

GREATER LONDON AUTHORITY

REQUEST FOR MAYORAL DECISION – MD2696

Title: Thamesmead and Abbey Wood Opportunity Area Planning Framework

Executive Summary:

Thamesmead and Abbey Wood is designated as an Opportunity Area (OA) in the London Plan and is one of the largest regeneration areas in London. Prepared jointly by the GLA, TfL, RB Greenwich and LB Bexley, the Thamesmead and Abbey Wood Opportunity Area Planning Framework (T&AW OAPF) supports and plans for the Mayor's proposal to extend the DLR to Thamesmead and beyond. With transport improvements, the OAPF identifies the potential for the OA to provide 15,500 new homes and 8,000 new jobs. The OAPF is guided by the Mayor's Good Growth objectives and has been informed by engagement with stakeholders and local communities.

Decision:

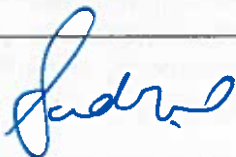
That the Mayor approves the adoption of the Thamesmead and Abbey Wood Opportunity Area Planning Framework (OAPF) as guidance to the London Plan.

Mayor of London

I confirm that I do not have any disclosable pecuniary interests in the proposed decision and take the decision in compliance with the Code of Conduct for elected Members of the Authority.

The above request has my approval.

Signature:



Date:

1/12/20

PART I - NON-CONFIDENTIAL FACTS AND ADVICE TO THE MAYOR

Decision required – supporting report

1. Introduction and background

- 1.1 A draft version of the Thamesmead and Abbey Wood Opportunity Area Planning Framework (T&AW OAPF) was published for public consultation between 17 December 2019 and 10 March 2020 and was approved through a Mayor's Planning report on 16 December 2019. The OAPF was amended following a detailed review of the consultation feedback (see Paragraph 1.19 and Paragraph 4.13).
- 1.2 There are no direct costs associated with the publication of the T&AW OAPF. All previous costs associated with this project have been covered via GLA Planning budget.
- 1.3 The Thamesmead & Abbey Wood Opportunity Area (T&AW OA) is one of the largest regeneration areas in London. It stretches across the Royal Borough of Greenwich and the London Borough of Bexley, extending to Plumstead town centre to the west, the Belvedere growth area to the east, the Thames to the north and a southern boundary defined by the over ground tracks of the North Kent / Elizabeth lines. Thamesmead is home to over 50,000 people, a population likely to more than double in the next few decades.

Policy context

- 1.4 The T&AW OA is designated in Table A1.1 of the current London Plan (2016) as an Opportunity Area (OA) with an indicative capacity of 3,000 new homes and 4,000 jobs. The T&AW OA designation states that:

“The residential environment and capacity of Thamesmead should be enhanced through estate renewal integrated with strategic opportunity sites for new housing, social and recreation facilities together with improved open space and Metropolitan Open Land. Access to the riverside and adjacent spaces in Tripcock Park should be enhanced, together with measures to secure better use of landscape assets such as the Ridgeway and improved local connections through the South East London Green Chain. In view of the low-lying nature of parts of the Area, particular attention should be given to flood risk management. There is scope to enhance employment capacity in the White Hart Triangle and other industrial sites, including waste management and logistics provision.”
- 1.5 The current London Plan sets out public transport schemes and improvements to increase the capacity of public transport in London (Table 6.1). This includes work towards potential extension of the DLR east of Gallions Reach post-2022.
- 1.6 The Intend to Publish London Plan (2019) identifies an opportunity for T&AW OA to accommodate 8,000 new homes up to 2041 (Table 2.1). This is an uplift of 5,000 new homes from the current London Plan. The T&AW OA designation states that alongside the opening of the Elizabeth line at Abbey Wood, major investments in transport infrastructure such as the proposed DLR extension from Gallions Reach are needed to support high density development and provide access to areas of significant employment growth, such as the Royal Docks.
- 1.7 Paragraph 2.1.4 of the Intend to Publish London Plan sets out that OAPFs can represent the first stage in a plan-led approach to providing significant quantities of additional jobs and homes, improvements to transport and other infrastructure, and better access to local services. The Mayor recognises that there are different models for taking these forwards depending on the circumstances and development needs of each OA, and for translating these frameworks into policy in Development Plan documents and Supplementary Planning Documents. Whatever model is used, the Intend to Publish London Plan sets out that frameworks must be prepared in a collaborative way with local communities and stakeholders (see Paragraph 1.19 and Paragraph 4.13).

Transport proposals and Good Growth

- 1.8 The T&AW OAPF supports and plans for the Mayor's proposal to extend the DLR from Gallions Reach to Thamesmead. In addition, the T&AW OAPF contains a Transport Strategy and Local Connections study which propose a range of improvements to support higher density development. These include a bus transit linking with the Elizabeth line at Woolwich and Abbey Wood as a complementary and intermediate stage to provide reliable, sustainable public transport connections from the outset with potential to kick-start some investment and development in the OA.
- 1.9 With this suite of transport improvements, the T&AW OAPF identifies the potential for the OA to accommodate 15,500 new homes and 8,000 new jobs. This is an uplift of 7,500 new homes and 4,000 new jobs from the indicative capacity in the Intend to Publish London Plan.

Current London Plan (2016)	Minimum 3,000 homes and indicative employment capacity of 4,000
Intend to Publish London Plan (2019)	8,000 new homes and 4,000 new jobs indicative capacity
T&AW OAPF 2020	15,500 new homes and 8,000 new jobs dependent on new and improved public transport (DLR and bus transit)

- 1.10 The T&AW OAPF sets out long-term guidance that demonstrates the benefits of future investment and growth in the OA. It does not establish new policies but rather illustrates how London Plan policy can be implemented in the OA and provides a direction of travel for forthcoming Local Plan and policy reviews. The T&AW OAPF will be a material consideration in planning decisions that apply to the OA.
- 1.11 The OAPF and accompanying Transport Strategy (Appendix A) provides further detail on proposals in the Mayor's Transport Strategy (2018) to extend the DLR to Thamesmead. The transport improvements considered in the OAPF are currently unfunded. Delivering major new public transport schemes is partly dependent on the scale of new growth. By illustrating how significant new development can align with Good Growth principles, the T&AW OAPF contributes to a strong business case for the investment needed. As growth in the T&AW OA is intrinsically linked to the delivery of strategic public transport connections, new public transport is needed to support housing and employment growth, and vice versa.
- 1.12 As has been the case for other major infrastructure improvements (Crossrail or Northern line extension), any funding package for new public transport connections is likely to include contributions from the new residential and commercial development that new routes would serve. Developer contributions would also be expected to help fund local transport improvements, such as new or improved walking and cycling routes and public spaces.

Design-led approach to site capacity

- 1.13 The T&AW OAPF uses a design-led approach to assess potential site capacity uplifts unlocked through new public transport infrastructure, including the DLR extension. This approach is in accordance with Policy D3 of the Intend to Publish London Plan and the modifications set out by the Secretary of State in his direction DR3 as set out in the Annex to his response to the Mayor on 13 March 2020. This requires consideration of design options to determine the optimal quantum and form of development in response to the context and character of a site. The design-led approach has contributed to the increased indicative capacity in the OAPF, with higher density options considered on strategic sites.

Statutory status of the OAPF

- 1.14 The Mayor's statutory plan-making powers are set out in Part VIII of the Greater London Authority Act 1999 ("the Act"). Section 334 of the Act requires the Mayor to prepare and publish the London Plan. Sections 339 and 340 of the Act require the Mayor to keep the London Plan under review.
- 1.15 There is no statutory requirement for the Mayor to prepare planning guidance such as OAPFs, though he has the powers to do so under section 30 of the Act which gives the Mayor the power to do anything he considers will promote the improvement of the environment in Greater London and section 34 of the Act which gives the Mayor the authority to do anything which is calculated to facilitate, or is conducive or incidental to the exercise of any of the statutory functions of the Authority.
- 1.16 This OAPF, has been produced to provide further guidance to the policies contained within the adopted London Plan. However, it has also been produced so as to provide further guidance to the policies also contained within the Intend to Publish London Plan once this is formally published. It may therefore reasonably be regarded as facilitating, being conducive or incidental to the exercise of the Mayor's powers detailed above.
- 1.17 The OAPF as guidance to the London Plan will be a material consideration in planning decisions in London and must be read in the context of relevant statutory planning policies within the London Plan that apply to the OA. In addition, the OAPF can be adopted by local planning authorities as a Supplementary Planning Document (SPD).

Project initiation

- 1.18 The preparation of the T&AW OAPF began in 2017 and is a joint project between the GLA, TfL, RB Greenwich and LB Bexley. The production of the T&AW OAPF was seen as timely for numerous reasons, including:
 - the Elizabeth line opening its eastern terminus in Abbey Wood;
 - the Mayor's commitment to deliver the DLR to Thamesmead;
 - managing policy challenges and aligning growth aspirations of LB Bexley and RB Greenwich to the new London Plan; and
 - the need to work with and steer Peabody's ambitions for the area.
- 1.19 The project has been informed throughout by close working with LB Bexley and RB Greenwich, including Deputy Mayor for Planning, Regeneration and Skills, the Leaders of both Boroughs, local councillors, and senior officers from the GLA, TfL, LB Bexley, and RB Greenwich. Key stakeholders, including Peabody, have also provided regular input into the project.
- 1.20 This final draft T&AW OAPF has been endorsed by LB Bexley and RB Greenwich.

Public consultation and responses summary

- 1.21 Paragraph 2.1.4 of the Intend to Publish London Plan sets out that frameworks must be prepared in a collaborative way with local communities and stakeholders. The T&AW OAPF has benefitted from extensive stakeholder and community engagement throughout its development. It was subject to a 12-week formal public consultation from 17 December 2019 – 10 March 2020, and an informal 6-week public engagement in August – September 2019. Full information on consultation methods, publicity, events, feedback received and their impact on the final Adoption draft OAPF has been recorded in Appendix B Engagement and Consultation Summary.
- 1.22 A draft version of the OAPF was published online during formal consultation and hard copies were made available at all local libraries within and near the OA. In addition, a T&AW OAPF specific consultation website was set up which attracted over 3,100 unique visitors and 417 contributions (over 1,670 unique comments).

1.23 28 email consultation responses were also received from a variety of stakeholders including developers, agents, borough councils and campaigning groups (listed below). Officers have analysed the responses and, where appropriate, updated the OAPF having considered the responses.

Consultation responses received

- Environment Agency
- Highways England
- Historic Buildings and Monuments Commission for England (Historic England)
- Natural England
- Sport England
- Network Rail
- Moorings Neighbourhood Forum
- Port of London Authority
- LB Newham
- LB Bexley
- Abena Oppong-Asare MP
- Councillor Ann-Marie Cousins
- Councillor Daniel Blaney
- National Grid
- Savills on behalf of Thames Water
- London City Airport
- Peabody Housing Association
- Montagu Evans on behalf of Aberdeen Standard Investments
- Collective Planning on behalf of Sabreleague Ltd
- Gerald Eve on behalf of Berkeley Homes and Peabody
- L&Q
- St William Homes LLP
- Barton Willmore on behalf of Aitch Group
- JLL on behalf of Ministry of Justice
- Lendlease on behalf of Thamesmead Waterfront JV
- Individual respondents

1.24 The majority of responses received during formal consultation were supportive of the Mayor's objectives for the Thamesmead and Abbey Wood OA. Key themes in the responses from strategic stakeholders to the consultation and changes to the OAPF are as follow:

- Transport and Growth – General support for the transport and local connections package proposed. 68% of respondents on the consultation website felt 'positive' or 'somewhat positive' about the proposed transport options. 18% felt neutral and the remaining 14% felt 'somewhat negative' or 'negative'. Safety at night, and better walking and cycling were highlighted as key concerns. Multiple stakeholders, including developer and landowner groups, were supportive of the higher growth scenario (DLR and bus transit). The commercial case for development coming forward as part of the intermediate bus transit scenario was queried. Responses also requested that the OAPF make clearer that new development will need to be of a higher density than the existing context.

GLA comment: The intermediate and high growth scenarios were relabelled to provide a clearer narrative that the OAPF plans for the DLR extension, and that in the interim a bus transit could provide improved public transport particularly in North and West Thamesmead and for those that are far from train stations. The delivery of bus transit could have the potential to kick-start some investment and development in the OA. Additional precedents and design guidance were added in the OAPF to demonstrate the level of development envisaged in the OA and to guide future development.

- **DLR route alignment** – Responses received asked for clarity on the DLR extension route alignment and the process through which this will be determined. *GLA comment: The OAPF was amended to show the latest DLR route alignment from Gallions Reach station via Beckton Riverside to Thamesmead. Additional reference on next stages for the proposed transport schemes was added to the delivery chapter.*
- **OA boundary and ‘potential areas of change’ boundary** – Several respondents queried the boundary of the OA and recommended an extension towards Belvedere in the east, and south of Abbey Wood station. The MOL west of Thamesmead Waterfront and the safeguarded river crossing site were requested to be included in the ‘potential areas of change’. *GLA comment: No changes to boundaries in the OAPF were made.*
- **Open and green space** – The need for better maintenance, accessibility, and amenities in open space was recognised by local communities and stakeholders. Responses were received that recommended the OAPF align more closely with Peabody’s Green and Blue Infrastructure study. *GLA comment: Additional references were provided in response.*
- **Social and community uses** – Multiple responses raised concerns that there would not be sufficient community provision to support the level of new homes. In particular, a lack of community provision for young people and the elderly, and in the evening, weekends and outdoors were raised. *GLA comment: A strategic assessment of social functions needed to support growth and how these can be physically provided in the OA has been undertaken with RB Greenwich and LB Bexley, and will need to be kept under review with detailed assessments by the LPA.*
- **Town Centre and Employment** – Concerns were raised on the general lack of information on town centre improvements. The poor mix of shops and lack of access to amenities, leisure activities and services were also raised as concerns for the area. *GLA comment: Additional commentary on town centre and employment improvements were provided in response.*
- **Culture and Heritage** - Positive comments on the Lakeside Centre improvements were received. The need for more affordable and volunteering activities was raised by local communities. *GLA comment: Additional references on culture and heritage were provided in response.*

2. Objectives and expected outcomes

2.1 The objectives of the OAPF are to:

- support a DLR extension to Thamesmead and bus transit linking with the Elizabeth line at Woolwich and Abbey Wood to enable access to opportunities within the OA and to areas of significant employment growth;
- plan for 15,500 new and affordable homes and 8,000 jobs unlocked by a new DLR and bus transit, while ensuring the area remains mixed and inclusive;
- overcome obstacles and promote safe, accessible walking and cycling routes;
- support strong and inclusive communities by planning for good quality social infrastructure people can easily access to support their day-to-day needs;

- make best use of land and plan for efficient use of industrial land so that the OA continues to play a strong economic and industrial role in London;
- ensure a holistic approach to manage the impacts of climate change, make efficient use of energy and water and reduce waste;
- create vibrant, well-connected town centres that encourage local employment and support local businesses and commercial activity;
- celebrate and protect existing cultural and heritage destinations while encouraging new assets; and
- build strong and lasting partnerships to ensure a coordinated approach to development and delivery.

2.2 Following the publication of the OAPF, TfL will progress technical and feasibility work required to support the case for the delivery of the transport schemes necessary to support the vision presented in the OAPF. This work will be progressed with support from RB Greenwich, LB Newham, Department of Transport (DfT), Ministry of Housing, Communities and Local Government (MHCLG), GLA, TfL and stakeholders including landowners and developers at Beckton and Thamesmead. While funding to progress technical and feasibility work has been secured, it is noted that the public transport improvements proposed in the OAPF remain unfunded and external factors (such as the risk of no-deal Brexit, the Covid-19 pandemic and its associated effects on the economic and political environment) could pose a risk to the deliverability of the OAPF objectives (See Para 4.1).

2.3 Outputs from the technical work will be used to make the case for the transport infrastructure schemes, and to support funding bids, including from the Government's Single Housing Infrastructure Fund (SHIF).

3. Equality comments

3.1 The Mayor and GLA are subject to the public sector equality duty ("the Duty"), as set out in section 149 of the Equality Act 2010 covering race, disability, gender, age, sexual orientation, religion or belief, pregnancy and maternity, and gender reassignment. These are the grounds upon which discrimination is unlawful and are referred to as 'protected characteristics.' The Duty requires the Mayor when exercising his functions to have due regard to the need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act, advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it and foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

3.2 Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic; take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it; encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low. Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to tackle prejudice, and promote understanding. Compliance with these duties may involve treating some persons more favourably than others.

3.3 The courts have emphasised that "due regard" requires an active and engaged analysis of the relevant material with the specific statutory considerations in mind, but the Duty does not require that the considerations raised in the analysis are decisive in the particular case and finally, that the weight to be given to the requirement that "due regard" is to be had is for the decision maker to decide.

- 3.4 These duties apply to the Mayor's decision whether to publish this OAPF. The proposed OAPF supports the equalities objectives of the London Plan and the Intend to Publish London Plan by providing guidance to help boroughs, developers and local communities. The policies of the London Plan and the Intend to Publish London Plan have been subject to a full Equality Impact Assessment (EqIA).
- 3.5 The T&AW OAPF has been subject to an Integrated Impact Assessment (IIA) which included an Equalities Impact Assessment, attached as Appendix C. The effects of this are summarised below:
- The greatest impact on equalities is likely to come from the social and community infrastructure strategy in the OAPF, which sets out a strategic estimation of the social infrastructure required to support a growing population. Transport and walking/cycling proposals in the OAPF would improve connectivity of the area significantly, making it easier and quicker for existing and future residents to travel to existing and proposed social infrastructure, such as in Thamesmead Town Centre, Waterfront and Southmere Lake. By providing sufficient infrastructure, such as sports and community facilities, and access to facilities that provide multiple services, this could promote social inclusion by providing areas for people to meet and interact. It is also noted that the location of these facilities has potential to cause an uneven impact on different groups depending on proximity to services.
 - The housing uplift proposed is also likely to impact on equalities. All transport options would support the additional provision of housing. The DLR and bus transit would support the highest housing growth. This should in turn support the greatest provision of affordable housing and specialist housing – benefiting young families, older people, disabled people, BAME groups. This option has the greatest potential to alleviate homelessness, which could benefit women who are single parents or victims of domestic abuse and alleviate overcrowding which affects BAME families the most. Transport improvements can increase property values which could have a positive effect on those who already own their own homes but could increase costs for those wanting to buy or rent in the area. This would benefit older people who are most likely to own their own home but disadvantage young adults who are least likely to own their own home, but want to.
 - There is the potential for differential impacts to occur on vulnerable groups, in particular:
 - whilst the accessibility improvements promoted through the transport and movement strategy and linked local connections plan within the OAPF would improve connectivity for all residents within the OA, the planned improvements to public realm and the integration of stations with their surroundings would be of particular benefit to disabled people in terms of improving step free access;
 - an identified Gypsy and Traveller site is located within the OA. The OAPF refers to protecting the existing provision and encourages early engagement and inclusion in development proposals in its proximity with the Gypsy and Traveller community in order to provide opportunities for the community to actively participate and be involved in decision making;
 - the focus within the social and community infrastructure section of the OAPF on providing sufficient school places to meet rising demand would be of particular benefit to young people. This could minimise the need for young people resident within the OA to travel beyond the locality to attend school, which could have wider equalities benefits in terms of minimising travel costs; and
 - neutral effects have been identified in relation to two equality objectives that is i) materials and waste – the OAPF identifies existing designated waste sites in the area. It does not include proposals that would have an impact on waste processing and disposal for vulnerable groups or on local reuse and recycling rates, and is therefore seen to have a neutral impact on vulnerable groups ; ii) noise and vibration – the OAPF proposals in the transport chapter encourage the use of sustainable transport modes that reduce reliance on private modes of transport. This would reduce levels of congestion in the longer term and is therefore likely to reduce the level of noise of people exposed to road traffic, in particular the identified Gypsy

and Traveller site located along Harrow Manorway. The proposals as such are regarded as having a neutral effect on minimising noise and vibration levels and disruption to people and communities across the OA.

- 3.6 The assessed impacts in equalities terms within the EqIA have been set out within paragraph 3.5 above. Officers consider that this provides an accurate reflection of these issues. Whilst the EqIA identified neutral impacts on equalities, overall the EqIA shows a generally positive effect on the GLA's identified equality objectives.

4. Other considerations

Key risks and issues

- 4.1 As a result of the Covid-19 pandemic, government planning reform changes and other external factors such as the risk of a no-deal Brexit, the economic and political environment in which the adopted OAPF will operate has created a more challenging environment than at the outset of the project. These factors could be a risk to the deliverability of the OAPF objectives.
- 4.2 The unfunded status of the public transport improvements proposed in the OAPF is a risk. The OAPF clearly sets out in the Executive Summary, Transport, and Delivery chapters that the delivery of major new public transport schemes will depend on the scale of growth to make a strong case for investment and on the availability of funding for construction.
- 4.3 Whilst an uncertain socio-economic landscape may impact on the progress of the OAPF objectives, the GLA will continue to work closely with project partners to support the case for transport improvements and growth in the OA, and to encourage positive partnerships with delivery partners.

Links to Mayoral strategies and priorities

- 4.4 The proposals detailed in the OAPF are underpinned by policies in the current London Plan, Intend to Publish London Plan, and the Mayor's Transport Strategy. There is a specific emphasis on the Mayor's objectives for Good Growth – this means growth that is socially and economically inclusive and environmentally sustainable. The drafting of the OAPF has involved numerous teams within the GLA, including Planning, Environment, Housing and Land, Regeneration, Culture, Infrastructure, Connected London and Communities and Skills.

Consultation and impact assessments

- 4.5 The OAPF has been supported in its development by an Integrated Impact Assessment (IIA) and a Habitats Regulation Assessment (HRA) screening. The IIA enables common themes to be considered together and involves an integrated assessment which followed the stages of the SEA methodology outlined in the Environmental Assessment of Plans and Programmes Regulations (EAPP) 2004. The IIA demonstrates how duties have been considered and fulfil assessment requirements of:
- Strategic Environmental Assessment (SEA);
 - Equality Impact Assessment (EqIA);
 - Health Impact Assessment; and
 - Community Safety Impact Assessment.
- 4.6 A draft IIA Scoping Report was published between 29 October 2019 – 3 December 2019 for a 5-week consultation period. Comments received were considered and a revised post-consultation Scoping Report was published alongside the consultation draft T&AW OAPF on 17 December 2019.
- 4.7 Post consultation changes to the IIA Scoping Report included:

- responding to Environment Agency feedback by adding reference to the principle of 'net gain' and the Thames Estuary 2100 plan;
- adding text to the Historic Environment section noting the need for policies that seek to protect and enhance local historic assets, and for an archaeological framework to assess and evaluate the significance of archaeology in the OA;
- in response to Sports England, the OAPF contains a high-level assessment of future demand for sports and recreation in the OA. There is also a recommendation that further work be undertaken by local planning authorities as part of the Local Plan process; and
- the Port of London Authority's suggestions that greater prominence be given to the Thames Path, and role of the Thames as a freight route, were acknowledged and amendments were made accordingly in the OAPF.

Evaluation of the OAPF against the IIA assessment

- 4.8 Overall, the IIA considers the OAPF to have a generally positive impact when compared to the alternative of not preparing an OAPF. The OAPF has been assessed as performing strongly against the IIA objectives for housing supply, quality, choice and affordability, sustainable land use, design, accessibility, connectivity, and economic competitiveness and employment. While there are some neutral effects, such as those in relation to air quality, greenhouse gas emissions and water resources, no negative effects were identified through the assessment.
- 4.9 The key findings from the IIA Report on the OAPF objectives are:

OAPF Objective 1:

Make the best and most efficient use of land so as to support sustainable patterns and forms of development

The proposal in the OAPF are likely to be beneficial in several ways. The Places section is clear about the potential opportunities for integrating new development with existing and potential transport infrastructure. This includes intensifying land use around transport nodes and realising opportunities for wider environmental improvements. The importance of new development integrating with existing communities is also emphasised, ensuring that higher density development does not adversely impact on different groups of people. Emphasis is also placed on new development acknowledging the importance of local cultural and historic assets, as well as incorporating resilience principles. In addition, the industrial strategy seeks to intensify uses, making better use of land including providing residential development. The provision of residential development could limit the attractiveness of industrial floorspace provided in mixed-use schemes, although policies in the London Plan are designed to mitigate this risk.

OAPF Objective 2:

Maintain, strengthen, and support the local economy, recognising the existing and historical economic base with regard to logistics, manufacturing and the Thames Estuary Production Corridor vision and build upon this as a priority. Enhance the existing economy by improving conditions for business to thrive. To plan for efficient use of employment land and safeguard protected industrial capacity

Several components of the OAPF are likely to have positive effects on this objective. The Places section proposes visions for the future of five places in the OA area. Some of these emphasise the importance of retaining existing industrial floorspace in accordance with draft London Plan policy. Potential new local connections and environmental improvements would also make it easier for existing and future residents to access local job opportunities.

The proposed bus transit and DLR extension would provide better connectivity between local employment centres and neighbourhood centres creating new opportunities for businesses. This could

also contribute to the creation of mixed-use developments in the OA providing employment opportunities to local residents including those in the most deprived areas. Traffic congestion has an adverse effect on the local economy and businesses and the transport proposals of chapter 3 promote a shift from car use to the most space-efficient modes of transport. This would contribute to reducing traffic congestion and help to provide a reliable and resilient network making bus journeys and freight trips quicker and more efficient.

In addition, the spatial strategy facilitates employment by promoting the intensification of SIL to provide more floorspace and local jobs. The strategy promotes new town centre uses, which would provide more job opportunities in the local area.

OAPF Objective 3:

Ensure the provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness

The Social and Community Infrastructure section presents an assessment of uses that support each growth scenario. It sets out requirements for specific infrastructure – including schools, leisure and energy. This would support a greater choice of schools and educational opportunities for all, which is particularly important for low-income communities, ethnic minority groups, disabled residents or those with existing health conditions, and Gypsy and Traveller communities. This is likely to ensure that the relevant social infrastructure is accounted for and therefore, is likely to have a positive effect on the sustainability objective.

The public transport proposals in Thamesmead would deliver physical infrastructure which increases connectivity in the area and is likely to have a positive effect on the sustainability objective. They would create an integrated public transport network giving greater access to key services and enabling growth in areas which are currently isolated. The Places section further emphasises the importance of integrating the Healthy Streets approach into future change. This includes promoting cycling, walking and public transport, and implementing projects that improve environmental quality. The Healthy Streets approach aims to contribute to improved physical and mental health and reduce health inequalities. Potential local and strategic connections and improvements are identified, resolving historic severances caused by infrastructure and poor urban design.

OAPF Objective 4:

Manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system

The Spatial Strategy recognises the need for utilities to be provided in a timely manner, and states that discussions have taken place with utility providers to estimate requirements for the OA. It proposes delivery coordination to minimise disruption and mitigate impacts of future growth. The strategy references work being done on energy masterplanning with Bexley to create a heat network, using the Riverside Resource Recovery facility. This could also tackle fuel poverty which affects people in older, poorer housing stock. 10 per cent of households in London are fuel poor and national evidence demonstrates that there is greater proportion of BAME households in fuel poverty and a significant proportion of households that are fuel poor include children. Whilst short term energy supply has been secured, the Development Infrastructure Funding Study identified a shortfall in capacity in the long term, and the upgrades required to meet capacity. The energy section encourages new developments to adopt energy efficient designs and be net zero carbon. The Spatial Strategy and Vision and Principles section is likely to have a positive effect on this objective, while the Places is likely to have a neutral effect.

OAPF Objective 5:

Manage the risk of flooding from all sources and improve the resilience of property and infrastructure to flooding and reduce its effects and impacts on the community

The Places and Spatial Strategy has a positive effect on managing the risk of flooding. The Spatial Strategy section on flood risk identifies that the area is in zone 2-3, and that the Thames Estuary 2100 Plan sets out an action plan for tidal flood risk management. This is further emphasised in the Places section. The strategy promotes the production of a Riverside Strategy that could set out requirements for updating flood defences and promotes use of sustainable drainage systems.

OAPF Objective 6:

Tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050

The proposals in the OAPF are likely to have positive effects with the exception of the Places section which is likely to have a neutral effect. The inclusion of the OAPF objectives on climate change and aim to coordinate delivery of district heating is more likely to result in the delivery of such a network and reduce carbon dioxide emissions. The mixed used nature of development is more likely to enable the use of waste heat from industrial and waste processes, reducing the need for gas heating. By promoting the Healthy Streets approach, the Places section could contribute indirectly towards the sustainability objective by encouraging a modal shift towards sustainable transport and a corresponding improvement in local air quality.

4.10 Following the statutory public consultation on the draft OAPF in December-March 2020, the following changes were made to the IIA:

- page 46 – the strategy contained in the OAPF was amended as having the potential to enhance as well as protect the historic environment; and
- page 42 – A reference was made to the need to undertake an Archaeology Study led by Historic England.

Habitats Regulation Assessment

4.11 To confirm whether the OAPF is likely to have a significant effect on any European Sites a separate Habitats Regulations Assessment (HRA) Screening Report has also been prepared by the GLA to accompany the OAPF. The screening identified those European Sites within 15km of the OA boundary. These sites are Epping Forest SAC and the Lee Valley SPA/Ramsar. The assessment reviewed the reasons for site designations and key vulnerabilities. In brief it is considered that: the distance between the OA and the sites (9km and 12km respectively), their position north of the river and beyond central London, and the amount of open space within and close to the OA all lead to an assessment that the Thamesmead and Abbey Wood OAPF will not have a likely significant effect on any European Site. In addition, individual schemes within the OA will be subject to wider London Plan and more specific policies set out in the OAPF on air quality, water management, sustainable transport and open space enhancements that aim to minimise adverse effects of development.

4.12 All assessments detailed within this report were made publicly available during consultation and are considered by GLA officers to contain an adequate analysis of the material.

Engagement

4.13 Effective and ongoing engagement with local communities, landowners and stakeholders has played an important role in the preparation of the T&AW OAPF. All feedback received and their impact on the final Adoption draft OAPF has been recorded in Appendix B Engagement and Consultation Summary. Public engagement has comprised:

- a 12-week formal public consultation on a consultation draft OAPF from December 2019 – March 2020;

- a non-statutory 6-week 'vision and objectives' public engagement in August-September 2019 on initial analysis and emerging vision and objectives for the T&AW OAPF; and
- a series of 1-2-1 meetings with key stakeholders within the T&AW OA.

4.14 Public engagement comprised of a series of "vision and objectives" engagement events. These included:

- an online engagement platform that was open for 6-weeks from August to September 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;
- project webpage which detailed future engagement events and how to comment on the OAPF;
- an Open House event on 14 Aug 2019 and 2-week exhibition at 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 with stakeholders including Peabody, London Fire Brigade, London Gypsy and Travellers; and
- engagement with public bodies and utility companies such as Heritage England and the Environment Agency.

4.15 The feedback received during the 'vision and objectives' engagements informed the consultation draft T&AW OAPF which was published in December 2019. This has ensured that the document addresses local priorities and concerns about accommodating strategic level growth. Following the formal public consultation which was held from December 2019 – March 2020, the OAPF was amended after a detailed review of responses received from stakeholders and local communities. Officers do not consider the changes made during the consultation process required further formal assessment.

5. Financial comments

5.1 There are no direct financial implications for the Greater London Authority arising from this decision.

6. Legal comments

6.1 The Mayor's statutory plan-making powers are set out in Part VIII of the Greater London Authority Act 1999 ("the Act"). Section 334 of the Act requires the Mayor to prepare and publish the London Plan and sections 339 and 340 require the Mayor to keep the London Plan under review.

6.2 Whilst there is no statutory requirement for the Mayor to prepare planning guidance documents such as OAPFs, he has the powers to do so under section 30 of the Act which gives the Mayor the power to do anything he considers will promote the improvement of the environment in Greater London and section 34 which gives the Mayor the authority to do anything which is calculated to facilitate, or is conducive or incidental to the exercise of any of the statutory functions of the Authority.

6.3 This OAPF as Planning Guidance to the London Plan and the Intend to Publish London Plan supports the implementation of its policies and may reasonably be regarded as facilitating, being conducive or incidental to the exercise of the Mayor's powers detailed above.

6.4 An integrated impact assessment has been carried out as detailed within section 3 and 4 above in order to demonstrate how the legal duties under the following legislation have been met;

- the Equalities Act 2010 as assessed in detail with section 3 of this report;
- Strategic Environmental Assessment Scoping report in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004.;
- appropriate assessment Screening Report in compliance with Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (the 'Habitats Directive') as implemented by the Conservation of Habitats and Species Regulations 2010 (as amended) in order to ascertain whether the OAPF is likely to have a significant effect on any European Sites;
- community safety in accordance with the legal duties under the Crime and Disorder Act 1998 (as amended) and the Police and Justice Act 2006; and
- health impacts.

6.5 As these duties are ongoing duties, they have been reassessed following the consultation and are discussed in detail within section 3 and 4 above. The Mayor should have regard to these assessments when considering this decision.

7. Planned delivery approach and next steps

Activity	Timeline
Announcement	December 2020
Delivery End Date	2041

Appendices and supporting papers:

Appendix A Transport Strategy

Appendix B Engagement and Consultation Summary

Appendix C Integrated Impact Assessment

Appendix D HRA Screening

Appendix E Historic England Archaeological Framework

Appendix F Sustainability Statement

Public access to information

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FoIA) and will be made available on the GLA website within one working day of approval.

If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary. **Note:** This form (Part 1) will either be published within one working day after it has been approved or on the defer date.

Part 1 - Deferral

Is the publication of Part 1 of this approval to be deferred? NO

Until what date: (a date is required if deferring)

Part 2 – Sensitive information

Only the facts or advice that would be exempt from disclosure under FoIA should be included in the separate Part 2 form, together with the legal rationale for non-publication.

Is there a part 2 form – NO

ORIGINATING OFFICER DECLARATION:

Drafting officer to confirm the following (✓)

Drafting officer:

Mathieu Proctor and Ei-Lyn Chia has drafted this report in accordance with GLA procedures and confirms the following:

✓

Sponsoring Director:

Phil Graham has reviewed the request and is satisfied it is correct and consistent with the Mayor's plans and priorities.

✓

Mayoral Adviser:

Jules Pipe has been consulted about the proposal and agrees the recommendations.

✓

Advice:

The Finance and Legal teams have commented on this proposal.

✓

Corporate Investment Board

This decision was agreed by the Corporate Investment Board on 30 November 2020.

EXECUTIVE DIRECTOR, RESOURCES:

I confirm that financial and legal implications have been appropriately considered in the preparation of this report.

Signature

D. Bone

Date

30 November 2020

CHIEF OF STAFF:

I am satisfied that this is an appropriate request to be submitted to the Mayor

Signature

D. Bellamy

Date

30 November 2020

