as a way of enabling growth in currently poorly connected parts of outer London. We would welcome further information when available, especially around timescales for implementation and funding arrangements.	None

L&Q	18 6	L&Q support, in principle, the 'greater growth' scenario as this level of transport investment will support the higher housing targets set out in the OAPF. In providing connections across the Thames Estuary this option should spur on growth in neighbouring opportunities areas at Bexley Riverside and Royal Docks and Beckton and increase access to employment opportunities in the CAZ.	None
L&Q	18 7	L&Q note that the transport schemes identified in the OAPF are currently unfunded and that contributions from new residential and commercial developments that the routes would serve would be sought as part of the funding package. L&Q note that developers would also be expected to help fund local transport improvements, such as new or improved walking and cycling routes and public spaces. We believe that developers should be given as much information as possible about how infrastructure upgrades are planned to be funded and the timeframes for them to come forward.	Acknowledged
L&Q	18 8	We support the need to develop a public realm that follows the Mayor's Healthy Streets approach so that people feel safe to use public transport at all times of the day. The GLA should engage early with developers about any public realm improvements required on a project specific basis that might be sought through S106 contributions/ Highways Agreements. We support the proposals for residential developments with fewer car parking spaces and car free development but recognise that this will only be feasible with the delivery of the above public transport improvements.	Acknowledged
L&Q	18 9	We welcome the Draft New London Plan Policy T6.1 Residential Parking which requires 3% wheelchair parking in areas with good Public Transport Accessibility Levels and recommend this policy is applied in the OA.	None

L&Q	19 0	We suggest the GLA considers taking a flexible approach, where appropriate, to the upfront delivery of cycle parking requirements set out in the London Plan especially where this helps to release space elsewhere to create increased active frontage, whilst still securing space for future cycle parking if demand arises, for example in the landscape.	None
L&Q	19 1	L&Q support the use of a design-led approach to determine the optimum capacity of potential development sites. We agree that development should respond to a site's context and its capacity for growth, including in terms of building height and proximity to local amenities. We believe high-density development should be encouraged in town centres and areas with high PTALs.	None
L&Q	19 2	We understand the need for new developments to be informed by their context without compromising local character, heritage and sense of place although we believe this shouldn't preclude the delivery of taller buildings in the borough, where appropriate.	None
L&Q	19 3	L&Q recognise that new homes should provide for households across a range of incomes and sizes. We would encourage the Council's to consider applying family housing requirements (3 bedrooms and above) flexibly, especially in town centre locations and to recognise 2-bed 4- person properties as family homes.	None
L&Q	19 4	L&Q note the role of Woolwich Town Centre, Thamesmead Town Centre and Abbey Wood as major centres with the OA which should be improved as employment and retail locations for local residents. There are also local centres and industrial areas that provide employment opportunities for local residents and the OAPF seeks to introduce new cultural and creatives industries too. L&Q support this approach to improve town centres, especially those which will host new transport links, such as Abbey Wood and Thamesmead, to help sustain existing and new communities.	None

L&Q	19 5	L&Q support the OAPF objective to make best use of land close to transport links to provide high quality, affordable homes and improved public realm by intensifying and making more efficient use of industrial land in the OA and releasing land elsewhere for other uses.	None
L&Q	19 6	L&Q recognise the significant extent of the West Thamesmead SIL and the 150 businesses located there in small to medium, old and new industrial units. We note key businesses such as Greenwich Reuse and Recycling Centre (safeguarded waste site).	None
L&Q	19 7	As this SIL is adjacent to the Plumstead Housing Zone, we support the potential to intensify and consolidate parts of the SIL to release some land for non-industrial uses close to Plumstead Station. We note that the OAPF stipulates where SIL is released for non-industrial uses, the re-provision of industrial floorspace capacity must be secured. We would welcome further guidance on the requirements for re-providing industrial floorspace and how this aligns with the London Plan policies. We would highlight that re-providing industrial uses as part of a mixed-use residential scheme carries significant challenges for development viability.	Acknowledged
L&Q	19 8	W. Thamesmead Option 1 - L&Q agree with the OAPF that this option limits the delivery of new homes in areas closest to transport connections;	None
L&Q	19 9	W. Thamesmead Option 2 - L&Q support the provision of new homes closest to Plumstead Station however would note that residential, mixed use and industrial uses will need to be delivered alongside each other in practice and the agent of change principle managed in a way that does not undermine the quality and viability of future residential;	None
L&Q	20 0	W. Thamesmead Option 3 - L&Q note that this option considers the potential for on-site co-location of light industrial and residential uses. Whilst L&Q support the principle consolidating industrial uses in other parts of SIL to allow for residential led mixed-use development closest to Plumstead Station, we would raise concern with principle of co-location of residential and industrial uses for reasons set out below.	None

L&Q	20 1	We would encourage the GLA to consider further how residential and industrial uses can exist alongside each other, or indeed as part of the same development, without requiring expensive design solutions which can compromise viability, especially where significant proportions of affordable housing is being delivered, and potentially creating living environments that with noise and air quality issues.	None
L&Q	20 2	A practical and robust approach is required to the successful co-location of industrial and residential use to ensure developers will invest in the area. In L&Q's experience, there are various challenges to providing residential use over industrial, for instance the vertically stacked typology carries inherent cost, design and management challenges.	None
L&Q	20 3	This typology is complex to build and carries concerns around adequately mitigating noise, vibration and ventilation impacts from the industrial uses. Securing separate access to sites for industrial vehicles and residential vehicles/servicing is also important however it is not always possible on constrained sites. Our recommendation would be to focus industrial in one area of the OA and residential in another (closest to Plumsted Station).	None
L&Q	20 4	Any industrial use should be designed to be flexible to accommodate both small and large occupiers to increase chances of securing a tenant and adapting to changing industry demands.	None
L&Q	20 5	L&Q note that the Veridion SIL has capacity for expansion of industrial use in its western end, where there is currently vacant land. We recognise that intensification and consolidation of industrial land in the SIL could create potential opportunities to release land for non-industrial uses close to Belvedere Station, provided that the re-provision of industrial floorspace capacity is secured. We also note the creation of flexible (B1c/ B2/ B8) hybrid space to accommodate services that support the wider economy.	None

L&Q	20 6	Veridion Park SIL Option 1 - Whilst L&Q understand the need to protect and maintain industrial uses, this option does not allow for the release of any land for housing. L&Q would suggest that if this option is pursued, the additional industrial land is used to re-locate businesses that are displaced from West Thamesmead SIL as a result of land release for residential uses.	None
L&Q	20 7	Veridion Park SIL Option 2- L&Q welcome the principle of releasing industrial land for housing however would anticipate that this option requires long term phasing and could be challenging given multiple land ownerships. Further information would be welcomed on this option.	None
L&Q	20 8	L&Q support the objective to plan for good quality social infrastructure people can easily access to support their day-to-day needs. L&Q agree that it is especially important to invest in existing communities as well as new communities, and to try and create relationships between the two. L&Q support the GLA's aims for a range of facilities across the OA which will enable and support active, vibrant and engaged communities. We understand the need to protect existing community facilities where there is a clear local demand.	None
L&Q	20 9	We support the key infrastructure priorities set out in the OAPF which are education, health, community centres, park and leisure. We agree that these facilities should be located in town centres and close to transport connections to ensure they are accessible. We would welcome further information on how social and community infrastructure will be funded.	Acknowledged
L&Q	21 0	L&Q support the GLA's objective to improve the quality, functionality and accessibility of existing green spaces. We agree that the OA's natural assets- green spaces, water bodies and Sites of Importance for Nature Conservation (SINC)- should be protected and enhanced as part of the regeneration of the area.	None

L&Q	21 1	L&Q note that the OAPF requires new developments to improve the green infrastructure network by reducing traffic, creating boulevards and pocket parks, introducing green roofs and walls, providing flood storage, and introducing various planting specimens. In addition, new developments are required to support and secure management of new and existing open spaces and ensuring new public spaces and routes are well-lit and safe. Whilst L&Q understand the need to enhance green infrastructure, consideration should also be given to the cumulative impact these requirements can cause to project viability and that some sites are constrained in ways that make these requirements challenging to achieve.	None
L&Q	21 2	L&Q support the GLA's objective to address flood risk, waster use and waste water through natural flood management methods. L&Q note that the OA is in Flood Zone 2-3 and is therefore at a high risk of flooding from various sources. We are aware of the implications this can have on the use of ground level spaces for residential accommodation.	None
L&Q	21 3	The OAPF encourages new development to maximise opportunities for source control features, permeable paving, blue and green roofs, rain water harvesting, green walls and other means of SuDS to help reduce discharge to greenfield run off rates. Whilst L&Q understand the need to mitigate flood risk and promote sustainable use of water, we would highlight that the most suitable ways of doing this should be agreed on a site by site basis and taking into consideration all other relevant, competing design and policy considerations. In particular, green walls and blue roofs are considered difficult to maintain and costly to repair if they become faulty which can impact on building management costs and service charges.	None

L&Q	21 4	L&Q support the GLA's objective to create a smart, integrated energy system that allows new developments to achieve net zero carbon and the opportunity for existing buildings to connect to a low carbon heat network which will help provide high quality, energy efficient, new homes for our residents.. We understand the role heat networks play in achieving the draft New London Plan zero carbon by 2050 target.	None
L&Q	21 5	In our experience, developments are being brought forward with capabilities to connect to a district heat network but it is often the case that a district heat network has not been established to connect into. L&Q would welcome further information on LB Bexley and RBG's plans to bring forward district heat networks in the OA. In the meantime, in circumstances where there are no existing or planned heat networks, such as in this OA, there should be flexibility on providing infrastructure to connect to a heat network where one is not planned in the near future.	Acknowledged
L&Q	21 6	We understand the importance of providing on-site renewable technology but would request that where PV is concerned, the competing requirements for roof space and overshadowing studies are taken into consideration.	None
L&Q	21 7	L&Q welcome the 'Energy Masterplan' that is being prepared by GLA and LB Bexley which seeks to create a heat network in the OA. We would welcome further information on the progression of this document and likely timescales for a future heat network to be delivered.	Acknowledged
L&Q	21 8	L&Q note the requirement for post construction energy performance to be reported and monitored. We agree that monitoring and reporting is required for calculating the final Carbon Offset Contribution, however, potential requirements to monitor energy use beyond this should be consulted on to ensure this is practical and reasonable.	Acknowledged

L&Q	219	L&Q support in principle the GLA's objective to reduce waste, increase material re-use and recycling, and support the circular economy. We note the requirement for the preparation of a Circular Economy Statement for large scale developments and would request that a practical approach is taken by the GLA as to whether there are realistic and viable prospects of re-using and recycling materials within any existing buildings	None
L&Q	220	L&Q support, in principle, the OAPF's strategic framework which seeks to deliver Good Growth and ensure that existing and new communities benefit from investment in the area. We support the spatial concepts which seek to 'create welcoming arrival spaces', 'connect local centres', 'use the transit corridor to connect local trips', 'overcome major obstacles', 'stitch assets and neighbourhoods together' and 'connect local economies'. We agree that these principles need to be focussed in Thamesmead and Abbey Wood which provide the largest 'areas of change' and 'development sites' as per the Spatial Framework map.	None
L&Q	221	The OAPF also refers to Plumstead as an 'area of change' and we would strongly agree that Plumstead requires investment, however we are concerned that it may not reach its full growth potential as it currently falls outside the OA. We would be interested to understand if the GLA has considered including Plumstead within the remit of the Thamesmead and Abbey Wood OA.	None
L&Q	222	L&Q support the vision for West Thamesmead and Plumstead to have an improved town centre, high street, industrial and residential offering. As mentioned previously, we welcome further information on how the GLA envision employment sites will be intensified and how this can be achieved appropriately alongside housing delivery. We strongly support proposals to improve transport connections to and from the area.	Acknowledged

L&Q	22 3	L&Q support the vision for Thamesmead Town Centre and Waterfront to combine the best of city and natural landscape but would welcome more information on how natural landscape will be preserved without limiting the areas growth potential. We particularly welcome a new transport interchange here to reconnect it to the wider OA and the wider London area. We agree that this significant level of change does require careful phasing and meanwhile uses to overcome any negative impacts on existing communities and businesses during construction.	Acknowledged
L&Q	22 4	L&Q support the vision for improved transport connectivity in this area to allow residents better access to opportunities in the wider OA and London. We support an improved neighbourhood parade as this will boost local economic activity.	None
L&Q	22 5	L&Q support the vision for Abbey Wood following the arrival of the Elizabeth line and making this area a gateway into the OA. We support the provision of local amenities around the station and creating new routes to Southmere Lake. We support the creation of a new hub for sports, health, leisure and community at Southmere Lake and would welcome further information on how this type of infrastructure will be funded.	Acknowledged
L&Q	22 6	L&Q support the vision for East Thamesmead and Veridion Park to provide new industrial facilities as well as estate regeneration opportunities to deliver high quality new homes. Our comments on the future of Veridion Park SIL are set out above.	None
L&Q	22 7	L&Q note that the GLA are consulting of different types of delivery structures to ensure the OAPF is updated and fit for purpose. The idea of a Strategic Delivery Board, Developer and Landowner Forum, Community Consultation Panel and Utilities Forum is supported, and we would be interested in receiving further information on these groups when available.	Acknowledged

L&Q	22 8	We welcome the preparation of a detailed Development Infrastructure Funding Study to identify costs and funding mechanisms for new infrastructure. L&Q would request that developers are given early indication on funding mechanisms.	Acknowledged
LB Bexley	22 9	Given that Bexley is one of two boroughs within the opportunity area, the Council is highly disappointed that the Greater London Authority (GLA) launched the public consultation without the Council's endorsement. Our concerns with this process are presented below.	None
LB Bexley	23 0	Notwithstanding this, LB Bexley welcomes in principle the draft OAPF as helpful and relevant guidance setting out how many of the opportunities and challenges facing the opportunity area can be addressed. However, the OAPF misses a number of key opportunities to set useful frameworks and support the delivery of key physical and social infrastructure to the area; our main concerns in this regard relate to: <ul style="list-style-type: none"> • the failure to make a strong case for transport infrastructure within Bexley, in particular to extend the DLR from Gallions Reach beyond Thamesmead to Belvedere and to implement the proposed Bus Rapid Transit route in full, given that both schemes would unlock significant potential for development within the opportunity area and the neighbouring Bexley Riverside OA; • the lack of guidance on estate regeneration despite the fact that the vast majority of Bexley's residential development capacity is potentially from this source; and • the need to identify definitive requirements for social and community infrastructure in line with the approaches of both local authorities. 	Amended
LB Bexley	23 1	The Council is disappointed that the GLA published the draft for public consultation without first securing an endorsement from the borough.	None

LB Bexley	23 2	Bexley is one of only two boroughs within the opportunity area. The guidance presented in the document will be a material planning consideration in the determination of applications in the borough. The OAPF will have a significant influence over development within this area. Thamesmead and Abbey Wood is also one of the borough's most important areas for regeneration, identified as a Growth Area in the adopted Growth Strategy (2017) and the centre of the borough's only designated Housing Zone.	None
LB Bexley	23 3	Despite the significant impact that this guidance will have on the future development of one of Bexley's most important growth areas, the GLA decided to launch the public consultation without sign off from the Council.	None
LB Bexley	23 4	The decision to take a noncooperative approach was surprising because it was at odds with the largely collaborative working style that previously characterised the production of the document over the last three years. Beginning in December 2018, Council officers had begun to comment on different iterations of a draft document, however in late 2019, the GLA suddenly imposed a deadline by which the councils needed to sign off on a final version of the draft for public consultation. Unfortunately, the timetable did not provide sufficient time for the Council to properly discuss its concerns or approve the document through its established procedures.	None

LB Bexley	23 5	The publication of a draft for public consultation without the endorsement of the local authority meant the Council could not properly exercise its right to decide what is best for their area. This role is important not only because councils are best placed to understand local needs and circumstances, but also because they have legal responsibilities to their residents. The Mayor's own draft London Plan reiterates the importance of local council involvement in the production of OAPFs; paragraph 2.14 in support of draft Policy SD1 Opportunity Areas is clear that "frameworks must be prepared in a collaborative way with local communities and stakeholders".	None
LB Bexley	23 6	The decision appears to have been driven by the desire of developers of a proposed scheme on the Greenwich side of the opportunity area to submit a planning application by a certain deadline and use the OAPF as a material consideration in the determination. Not only is it inappropriate for a developer to drive the timetable of a strategic planning document, but in the end the guidance set out for that site in the draft document is so lacklustre that it is unlikely to make a significant difference to the determination of that planning application, particularly given the low weight given to a draft public consultation version of an OAPF.	None
LB Bexley	23 7	OAPFs must be comprehensive without being excessive. If they become too long or contain superfluous information, then key approaches and guidance risks being lost within an enormous document. At over 200 pages, the draft Thamesmead and Abbey Wood OAPF would be one of the longest OAPFs if adopted.	Acknowledged
LB Bexley	23 8	To make the document more accessible and place greater emphasis on key elements, the GLA should undertake an editing exercise. Some elements, such as the pre-consultation engagement boards and summary of feedback, could be relocated to an appendix. Finally, the GLA might wish to cut text which is not spatial or does not deal with infrastructure.	Acknowledged

LB Bexley	23 9	The Council welcomes the document for setting a vision for the development of the area over the next two decades that is shared by the boroughs, the GLA, TfL, and other stakeholders. Although we are concerned about some aspects of the approaches for realising this vision, the vision itself is ambitious yet realistic and it informs most of the guidance that follows in the document.	None
LB Bexley	24 0	One element which is key to helping Thamesmead and Abbey Wood to realise its potential is skills and training. The issue was raised and discussed as part of the pre-consultation engagement, as noted repeatedly in the summary of those exercises, and then the OAPF addresses it with ambitions for facilities to train people in new types of skills, including those related to the construction industries in new facilities in East Thamesmead. However there is no reference to skills and training within the Vision or the Objectives.	Amended
LB Bexley	24 1	The Council recommends embedding ambitions for skills and training as a key piece to delivering Good Growth in the area by adding a reference to it in the Vision. This should then be addressed in more detail with a short discussion of skills and training within one of the Objectives and the baseline analysis.	Amended
LB Bexley	24 2	Abbey Wood vision: bus and transit improvements should be mentioned 4.4. Similarly, the vision for Abbey Wood (page 55) makes no mention of bus and transit improvements. Improvements to public transport infrastructure are referenced throughout the document and are a key component of the growth scenarios. The Council recommends including a short discussion of bus and transit improvements within the vision for Abbey Wood.	Amended
LB Bexley	24 3	Make the case for transport infrastructure in Bexley 5.1. The draft OAPF and accompanying Transport Strategy fail to make a strong case for transport infrastructure within Bexley.	None

LB Bexley	24 4	The draft OAPF itself notes that one of its main purposes is to build the business case for the delivery of transport links. OAPFs should be aspirational documents which set out potential levels of growth as incentive for infrastructure investment. Unfortunately the document's ambitions for new transport infrastructure within Bexley is anaemic.	None
LB Bexley	24 5	Bexley has a systemic deficit in transport provision compared with inner and much of outer London. Frustratingly, the document repeats a historic pattern of underinvestment in transport infrastructure in the borough. Repeatedly, major transport infrastructure opportunities have stopped at our boundary: the Elizabeth Line, the old Greenwich waterfront transit, and now the draft OAPF continues this with its proposals regarding the BRT pilot and DLR extension.	None
LB Bexley	24 6	The disparity in the ambitions for Greenwich and Bexley is thrown into sharp relief by the draft document. For example, under the High Growth Scenario, in addition to the new Elizabeth line station, Greenwich would benefit from the pilot section of the proposed BRT scheme, a DLR extension, and improvements to local bus services. Under the same scenario, Bexley would enjoy only the local bus improvements.	None
LB Bexley	24 7	It is the Council's strong belief that DLR is essential to securing enhanced levels of growth within Thamesmead and Abbey Wood as well as in Bexley Riverside. The failure to emphasise the onward extension of DLR to Belvedere represents a significant missed opportunity.	Amended

LB Bexley	24 8	Evidence suggests that the extension of the DLR beyond the Moorings would unlock significant increases in residential development. The testing clearly shows that some sites could accommodate more growth with the extension whilst other sites would only come forward if unlocked by this infrastructure. This potential exists within Thamesmead and Abbey Wood as well as in the neighbouring opportunity area, Bexley Riverside. It should also be noted that additional capacity is not facilitated simply by the DLR service itself, but by that service being complemented by the 'loops and feeders' feature of bus transit, which will maximise the impact of both Crossrail/C2E as well as DLR. In addition to significantly greater development capacity in east Thamesmead and around Belvedere, the full DLR extension would create an important connection to the major employment hub in the Belvedere industrial area. The Belvedere industrial area is identified by the current and draft London Plans as a Strategic Industrial Location and the Plan's evidence base identifies Belvedere as a "prime" location with an important role to play in supporting London's industrial activity, particularly with regard to logistics ² . The DLR extension would improve connectivity to Belvedere from Thamesmead and East London, greatly enhancing those areas' access to employment opportunities. These opportunities will grow as Belvedere realises its potential as a future District centre with capacity for commercial growth.	None
LB Bexley	24 9	Whilst the documents each make a passing reference to the potential to extend the DLR to Belvedere, it should be amended to place further emphasis on this part of the scheme.	Amended
LB Bexley	25 0	The Council welcomes the inclusion of the potential DLR extension to Belvedere in the Key proposals map (Fig. 1.3). The scheme is also shown in other diagrams throughout the document, but there are some in which it is not shown at all. The Council recommends that the document is revised to show the potential DLR extension to Belvedere (as depicted in Fig 1.3) in all relevant diagrams; specifically, the extension should be shown diagrammatically in Fig. 2.1, Fig. 3.8, Fig. 4.1, Fig. 5.1, and Fig. 5.30.	Amended

LB Bexley	25 1	The potential DLR extension to Belvedere should also be emphasised in the OAPF text. Currently, the only textual discussion is on page 80 in the context of the high growth scenario where, after five paragraphs discussing a DLR extension from Gallions Reach to Thamesmead town centre, there is one short paragraph about connecting to Belvedere in the long term. The proposed DLR extension to Thamesmead is referenced in other parts of the document and discussed in detail on page 72, but the potential extension to Belvedere does not receive the same emphasis.	Amended
LB Bexley	25 2	Bexley recommends that the draft OAPF is amended to include references to the potential extension in all relevant parts of the document where the DLR extension is discussed.	Amended
LB Bexley	25 3	The accompanying Transport Strategy's treatment of the potential extension to Belvedere is very poor. Although limited, the discussion in the draft OAPF is at least positive; by contrast, the Transport Strategy does not mention the extension even as a potential. The only reference is hidden away in the Transport and Delivery Plan in Appendix B, where the scheme is marked as the lowest priority and kicked into the long term, with no justification for that prioritisation anywhere in the document. The Transport Strategy should therefore be revised to include an open-minded assessment of the potential extension, noting that the majority of the costs of an extension relates to getting across the River Thames and that this would be paid for anyway in the extension to Thamesmead. The discussion should also note that the extension would unlock significant additional capacity for residential development and that it will be the subject of further research and consideration as part of the Thames Estuary Connectivity Study, a project for which the C2E Partnership has received substantial funding from government.	Amended

LB Bexley	25 4	In addition to new text emphasising the potential extension of the DLR to Belvedere, the Council recommends that the BRT scheme is discussed as a comprehensive scheme. Although the evidence supports an extensive scheme from North Greenwich to Slade Green, this is mentioned only once in the document on page 53; the draft OAPF instead focuses almost exclusively on the Woolwich to Abbey Wood section. Additionally, the map of Potential transport options (Fig. 2.1) describes the pilot section as “Proposed BRT transit” and shows the continuation to Belvedere and beyond as “Potential BRT extension”; the figure does not even show the route continuing further west from North Greenwich into Woolwich.	None
LB Bexley	25 5	The OAPF should look beyond the pilot section and set an aspiration for the full route to be realised. Bexley therefore recommends that most references to the BRT scheme should be amended to describe the scheme as “BRT from North Greenwich to Slade Green, with the section from Woolwich to Abbey Wood as an initial pilot project.” Similarly, Fig 2.1 should be amended to show the full route from North Greenwich to Slade Green as “Proposed BRT”; the section between Woolwich and Abbey Wood can be singled out but it should be described as “Proposed BRT pilot section”.	None
LB Bexley	25 6	Section 3.3 A good transport experience 5.14. The elements of a good transport experience set out in section 3.3 would address the challenges that face existing public transport services and identify new services to support journeys both locally and regionally.	None

LB Bexley	25 7	<p>The sub-section on Rail service improvements argues that the creation of a “London suburban metro”, often referred to as the “metroisation” of existing suburban rail services, “could bring frequency and reliability standards of suburban rail services in line with that of other TfL run lines, making rail services a more attractive form of travel” (page 74). The Council supports more frequent and better train services but cautions that “service improvements” should not be at the expense of losing direct access to the current range of London termini. Metroisation would be unacceptable if it relies on the so-called “single terminal approach”, in which the North Kent Line would serve only one terminal. Southeastern trains from Abbey Wood currently offer direct services to Charing Cross, Cannon Street, and London Bridge, whilst Thameslink offers direct services to London Blackfriars and London St Pancras International; the borough’s two other rail lines also offer choice of termini. Beyond being important destinations in their own right which offer access to employment and cultural opportunities, these termini are key interchanges from which residents can access trains to many other parts of London, the UK, and even mainland Europe. The single terminal approach would lengthen the journeys of those residents who have located near a station for its direct service to their place of work.</p>	None
LB Bexley	25 8	<p>Additionally, the Council would oppose the introduction of more metro-style carriages that would see a reduction of seating in favour of more standing room. Public transport should be accessible to all regardless of ability, including being able to sit down.</p>	None

LB Bexley	25 9	<p>Clarifying transport infrastructure to support high growth scenarios</p> <p>5.17. The growth scenarios described in section 3.4 must be clearer that the high growth scenarios do not include the uplift that could be realised by extending DLR to Belvedere and transit beyond Abbey Wood. The current draft is unclear if those infrastructure improvements reflected in the high growth scenario. In the figure summarising the high growth scenario on page 80, it sets out that the transport infrastructure required to support the scenario is “Elizabeth line opening, Bus Transit (Pilot), and proposed DLR extension to Thamesmead and potentially onwards.” This could imply that the 15,000 homes and 8,000 jobs in this scenario are based in part on the “onwards” extension. The figure should be clarified, with the Homes, People, and Jobs figures qualified with text stating “(potentially more if supported by the onwards extension of the DLR and BRT)”. The confusion could be resolved further if the final paragraph on page 80 were amended to note that the DLR to Belvedere extension could support growth in Thamesmead and Abbey Wood beyond that shown in the high growth scenario; the text should read “In the long term, a potential extension of the DLR to Belvedere could support further housing and employment growth in the eastern part of the opportunity area beyond the growth level set out in this scenario. This extension would also support significant growth in the neighbouring Bexley Riverside OA. ...”</p>	Amended
LB Bexley	26 0	<p>Chapter 4 Spatial Strategies</p> <p>6.1. This section sets out distinct strategies to help deliver the OAPF Vision and objectives: on commerce (town centres, local businesses and employment), on social and community infrastructure, and on the environment, energy, and utilities. The strategies ensure a coherent approach to forthcoming developments and interventions.</p>	None

LB Bexley	26 1	<p>Add guidance on estate regeneration</p> <p>6.2. Despite the comprehensive nature of these strategies, the document fails to set out an approach to one of the most significant sources of housing in the opportunity area: estate regeneration.</p> <p>6.3. The majority of the development capacity within the Bexley side of the opportunity area is from estate regeneration. The Mayor recognises the genuine benefits that estate regeneration can bring when undertaken successfully, noting in the Good Practice Guide to Estate Regeneration that schemes can deliver an increase in housing including more homes of all tenures, with better homes for local people living on the estate, improvements to neighbourhoods, and new community facilities³. The good practice guide also notes that estate regeneration is a sensitive issue fraught with political and personal challenges. Although the Mayor’s Good Practice Guidance and Policy H10 in the draft London Plan – both of which are referenced in passing in the draft OAPF – set out good principles, the unique challenges faced by different schemes are best supported with bespoke guidance developed with regards to the circumstances of the local area. Thamesmead presents a unique situation for estate regeneration, including the sheer quantum of potential regeneration, the complex and extensive phasing associated with those schemes, a single Registered Provider, and the fact that the area crosses borough boundaries. This situation demands the production of estate regeneration guidance that applies existing Mayoral policy and guidance to the specific circumstances of Thamesmead. The OAPF is the natural home for such guidance.</p>	Addition
LB Bexley	26 2	<p>6.4. Unfortunately, estate regeneration is hardly referred to in the draft. The Council is concerned by the lack of profile overall given to regeneration/housing. Regeneration/housing should be so important that a new strategy on estate regeneration should be added to the existing strategies in chapter 4.</p>	Addition
LB Bexley	26 3	<p>6.5. The Council suggests the guidance based on the following bullet points, which reference design, construction methods, access to services, collaborative and joint planning techniques, consultation and resident ballots. This guidance should inform both the content of planning applications as well as their evaluation. In particular the following challenges should be highlighted:</p>	Addition

LB Bexley	26 4	<ul style="list-style-type: none"> • decants from current homes <p>Regeneration schemes require considerable resources to undertake and often do not provide a significant additional supply of housing by unit count and put pressure on existing affordable housing allocations to accommodate decant requirements. To reduce the impact of such schemes and ensure there are sufficient resources to deliver them, partnership working is required to develop a managed and fully funded programme of estate renewal, phased in such a way as to enable a practicable decant strategy which does not reduce the overall supply of affordable housing and increases it wherever possible. The use of outline applications incorporating a large site or more than one site can provide an opportunity to explore the phasing of development so as to mitigate the some of the impacts of decanting.. The 'right of return', as required by the Mayor, also needs to be considered as part of the decant strategy.</p>	Addition
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LB Bexley	26 5	<ul style="list-style-type: none"> • the importance of phasing and demolition in terms of housing delivery numbers and any potential loss of New Homes bonus <p>Consider the implications of the proposed decant strategy and the phasing of demolition and rebuild to ensure impacts on the overall affordable stock and loss of any New Homes Bonus, is minimised. This should ensure that new housing provided through estate renewal will re-provide the existing level of affordable housing with equivalent habitable floorspace, or if potentially increase provision, on site or as part of a programme approach and with a dwelling mix of homes that meets current and projected housing need. To assess the maximum level of affordable housing that a scheme can deliver, applications should follow the Viability Tested Route. Adhering to this guidance would satisfy draft London Plan policy H8 on the loss of existing housing and estate redevelopment, particularly Part D which prohibits demolition of affordable housing as part of estate regeneration where it is not replaced by an equivalent amount of affordable housing floorspace.</p>	Addition
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LB Bexley	26 6	<ul style="list-style-type: none"> • additional requirements for social and physical infrastructure including school place planning <p>If supporting social and physical infrastructure investment is not secured, the borough's capacity for sustainable growth will decline significantly. It is expected that major housing schemes will need to safeguard space for the transport infrastructure of the future. Within Thamesmead, schemes close to the North Kent Line will need to be designed to ensure they do not preclude future four-tracking, and schemes along Yarnton Way will need to provide sufficient space to accommodate the proposed BRT. Applications for schemes which fail to safeguard space identified as potentially required for future transport infrastructure should be refused. It will also be necessary to plan for additional social and community infrastructure such as school place and obtain resources to do this - for example, Peabody are contributing the cost of a 1 x FE (First Entry) in the Housing Zone.</p>	Addition
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LB Bexley	26 7	<ul style="list-style-type: none"> • potential for meanwhile use pending redevelopment <p>Review the benefits/disbenefits of any ‘meanwhile’ use on sites pending redevelopment guided by planning policy as appropriate. The provision of a meanwhile use is a material consideration in the determination of planning applications; schemes that would provide temporary public realm, meanwhile use for housing, or pop-up spaces for cultural or creative activities are considered to provide a public benefit in line with a number of draft London Plan policies (D8 part M, H3 and HC5 part 4). Some sites in Thamesmead have been cleared and might represent opportunities to utilise the space. There will always be a requirement for some element of temporary accommodation (TA) while more permanent arrangements are secured. In this context schemes should consider the potential to supply good quality TA to meet our requirements. This could also include the use of short-term lettings in regeneration scheme properties that are empty awaiting redevelopment. The use of modular housing on ‘meanwhile sites’ should also be considered; sites awaiting redevelopment, but only in locations offering quality, accessible local accommodation for families</p>	Addition
LB Bexley	26 8	<ul style="list-style-type: none"> • resident engagement and securing buy-in for regeneration <p>In planning for growth and regeneration, residents should stay close to friends and family maintaining informal support networks as their circumstances change. A mix of accommodation types will ensure the local housing stock provides choice in terms of size and tenure, creating options for existing residents to stay in the area if they wish and for new residents to join local communities that are strong, vibrant, stable and self-sufficient. Effective engagement with the existing community will be essential. The impact on community cohesion and opportunities to create new welcoming communities should be considered through appropriate appraisals.</p>	Addition

LB Bexley	26 9	<ul style="list-style-type: none"> • use of CPO powers <p>Land assembly is usually the key to unlocking sites for comprehensive redevelopment and the use of statutory Compulsory Purchase Powers (CPO) enables this to happen. However, CPO powers will only be used in carefully selective circumstances, in the public interest, to enable comprehensive redevelopment for high quality regeneration. There must be an evidenced business case to support redevelopment, as opposed to refurbishment and the benefits must be clearly demonstrated before taking this course of action.</p>	Addition
LB Bexley	27 0	<p>6.6. This suggested guidance sets out an approach to estate regeneration that will optimise the benefits whilst addressing the unique challenges faced by schemes in Thamesmead and Abbey Wood. The Council welcomes continued engagement with the GLA to develop guidance that will deliver estate regeneration that realises the vision and objectives set out by the draft OAPF.</p>	None
LB Bexley	27 1	<p>7. Chapter 4 Spatial Strategies Section 4.1 Town Centres, Local Businesses and Employment Spatial Strategy: Veridion Park SIL needs further articulation of the approaches</p> <p>7.1. The Council welcomes the inclusion of a spatial strategy for Veridion Park. Veridion Park offers potential to accommodate exciting new industrial and related uses, both benefitting and producing agglomeration effects with existing facilities within the Strategic Industrial Location (SIL) including the Engine House. There is also potential for the site to provide uses related to the creation of a new construction-related further education facility in East Thamesmead, which is a key ambition for the Council.</p>	None

LB Bexley	27 2	7.2. The two options proposed require further textual explanation to make clear the differences between them. Option 1 sets out industrial intensification on part of the site and the creation of flexible (B1c/B2/B8) hybrid space on the other, whilst Option 2 calls for industrial intensification across the site. It is unclear why the creation of a flexible hybrid space would not represent industrial intensification, particularly if it includes B2 and B8 uses, both of which are suitable for SIL. Furthermore, the name given to Option 1 is "Retain existing land use" but the option would introduce a B1 use onto the site. The Council therefore suggests that some text is added to the body text to explain the principles that are set out in the diagrams and text boxes.	Amended
LB Bexley	27 3	7.3. The section suggests that intensification of Veridion Park could provide additional capacity that would allow the release of designated industrial land for non-industrial uses within the neighbouring opportunity area at Bexley Riverside in an allusion to the no net loss policy in the new London Plan.	None
LB Bexley	27 4	7.4. Whilst the Council welcomes the acknowledgement of the intrinsic interrelationship between land use and other proposals within both opportunity areas, and the principle of potential employment land release within the area this particular reference is problematic. Firstly, it is unlikely that development of industrial facilities within Veridion Park will create additional capacity on its own could accommodate release elsewhere, because of the way that additional capacity is calculated. Much of Veridion Park is vacant; this means that additional capacity on the site only counts on floorspace above a 65 per cent plot ratio. This means any additional capacity secured through the intensification of Veridion Park is unlikely on its own to accommodate release elsewhere.	Amended

LB Bexley	27 5	7.5. Secondly, the approach set out in the draft OAPF presupposes the findings of the Industrial Land Strategy currently being produced by LB Bexley. The ILS will set out a proactive plan-led spatial approach for the management of the borough's designated industrial land. Given the many factors involved in identifying sites for intensification or release, it is unclear at this stage how the ILS will approach Veridion Park and the designated industrial land around Belvedere station.	None
LB Bexley	27 6	Section 4.2 Social and Community Infrastructure 7.6. The provision of necessary social and community infrastructure is essential to sustainable development within the opportunity area. It is imperative that development is accompanied by the right levels of new and enhanced social infrastructure to ensure that communities have access to sufficient and high-quality services. Infrastructure should be tailored to serve all elements of the community, including those with disabilities. The Council welcomes the identification of social infrastructure requirements in the draft OAPF to inform the proper planning of development in the opportunity areas.	None

LB Bexley	27 7	7.7. The social infrastructure requirements set out in section 4.2 are based on extensive collaboration between relevant officers at LB Bexley and RB Greenwich with their counterparts at the GLA. This work should be continued after the close of the public consultation, with further dialogue to confirm that the assumptions and outputs are factually accurate and reflect the approaches taken by the boroughs. Within Bexley, the Bexley Playing Pitch Audit details current and future demand for formal outdoor sports provision. The audit identified a deficit of these facilities within Thamesmead. To address this deficit, the draft OAPF should be amended to reference the need for formal outdoor sports provision; the discussion of the football pitches at the Thamesmead Sporting Club is a good jumping off point, but this should be enhanced with more detailed language about formal outdoor sports provision at an expanded club (as indicated by the “potential outdoor sports provision and community spaces for all ages” shown in Fig 4.11) as well as in other locations across the opportunity area.	Amended
LB Bexley	27 8	7.8. Page 112 is titled “Emergency Services” but focuses exclusively on the London Fire Brigade. There is no text regarding the need for additional police infrastructure; can the GLA confirm that no such infrastructure is required? Even if not, then a short discussion of the existing provision and how that will satisfy need should be included, with a positive statement about the role of the Metropolitan Police in keeping communities safe.	Amended
LB Bexley	27 9	8. Chapter 6 Delivery and coordination 8.1. The Delivery chapter sets out three recommendations to deliver growth in the opportunity area in a way that will realise the vision and meet the objectives articulated by the draft OAPF.	None

LB Bexley	28 0	Relationship between growth and investment 8.2. The Growth Scenarios sub-section (page 191) notes that growth is intrinsically linked to the delivery of strategic public transport connections. It is a reciprocal situation: growth is only possible if supported by public transport, but public transport must be justified by growth. The final paragraph of the sub-section states that “any major new public transport scheme in the area will depend on the scale of new growth to make a strong case for investment”, but the document appears almost agnostic on whether the level of growth justifies the cost of transport interventions. The document should be unequivocal that the potential for growth it sets out justifies expenditure on transport, subject to modelling and more detailed analysis from TfL.	None
LB Bexley	28 1	Delivery structure 8.3. Recommendation 1 proposes a delivery structure with one body – the Strategic Delivery Board – managing the overall framework programme and overseeing a funding strategy for delivery of key infrastructure. The structure is appropriate but each of the constituent groups must have clear scopes and authorities. The draft OAPF suggests that the Strategic Delivery Board could be “a continuation of the existing Champion’s Board, jointly led by LB Bexley and RB Greenwich in collaboration with delivery partners (e.g. Peabody) and strategic partners (such as TfL and GLA)” (page 192). The final document should reiterate that if a new bespoke Board is created then it should be based upon the structure of the boroughs leading in collaboration with Peabody, TfL, and the GLA.	Amended
LB Bexley	28 2	8.4. The Developer and Landowner Forum and the Community Panel appear to be largely advisory; to prevent them from becoming talking shops, the Council recommends that procedures are established by which the Strategic Deliver Board must at least consider the recommendations of those bodies.	Amended

LB Bexley	28 3	8.5. Finally, the Utilities Forum would plan for utilities and coordinate delivery. The document should be amended to make clear who the GLA expects to sit on this body. Utilities providers often sit on bodies only when there are clear and urgent purposes, not just to “enable long-term planning”. Unless the GLA receives feedback that providers are willing to sit on such a body, it should not be a core feature of the delivery structure; utilities planning and delivery coordination could instead be the responsibility of Strategic Delivery Board, which could call on utilities providers when and as needed. If, however, providers express a willingness to join such a body, then the Forum should involve not only providers but Council officers and independent advisor, to ensure that decisions on utilities provision are driven not only by commercial considerations but also factors including need, responding to emerging technologies, and mitigating environmental impacts.	Amended
LB Bexley	28 4	Further studies 8.6. The second recommendation is to undertake further studies to gather a more detailed evidence-base and successfully deliver ambitions of the draft OAPF. The Council welcomes this intention but any studies should take account of existing evidence to reduce costs and ensure consistency of approach whilst the draft OAPF should indicate how these studies will be funded.	Amended
LB Bexley	28 5	9. Detailed comments: document-wide 9.1. This section of LB Bexley’s response sets out detailed revisions to be made, mostly for factual purposes. Figure 1.5 9.2. Figure 1.5 is a timeline of the 20-year period of the OAPF within the context of the London Plan and other strategic planning frameworks. Whilst the RB Greenwich Core Strategy is shown, the emerging Bexley Local Plan is not. The emerging Bexley Local Plan should be shown, with the expected plan period 2021-2036.	Amended

LB Bexley	28 6	Trust Thamesmead 9.3. The Governance section in section 1.4 references the three bodies that Peabody acquired in 2014: Gallions, Trust Thamesmead and Tilfen Land. Gallions and Tilfen Land are introduced earlier in this paragraph, but Trust Thamesmead is not explained in terms of its nature and function. A short explanation of the role of Trust Thamesmead should be provided, to make clear what function Peabody took over when it acquired the organisation.	None
LB Bexley	28 7	River crossings 9.4. The draft OAPF notes that the Mayor has “prioritised and is exploring schemes” to address the lack of river crossings in this part of the Thames (page 31). The Council recommends that the detail of these proposed schemes is referenced, including signposting supporting evidence and analysis. Furthermore, the Transport Strategy fails to include any reference to the proposed river crossings despite acknowledging that the failure to provide river crossings prevents easy access to employment opportunities in relatively recent employment hubs at Canary Wharf and Stratford (Appendix A). The Transport Strategy should be updated to include a short discussion of the proposed river crossings and the role they could play in improving orbital connectivity within east/south-east London.	Amended
LB Bexley	28 8	Baseline data: life expectancy and childhood obesity 9.5. The baseline data on life expectancy and childhood obesity are dated (page 47). The London Datastore has similar datasets from the ONS and Department of Health by Ward/MSOA which were updated in 2014 using ONS mid year estimates (though the life expectancy dataset has since been discontinued) ⁴ . This data, or using another source, should be used, instead of relying on the 2011 Census. Furthermore, the Council recommends comparing life expectancy and childhood obesity statistics from the opportunity area with the rest of the boroughs rather than London as a whole.	Amended

LB Newham	28 9	Thank you for the opportunity to comment on the draft Thamesmead and Abbey Wood Opportunity Area Planning Framework (TM&AWOAPF). The London Borough of Newham (LBN) is committed to working jointly with the Greater London Authority (GLA) on the emerging Opportunity Area Planning Frameworks (OAPF's) in the Thames Estuary area, particularly in relation to the emerging Royal Docks and Beckton OAPF (RD&BOAPF). We recognise the importance of infrastructure to support Good Growth, ensuring development maximises opportunities to unlock new employment and housing opportunities across East London.	None
LB Newham	29 0	<p>LBN are supportive of the commitment in the TM&AWOAPF document to explore options as part of the 'high growth scenario' (15k homes and 8k jobs) for a DLR extension from Gallions Reach to Thamesmead Central (via Beckton). The option proposed would not only unlock significant growth and opportunities in Thamesmead, but also for Newham at the largest [area of change] development site proposed in the RD&BOAPF at Beckton Riverside (Strategic Site S01 in Newham's Local Plan). With strong policy support for the DLR extension in the Draft London Plan (2019), Mayor of London's Transport Strategy (2018) and Newham Local Plan (2018) this high priority project would present significant benefits for Newham as well as London (across two OA's) including;</p> <p>Further enhancement to the public transport network, with new destinations accessible by public transport for communities, alongside passive provision for a further DLR extension to Barking;</p> <ul style="list-style-type: none"> · Improved connectivity [and improved journey times] and access to two key employment areas from Beckton to the Royal Docks and beyond; · Provide a much needed sustainable travel option to the car at Beckton in an area poorly served by the current TfL network and currently very car-based; · Unlocks a new neighbourhood including a major town centre, school and a significant number of homes and jobs at Beckton Riverside – the largest site for growth in the emerging RD&BOAPF and Newham's Local Plan; · A station at Beckton Riverside would support a landmark opportunity to champion Good Growth objectives through detailed master planning; · DLR extension identified as a more feasible option to 	None

		<p>build/operate with greater train frequencies;</p> <ul style="list-style-type: none"> · Joins up and supports the highest growth potential across two neighbouring OA's in London through sustainable transport infrastructure. 	
LB Newham	29 1	<p>Noting the above, the DLR extension project is seen as a high priority for supporting growth. It will therefore be critical following adoption of the TM&AWOAPF and as the RD&BOAPF progresses, that the GLA and TfL lead and work positively and jointly with Newham (and other relevant Boroughs) and stakeholders to progress this project closer to delivery through a 'single preferred option'. This includes further work on the extension [and station] alignment and costings.</p>	None

LB Newham	29 2	<p>Whilst, it is recognised that the highest growth scenario will offer greater capacity benefits, it is critical that in pursuit of ‘Good Growth’ principles and benefits for Newham, that sufficient DLR service patterns are considered from the Thamesmead side.</p> <p>In particular the subsequent impacts in relation to DLR capacity and the associated direct travel patterns from the Thamesmead area to key economic areas (including the Royal Docks and Isle of Dogs OA’s which will see significant employment growth) into Central London.</p> <p>This is a key objective within the Local Plan (notably policy INF1) ensuring access to employment and homes is not at the expense of quality of transport service. The growth scenarios therefore in the longer term presented from the DLR will need to be duly considered with respect to service patterns and to ensure there is sufficient transport infrastructure [including capacity] to support areas of significant growth over the OA period. Further to this, LBN will continue to support a wider package of sustainable transport options.</p> <p>This is particularly important in recognising the role of future Bus Transit in Newham to provide a reliable and frequent service [with good coverage across the OA]. This is critical alongside the DLR extension going forward to unlock areas in the Royal Docks and Beckton that may be limited in service by a range of sustainable travel options. As part of the emerging RD&BOAPF, this will be a key consideration in supporting and securing a more sustainable pattern of movement for Newhams existing and future communities and the inter-connectivity with OAs in the wider Thames Estuary area.</p>	Acknowledged
LB Newham	29 3	<p>Going forward, it will also be important that as part of the Mayor of Newham’s participation agenda, that existing communities are listened to and considered throughout evolution of this project. As shared strategic aspirations have been identified above and across the OA document, LBN look forward to collaborating with the GLA as both OA’s documents progress to adoption.</p>	None

Lendlease on behalf of Thamesmead Waterfront JV	29 4	In 2019, a new Joint Venture between Peabody and Lendlease was formed to lead the transformation and delivery of Thamesmead Waterfront. The establishment of the 50/50 Joint Venture between two committed, experienced and capable delivery partners creates a once in a lifetime opportunity to fulfil the potential that the site offers for both Thamesmead and London. These representations to the OAPF document as published for consultation are submitted on behalf of the Thamesmead Waterfront Joint Venture.	None
Lendlease on behalf of Thamesmead Waterfront JV	29 5	Thamesmead Waterfront is a regionally significant opportunity, with the ability to maintain and expand London's competitive edge as a leading global city for the next 50-100 years. It is one of the few remaining undeveloped sites in London that offers the scale and capacity to accommodate significant long-term economic and housing growth quickly, given the scale of Peabody's land ownership across the site.	None
Lendlease on behalf of Thamesmead Waterfront JV	29 6	With regards to how the Thamesmead Waterfront is presented in the OAPF, the Joint Venture considers that the 'Potential Area of Change' should cover a wider area than that currently shown on the OAPF diagrams, to reflect the red line boundary of the Thamesmead Waterfront Joint Venture (as per the plan below):	None
Lendlease on behalf of Thamesmead Waterfront JV	29 7	The Joint Venture welcomes the OAPF's acknowledgement of the importance of the DLR extension in unlocking Thamesmead Waterfront's potential. The case for a DLR extension to Thamesmead is strong, representing a relatively inexpensive, long term investment in a mass transport system, sufficient for the needs of the area and with the potential to extend further into neighbouring areas.	Acknowledged

Lendlease on behalf of Thamesmead Waterfront JV	29 8	The Joint Venture supports the introduction of a Bus Transit system as a complementary measure to the DLR, and acknowledges this may help to accelerate delivery of a small amount of development at Thamesmead Waterfront whilst the DLR extension is being designed and constructed. However, development of material quantum at Thamesmead Waterfront will only come forward if/when the DLR extension is formally committed through the submission of a TWAO and this can be incorporated into the planning assessment.	None
Lendlease on behalf of Thamesmead Waterfront JV	29 9	The Joint Venture notes that new infrastructure is identified as coming forward at Thamesmead Waterfront as part of the "Intermediate Growth Scenario." As any development across the Thamesmead Waterfront site (including social infrastructure) would only come forward if/when the DLR extension is formally committed to by the submission of a TWAO, this should be amended within the OAPF.	None
Lendlease on behalf of Thamesmead Waterfront JV	30 0	As work to assess potential DLR routing options is ongoing, the Joint Venture would expect any land use plans developed for Thamesmead at this stage, including the Thamesmead OAPF and the Beckton Riverside OAPF, to retain sufficient flexibility to respond most effectively to the outcomes of this work.	Acknowledged

<p>Lendlease on behalf of Thamesmead Waterfront JV</p>	<p>30 1</p>	<p>Subject to the outcome of public consultation on the OAPF, alongside other private and public stakeholders, the Joint Venture has committed to play a key role in supporting TfL's operational and procedural decision-making process to develop the next steps of the feasibility work for transport investment into Thamesmead, in particular the DLR extension to Thamesmead Waterfront.</p> <p>The progression of the DLR extension will necessitate both private and public stakeholders on the north and south of the river to work collaboratively and the Joint Venture looks forward to crystallising suitable project management and governance arrangements to facilitate this.</p> <p>The Joint Venture has commissioned transport infrastructure specialists to assess the most efficient method of extending the DLR from north of the Thames, under the river to Thamesmead; this work has identified that the most efficient route for a DLR extension would be a direct extension from Gallions Reach to the Thamesmead Waterfront site. The Joint Venture understands that there is no firm decision on potential route alignments from TfL at this stage and recognises that other routes may offer opportunities to pick up housing schemes north of the river. Various options are therefore likely to be tested and explored, including options for routing via Beckton. The Joint Venture strongly supports the exploration of all possible options as part of the next stage of work to ensure that both deliverability and value for money are maximised.</p>	<p>Acknowledged</p>
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<p>Lendlease on behalf of Thamesmead Waterfront JV</p>	<p>30 2</p>	<p>Additional information to enable the Joint Venture to understand the development assumptions that underpin the growth scenarios outlined within the OAPF, in terms of the density of development anticipated and its spatial distribution, would be advantageous.</p> <p>The Joint Venture recommends that the OAPF makes clearer that in order to meet the OA’s capacity for growth, new development will need to be of a significantly greater density than much of the existing development in the area, in order to make the most efficient use of land and to make the most of increased connectivity and accessibility. In particular, to enable the development potential unlocked by the DLR extension to be maximised, and in accordance with the OAPF’s emphasis on transport interventions serving to enable development and growth and making the best use of land, the Joint Venture would expect to see greater residential densities promoted in the areas best served by a new DLR extension.</p> <p>The Joint Venture considers that the development potential of Thamesmead Waterfront is significantly greater than appears to be implicitly stated in the development potential outlined in the Higher Growth Option of 15,500 new homes and 8,000 new jobs across the entire Opportunity Area. The Joint Venture has commissioned a Development Capacity Study for the Thamesmead Waterfront site which has demonstrated that the site has the capacity for at least 11,500 new homes with the potential capacity for over 15,000. Work undertaken to date has indicated that this level of development is achievable across the site without constituting over-densification or compromising the Joint Venture’s ambitious objectives for the quality of place to be created. Development of this scale will be essential in ensuring that the DLR extension to Thamesmead is delivered, and the Joint Venture would advocate that the OAPF document is amended to consider and reflect this.</p>	<p>Amended</p>
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Lendlease on behalf of Thamesmead Waterfront JV	30 3	Safeguarded Land – River Crossing Land is currently safeguarded for the Thames Gateway Bridge at Gallions Reach and this is identified on Fig. 2.1. The Joint Venture is committed to working with the relevant statutory authorities to eventually lift this designation on the basis that, when approved, the DLR extension would achieve the objective of providing a public transport led connection across the River Thames in this area. The Joint Venture would welcome explicit acknowledgment of this in the OAPF.	Addition
Lendlease on behalf of Thamesmead Waterfront JV	30 4	We would be grateful if you could confirm receipt of these representations and we look forward to engaging further in due course. The Joint Venture is committed to working with all partners to progress Thamesmead Waterfront and would welcome the opportunity to discuss these representations, and the Development Capacity Study work in particular, in greater detail with the GLA.	Acknowledged

<p>London City Airport</p>	<p>30 5</p>	<p>London City Airport is the capital’s most centrally located airport and a critical component of London’s transport infrastructure. Last year, we connected a record 5.1 million business and leisure passengers to over 45 domestic and European destinations. Passenger numbers have increased by over 40% in the past five years and the airport’s current £500m City Airport Development Programme (CADP) will result in the construction of new airfield infrastructure and enhanced passenger facilities. In line with our master plan, which will set out the airports vision for how we can respond to increased passenger demand over the longer term, we forecast that passenger numbers could increase to up to 11 million by 2035.</p> <p>London City Airport is already the best performing UK airport for sustainable transport use, with 69% of passengers using public transport on their journey to and from the airport in 2018. We are targeting further improvements to our excellent surface transport performance by achieving 80% of passengers using public and sustainable transport modes by 2035.</p> <p>Through close collaboration with our stakeholders, including TfL, we believe we can further reduce carbon emissions from our operations and potentially achieve the Mayor of London’s ambitious target of 90% of journeys being by public transport, walking and cycling by 2041. This will include continued investment in the DLR to provide more frequent and earlier DLR services for shift staff and early morning departing passengers, for example, and we retain our aspirations for a new dedicated Elizabeth line station at Silvertown, which could serve the airport and provide improved connectivity in North Woolwich. We are also currently working with stakeholders to explore the potential for connecting with current and future river and bus services in the Silvertown/Royal Docks area.</p> <p>Last year, London City Airport (LCY) achieved carbon neutral status from the international Airport Carbon Accreditation programme for its own business emissions, one of only five UK airports to achieve that status. This includes carbon neutrality for the airport’s electricity and heating of the terminal building and offices, LCY owned vehicles and staff business travel. In February, we also joined industry partners across the aviation and aerospace sectors in committing to Net Zero emissions in 2050, as part of the Sustainable Aviation coalition</p>	<p>None</p>
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London City Airport	306	In line with the Mayor's Transport Strategy to achieve 90% of journeys by walking, cycling and public transport by 2041, London City Airport is keen to enhance public transport connections to the airport, as well as creating walking and cycling opportunities. We are therefore strongly aligned and supportive of the connectivity improvements being considered as part of the Thamesmead and Abbey Wood Opportunity Area Planning Framework (OAPF).	None
London City Airport	307	Connectivity improvements between the Opportunity Area and the Royal Docks area would open up significant opportunities to residents and businesses and support the growth ambitions of the Planning Framework. The provision of a direct link to the airport from the Opportunity Area on the DLR will give residents and businesses from these areas access to more employment and business opportunities, at the airport and the Royal Docks area, as well as access to air travel through their local airport.	None
London City Airport	308	London City Airport is an important part of London's transport infrastructure, it is a major transport hub and is a major employer in east London. Opportunities already exist at the airport for local residents to work here, it is something that we want and are committed to. We have a target of employing 70% of new LCY and onsite employees from our local area which includes the Royal Borough of Greenwich and the London Borough of Bexley. The airport is also a major contributor to a strong and growing economy in east London.	None
London City Airport	309	The airport is well served by the DLR (64% of our passengers used it in 2018) and this demonstrates its effectiveness and popularity. Whilst it is well used we are always striving to increase its use and have, for example, supported improvements through our existing development programme towards this, including new DLR infrastructure and DLR staff and we continue to monitor progress. We are also contributing to and providing improvements to walking and cycling provision.	None

London City Airport	310	<p>The Framework acknowledges that the delivery of the proposed cross-river DLR connection relies on funding and is likely therefore to be a longer-term prospect. Given the interdependencies of delivering a river crossing between the Thamesmead and Abbey Wood Opportunity Area and the Royal Docks and Beckton Riverside Opportunity Area, cooperation between both areas will be important to help with impetus and financial support. The two Planning Frameworks should therefore be aligned to provide a coherent approach and identify mechanisms to provide for its delivery. This will be important to optimise employment opportunities and sustainable access to air travel that other parts of our local area already have access to.</p>	Acknowledged
London City Airport	311	<p>We are mindful of the Mayor's ambitious targets to achieve 99% of travel into London, 90% within inner and outer London zones and 90% to outside London to be made by DLR, bus, walking and cycling. With that in mind we would consider it important for the proposed rapid bus route to connect with the Woolwich Elizabeth line/Woolwich Arsenal stations, as this will optimise connectivity to the wider London transport network and the plans are not clear on this point. Also, we would encourage the GLA to consider providing wharf connections and walking and cycling opportunities as part of any river crossing. A wharf could form part of the Thames river bus route that is planned to Barking Riverside wharf, for example.</p>	Acknowledged

London City Airport	31 2	<p>We have noted that our draft master plan for the airport is not a reference source in the consultation. This provides a high level vision for potential future development to 2035 and was consulted on in 2019. We will publishing our final master plan later this month. Whilst a non statutory document it is prepared to provide an indication of the airport's potential development up to 2035 and should inform local authority land use policy and other strategies. The master plan includes details of surface access ambitions, employment and business growth opportunities, as well as potential noise contour areas and environmental controls. We would welcome the opportunity to discuss our CADP and master plan with you and for further consultation on proposals in the Opportunity Area in due course.</p>	None
Montagu Evans on behalf of Aberdeen Standard Investments	31 3	<p>ASI owns Gallions Reach Shopping Park, which is located in Beckton in the London Borough of Newham. Whilst not located within the area covered by the Draft Thamesmead and Abbey Wood OAPF, it is located close to the Opportunity Area on the northern side of the River Thames.</p> <p>ASI purchased the site in 2006 and has implemented a number of asset management initiatives in order to improve the overall appearance of the park and the tenant mix since its purchase. Following the identification of Gallions Reach Shopping Centre in the Draft London Plan and Newham Local Plan as a new Major Town Centre, Aberdeen Standard is now working to transform the existing shopping centre and create a vibrant new town centre to serve the wider community. The 2018 Newham Local Plan recognises the potential of Gallions Reach to 'co-evolve and intensify to become a Major town centre for the area focused around a transport hub' (pg. 40, 2018 Newham Local Plan). Beckton Riverside (the wider area in which Gallions Reach is located) is designated a Strategic Site in the Newham Local Plan (site ref: S01). It is on these strategic sites that Policy S5 of the Newham Local Plan expects major new housing provision, at least 5,278 residential units, and jobs growth to be concentrated.</p>	None

Montagu Evans on behalf of Aberdeen Standard Investments	314	The draft London Plan also recognises the growth potential of Gallions Reach through designating Beckton Riverside and neighbouring Royal Docks as an Opportunity Area. This growth will create a new Major Town Centre with the opportunity to form a new destination with a distinct character. The draft London Plan assumes 41,500 new jobs and 30,000 new homes in the wider opportunity area.	None
Montagu Evans on behalf of Aberdeen Standard Investments	315	Thamesmead and Abbey Wood is located to the southeast of Gallions Reach, on the south side of the Thames. An extension of the DLR across the river from Gallions Reach to Thamesmead is proposed to connect these two growth areas as part of the Higher Growth Option set out in the OAPF. In addition, the OAPF for Thamesmead and Abbey Wood outlines the ambitions and principles of the OA and conveys important principles of interconnectivity between the areas; both of which are important considerations for the delivery of a new Town Centre at Gallions Reach. It is in this context that we submit representations on the draft OAPF.	None
Montagu Evans on behalf of Aberdeen Standard Investments	316	ASI support the general principles of the OAPF for Thamesmead and Abbey Wood to guide development and particularly supportive of the higher growth option set out in the OAPF	None

<p>Montagu Evans on behalf of Aberdeen Standard Investments</p>	<p>31 7</p>	<p>The OAPF recognises that the lack of river crossing in this area is a barrier to the highest level of growth in Thamesmead and Abbey Wood being achieved. The growth options for the OA are detailed on pages 12 and 13 with further discussion in Section 3 and the accompanying OAPF Transport Strategy.</p> <p>The Higher Growth Option is facilitated by a 'new crossriver DLR connection (mayoral priority) and new partially segregated bus transit corridor' (pg. 13). This Higher Growth Option shows how growth in Thamesmead and Abbey Wood can be enhanced through a cross-river DLR connection between Thamesmead and Beckton</p> <p>We strongly support the location of the proposed cross-river DLR linking the two growth areas (as shown on figure 2.1) and we support the recognition that such a crossing has potential to unlock greater growth in the OA and promote connectivity with Beckton Riverside OA.</p>	<p>None</p>
<p>Montagu Evans on behalf of Aberdeen Standard Investments</p>	<p>31 8</p>	<p>The Growth Options detailed in the OAPF show new homes figures and new jobs figures that can be unlocked by transport infrastructure. The OAPF sets out that the Higher Growth Option could deliver 15,500 new homes and 8,000 new jobs.</p> <p>It is noted that the OAPF Transport Strategy accompanying the OAPF (Appendix E) advises the figures come from transport modelling undertaken by TfL.</p> <p>Appendix D of the OAPF Transport Strategy advises that the size of the model zones does not directly correlate with the Thamesmead and Abbey Wood OA and as a consequence the increase in the number of jobs and homes stem from an area wider than Thamesmead and Abbey Wood OA alone. We would welcome further clarification as to whether these figures include growth potential in Beckton.</p>	<p>Acknowledged</p>

Montagu Evans on behalf of Aberdeen Standard Investments	319	Whilst at an early stage of development, ASI has been considering potential design options for the redevelopment of Gallions Reach, including the potential design and massing opportunities for residential development on the site. We consider the site could support between 3,500 – 4,500 residential units as well as the potential for a wide range of town centre and other uses.	None
Montagu Evans on behalf of Aberdeen Standard Investments	320	As Gallions Reach has been identified as the location for a major town centre, growth on the site is not tied to the provision of the proposed DLR river crossing but we consider that the provision of the link across the Thames would support an increase in development potential from the base position and the delivery of the new town centre. In addition, a new cross-river DLR connection with Gallions Reach will improve access for residents of Thamesmead to employment opportunities, retail, community facilities and other town centre uses at Gallions Reach.	None
Montagu Evans on behalf of Aberdeen Standard Investments	321	The OAPF recognises that the transport schemes identified in the growth options are currently unfunded and recommends a detailed Development Infrastructure Funding Study (DIFS) is undertaken to 'identify costs for providing infrastructure and potential funding mechanisms for this delivery' (pg. 193). We supports a DIFS being undertaken to provide further clarification on funding timescales as well as phasing of future infrastructure projects. We welcome the opportunity to review this in the future.	Acknowledged

Montagu Evans on behalf of Aberdeen Standard Investments	32 2	The Thamesmead and Abbey Wood OAPF is positively worded to support growth and connectivity in the OA and ASI are supportive of its vision, principles and objectives. We strongly support the proposed higher growth transport option which will deliver a much need cross-river DLR connection. We seek further clarification on the study area for the transport modelling which has produced the potential growth figures in the growth options. Notwithstanding this, we consider the proposed DLR river crossing would further growth in Beckton and provide significant benefits in term of access to the emerging Town Centre and jobs for Thamesmead and Abbey Woods Residents.	Acknowledged
Moorings Neighbourhood Forum	32 3	We support the higher growth DLR and bus transit as it will go through the Moorings and will positively affect residents and representatives of the Moorings. We support any idea that will mean that our walkways are safer, better light and accessible to all. Opening up connections between the various parts of Thamesmead.	None
Moorings Neighbourhood Forum	32 4	We support the creation of the proposed information hub within the Moorings which we feel would allow residents to be better connected with each other and informed. Especially in light of the former social club (The Moorings) currently being redeveloped.	None
Moorings Neighbourhood Forum	32 5	We support any venture that will mean that our green spaces and pathways are better used for the benefit of our residents and representatives of the Moorings.	Amended
Moorings Neighbourhood Forum	32 6	We support investment in local culture that allow people to come together socially to create community connectedness. Specifically The Moorings, TACO, Tump 53 and Birchmere Park, all of which fall within the Moorings.	None
Moorings Neighbourhood Forum	32 7	We support any environmental measures which will be beneficial to the health and wellbeing of our residents and representatives of the Moorings.	None

Moorings Neighbourhood Forum	328	Whilst we are in support of the above areas we would strenuously demand that we are continuously consulted and actively involved in progressing any projects or ventures generated from the OAPF. Specifically those that fall within or affect the Moorings.	Acknowledged
MP Abena Oppong-Asare	329	I am writing in response to the Thamesmead and Abbey Wood Opportunity Area Planning Framework. Firstly, I want to thank you for opening up a consultation, giving us access to the OAPF so that we can offer our feedback. I also want to express my gratitude for the OAPF itself. The framework expresses a genuine dedication to recognise and tackle the issues facing the area, primarily problems relating to geographical isolation and the lack of reliable investment and housing redevelopment, or the lack of efforts to mitigate against geographical isolation. I want to thank in particular the efforts of the Royal Borough of Greenwich, London Borough of Bexley, Greater London Authority and Transport for London for making this happen. As the Member of Parliament for Erith and Thamesmead, I want to clarify what I believe are the most important considerations going forward.	None

MP Abena Oppong-Asare	33 0	<p>The first is the affordability of housing. The delivery of 15,500 new and affordable homes is extremely welcome. I am also glad that families are a priority, with 35% of housing being allocated to three to four-bedroom units. However, as you will know, there is a distinction between affordability and genuine affordability, especially in London. I will always push for the largest possible proportion of genuinely affordable housing, so that those on lower incomes receive the largest share in the fruits of the development. In fact, the desire for genuinely affordable housing was something that was noted in the Engagement Feedback Summary on page 21. This is particularly pertinent in the context of rising homelessness. As I raised in the House of Commons on the 29th, the scourge of homelessness should shame us all. We have a moral and political responsibility to satisfy everybody's human right to a safe and secure existence. The OAPF must play a substantial role in this regard.</p>	Acknowledged
MP Abena Oppong-Asare	33 1	<p>The second, intimately connected issue is the environment. The report shows a detailed and fervent commitment to sustainability and environmental protection, notably through an increase in green spaces, and walking and cycling routes. More broadly, I was pleased to see that the new developments will contribute towards London becoming zero carbon by 2050. Firstly, however, you will be aware that the Labour Party wants to aim for net-zero emissions by 2030. This is a target I would strongly encourage the OAPF to meet. Secondly, the weight of the environmental pledge would be significantly increased if there was an indication of how the housing itself will be energy-efficient.</p>	Acknowledged

MP Abena Oppong-Asare	33 2	Thirdly, it is excellent to see the provision of 8,000 new jobs. However, I would like to see more information about the kind of employment being provided. Any new jobs must be secure, well-paid and union-protected; I will strongly oppose precarious forms of employment, namely zero-hour contracts. It would also be welcome to see greater evidence of these jobs contributing to the kind of green economy outlined above.	None
MP Abena Oppong-Asare	33 3	As I stated at the beginning, I am extremely grateful of the existence of a consultation in the first place. Thank you for the summary of the feedback that has already been provided. The OAPF mentions that this consultation is meant to be "ongoing." In that regard, finally, I would be grateful for a schedule of future consultations. This is because I hope the consultation will continue, so that this project is as open and transparent as possible. Developments should have as much democratic input as possible, which means, in my view, the consultation period should be extended far beyond the 12-week period that is suggested. I look forward to working with you in the future so that we make this exciting opportunity a reality.	None
National Grid	33 4	National Grid owns a 50% stake in St William Homes, a joint venture with the Berkeley Group. The partnership combines National Grid's extensive portfolio of surplus brownfield sites across London and the South East with the Berkeley Group's design expertise and proven track record of delivery to create high-quality residential and mixed use developments.	None

National Grid	33 5	<p>The National Grid Beckton Gasworks site in the London Borough of Newham (Beckton Gas Works, Armada Way, Beckton) is one of a number of sites in the St William joint venture.</p> <p>This 92 acre site has the opportunity to deliver housing growth and regeneration in Newham and forms part of a wider allocation in the Newham Local Plan (Strategic Site reference SOI), adopted in December 2018, for mixed use developments delivering new neighbourhoods centred on a major town centre and new station.</p>	None
National Grid	33 6	<p>1. Alignment</p> <p>National Grid welcomes the potential for the incorporation of a new DLR station at Beckton Riverside, around which there is the potential for a new mixed-use neighbourhood, including the delivery of new homes and a major new town centre. However, National Grid believes that the Draft OAPF would benefit from more clarity regarding the DLR extension route alignment through Beckton from Gallions Reach, and the process through which this will be fixed. The Royal Docks and Beckton Riverside OAPF can be the means to fix this alignment.</p> <p>National Grid considers that the preferred alignment for the DLR extension would run via a new station at Beckton Riverside, to the South of Armada Way and to the North of the existing DLR Depot (Appendix 1).</p>	None
National Grid	33 7	<p>2. Additionality</p> <p>A new station at Beckton Riverside would serve to support growth in the Royal Docks & Beckton Riverside Opportunity Area by facilitating the delivery of a new Major town centre and approximately 5,000— 10,000 new homes. It is considered that the addition of a DLR station at Beckton Riverside would increase the delivery of both homes and jobs in the plan period.</p>	None

National Grid	33 8	3. Deliverability National Grid recognises that deliverability is key when considering the potential DLR alignment options. Initial design work has been undertaken by Atkins (a design, engineering and project management consultant), which demonstrates a deliverable DLR alignment option that passes through Beckton Riverside.	None
National Grid	33 9	National Grid welcomes the opportunity to comment on the Draft Thamesmead & Abbey Wood Opportunity Area Planning Framework and supports its aims and ambitions.	None
National Grid	34 0	National Grid considers that the route alignment via Beckton Riverside, which includes the delivery of a new station South of Armada Way, should be the preferred DLR alignment in the Draft OAPF due to its deliverability and the wider additionality it will unlock in the plan period. National Grid would welcome amendments to wording and associated drawings (Appendix 2) of the Draft OAPF and Transport Strategy to reflect the preferred DLR extension alignment.	None
Natural England	34 1	Thank you for your consultation on the above Strategic Planning Consultation, dated and received by Natural England on 19th December, 2019. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England have no comments to make on this consultation.	None
Network Rail	34 2	Thank you for consulting Network Rail on the Thamesmead and Abbey Wood Opportunity Area Planning Framework. We do not wish to make any comments at this stage, however we would appreciate to be included on any further consultations in the future.	None

Port of London Authority	349	<p>Thank you for consulting the Port of London Authority (PLA) on the Thamesmead and Abbey Wood Opportunity Area Planning Framework (OAPF) consultation, which has been prepared to ensure that future investment and growth in the OAPF area is properly planned for and delivered between now and 2041. I have now had the opportunity to review the submitted documents and have the following comments to make.</p> <p>For information, the PLA is the Statutory Harbour Authority for the Tidal Thames between Teddington and the Thames Estuary. Its statutory functions include responsibility for conservancy, dredging, maintaining the public navigation and controlling vessel movements and its consent is required for the carrying out of all works and dredging in the river and the provision of moorings. The PLA's functions also include for promotion of the use of the river as an important strategic transport corridor to London. In addition, the PLA's Vision for the Tidal Thames (2016) (the "Thames Vision") is the framework for the development of the Tidal Thames between now and 2035 and must be considered as part of the development of this OAPF.</p>	Acknowledged
Port of London Authority	350	<p>Vision</p> <p>Welcome reference to the promotion of Thamesmead and Abbey Wood's green spaces and waterways and the recognition within the OAPF that the River Thames is an important asset for the area.</p>	None

Port of London Authority	35 1	Transport: Welcome reference to the proposed DLR extension from the London Borough of Newham into Thamesmead and Abbey Wood as part of the high growth scenario for the OAPF. The PLA must be involved in discussions on such a crossing at an early stage, particularly on the type of crossing (bridge/tunnel) proposed. The OAPF also includes some references to the potential London Overground extension from Beckton to Thamesmead and Abbey Wood and the proposed Gallions Reach Crossing. Again whilst the PLA is supportive of additional river crossings which will help to improve cross river connectivity for people, these need to be sited and designed to allow the full range of river uses to continue and the PLA must be involved in early discussions for any proposed crossings.	Acknowledged
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Port of London Authority	35 2	<p>Support the references within the consultation documents to the potential for a new pier to the north of Thamesmead Town Centre. This is supported by the Thames Vision, which includes the goal to see double the number of people travelling by river by 2035, with Thamesmead mentioned as a specific location for a potential new pier, Thamesmead is also included as a location for a potential new pier in Transport for London’s (TfL) Passenger Pier Strategy (2019).</p> <p>However, it is disappointing that references to the pier within the OAPF documents are inconsistent.</p> <p>Whilst the potential new pier is included within the associated Transport Strategy and on figure 1.3 (key proposals) the pier is not included in the descriptions of the two different growth scenarios as a piece of required infrastructure and is also missing from the vision for Thamesmead Town Centre and Waterfront area and associated figure 2.1 (Opportunities in Thamesmead and Abbey Wood Opportunity Area).</p> <p>The PLA considers that the potential new pier for Thamesmead must be regarded as a key piece of infrastructure for the area, which will help to open up and promote increased activity along the riverside, and will also help to promote modal shift from car use to other sustainable forms of transport including via river, in line the objectives of the OAPF to improve connections and access to opportunities within and outside the OA (Opportunity Area). This is particularly important for the northern parts of the OA which the Transport Strategy identifies in figure 13 (Walk distances to rail stations serving the OA) as an area which has poor access to rail services.</p>	Amended
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Port of London Authority	35 3	<p>Throughout the OAPF documents there are a several references to the following required strategies:</p> <ul style="list-style-type: none"> . Construction and Freight Strategy in the air quality section of chapter 4; . Construction logistics strategy and Infrastructure Delivery Plan in recommendation two (Ongoing studies) of the OAPF; and . A Freight Area Management Plan, in Appendix B of the Transport Strategy. <p>It must be clarified as to whether these are all separate documents or will form one coordinated strategy. On any future freight strategy for the OAPF the PLA considers that this must include full consideration to the potential use of the River Thames for the transportation of construction materials and freight, either directly to riverside sites or via the supply chain, particularly as there are a number of Safeguarded Wharves located to the east of the OAPF area in Belvedere and Erith. The use of the River Thames for the transportation of construction materials and freight will help to improve air quality and reduce congestion for the wider area, in line with objective 3 of the OAPF, to overcome obstacles and promote safe, accessible routes for active travel.</p>	Acknowledged
Port of London Authority	35 4	<p>In addition, the PLA consider that the OAPF must also acknowledge the role the potential passenger pier could play as part of the delivery of small-scale freight, particularly given its proposed location to the north of Thamesmead Town Centre and within an identified 'site of change' where significant growth is proposed. This is supported by the Mayors Transport Strategy (2018) and associated passenger pier strategy which both promote the potential use of passenger piers for small-scale deliveries and business servicing, to further help promote modal shift from road to more sustainable forms of transport and improve air quality.</p>	Addition

Port of London Authority	35 5	<p>Thames Path:</p> <p>Figure 1.3 (Key proposals in the Thamesmead and Abbey Wood OAPF) refers to river frontage improvements along the Thames Path, and the OAPF in general supports the greater use of the Thames Path for recreational and commuting purposes, which is supported. The PLA requests to view the detailed proposals for the areas in the OA highlighted for 'river frontage improvements' including on the proposed lighting, public realm, such as seating and safety measures. As part of any future improvements and developments along the Thames Path and riverside areas, it must be ensured that there is appropriate Riparian Life Saving Equipment (such as lifebuoys, grab chains and escape ladders) provided, to a standard recommended in the 1991 Hayes Report on the Inquiry into River Safety. There must also be consideration of the need for suicide prevention measures in appropriate locations (such as CCTV and signage with information to access support) to be provided as part of new development along the riverside. This is supported by the recently published Drowning Prevention Strategy (2019) (https://www.pla.co.uk/Safety/Water-Safety/Water-Safety) produced by the Tidal Thames Water Safety Forum (including the PLA, RNLI and emergency services).</p>	Acknowledged
Port of London Authority	35 6	<p>On lighting, the OAPF refers to the poor lighting infrastructure along the Thames Path, and the need for this to be improved to address safety concerns and provide more welcoming spaces. Whilst this is supported any future proposed lighting must be designed in such a way as to not have a negative impact on riverside ecology, avoid glare and be specifically located away from sensitive areas, the PLA requested to view any specific proposals as they come forward.</p>	Acknowledged
Port of London Authority	35 7	<p>In addition, as noted in the PLA's response to the OAPF IIA Scoping Report, reference in the must be given in the OAPF to the estuary edges guidance (https://www.estuaryedges.co.uk/) which provides guidance and case studies with regard to ecological design of riverside areas.</p>	Addition

Port of London Authority	35 8	<p>Within the West Thamesmead and Plumstead Spatial Framework chapter, there is a specific reference in figure 5.14 (potential local connections at West Thamesmead and Plumstead) to reactivating the pier as part of the potential improved walking/cycling routes, which could take the form of public art or lighting. To note any specific works to the pier at this location will require a River Works License (RWL) with the PLA. For further information, the PLA licensing team should be contacted on lic.app@pla.co.uk .</p>	Acknowledged
Port of London Authority	35 9	<p>Social and Community Infrastructure:</p> <p>Section 4.2 (Social and Community Infrastructure) states that as part of the OAPF a strategic assessment of social functions needed to support each growth scenario and how these can be physically provided has been carried out. With regard to sports and recreation under the higher growth scenario there is a potential need for two new sports halls and two new community pools (or equivalent) and there is recognition that there are opportunities in the area to improve the usability of green and blue spaces.</p> <p>However it is disappointing that the role the River Thames could play with regard to sports and recreation does not appear to be referenced. The entire riverside along the OAPF area is identified as an extended Sport Opportunity Zone through the Thames Vision, which also includes the goal to see greater participation in sport and recreation on and alongside the river specifically noting that with a growing population in London over the next 20 years, particularly in the east, there is considerable potential for growth in participation, by developing extra capacity an increasing awareness of existing sports provision.</p> <p>The potential use of the River Thames for sports and recreation purposes within the OA must be considered in this section of the OAPF. Within Thamesmead itself there has been a recent planning permission for a boat storage and learning facility at Southmere Lake (ref: 19/01488/FUL) and within Bexley itself there are several other water-related recreational opportunities located at Danson Lake. For users of these existing facilities the potential opportunity to make use of the River Thames in the Thamesmead and Abbey Wood OA for sports and recreational purposes will further</p>	Addition

		help to encourage increased movement and activity in the area and help to meet the objectives of the OAPF.	
Port of London Authority	360	<p>Glossary:</p> <p>Consider that the Thames Path National Trail must be added to the glossary, highlighting the wider route and importance of the path and the need to join up the path from source to sea, including creating access for local communities to it and keeping the path well maintained.</p>	Addition

Port of London Authority	36 1	<p>Future Documents:</p> <p>In addition to the proposed freight plan mentioned above, there are several other supporting documents recommended to be developed to support the OAPF, including:</p> <ul style="list-style-type: none"> . A detailed Development Infrastructure Funding Study (DIFS): to identify the cost of infrastructure required to support development in the OA. This must consider further details both on the proposed passenger pier and potential sports and recreational uses on the River Thames; . A Riverside Strategy which will specifically look at flood risk and drainage, and the incorporation of green infrastructure as part of development plans and local master plans in riverside areas; . Green and Blue Infrastructure Strategy; . Wayfinding Strategy; . Creative and Cultural Strategy; and . Detailed Area Masterplans (particularly of the Thamesmead Waterfront and Town Centre area). <p>The PLA request to be able to view and comment on these documents as they are developed.</p>	Acknowledged
Savills on behalf of Thames Water Planning Policy	36 2	<p>Thames Water are the water and sewerage provider for the area. Crossness Sewage Treatment Works is located immediately to the East of the opportunity area and consideration to its ongoing operation should be taken into account when allocating development adjacent to it, ensuring that future occupiers of new development would not be adversely affect by issues of noise or odour.</p>	Acknowledged

Savills on behalf of Thames Water Planning Policy	36 3	Page 41 makes reference to flood risk but should be expanded to cover all sources of flood risk including sewer flooding. The scale of development proposed will result in increased demands on the sewer network and it will be essential that development is aligned with any sewer network reinforcement works necessary to accommodate the growth in order to avoid adverse impacts such as sewer flooding. In relation to the references to the need for improvements to the sewer network on p124 this is supported.	Addition
Savills on behalf of Thames Water Planning Policy	36 4	<p>With regard to SuDS, Thames Water supports the use of SuDs and a sequential approach to surface water run-off and its management as close to source as possible. As such we support the references to SuDS on p124 of the document.</p> <p>SuDS provide opportunities to reduce the causes and impacts of flooding, remove pollutants and provide amenity, recreation and wildlife benefit. In particular developers should ensure that surface water run-off is managed as close to source as possible and should aim to achieve greenfield run-off rates.</p> <p>With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground or watercourse. It is only when all options have been exhausted and there is not practical reason for using sustainable drainage that developers should seek connection to the public network. It is important to minimise the quantity of surface water entering the public system in order to reduce the risk of sewer flooding.</p>	None

Savills on behalf of Thames Water Planning Policy	36 5	<p>Water Efficiency</p> <p>The South East region is identified as a serious water stress area by the EA. Thames Water strongly supports policies that maximise the potential for water conservation and water efficiency in new development. Thames Water therefore supports the requirement on p124 for new dwellings the optional target within the building regulations (105 litres per person per day) for residential developments and BREEAM Excellent for non-residential as a minimum. This should be a condition of any planning permission to ensure that the standards are applied through the Building Regulations.</p>	None
Savills on behalf of Thames Water Planning Policy	36 6	<p>Integrated Water Management Strategy (IWMS)</p> <p>Thames Water support the reference to the 2017 IWMS on p122 of the draft OAPF. The provision of a IWMS can help to deliver the development within the opportunity area while minimising the demand on clean water and reducing the impact on wastewater infrastructure.</p> <p>We would welcome early engagement with developers to discuss water supply and drainage requirements of development proposals to ensure that they are understood and that any upgrade requirements are identified. All developers should be encouraged to contact Thames Water Developer Services in advance of the submission of planning applications.</p> <p>Information for Developers on water/wastewater infrastructure can be found on Thames Water’s website at: http://www.thameswater.co.uk/developers/1319.htm . Contact can be made with Thames Water Developer Services by: Post to: Thames Water, Developer Services, Clearwater Court Vastern Road Reading RG1 8DB by telephone on: 0800 009 3921 or by Email: developer.services@thameswater.co.uk</p>	Acknowledged

Savills on behalf of Thames Water Planning Policy	36 7	<p>Air Quality</p> <p>P127 focuses on air pollution. It is considered that reference should also be made within the document to issues of odour. Where development is located close to an existing source of odour such as a sewage treatment works or sewage pumping station, the developers should engage with Thames Water to discuss the potential impacts on the amenity of future occupiers. Where there would be an impact mitigation measures would need to be agreed and secured.</p>	Addition
Savills on behalf of Thames Water Planning Policy	36 8	<p>Land South of Crossness Sewage Treatment Works</p> <p>Thames Water own land within the Opportunity Area to the south of Crossness Sewage Treatment Works as shown in the enclosed site location plan. This land has been previously promoted for employment use where it could expand the area of Veridion Park to increase employment development. While the site is currently designated as Metropolitan Open Land and an area of importance for nature conservation, it is considered that development of the area forms a logical extension to the adjacent business park. It's development could enable habitat enhancement elsewhere within the Thames Water site. Alternatively, there is potential for the site to provide opportunities for delivering mitigation measures to assist with the delivery of development elsewhere within the Opportunity Area.</p>	None

Savills on behalf of Thames Water Planning Policy	36 9	Thames Water seeks to co-operate and maintain a good working relationship with GLA Greenwich, and Bexley Council and to provide the support needed with regards to the provision of water and wastewater infrastructure. For Thames Water to provide this essential service most effectively, it is vital that we are consulted at the earliest possible stage in the planning process. The importance of consulting water and wastewater companies is detailed in the Government's National Planning Practice Guidance. Thames Water would welcome the opportunity to meet yourselves to discuss the water and wastewater infrastructure needs relating to the Local Plan.	Acknowledged
Sport England	37 6	As discussed at the meeting, Sport England is broadly supportive of the existing text in the document which refers to the Sports Facility Calculator (SFC) and also suggests facilities planning model (FPM) work should be carried out.	Acknowledged
Sport England	37 7	Sport England is particularly supportive of FPM work being carried out as it will provide more specific and relevant findings with regard to sport provision and requirements in the local area with regard to sports halls and pools.	None
Sport England	37 8	I would like to clarify that SFC helps with quantifying the demand side of the facility provision equation. It helps to answer questions such as, "How much additional demand for swimming will the population of a new development area generate, and what would the cost be to meet this new demand at today's values?". It is important to note it has been updated several times since 2016 (the date referenced in the document).	Amended

Sport England	379	<p>I would note that the SFC looks at demand for facilities and does not take into account any existing supply of facilities. The SFC should not be used for strategic gap analysis; this approach is fundamentally flawed as the SFC has no spatial dimension with the figure that is produced representing total demand for the chosen population. It is important to note that the SFC does not take account of facility location compared to demand, capacity and availability of facilities and their opening hours, cross boundary movement of demand, travel networks and topography and attractiveness of facilities.</p> <p>For these reasons total demand figures generated by the SFC should not simply be compared with facilities within the same area; this should be clear within the document.</p>	Acknowledged
Sport England	380	<p>As they only provide an indication, results from the SFC really need to be looked at alongside local authority's own local knowledge and findings from an evidence base such as a robust and up-to-date Playing Pitch Strategy and Built Facilities Strategy, where they exist and are up to date. In particular, a PPS will provide important information on playing fields in the area, how they are used and where the deficits are/where improvement works are most needed.</p>	Acknowledged
Sport England	381	<p>I understand that Bexley currently has these documents as part of their evidence base and they should be used to inform the OAPF with regard to sporting need as they are up to date and carried out to Sport England guidance.</p>	Acknowledged
Sport England	382	<p>As I mentioned as the meeting, Sport England is of the view that Greenwich's evidence base is well out of date given how quickly the landscape can change – we would certainly not support using documents from 2015 to inform this OAPF and will be objecting to their Local Plan later on in the year on this basis if there is no movement towards developing new, up to date documents.</p>	None

St William Homes LLP	38 3	<p>Established in 2014, St William is a joint venture between the Berkeley Group and National Grid Property ('National Grid'). The partnership combines National Grid's extensive portfolio of surplus brownfield sites across London and the South East with the Berkeley Group's design expertise and proven track record of delivery to create high-quality residential and mixed use developments.</p> <p>Our written representations to the Draft OAPF consultation are set out below. It should be noted that these representations are made solely on behalf of St William, notwithstanding any representations made by other divisions of the Berkeley Group or National Grid.</p>	None
St William Homes LLP	38 4	<p>As National Grid's joint venture development partner, St William have an interest in the Beckton Gasworks site in the London Borough of Newham (Beckton Gas Works, Armada Way, Beckton). This 92 acre site has the opportunity to deliver housing growth and regeneration in Newham and forms part of a wider site allocation in the Newham Local Plan (2018) (Strategic Site reference S01), for mixed use developments delivering new neighbourhoods centred on a Major town centre and new station. Newham's adopted spatial strategy highlights Beckton as one of the large sites which hold the greatest opportunity to deliver the 'majority of new housing' in the Borough.</p>	None
St William Homes LLP	38 5	<p>The link between strategic public transport delivery and growth is supported. St William strongly supports an extension of the Docklands Light Railway (DLR) to Thamesmead via a new DLR station at Beckton Riverside. A new DLR station at Beckton will unlock the wider area's potential to deliver not only an extensive amount of new homes for London, but a new town centre with associated facilities and job opportunities for local people. St William welcomes the increase in delivery of homes and jobs that an extension of the DLR would unlock under the 'High Growth Option' scenario detailed in the Draft OAPF.</p>	None

St William Homes LLP	38 6	<p>1. Alignment</p> <p>St William welcomes the potential new DLR station at Beckton Riverside, around which there is the potential for a high quality, high density mixed-use neighbourhood. However, St William believes that the Draft OAPF would benefit from more clarity regarding the DLR extension route alignment through Beckton from Gallions Reach, and the process through which this will be fixed. As a minimum, Plans within the OAPF which indicate the potential DLR river crossing from Beckton, should include an ‘indicative’ Beckton Riverside DLR station – currently plans such as figures 1.3 and 1.15 merely show an indicative alignment; an indicative station should also be shown. The Royal Docks and Beckton Riverside OAPF can be the vehicle to fix this alignment.</p> <p>St William considers that the preferred alignment for the DLR extension would run via a new station at Beckton Riverside, to the South of Armada Way and to the North of the existing DLR Depot (Appendix 1).</p> <p>Specifically, section 3.4 (p80), paragraph 1 should make reference to the DLR extension being via Beckton Riverside.</p>	None
St William Homes LLP	38 7	<p>2. Additionality</p> <p>The approach to growth options linked to public transport provision is supported. A new station at Beckton Riverside would serve to support substantial growth in the Royal Docks & Beckton Riverside Opportunity Area by facilitating the delivery of a new Major town centre and approximately 5,000 – 10,000 new homes. It is considered that the addition of a DLR station at Beckton Riverside would increase the delivery of both homes and jobs in the plan period.</p>	None
St William Homes LLP	38 8	<p>3. Deliverability</p> <p>St William recognises that deliverability is key when considering the potential DLR alignment options. Initial design work has been undertaken by Atkins (a design, engineering and project management consultant), which demonstrates a deliverable DLR alignment option that passes through Beckton Riverside.</p>	None

St William Homes LLP	389	4. General Comment The safeguarded land for the Thames Gateway Bridge crossing is noted on a number of Plans; the OAPF could be used as a masterplanning tool to understand the status of this safeguarding on both sides of the river. Removing such a constraint could unlock further growth and allow for a more coherent and high quality masterplan to be achieved.	Addition
St William Homes LLP	390	St William welcomes the opportunity to comment on the Draft Thamesmead & Abbey Wood Opportunity Area Planning Framework and supports its aims and ambitions.	None
St William Homes LLP	391	St William considers that the route alignment via Beckton Riverside, which includes the delivery of a new station South of Armada Way, should be the preferred DLR alignment in the Draft OAPF due to its deliverability and the wider additionality it will unlock in the plan period. St William would welcome amendments to wording and associated drawings (Appendix 2) of the Draft OAPF and Transport Strategy to reflect the preferred DLR extension alignment.	None