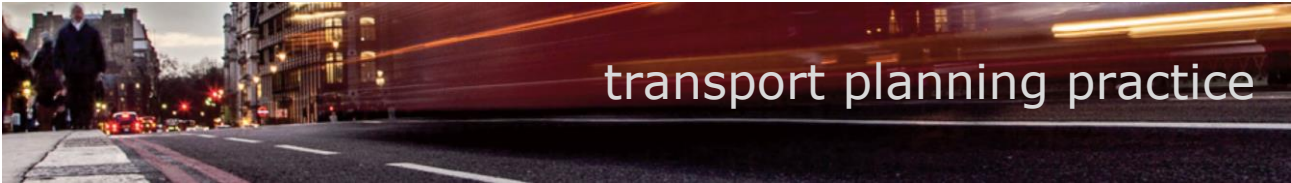


Appendix A

Responses to Consultees' Comments



Charlton Riverside Ref: 16/408/F

Anchor and Hope Lane Sites

Response to Consultee Comments

Introduction

1. This note has been prepared to address a further series of transport comments made by the statutory consultees following the submission of the planning application for the Anchor and Hope Lane site, Charlton, (planning reference 16/4008/F). These include comments from the Royal Borough of Greenwich (RBG) Waste and Street Services and the Port of London Authority (PLA). These responses have been reviewed, and this note sets out our response to the issues raised.

Response to RBG Comments on Master Plan Road Infrastructure

2. RBG have requested that it should be demonstrated that the East-West route through between the two plots (a 20m road corridor) can be delivered at a later stage when the wider Charlton Riverside masterplan is implemented.

Response:

3. The development proposals for the site have always been cognisant of the wider Charlton Riverside Masterplan and have been developed around a general framework of highway infrastructure. As neither RBG nor their appointed masterplan team have prepared a sufficiently detailed drawing the applicant has prepared such a plan to enable the preparation of development schemes on their plots. TPP Drawing Numbered 30821/AC/217 indicates the provision of a 20m highway corridor in the vicinity of the application site.

Response to RBG Waste Officer comments

4. Comments on the waste storage and provision have been made by the RBG Assistant Strategy Manager. These comments are noted and where there may have been omissions they are being taken on board. A response to the comments made are set out below.

Refuse and recycling container quantities

The numbers of refuse and recycling containers proposed in each core consistently falls between 3 and 5 containers below that which we require (based upon the metric in our waste guidance notes in new developers). I have calculated the required number of containers in the table pasted below. We would require the bin quantities to meet these as closely as possible. Please note that I have made an assumption that the two bin stores in Block H equally serve 31 of the 62 total properties due to the equal number of bins shown – if that's not the case then the model may require some adjustment.

5. When developing the proposals, the RGB waste guidelines were used to calculate volumes along with a comparison with those provided by the Building Regulations Part H6 and also the British Standards BS 5906. It is noted that RGB's waste guidelines result in a higher generation of waste than either of these national standards and guidance. The following brief summary sets out how much higher these figures are:

RGB Guidance is 90% higher than (BS5906+25%)

RGB Guidance is 26% higher than Building Regulations Part H6

6. In respect of the BS 5906(+25%) the reason for the huge discrepancy is the fact that the average number of bedrooms per residential unit across the scheme is 1.7 bedrooms per dwelling. In such cases, it would be more appropriate to use the BS 5906(+25%) calculation. Therefore the tabulated 'deficiency' calculated by RGB would still meet the Building Regulations H6 levels and exceed the BS5906(+25%) requirements.
7. In respect of the provisions for Textiles, WEEE and batteries, the scheme will provide a centralised bin within each plot for each of these waste streams, rather than the local bin stores, close to the bulk waste store area for each plot. Therefore the local waste stores will each provide sufficient 1100L Eurobins for both General and Mixed Dry Recyclable (MDR) Waste based on RGB's guidance, along with 240L wheeled bins for Organic Waste.
8. In respect of the split in Block H, H North has 29 units and H South has 33 units. Thus H South will be provided with a greater number of bins.
9. The Local Bin Stores are being rearranged in accordance with the above.

Basement Bin Storage

We have no issue in theory with bin stores being at basement level for resident use and the bins being moved to a ground floor collection point for weekly collection. For this to work properly the bin holding areas will need to be large enough to accommodate the entirety of one waste stream for the properties it serves. For example the Plot A holding area shows 20 spaces, however there are 45 mixed dry recycling containers in the bin stores of blocks A-F so this will need to be increased.

10. For collection of residential waste by RGB the combination of the ground floor collection room and the basement bin holding area will be used for the waste streams being collected. One minor note in respect of Plot A is that with the close proximity of the local bin store for Building B, there would not be a need to move the waste to the holding area for collection, as it is adjacent to the waste lift. On-site management would be in attendance during the waste collection times with staff within both the basement bin holding area and the waste collection room to transfer bins using the bin lift. Therefore the RGB waste operatives will only need to move the bins from the ground level collection rooms to their vehicle, with all other bin movements internally undertaken by on-site staff.

Where lifts are proposed to move the bins up to ground floor left I recommend two lifts at each point to ensure cover breakdowns and ensure there are no missed collections. RGB will not re-attend the development if the containers are not presented for collection due to faults with the lifts.

11. Lift failures for industrial type lifts are uncommon and therefore the need for duplication is unnecessary. In the event that there is a mechanical failure, the bins would be brought

up to ground level by on-site staff using the bin tugs that will be used to transfer the bins between the local bin stores and the Holding and Collection waste stores.

It is not shown how many bins can be accommodated in the lift, however there will be a limited capacity therefore the onsite staff may find the process onerous.

12. The lifts will be sized to accommodate 2 eurobins simultaneously with on-site staff at both basement and ground floor levels.

What are the distances between the bin stores and the lifts? On site staff may require towing equipment to make these manoeuvres. If the distances are great it may be considered unsafe for the staff to carry this out by hand.

13. On-site staff will use manual towing tugs which have a towing capacity of up to 4 tonnes, therefore multiple bins can be moved at a time.

It is not obvious where the bulky waste stores mentioned in the design and access statement are located in the basements of plots A and B.

14. The Bulk Waste Store for Plot A is adjacent to the basement bin holding area. For plot B, a Bulk Waste Store will be included.

The commercial units will each contain their own refuse store separate from those of the residential units. These are not currently shown.

15. The commercial units will, within the fit out of their demise, include their own waste storage provisions. These are not currently shown as the commercial space is subject to a flexible set of land uses and as a result the waste generations can be quite different between operators. Commercial units are currently shown as a 'shell' which will be leased. The responsibility of the future tenant will be to include waste storage within their own demise.

General collections observations

It is stated in the design and access statement that "The refuse collections will be made early in the morning and the management team will ensure the bins are brought to the service bay prior to the refuse vehicle's arrival" RBG cannot guarantee early morning collections due to a number of uncertainties such as adverse weather, vehicle breakdowns or unusual traffic.

16. Typically that would be what would be expected, however, it is noted that collections may be undertaken at different times although generally there would be expected to be a regular time that collections would occur, whilst appreciating that there would be some flexibility in the event of RBG fleet or weather difficulties.

The bin stores of Blocks G and H are detailed as being on a 'Play street'. What does this mean?

17. There are very few vehicle movements within the 'play street' which serves buildings G and H. The street is a cul-de-sac and provides access to Imex House at the northern end, servicing and waste collections for buildings G and H. This equates to 1 or 2 vehicle movements per hour, well below the homezone type of classification, and is therefore provided as public realm in which vehicles have access.

What are the distances of the 'bin wheeling routes' shown for blocks G and H? It should be noted that RBG operatives should not be required to drag bins for more than 15m to the waiting collection vehicle.

18. Wheeling routes, with suitable hard surfacing, will be provided through the landscaped public realm directly outside the waste storage rooms within Buildings G and H which meet the 15m drag distances.

Vehicle access considerations

The vehicle tracking in the two locations below appears to show obstruction with the building. If the building overhangs the road then adequate clearance needs to be allowed for the vehicle and extra height required to operate the lifting mechanism. In both instances it appears the vehicle may need to mount the kerb to turn, this would not be acceptable.

19. The building outlines referred to are the upper levels of the buildings. The ground levels within the vehicle tracking are clear of physical obstructions, and are within a flat shared surface, thus there are no kerbs mounted. Headroom clearance is provided in excess of 3.8m.

Can it be confirmed that in the locations where the refuse collection vehicles are proposed to stop that other vehicles can safely pass.

20. The locations where the waste lorry is stopped, the route is 5.5m wide or greater this will enable other vehicle to pass. However, the number of other vehicle movements is very small and will be managed.

Response to PLA comments

21. Transport comments were made by PLA in their email dated 02 February 2018. The quotes in italics are directly taken from the PLA email.

Issue: Impact of construction traffic on the safeguarded wharves:

'Whilst it is accepted that residential use in itself is unlikely to impede on the operations of the vehicles associated with the Wharves, it is surprising that no consideration has been given to construction traffic associated with the proposed development at construction stage, as these are far more likely to cause a problem in terms of access to the Wharves.'

Response:

22. There are no proposed changes to any roads where access is provided to the safeguarded wharves during the construction stage and therefore there will be no impact on the access arrangements to the wharves during construction.
23. The impact of construction traffic on the local roads network was assessed within the Transport Assessment (Chapter 20). It is noted that the existing site currently generates vehicle movements associated with its industrial uses which will cease prior to the construction of the scheme. The assessment showed that the number vehicles associated with the construction activities would be less than the traffic already generated by the existing site. Accordingly, all key roads would experience a reduction in overall traffic during the construction stage and would not cause a negative impact in terms of access to the Wharves. This is the reason why no further consideration was necessary of the construction stage of the proposed development in terms of traffic impact on the

safeguarded wharves operation, as there would be an improvement. The PLA could have come to the same conclusion, had they made this comparison.

Issue: Consideration of level of services and connection to infrastructure to accommodate further residential units:

'Not only this, but the level of services and connection to infrastructure (which is required to accommodate further residential units in the area) has also been missed, and should be considered as a possible negative impact. Angerstein and Murphy's Wharves are active for aggregate and bulk operations, which rely heavily on the Thames. The Wharves are safeguarded by Ministerial Direction and Policy 7.26 of the London Plan, which protect the Wharves for cargo handling. The proposed development must not restrict the operations of the Wharves, and retain good access onto the local road network.'

Response:

24. The Transport Assessment included a detailed impact assessment of the proposed development on the local transport infrastructure including junction modelling work. It was concluded that the transport demand arising from the additional units can be met by the existing services. Additionally, the public realm proposals within the scheme will improve the quality of connections across the site to the existing links and eventually the wider masterplan. If anything this constitutes an improvement rather than a 'possible negative impact'.
25. Finally, the proposed development does not propose any changes to any roads that provide access to the wharves and would not restrict their operations or affect their ability to access the local road network, nor does it propose any alteration to the movement of boats along the Thames. Therefore the operations of the wharves will remain unchanged.

Issue: Consideration to alternative modes of transport for the delivery of goods and removal of waste associated with the construction

'The ES provides limited consideration to alternative modes of transport for the delivery of goods and removal of waste associated with the construction. It is recognised within the supporting documentation that there are local concrete batching plants at Angerstein Wharf (Cemex) on Bugsbys Way and Victoria Deep Water Terminal (Hanson) at Tunnel Avenue that are both within 3km of the site, and which are both served by the River. The Applicant has stated that both of these would be considered by the main contractor and if used, would reduce the travel distances by road for the provision of concrete and aggregates. However, it is stated within the submission that for a robust assessment of the impact of the demolition and construction works on the highway network, it is assumed in the ES that these materials will be transported by road. I am not sure I completely agree with the reasoning provided and the PLA remain disappointed that serious consideration of the possibility of using the River Thames (waterborne freight) has not been given. Policy guidelines encourage Local Authorities to promote sustainable development in their planning decisions. As road freight is a major contributor to CO2 and to congestion, waterways should be considered as part of the solution to reduce dependency on road haulage. Paragraphs 29 and 30 of the National Planning Policy Framework (NPPF) seek to promote sustainable

transport and Policy 7.26 of the London Plan seek to increase the use of the Blue Ribbon Network for freight transport. With these policy aims and objectives in mind, the Applicant should be encouraged to place further consideration on adhering to these policy criteria.'

Response:

26. The appointed contractor will assess the feasibility of using the River for the delivery of goods and removal of waste associated with the construction. However, it should be noted that whilst the site is located in close proximity to the River Thames the only direct access to the River is via a narrow strip of land to the east of Anchor and Hope Lane and the site is otherwise surrounded by roads and developed land. The strip of land that leads towards the River connects with the Thames Path rather than directly with a river or a dock site.
27. Obtaining of concrete aggregates from local suppliers will be considered by the appointed contractors. However, it should be noted that there are many commercial factors that determine what supplier is used and this cannot be solely based on proximity.
28. The Transport Assessment assumed that all materials will be transported by road. Should any materials be transported in a different way then this will have a positive impact on the road network. As such, the assessment undertaken is robust.
29. Making a presumption in direct favour of the use of a specific wharf would not be appropriate when examining environmental impacts would be incorrect and heavily criticised upon such an assumption.

Issue: Promotion of river based transport

'No consideration appears to have been given to the promotion of river based transport, which would accord with the River Action Plan (February 2013) and draft Transport Strategy. The River Action Plan and London Plan itself assert the importance of promoting sustainable travel, and outlines a number of specific measures to be taken by Transport for London (TfL) and other stakeholders to help boost the number of river trips.'

Response:

30. As set out in the adopted Charlton Riverside SPD, river services are expected to serve a new Charlton Riverside pier. This is not a proposal of the applicant but is an aspect considered over the longer term by the council as part of the overall regeneration for the area. However, the pier is outside the scope of this application and the exact location and frequency is not known. Therefore it would be premature to be promoting the use of river services at this early stage.
31. The closest existing river taxi passenger pier used by Thames Clippers services from the site is at North Greenwich located approximately 2km away. The Transport Assessment has followed guidance provided by TfL in respect of assessment of river services which advise that these need to be included as part of the baseline conditions for developments which are located within 750 metres of a pier. As can be seen the proposed development does not currently meet this criteria. Therefore the assessment that has been undertaken has followed the appropriate guidance. The Travel Plan also includes reference to river transport services and this would be the appropriate way in which the promotion of river services is undertaken.

Issue: Consideration of the River Bus including the Woolwich Ferry

'The site is in relative proximity to Barrier Gardens Pier on the River Thames itself, as such the PLA would like to see consideration given to the use of the River Bus, including the Woolwich Ferry, as an alternative form of sustainable transport. The need to reduce our carbon footprint and establish sustainable communities is paramount within National Policy. The use of the river as an alternative transport method would therefore aid in promoting the objective of sustainable communities within the Borough. Information on the following is required to be provided by way of condition to the planning decision (should planning permission be forthcoming):

- 1. Provision of targets for river bus use (which reflect the targets set out within the River Action Plan);*
- 2. Measures to encourage river bus use*
- 3. Timetable for River Bus stop.'*

Response:

32. As mentioned above, the TfL guidance states that river services be considered and promoted for schemes that are located with 750m of a pier. North Greenwich Pier is located some 2km away from the site with Woolwich Ferry located over 2.5km away. The Barrier Gardens Pier is situated circa 1km away but is only be served by occasional leisure boats which require pre-booking and does not form part of the commuter river piers used by Thames Clipper river taxi services.
33. As such there is no justification for detailed consideration to be provided regarding the use of the River Bus beyond general promotion within the Travel Plan.

Response to Proposed Conditions

'The PLA would like to see an appropriately worded condition imposed on any forthcoming planning consent requesting the submission and upon approval, implementation, of a River Transport Plan.'

34. Given that the site is not currently within 750m of a pier, a River Transport Plan is not considered necessary and this should not form part of any planning consent.

RBG Waste/ Street Services Further Comments		
1.	<p>5) Understands that the developer has used a number methodologies to arrive at a final number of waste and recycling containers, however suggests that the methodology from the RBG guidance notes should be used above all else. Suggests that their rationale for this is that the methodology allows for 'future proofing' of the waste capacity for the lifetime of the building. If waste production habits, or collection methods be altered due to a future change in legislation we need to have capacity to accommodate this. Notes that it is also in the benefit of the building owner to have ample capacity to minimise dumping in the bin store and maintaining safe, clean, bin storage.</p>	<p>The number of waste containers for all waste streams within the proposed development has been established using the RBG Guidance and will be provided on this basis. The reference to the British Standards and the Building Regulations was made to highlight that a lower amount of containers would be expected to be sufficient for the proposed development when the unit sizes are considered in calculating waste generation, which the RBG Guidance does not take account of. Therefore, when the weekly collections are made to the development it would be unlikely that these total waste bins would need to be presented and collected by the council operatives at ground level and through site management to the basement main waste rooms. Thus a lower number of bins would need to be transferred during collections using the lifts.</p>
2.	<p>7) Confirms they are happy for WEEE, Textiles and batteries to be centralised for use of a number of residents, rather than in individual bin stores. Requests that this location is shown on plan and the number of proposed containers detailed. The 240L bin mentioned for organic waste have not been shown on plan. Recommends the use of a 500L organic waste bin in each store as per RBG's guidance notes.</p>	<p>This is noted although the weight of the 500l organic waste bin would be significantly higher compared with other waste streams. It would be more practical to include two x 240L bins instead, and provides a similar volume of container..</p>
3.	<p>9) States that with regards to the ground floor collection points it should be noted that RBG will only be able to empty bins if they are presented upon arrival. The collection crew will not be obliged to wait for containers to be brought up from the basement level, nor will they make a return trip to collect waste that has not been presented. Therefore, suggests that a larger collection point would facilitate all bins being emptied at once, bearing in mind that bringing approx. 45 bins up in pairs will be a lengthy process.</p>	<p>This aspect has been considered as part of the design with a balance being made between the on site management of waste storage and the provision of active frontage around the base of the buildings.</p> <p>The architect has prepared a sketch indicating the implications that the provision for larger ground floor waste collection rooms for Plot A and B would have in relation to the ground floor arrangements of the scheme.</p>
4.	<p>10) Confirms they are happy for a manual bin tug to be used as a contingency plan in the event of lift breakdown.</p>	<p>Noted.</p>
5.	<p>13) Notes that bin tugs may have a 4 tonne capacity, however in practise no</p>	<p>Noted. However, it is also noted that significantly longer waste bin chains can be observed within mainline railway concourses during peak periods on a</p>

	more than 4no. 1100L bins can safely be towed in a chain at one time.	frequent basis where 8 to 10 bins in a single chain are pulled through passenger areas.
6.	14) Requests that the bulk waste store for block B is shown on plan.	This is shown on the basement plan for Plot B immediately west of the main centralised bin store but highlighted in grey rather than yellow.
7.	16) Notes that regardless of weather or fleet difficulties, RBG residential waste operations occur Monday – Friday 06:00 – 20:00. Therefore, suggests that it should not be expected that early morning collections will occur at this development.	Noted and agreed.
Transport for London		
Future Transport Connections		
8.	Concerned that the development proposal would preclude the delivery of east – west route as envisaged by RB Greenwich.	<p>The location of Plot B is to the south of the east-west route and the design of the buildings within this Plot have been further adjusted so that they would not preclude the future delivery of a 24m East-West Link Road as set out in the Charlton Riverside SPD.</p> <p>The development proposals for the site have always been cognisant of the wider Charlton Riverside Masterplan and have been developed around a general framework of highway infrastructure. As neither RBG nor their appointed masterplan team had prepared a sufficiently detailed drawing the applicant has prepared such a plan to enable the preparation of development schemes on their plots. This information has been provided to RBG as part of the discussions following the submission of the planning application in response to the consultation comments on the scheme.</p>
9.	Suggests that the location of Plot B would preclude the provision of an eastern arm to the Bugsby's Way and Anchor and Hope Lane junction to provide a link to Charlton Riverside.	The location of the western end of the East-West Link Road and its connection to Anchor and Hope Lane was discussed with RBG during the evolution of the Charlton Riverside SPD as part of the council's consultation with stakeholders. From the plans within the Charlton Riverside SPD, the route does not form an additional arm of the existing roundabout, but is indicated to connect Anchor and Hope Lane to the north of the existing Roundabout with Bugsby's Way. Therefore, this comment appears to be an error by TfL in their interpretation

		<p>of the Charlton Riverside SPD document.</p> <p>The East-West Link Road (24m wide corridor) can be provided off a new junction to the north of Plot B on Anchor and Hope Lane, rather than off the Bugsby's Way/Anchor and Hope Lane junction. This has been accounted for in the amendments to the plans for this Plot.</p>
10.	<p>Concerned by the proposed junction arrangement between the site access, Anchor and Hope Lane and Bugsby's Way. Suggests that under this arrangement it would appear difficult to implement measures to prioritise movements of buses in and out of the Charlton Riverside OA.</p>	<p>Whilst the Charlton SPD makes reference to a bus route through the overall master plan along the East-West Route, there is no indication that any bus priority measures are being considered along Anchor and Hope Lane or at the entrance to the master plan area at the western end of the East-West Link Road. Indeed, the SPD states that the bus priority (bus gate) measures would be at its eastern end. It would therefore be unreasonable to expect the applicant to show additional road width on their drawings in the absence of detailed proposals within the SPD. Furthermore, the SPD states at 7.4 of the document that the East West Link:</p> <p><i>"It is not intended to provide an alternative route for strategic through traffic which remains on the A206/SRN. Access will be restricted to local journeys and access, public transport, cyclists and emergency vehicles, via a mechanism such as a bus gate, at the eastern end of the new link. "</i></p> <p>Additionally at 7.2 of the Adopted SPD the proposals for the routes within the Master Plan area are described as:</p> <p><i>"On-street parking and the use of bus boxes, rather than lay-bys will help to manage traffic speeds, as will the prevalence of junctions and pedestrian crossings."</i></p> <p>Therefore it is clear that the flows of traffic on the East West link are intended to relate to the development and the location of the bus priority measures described as being at the eastern end, and not in the location of the proposed development, according to the Adopted SPD. Also the use of 'bus boxes' does not infer the need for bus lanes along its route.</p>
11.	<p>Concerned that the proposed development proposal would preclude the delivery of a high quality public transport link considered vital to the</p>	<p>Please see response above with reference to Chapter 7 of the Charlton</p>

	realisation of the vision for the Charlton Riverside OA.	Riverside SPD..
Existing Site Connectivity		
12.	Confirms that they are satisfied with the analysis undertaken and confirms agreement with the average PTAL score.	Noted.
Future Site Connectivity		
13.	Notes that the PTAL assessment should be taken as a guide to what potential PTAL could be achieved, however this should not be relied upon to justify departures from the London Plan housing density matrices.	<p>It is reasonable to expect public transport improvements to come forward in order to support the Opportunity Area as stated in the Charlton Riverside SPD, June 2017. It is noted that the SPD also refers to future PTAL scores in Figure 6.3 on Page 62 stating that these are based on the proposed changes/improvements to public transport provision and an improved level of pedestrian accessibility. The assumptions within the Transport Assessment are therefore in line with those set out in the SPD. On examining Figure 6.3 of the SPD, it would appear that this has been produced by TfL using their WebCAT assessment tool. Therefore it is peculiar that TfL are suggesting that this should not be relied upon as the TPP assessment relates very closely to this.</p> <p>It is also noted that in the letter, TfL are seeking financial contributions to bus services to increase the frequency of routes in the immediate area. This further indicates that there ought to be some level of certainty with regard to the public transport improvements with the implementation of the Master Plan over time. With the proposed contribution levels suggested by TfL for the proposed development applied to the overall master plan for 7,500 dwellings the result would be circa £8m towards bus service enhancements, along with the additional revenue created through the additional patronage. With this level of funding, it would be expected that enhancements to services would be delivered by TfL. If not, then the contributions would be expected to be returned to each of the developers after a suitable period of time.</p>

Site Access, Layout and Healthy Streets		
14.	<p>Suggests that in line with Policy T2 of the Draft New London Plan the development should be designed appropriately to support mode shift towards active and public transport travel and the designs for new or enhanced streets must demonstrate how they deliver against the ten Healthy Streets Indicators.</p>	<p>The roads within the development have been designed to be highly permeable in terms of access for pedestrians and cyclists. A series of improvements to pedestrian facilities are proposed on and off-site as set out within the Transport Assessment. The assessment of the development against the Healthy Street Indicators is set out below:</p> <ul style="list-style-type: none"> • <i>Pedestrians from all walks of life</i> – The proposed development will deliver residential accommodation consisting of different unit and tenure mix resulting in a mixed community. • <i>People choose to walk, cycle and use public transport</i> – Car parking at the proposed development will be low at 0.27 spaces per reflecting the accessibility of the site by walking, cycling and public transport. The non-residential elements of the scheme will have no general car parking. As set out in the Transport Assessment, the majority of trips are predicted to be undertaken on foot, by cycle and by public transport. • <i>Clean air</i> – Limited car parking and associated low level of vehicle generation will help to achieve this. • <i>People feel safe</i> - The pedestrian environment within the application site will be of high quality with the provision of an attractive open space, well maintained and with legible illuminated pedestrian routes, natural/passive surveillance provided by the commercial elements and residential lobbies of the application site. The proposed development will also contribute to the perception of pedestrian safety by enhancing the public realm and increasing natural surveillance of pedestrian routes. • <i>Not too noisy</i> – Limited car parking and associated low vehicle generation will help to achieve this. • <i>Easy to cross</i> – Limited car parking and low vehicle generation as well as additional crossing points will help to achieve this. • <i>Places to stop and rest</i> – Seating will be provided within the public realm. • <i>Shade and shelter</i> – Trees and landscaping will be provided within the public realm. • <i>People feel relaxed</i> – The pedestrian environment will be of high quality with extensive public realm proposals.

		<ul style="list-style-type: none"> • <i>Things to see and do</i> – The proposed development will provide a mixed use scheme in what is currently an industrial development. The scheme will create new connections such as e.g. the link to the Thames path. <p>It would also be expected that RBG and TfL would follow the guidance within the SPD in developing the routes within the master plan area and <i>"All streets will be designed with reference to The Government's Manual for Streets (2007), so that design speeds, road geometry, forward visibility, street furniture and materials, and general arrangement, will tend towards creating an environment where the needs and safety of pedestrians is paramount."</i> (Ref 7.2 Charlton Riverside SPD) and also that <i>"its streets will be designed in line with the principles of Transport for London's Healthy Streets Framework"</i> (Ref 7.6 Charlton Riverside SPD). This will also relate to RBG's delivery of the East-West Link Road.</p>
15.	Whilst the proposed layout serves the immediate needs of the proposed development and allows access to both car parking areas, there appears to be limited information on how this access route will facilitate access by foot or cycle to the wider masterplan area and how it has been designed to not prejudice any future plans.	<p>The roads within the proposed scheme will eventually connect with the wider masterplan although no sufficiently detailed drawings have been produced to date by RBG or their consultants which would indicate what the proposed scheme is expected to tie in to.</p> <p>Therefore, the Applicant has had to work up plans for the proposed master plan roads for the Master Plan in the absence of any detailed specific plans from RBG in order to progress the 2016 and 2017 planning applications. Throughout the process cognisance has been taken of these routes, making allowance for a 24m corridor for the future delivery by RBG of the East West Link Road to be provided. Therefore, the future access through the master plan has been provided for.</p> <p>In addition, pedestrian and cycle connections through the development proposals to Anchor and Hope Lane (between Derrick Gardens and Atlas Gardens) and to the Thames Path.</p>

16.	Requests that the applicant set out how the proposed development will fit into, and facilitate, the future proposals for the site, without precluding any potential future transit route.	Again, there are no detailed plans available from RBG or TfL which the proposed scheme layout could tie in to. However the Applicant has taken the future provision of the East-West Link Road into account in developing the proposals, and the adjustments to the Plot B buildings have been made to enable this to be provided by RBG in the future.
17.	Suggests that the proposed access from Hope and Anchor Lane and the Bugsby's Way/Anchor and Hope Lane roundabout should be investigated in further detail.	<p>The proposed East-West Link Road will be provided off a new junction to the north of Plot B rather than the existing roundabout junction of Bugsby's Way and Anchor and Hope Lane. This follows the Charlton Riverside SPD.</p> <p>A diagram showing this has been provided as part of the application and the consultation process.</p>
Walking and Cycling Infrastructure and Access		
18.	Notes that the applicant has identified potential opportunities to contribute positively to the local pedestrian/cycle network. Suggests they would welcome further discussions with both the applicant and RBG on the mechanism for delivering these improvements and how they fit in with the overall movement strategy for the masterplan area.	<p>Noted.</p> <p>Proposals for improvements have been submitted as part of the development proposals on Anchor and Hope Lane. In addition, connecting routes through the site are included within the site for improved connections between Anchor and Hope Lane (between Derrick Gardens and Atlas Gardens) and the Thames Path.</p>
Trip Generation and Approach to Assessment		
19.	Confirms the methodology proposed to assess the trip generation for the residential element of this particular site is appropriate and acceptable to TfL.	Noted.
20.	Notes that the approach to the assessment of the non-residential trip generation is accepted, however suggests that it should be noted that the assumed daily profile of arrival and departures for office employees is taken from the Canary Wharf Employee Travel Survey undertaken in 2007 and should be updated.	This set of data is still considered valid and appropriate for the purposes of establishing the proportion of staff arrival and departure trips in the AM and PM peak hours. It is unlikely that significant changes to the profile of arrivals and departures have altered since 2007 which would result in a higher level of trips within the peaks. If anything, the peaks will have reduced through the current trend towards more flexible working and home working. Thus, the figures used within the Transport Assessment are robust and would provide a worse case assessment of the peak trips.

21.	Notes that the approach to the assessment of the ancillary uses is also accepted.	Noted
22.	Notes that in relation to the nursery, whilst the trip generation methodology is accepted, and the lack of drop-off and pick-up facilities welcomed, the applicant will need to have consideration to the fact that despite a lack of provision to do so, parents are still likely to drop-off and pick-up children on the way to/from work using private vehicles. Suggests the site design will need to provide a response to the likely scenario that people will attempt to park close to the nursery and pick-up/drop-off children. Suggests that the design of the internal streets will need to be carefully developed with these issues in mind.	<p>The assessed impact of the nursery has been undertaken to ensure that a robust assessment of the impacts on traffic flows around the adjacent highway network represent a worse case. However, the main purpose of the nursery is to provide for a local need largely related to this development and the immediate surrounding area. Thus it would be expected that the primary catchment area would be local and walkable.</p> <p>All car use to the nursery will be discouraged and the nursery operator will enforce the message that there will be no facilities for car parking or drop-off / pick-up within the vicinity of the site. It is possible that the internal shared surface area between buildings DEF and GH could be used to provide for a car drop off and pick up facility, subject to the management of the space as it would not amount to a high level of use of this space. However, the specific provision within the site for dedicated parking for this specific use would then result in a difficulty in reducing and minimising car use, and is against planning policy guidance to minimise private car use.</p>
Public Transport Impact Assessment		
23.	Expects contributions from this development in order to facilitate improvements to the bus network and mitigate the expected increase in demand. Suggests that a contribution of £830,000 would be required to enhance bus services or facilitate infrastructure as appropriate. This would	This is noted.

	facilitate the introduction of an increase in the frequency of routes in the immediate area to cater for the additional demand. This is based upon the introduction of four new journeys across an initial period of 3 years.	
24.	It is noted that as discussed at the pre-application meeting, TfL are interested in the potential impact of an additional number of passengers accessing Charlton station, and it was requested that these are set out clearly within the TA due to TfL's potential future interest in the station and services operating from it.	The predicted number of rail passengers arising from the proposed development is set out in Section 19 of the Transport Assessment. During the AM peak hour a total of extra 122 passengers are forecast with 103 extra passengers in the PM peak hour. The assessment shows that the largest impact on the rail network arising from the extra passengers at Charlton station is expected to be 1.1% which would occur in the weekday AM peak hour due to outbound trips. This is equivalent to an average of 10 passengers per train in one direction.
Car Parking		
25.	Suggests there should be 78 Blue Badge spaces included within the development compared to the 51 proposed.	<p>The proposed accessible car parking provision significantly exceeds the Draft New London Plan minimum requirements of 3% of residential dwellings by a multiple of 2. In addition, this level also exceeds the minimum of 10% of the parking provision required to be suitable for use as accessible bays as set out in the Borough's planning policy.</p> <p>Together with the car park management plan, it also complies with the Accessible London SPG and the currently adopted London Plan. Car parking will be managed so as to give priority to blue badge holders and will allow for parking layout to be amended to achieve disabled parking at a level of 10% of the units, should the need arise.</p>
26.	Suggests the TA should provide more details regarding the management and allocation of the ultimately agreed Blue Badge parking.	Details on how the car park will be operated will be provided within a Car Park Management Plan and it will be proposed that a right to park arrangement will be implemented and renewed on an annual basis, in order to allow priority to be given to blue badge holders and parking bays to be re-allocated on a needs basis. This is wholly in line with the adopted policies, and this is set out within the Transport

		Assessment.
27.	Suggests the applicant seeks to meet the requirements of the Draft New London Plan which requires any parking to be provided with 20% active charging points with all the remaining spaces provided with passive provision.	<p>Noted. However, it is also noted that this policy is Draft and not currently adopted.</p> <p>An appropriate adopted policy compliant condition securing the necessary minimum provisions would be expected to be imposed.</p>
28.	Expects the applicant to commit to a condition on the development for all future residents (except Blue Badge holders) prevented from applying for a residents parking permit.	Noted and agreed.
29.	Suggests the development should also fund an extension of the Charlton (C) Controlled Parking Zone to cover the extent of their development	<p>The roads within the site would be privately owned and so the CPZ would not apply.</p> <p>In terms of Anchor and Hope Lane, on-street parking, this is already included as part of the Charlton CPZ, despite the bays having a different regime of restrictions.</p>
Cycle Parking		
30.	Notes that there is a lack of detail on the type or location of this provision, except for the statement within the TA that they will be at ground and basement levels. Notes that there was no basement plan provided within the suite of planning drawings submitted and as such the layout cannot be reviewed. Requests that these should be included.	<p>Noted. The basement plan was prepared with a layout of cycle parking, however, this may have been a layering issue. A detailed replacement plan has been prepared.</p> <p>This has been undertaken by the Architect.</p>
31.	Notes that there is no mention of the provision of showers and storage facilities for the non-residential uses across the site, which should be confirmed.	Shower and storage facilities are expected to be provided for the proposed workspace. Currently, the proposed commercial space is provided as 'shell and core' to allow flexibility in the future fit out by operators or tenants. As such it would be suitable for this provision to be subject to a planning condition.

32.	Suggests residential or commercial visitor cycle parking located in the public realm will need to be designed to avoid any fly-parking around the site which may affect pedestrian or servicing vehicle flows and building entrances.	Visitors' cycle parking will be spread across various locations within the site. The provision is in line with the TfL standards and therefore there will be sufficient spaces to cater for visitors' demand for cycle spaces. In any event, the maintenance of the landscaping and operations within the site will be dealt with by the on-site management of the private estate.
33.	Notes that as there is a lack of information on the provision of facilities cycle parking, TfL cannot determine whether the number, type or location of cycle parking is acceptable.	The cycle parking provision would be expected to be conditioned and therefore details would normally be provided as a pre-occupation condition. The cycle parking types used will be a mixture of two-tier racks and Sheffield stands for larger bikes such as cargo bikes and tri-cycles etc.
Travel Plan		
34.	We welcome that modal shift targets are included in the Travel Plan, however as set out within TfL's Travel Plan Guidance when using percentages as a target, it is important to ensure values are correctly quantified. The targets should clearly differentiate between percentage point reduction/increases as opposed to percentage reduction/increases.'	The proposed targets are consistent with the Travel Plan Guidance and also consistent with how targets are expressed by TfL for individual mode increases for sustainable travel within London. This form of figures has been used and accepted by local authorities for setting targets on travel plans that have been implements. It should be noted that this is a Framework Travel Plan and the targets are provisional at this stage and will need to be revised once the baseline modal split has been established.
35.	Requests that a draft Construction Logistics Plan (CLP) is produced prior to determination.	The Transport Assessment includes an assessment of the impacts associated with construction traffic and the Environmental Statement includes a dedicated chapter on construction and demolition activities. It would be expected that a Construction Logistics Plan would be conditioned.