

# London Riverside Opportunity Area Planning Framework

## Public Consultation Report

September 2015



## Overview

In accordance with the Greater London Authority Acts 1999 and 2007, the Greater London Authority (GLA) undertook a public consultation on the draft London Riverside Opportunity Area Planning Framework for a period of eight weeks from 9 February to 7 April 2015.

This report presents a summary of the results of the public consultation. It is presented in a table format and includes a summary of the comment received, an officer response on the issue raised and an action (where applicable) as to how the document has been altered to take account of the issue. The responses represent the collected views of the organisations involved in the preparation of the OAPF, including the GLA, Transport for London (TfL) and officers from Havering and Barking and Dagenham Councils.

It should be noted that the table is not exhaustive and does not include every comment made by those that responded to the consultation. General comments and comments of support that did not raise issue with the document or its strategies have been omitted from the table, which focusses only on areas of disagreement or suggested changes.

Consultation letters or e-mails were sent to 45 companies, authorities or individuals, including land owners, developers, amenity and business groups, utility providers and public authorities. A total of 32 responses were received from a broad range of sectors as indicated below. Generally the responses were positive and supportive, recognising the potential of London Riverside.



Ref	Response from	Subject	Comment	GLA/TfL/LBBD/LBH comment	Actions arising
1	Barking & Dagenham Chamber of Commerce	General	<p>Where will the people in the new homes work and how will they get there?</p> <p>The strategy of creating a huge imbalance between the number of homes and the number of jobs can only put more pressure on the transport system that it already overloaded. It is logical to expect an average of 2 adults per household, which means approximately 50,000 people, of whom only 16,000 are employed in the area, potentially creating 34,000+ commuters.</p>	The number of jobs calculation is based on the development capacity study in Chapter 7, using broad job densities and site area. It is not possible at this stage with a strategic document on this nature to pinpoint where and what the jobs will be.	None
2		Chapter 3 – employment numbers	Requests an analysis of the 16,000 jobs referred to, with these sorted by public/private sector origin, where they will be, nature of businesses and employment and skills levels expected to be required.		None
3		Chapter 3 – employment types	Disappointing that there are no plans to encourage the development of high quality offices along A13/A1306/C2C corridor or along the riverfront, a move that could uplift the area.	The OAPF does not rule out B1 office use.	None
4		Chapter 4 – transport	The Overground extension is welcome. However the cancellation of plans to extend the DLR to Dagenham Dock or provision of another rail link into Riverside will surely result in congestion and an over-reliance on the car (the opposite of what is intended)?	<p>TfL is working closely with LBBD in developing a transport strategy for Barking Riverside. This will be underpinned by the London Overground extension, exemplar bus facilities and a comprehensive walk and cycle network to limit reliance on private vehicles.</p> <p>The Overground extension will be built in such a way as to not</p>	None

				preclude the DLR from being extended in the future should additional rail capacity be necessary to support additional growth in the area.	
5			The road changes proposed will barely cope with existing problems let alone the increased traffic from DP World and that generated by new population. A full end-to-end strategy of the A13 from Thurrock through to the City is essential, coupled with a plan to ease movement for the local population and its related traffic.	TfL is reviewing the operation of the whole A13 Corridor, and a strategy is due to be complete in late 2015. Additionally, TfL and LBH are working closely on the A1306 corridor to enhance its public realm and movement role.	None
6	Barking Power Ltd (Consultant: Gerald Eve)	Chapter 3 – land use strategy	The LROAPF proposes to promote the LSIP as a hybrid Business Park/Industrial Location (IBP-PIL), and in doing so, uses will be carefully managed. It is understood that the sort of uses to be promoted will be B1(c), B2 and other business uses. BP Ltd considers that managed uses in the LSIP should not be too restrictive.	The wording does not specify types of B Class uses to is not overly restrictive.	None
7			Figure 1.7 should be amended to reflect that the site is currently vacant and comprehensive redevelopment is proposed.	Figure 1.7 does not show vacant sites - it shows SIL release.	None
8			The site has the potential to assist in wider regeneration and if, as anticipated, an alternative energy-generating use is not found, the removal of infrastructure such as overhead pylons and water cooling tunnels will have a beneficial effect on the surrounding area. However, significant remediation costs will be required in order to remove these elements and value is required from	New text needed on BPS.	Insert new sub-section under 3.3 Employment covering Barking Power Station. Also refer to redundant pipeline tunnels under BPS and the potential re-use for other utilities i.e.:

			<p>the release of the site to pay for these enhancements.</p> <p>A flexible approach is therefore needed on the nature and form of employment generating uses (to include B1(c), B2, B8, other employment uses, or for an alternative energy-generating use), which are allowed on site in order to generate the value to enable the positive effects that will result from redeveloping the site. Given its proximity to transport networks and nearby freight uses in the safeguarded wharves, B8 use is particularly suitable.</p>		<p>broadband/waste.</p> <p>Small bit of history, vacancy, locational characteristics (transport etc), constraints and development potential (land uses etc).</p> <p>Future of this site will be dealt with the LBBDD's emerging Local Plan as it is outside the LSIP.</p>
9			<p>Notwithstanding Barking Power's general support, the document needs to better distinguish between specific policies and text providing explanation and commentary.</p>	<p>The OAPF is not a policy document, but an SPG to the London Plan. It cannot create new policy and specific "policies" are not required.</p>	<p>None.</p>
10	<p>Barking Riverside Ltd (Agent: Barton Wilmore)</p>	<p>General</p>	<p>Figure 3.2 – supports inclusion of revised BR masterplan, although it should be noted that this is currently not approved and should be made clear that this is for illustrative purposes.</p>		<p>Figs 3.2 and 5.26 – emphasis that masterplan at this stage is for illustrative purposes.</p> <p>Get updated masterplan layout from Matt Carpen following design freeze in July.</p>
11		<p>Section 4.4.3</p>	<p>This section states that Barking Riverside is a 'new development', but the current approval which is partially implemented was approved in 2009 (ref: 08/00887/FUL).</p>		<p>Alter wording in 4.3.5 – delete "new"</p>
12		<p>Section 5.5.4 (3.</p>	<p>BRL supports higher densities and taller buildings</p>	<p>Agree</p>	<p>Alter wording in 5.5.4</p>

	BR) and Fig 5.16	at Barking Riverside. The reference at para 3 of section 5.5.4 and Figure 5.16 need to be considered in the context of the need for a flexible consent for BRL and in discussion with BRL's new design team about clustering taller elements of the masterplan. Overall it is BRL's intention to retain stage 4 of the site as the high rise area of the site but also to bring more height around the station and to the east in stage 3 and in some parts more central where there is opportunity around open spaces for example.		(third bullet) to reflect need for flexibility over heights and densities.
13	Figure 5.25 And section 5.7.2 (6th para)	Figure 5.25 is entitled 'Barking Riverside Masterplan – consented'. However, the plan is in fact a Sub-Framework Plan which was approved under planning permission LPA ref. 08/00895/CDN. As identified above, a detailed masterplan for the whole of Barking Riverside is not yet approved.		Alter 5.25 plan title to 'Consented sub-framework plan'.  Alter text in 6th paragraph of 5.7.2 to the same.
14	Figure 5.10	BRL strongly supports the inclusion of the Barking Riverside Masterplan at Figure 5.27 which is correctly identified as an initial draft. With regard to the supporting text on page 90 of the draft LROAPF, the current position is that 686 units have been constructed (ref to 357 in the text), with a further 660 units within Phase 1 planned to come forward in two phases up to 2017.		Alter text on pg 87 (5.7.2):  3rd, 4th and 5th para: "To date 686 homes have been completed alongside the Rivergate Centre, including a primary school and place of worship, 7000 sq.ft of commercial floorspace including a local format store of 4000 sq.ft for Morrison's which is now open. A further 660 homes within the remainder of phase one are planned to come forward into two further

					phases up to 2017.”
15		Figure 5.27	BRL is concerned that the draft LROAPF is overly prescriptive in terms of dwelling typologies set out under Figures 7.1 & 7.2 and that this does not allow sufficient flexibility to optimise capacity and create places across London Riverside.	The purpose of the exercise is to estimate development capacity across the OA from the development sites. It forms part of chapter 7 for that purpose and not the urban design chapter.	Introduction to Chapter 7 - Development Capacity, to be reworded to explain its purpose for clearly.
16		Section 6.2.2 (Chapter 6 – Decentralised energy)	Given the work on the masterplan is moving forward, the images used are already superseded. BRL would be happy to provide the latest draft images, in particular for Figure - 3.2; 5.12; 5.16; and especially 5.27.	Agree.	Contact Barton Willmore/Matt Carpen for more up-to-date images.
17	Berkeley Group (Consultant: Quod)	General	The housing section should make it clear that there is support for a variety of housing types including the types of housing provided by the Berkeley Group, including Senior Living and Discount Market Sales. Berkeley Group would be happy to provide further details of these creative housing solutions.		Additional bullet point under 3.2: A variety of housing typologies are required to create a mixed neighbourhood and distinctive place. Higher densities and other forms of housing including senior living and other forms of AH such as DMS have the potential to diversify the housing offer.
18		Chapter 3: Land use	Further clarification is sought in respect of how relocation of the Thameside West SIL occupiers will be implemented. It is noted that page 30 only briefly mentions the potential for the area to ‘help accommodate the growing Green Industries and further industrial relocation from the Royal Docks.’	De-designation of SIL would only take place through the Local Plan adoption process, whereby an evidence base (i.e.: employment land review) would be required to justify the release. The OAPF only sets a direction of travel of future land uses in order to regenerate the area.	None.

19		Chapter 7: Infrastructure, phasing, delivery and development capacity	Sections 6 and 7 of the document need to explain how the de-designation will be implemented and set out how it may affect development capacity in the Royal Docks. Guidance on timing, infrastructure dependencies and how planning policy can assist with delivery, e.g. through changes to policy on safeguarded wharves, should also be given careful consideration.	As above.	None.
20	Environment Agency	General	<p>We support the production of a Development Infrastructure Funding (DIF) study and recommend that environmental infrastructure is included as part of this study, reflecting the infrastructure themes of the London Infrastructure Plan 2050. As an infrastructure provider we are keen to be involved in the process of this study.</p> <p>Consideration of future infrastructure needs should include environmental infrastructure highlighted in the LIP (water resources, drainage, waste water and flood risk, green infrastructure).</p> <p>We can provide relevant information on our 6 year flood risk management investment programme, and welcome the opportunity to be involved in the process of producing a DIF study.</p>	Consider at DIFS stage. The DIFS brief has been drafted and is in the process of being agreed with the boroughs, TfL and other stakeholders, including the EA.	No changes required to OAPF.
21		Chapter 2: Policy context AND Section 5.3 Existing constraints (flood risk and climate change)	We recommend that strategic Environment Agency plans relevant to London Riverside are also part of the OAPF policy context. These include the TE2100 Plan which sets out how the Environment Agency is planning to manage tidal flood risk in the Thames estuary until the year 2100. The Plan includes flood risk management policy which should be taken into account when planning Thames riverside development.	The TE2100 and TRBMP are not planning policy.  References to flooding and water management are referred to elsewhere.	
22			The Thames River Basin Management Plan 2015-2021 (soon to be published) will refer to required		



		<p>improvements to water quality in the Roding, Beam and Ingrebourne and Tidal Thames catchments, and we recommend that this is an additional and relevant framework to help inform this scale of planning.</p> <p>The OAPF should emphasize that all riverside developments take into account the recommendations of the TE2100 Plan. The relevant tidal flood risk management policy for London Riverside is ‘take further action to keep up with climate and land use change so that flood risk does not increase’. Recommendations of the Plan include setting back development from the riverside and demonstrating that the tidal defences can be raised in the future. The Environment Agency can provide further information and advice.</p>		
23		<p>The majority of the OA is located within Flood Zone 3 with ‘residual risk’ of flooding if the Thames tidal walls were to fail, breach or be overtopped. Development sites within London Riverside OA that lie in the floodplain of the rivers Roding, Beam and Ingrebourne, may also be at risk from fluvial flooding. We recommend an early conversation with the Environment Agency to help the Greater London Authority and London Riverside strategic partners to consider flood risk and options for managing flood risk.</p>		<p>Refer to Flood Zone 3 in section 5.3</p>
24	<p>Chapter 5: Urban design</p> <p>Section 5.3: Existing constraints</p>	<p>A de-designation is proposed of two Strategic Industrial Land (SIL) sites and release of locally significant industrial land to residential. Government’s National Planning Policy Framework guidance on climate change and flood risk classifies residential dwellings as More Vulnerable, compared to industrial uses which are classified as Less Vulnerable. An important consideration in these locations will be to ensure</p>	<p>Noted. Further detail to be added on flood risk and the likely impact on urban design.</p>	<p>Section 5.3: Refer to the fact that residential use is more vulnerable and detailed FRA will be required for all residential development proposals.</p> <p>Plus, Section 5.6.4,</p>

		<p>that development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. Again we recommend an early conversation with Environment Agency to help GLA and the relevant London boroughs to consider flood risk in these locations and options for managing flood risk.</p> <p>There is a brief mention of some environmental constraints to urban design, including flood risk and land contamination. However these constraints are not addressed further. There may be more options to address constraints at an Opportunity Area scale, or through design strategies at sub-area scale (for example A1306) than at an individual plot scale.</p>		<p>Design principle 5 – Built form:</p> <p>Include some commentary on the design challenge of flood remediation (i.e.: raising vulnerable uses to first floor) and the need for street level activity (ground level).</p>
25	Chapter 3: Land use (3.5.1: Waste)	<p>We welcome the inclusion of this section which acknowledges there is a need for increased waste management infrastructure for composting and recovery, as identified in the Joint Waste Development Plan. We also welcome the inclusion of sites identified for provision of new waste infrastructure in order to meet the waste apportionment outlined in the London Plan.</p> <p>However, it should be noted that the apportionment in the London Plan should not be regarded as a maximum capacity, and that the London Riverside OA may be suitable for the development of additional sites to provide further capacity. Existing waste treatment capacity should be protected.</p> <p>In addition, the area’s existing waste treatment infrastructure coupled with the initiatives already in place such as the Green Enterprise District and the London Sustainable Industries Park mean that there may be an opportunity to locate one of the ‘Circular Economy Hubs’ mentioned in the London</p>	<p>LBBB response: The Joint Waste Plan is focused on providing sufficient capacity to manage the apportionment for municipal and commercial industrial waste set out in the 2011 London Plan. Paragraph 5.78 of the current London Plan acknowledges that the latest data show a 40% drop in commercial and industrial waste apportioned compared with the 2011 London Plan figures. Moreover in line with the JWPlan the Council has approved in the last three years two anaerobic digestors and a gasification plant within the LSIP the combined capacity of which, along with the safeguarded waste sites, will comfortably exceed the waste apportioned to the four ELWA Boroughs. Whilst we recognise that</p>	<p>Include reference to LSIP as a Circular Economy hub in Section 3.5 (3.5.1)</p>

			<p>Infrastructure Plan 2050 in the London Riverside. This could be achieved potentially by encouraging facilities which are at the upper end of the waste hierarchy, such as remanufacturing, reprocessing and up-cycling, being located in the area.</p>	<p>the apportionment is a benchmark we have already comfortably exceeded the reduced apportionment set out in the current London Plan. The borough still continues to receive proposals for low grade waste uses and the JWP has proved an effective tool in deterring these. That said the Council recognises the potential advanced technology reprocessing facilities as demonstrated by Closed Loop and would welcome the reference in the OAPF to Circular Economy Hubs. However relaxing the apportionment would undermine such uses as they would get crowded out by lower grade uses. It would also need to recognise that the Circular Economy requires goods to designed to be reused, repaired or remanufactured.</p>	
26		<p>Chapter 4 – Transport strategy Section 4.3.1 Reducing physical barriers to travel</p>	<p>We recommend that this chapter acknowledges that successful transport infrastructure needs to be planned and designed to be resilient and adaptable to extreme weather and climate change over its lifetime in order for it to effectively support growth.</p> <p>The potential environmental impacts of new transport infrastructure are not referenced. We recommend that the OAPF acknowledges that transport infrastructure can be designed and managed to deliver multi-functional environmental benefits, for example, the sustainable management of drainage and flood risk, improved air quality and biodiversity, and for it to highlight where and how such environmental</p>	<p>Any significant transport interventions would be subject to an EIA where this would be assessed in greater detail.</p>	<p>None.</p>

			opportunities could be delivered.		
27			We recommend that the OAPF states that proposed new river crossings would need to be designed and constructed to minimise impacts on river and riverside habitats and species of conservation importance.	An Environmental Impact Assessment (EIA) will be undertaken to identify the effects of the scheme - including on habitats and species - and, working with relevant authorities - it will also outline any mitigation measures required. This EIA would be subject to consultation.	None.
28		Chapter 5 - Urban design strategy Section 5.4 Open space and public realm strategy	We support the principle of the All London Green Grid as a framework for delivering high quality open space and public realm in London Riverside. The river network is also a valuable asset of London Riverside's green grid. The Roding Beam and Ingrebourne Catchment Plan also sets out objectives and actions to improve the quality of the water environment for people and wildlife. This is a plan produced by partners including the London Boroughs of Havering and Barking and Dagenham, and we recommend it is an additional and relevant framework to help inform this scale of planning.	The Catchment Plan is relevant but it is not intended for the OAPF to go down to that level of detail.  Urban design chapter to be restructured with less emphasis on the ALGG.	Have another look at the layout and structure of Chapter 5: Urban Design. Too much emphasis on ALGG.  Refer to it only with key diagram, but remove detailed diagrams.
29		Section 5.3 - Existing constraints (Land contamination)	London Riverside presents an opportunity to promote the sustainable economic benefits of strategically addressing brownfield land resources and contamination issues. Many of these sites will have contamination issues associated with previous land use and may require clean up or remediation. We suggest that the London Riverside OAPF promotes exemplar sustainable management and remediation of contaminated land by the promotion and use of the Definition of Waste: Development Industry Code of Practice (DoWCoP).	Noted.	Include additional text in 5.3 referring to DoWCoP

30			<p>The whole London Riverside OAPF area suffers from poor air quality with the consequent health impacts. The boroughs of Barking and Dagenham and Havering are covered by Air Quality Management Areas (AQMA) and we understand Newham is shortly to declare a whole borough AQMA. Thus we would expect development to take account of impacts on air quality and potential exposure of residents and workers to poor air quality and to comply with the requirements of local borough Air Quality Action Plans. We would expect the OAPF to reference the London Plan Policy 7.14 and the SPG on Sustainable Design and Construction which includes the concept of development being 'air quality neutral' and that where possible air quality should be improved through planned developments in the area.</p>	<p>Noted. The London Plan policies are sufficient to ensure air quality considerations are given due regard in development proposals.</p> <p>In addition, both boroughs are pursuing air quality initiatives with the Mayor's air quality team.</p>	<p>Include a short reference to the need to improve air quality in the 'Existing Constraints' section.</p>
31			<p>The proximity of waste facilities to housing should be considered as part of the urban design and land use strategies for London Riverside. This is particularly important with respect to organic waste treatment plants which are not generally suitable for location next to housing developments due to odour issues. Although odours can be minimised using good practice and design they cannot be eliminated completely.</p> <p>It is also important that the link between urban design and waste collection and transport is not overlooked. The collection from multi-occupancy and high-rise developments needs to be considered at an early stage in the master-planning and design processes. The collection of materials from the kerbside needs to be done in a way that maximises the opportunities for the capture of materials for recycling and recovery and integrates with the collection methodologies</p>	<p>The land use strategy seeks to improve the relationship between SIL (including waste uses) and housing by consolidating land uses to avoid conflicts as far as practicable.</p> <p>Agreed.</p>	<p>Include additional text in 5.6.4 (section 1: The new 'high road') on the importance for waste storage and collection to be designed in from the outset, especially in high-density, high-occupancy schemes.</p>

			employed by the boroughs and private sector partners. It is important that in the design process issues such as the access/egress of collection vehicles is not overlooked.		
32		Chapter 6 – Decentralised energy	We support the principle of locally produced low to zero carbon and waste energy. However attention should be paid to minimising the effects of these schemes on local air quality. Facilities can have adverse impacts on local air quality depending on design of schemes, plant size and fuels used. In particular technologies that minimise the emissions of oxides of nitrogen should be considered where practicable.	This applies London-wide and is not specific to this OAPF.	None.
33	Estates & Agency Properties Ltd (EAPL) – landowners Abbey Retail Park and be:here (PRS developer) Agent: Icen Projects	Chapter 5 – Urban design) Tall buildings	<p>The first part of Section 7 details successful existing built form typologies from around London, and applies them to the key development sites across the London Riverside Area.</p> <p>Figure 7.1 (Development Capacity Study 2011) indicates that The Abbey Retail Park site is able to deliver a combination of 5 and 6 storey mixed use typology, as shown to be successful at Kings Wharf and Adelaide Wharf in Hackney. Our clients consider the proposed typologies for The Abbey Retail Park to be contradictory to the allocation as suitable location for tall buildings under Section 5 of the draft LROAPF.</p> <p>Whilst it is clear that the site has been allocated for, and can deliver, high density development, the draft LROAPF sends out a mixed message on the style and typology of development which should be brought forward on the site.</p> <p>It is the view of our clients that The Abbey Retail Park is capable of delivering higher density and taller buildings than indicated within the specified typology.</p>	Abbey Retail Park is located adjacent to the listed Barking Abbey. Whilst the tall buildings strategy indicates that Barking Town Centre and sites along the River Roding has potential for tall buildings, this needs to be balanced with the need to give special regard to heritage assets, hence the more reserved height of 5-6 storeys indicated for Abbey Retail Park.	None.

34			<p>Section 7.1.2 (Residential capacity estimate) states:</p> <p>‘For estimating residential capacity, the study applied a residential typology from a pool of five typologies to the key sites. It should be noted that whilst these estimated capacities do not have the robustness of a masterplan or approved scheme, they provide a greater degree of certainty on housing numbers and offer a spatially tested estimate of site capacity, which is required to establish the principles of built form and estimate social infrastructure requirements.’</p> <p>EAPL and be:here are of the view that the methodology utilised does not provide sufficient flexibility for future revisions to the London Plan housing delivery estimates; which as a consequence could impact on the viability of bringing sites forward within the London Plan time period (up to 2036).</p> <p>In line with the above, our clients propose amendments to Section 7.1.1, which state that although the typologies have been provided, typologies for each London Housing Zone site should be considered on a case by case basis, in order to confirm the style and type of built form which comes forward; and that the final decision on typologies should be deferred to the relevant Local Planning Authority.</p> <p>The proposed amendments to Section 7.1.1 will enable greater flexibility in housing delivery and ensure that sites are not rigidly designated for certain types of development.</p> <p>This flexibility, will in turn enable sites to bring forward appropriate and viable development in terms of density and design, in line with changing housing needs.</p>	<p>The purpose of the exercise is to estimate development capacity across the OA from the development sites to provide an indicative number of homes and jobs that could be achieved. The text explains that it is not a masterplan and therefore should not be used to indicate suitable housing typologies or densities. It does not form part of the urban design chapter for that reason.</p> <p>Nonetheless, additional explanatory text is suggested. Also refer to point 24.</p>	<p>Text of 7.1.1 needs rewriting as it doesn’t make sense how the capacity figures were reached through the earlier drafts - YP to re-draft and include additional capacity from HZ’s.</p> <p>Additional text also required to explain that the study and typologies are used only to generate indicative figures for the delivery of homes and jobs, and should not be used to indicate potential design/density solutions – YP to action.</p>
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35			<p>Furthermore, our clients note the recent proposal to vary the outline planning application at the Fresh Wharf Estate (LPA Ref: 14/01196/OUT), to the west of The Abbey Retail Park and the River Roding; which has a resolution to grant planning permission.</p> <p>The proposals for this site include provision of commercial and retail space, as well as up to 911 dwellings; within building blocks between 3 and 15 storeys.</p> <p>Similarly to the allocation for The Abbey Retail Park, the Fresh Wharf Estate is also included in the draft LROAPF tall buildings strategy, and has been identified as an appropriate area for the 5-6 storey development.</p> <p>Consequently, our clients are of the view that the typology identified is contrary to the LBBD's accepted typology (3 to 15 storeys) for this site. Therefore, it is considered that our clients' suggested amendments will allow greater flexibility for LBBD to permit development which is at an appropriate density for its given location, in line with current need.</p>	Agreed.	Alter Fig 7.2 to show Fresh Wharf estate in darkest blue (tall buildings)
36	Ford (Agent: Icen Projects)	General	<p>Ford wishes to seek assurances that in drafting these policies the GLA and relevant boroughs have fully assessed the constraints and opportunities associated with a number of sites within the London Riverside area. An element of flexibility should be applied to the OAPF policies in order to positively respond to the existing environmental and physical constraints; this is necessary to ensure that the identified growth and proposed land uses are both realistic and deliverable. The difficulties experienced in bringing forward development on the Beam Park site over the last decade bear testament to the</p>	<p>For clarification, the OAPF does not create new policies, but guidance for development going forward.</p> <p>Additional references will be included in 5.3 (Existing constraints) to recognise the environmental and physical constraints on the land in LR and the need for flexibility over layouts, designs etc.</p>	Action as refs 23, 24, 29.



			<p>impact of constraints in realising successful schemes.</p>		
37			<p>The aspirational land use policy set out in the Draft LR OAPF presents a significant change for the DSTO site. Whilst the consultation document sets out the possibility of ‘mixed use’ development, it is apparent from the wider document, and from the formal launch of the document at the NLA event on 25 February 2015, that it is the GLA’s intention to pursue residential development on this site and the neighbouring land at Beam Park.</p> <p>Ford is keen to ensure that sufficient flexibility is provided within the LR OAPF to support the prospects for a range of potential developments. Ford therefore encourages the GLA to incorporate an appropriate level of flexibility in Figures 1.7, 5.19, 7.2 and the general strategy to support proposals for other land uses as well as residential. This is not only important from the perspective of the sale of the site, but more importantly, to ensure a successful redevelopment of the site in the foreseeable future.</p> <p>A further and pressing reason to require flexibility relates to known and unknown environmental constraints. At present, Ford and respective parties are aware of the flood risk challenges associated with the site. Further, areas of contamination are also known within the site due to historical operations on the site. Ford has completed its environmental due diligence and is proceeding with marketing the property “with knowledge” as allowed under UK legislation. The current plan is to leave the site fit for continued industrial/commercial use. These environmental factors still have implications for land values and certain types of development in this area of</p>	<p>The consultation draft of the OAPF envisaged high-density mixed use and indicates a variety of land uses that could be considered for the site.</p> <p>Height is suggested as appropriate for Chequers Corner and whilst indicative routes through the site are indicated these are for illustrative purposes only (which is clear in the document) in order to achieve permeability.</p> <p>The document provides sufficient flexibility.</p>	<p>In light of the recent progress in the future of the DSTO site, alter the reference on Fig 5.19 to “high-density residential-led”.</p>

		<p>London.</p> <p>Flexibility should also be explored further in the land use policies as a result of developments which have either been constructed or recently granted planning consent on neighbouring sites. Most notably is the recent planning consent for the former goods yard which is located immediately south of the DSTO site. The site, which was previously used as a scrap metal processing site, was granted planning consent earlier this year for a rail-fed cement depot and cement bagging plant with associated structures (LBBB ref: 14/008948/FUL). This involves the construction of a substantial building along the southern boundary, at 14 metres in height, this will impact upon the type and layout of development that can be achieved on the southern parts of the DSTO site.</p>		
38	<p>Chapter 7: Development capacity / typologies (Tall buildings / density)</p>	<p>Figure 7.2 sets out that the development of the entire DSTO would be for six storey residential. Whilst this might simply refer to the broad character of the expected development typology, the policy should include a greater degree of flexibility to respond to the site-specific issues such as neighbouring uses and viability.</p>	<p>As noted earlier, chapter 7 is not an urban design tool, but a broad methodology for calculating development capacity. Additional explanatory text to be included.</p> <p>Links with ref 57 and 24.</p>	<p>Action noted elsewhere.</p>
39	<p>Chapter 3: Land use strategy</p> <p>Para 3.6.3 – Ford’s Vehicle Operating Compound</p>	<p>Further the policy for the DSTO site, and also the Beam Park area, needs to include specific references which require the development of these areas to pay due regard to the on-going operations and associated activities of Ford on the retained estate further to the south of the A13.</p> <p>The potential introduction of large-scale residential development would need to provide for adequate mitigation measures to ensure that Ford does not experience any difficulties in later years with its on-going operations, nor from</p>	<p>This applies to all retained industrial practices and the relationship with residential, and has been fully considered at a strategic level. Detailed layouts and direct impacts from development proposals will be assessed on their merits by the LPA through the planning application process.</p>	<p>None.</p>

			vehicles accessing the site from both Kent Avenue and Thames Avenue. Aside from protecting traffic levels and access routes, appropriate safe-guards need to be incorporated in respect of noise, emissions and hours of operation which will remain on a 24/7 basis.		
40	Chapter 1: Introduction and Chapter 4: Transport (River crossings)	<p>Ford notes the potential for an additional river crossing between the Bexley Riverside Opportunity Area and Dagenham/A13. This is shown on Figure 1.8, and, although apparently only indicative at this stage, it would appear to utilise and cross Ford operational land on the Dagenham estate to link in to the Marsh Way interchange with the A13.</p> <p>It is our understanding that Ford has received no formal communication from the GLA or Transport for London (TfL) regarding this proposal, and whilst it was mentioned as a possibility in a meeting between Ford and LB of Havering in December 2014, no specifics were given.</p> <p>Ford cannot support any such proposal until additional detail is supplied to reassure them that any additional river crossing would respect the on-going operational needs of Ford. The area south of the Marsh Way junction is used as a vehicle compound (VOC), and is an important part of the Transport Operations. We would expect as a minimum that if this proposal were to proceed the relevant authorities would engage in proper dialogue with Ford as landowner to understand the implications of this potential route, and to ensure that Ford's operations are not impeded in any way.</p>	<p>The Figure provided in the draft OAPF is indicative only and does not represent the exact alignment of the proposed crossing between Belvedere and Rainham.</p> <p>The next stage of engineering work, shortly to be commissioned, will consider in more detail the alignment of this crossing.</p> <p>Any interaction with any landholder's property that may occur will be discussed with the relevant landholder at such time that more details on the proposal are available.</p>	<p>Loosen the line reference to the Belvedere-Rainham crossing on transport maps.</p> <p>TfL will contact relevant stakeholder to discuss proposals.</p>	
41	Chapter 5: Urban design strategy	Ford notes that Figure 5.19 identifies a potential retail /commercial frontage along the full extent of the western site boundary, south western	Disagree – the level of detail is not too prescriptive and is for illustrative purposes.	Fig 5.19 – alter annotation to “potential retail frontages”	

	<p>Figures 5.19</p>	<p>corner, partially along the northern boundary, and the north-eastern corner of the site. It is felt that this level of detail is too prescriptive for inclusion in what is a strategic planning document this level of detail being more appropriate in the Local Plan or site-specific allocation. Notwithstanding this Ford wishes to encourage the GLA to include a note within this figure which states that these are 'potential locations of retail / commercial frontages'. It does not seem feasible - or commercially viable - to deliver development to the full extent which is identified in Figure 5.19. At present, this figure is also inconsistent with the aspirations of the 'Focused Plan Review' which was approved in the LBBB Cabinet meeting in September 2014. The LBBB Focused Plan Review of the Local Plan seeks to focus and accumulate a new centre for this type of development to the north of the DSTO site at Chequers Corner. The western boundary of the DSTO site seems too long a frontage for retail/commercial uses in its entirety.</p>	<p>The strategy still promotes a centre of activity around Chequers Corner but provides flexibility over potentially extending the retail frontage down to the station.</p>	
42	<p>Chapter 5: Urban design and Chapter 3: Land use</p>	<p>Figure 3.2 identifies a significant number of potential routes through the site. At present this diagram identifies four potential east-west routes, and one north-south route through the site. Whilst Ford is supportive of the Mayor's aspiration to increase accessibility through this area of Dagenham, Ford objects to the specification of the location, and the number of potential routes proposed through the DSTO site. Figure 3.2 and 5.19 as currently shown would result in a compromised developable area. It is felt that this level of detail is too prescriptive for inclusion in what is a strategic planning document, this level of detail being more appropriate in the Local Plan or site-specific allocation.</p>	<p>Disagree – the maps are for indicative purposes only and it would be for any architect to develop their own network strategy for new streets through the site. The OAPF merely seeks to promote permeability through the site and promote access to Dagenham Dock station.</p>	<p>None.</p>

			<p>Ford therefore encourages the GLA to include a note which highlights that routes through the site (both east-west and north-south) are aspirational, and that any future development should seek to facilitate routes in appropriate locations within the site. This could be secured through the local Development Plan, similar to the London Borough of Havering whereby Site Specific Policy SSA12 for 'Rainham West' requires the provision of an east to west route through all of the sites.</p>		
43	<p>Gallions Reach Shopping Park Ltd Partnership Agent: Montagu Evans</p>	<p>Chapter 1: Introduction (Fig 1.7) Chapter 3: Land use strategy</p>	<p>Figure 1.7 sets out the land use plan for the OA. Gallions Reach itself is undesignated within the plan, which we do not agree with, as detailed below. Surrounding land is predominantly identified as strategic industrial locations (SIL).</p> <p>Notwithstanding the lack of allocation for Gallions Reach specifically, we are broadly supportive of the land use objectives as set out within the emerging OA, in terms of the identification of preferred areas for housing and employment land.</p> <p>We do however recommend that confirmation is built into the wording of the emerging OA to clarify that other land uses will be permitted in suitable locations, assessed on a case by case basis.</p>	<p>Gallions Reach will be removed from LR and put into the Royal Docks OAPF.</p>	<p>Action already noted.</p>
44		<p>Chapter 3 (Retail hierarchy)</p>	<p>Figure 3.3 recognises the existing retail provision at GRSP. Critically however, this diagram does not recognise GRSP as an emerging major centre. We consider this to be directly at odds with the policy position set out within the London Borough of Newham's Core Strategy, which positions GRSP as an emerging centre serving the eastern edge of Newham and the wider area.</p> <p>Section 3.4 of the emerging OA recognises that: <i>"In terms of retail hierarchy, it is recognised that</i></p>	<p>As above. Comment has been passed onto officers dealing with the Royal Docks OAPF.</p>	<p>None.</p>

		<p><i>Barking Town Centre is the primary focus within the opportunity area. Whilst it is anticipated that retail and ancillary uses will also come forward in other existing and emerging centres, the main focus for retail development should be within the major centre in the opportunity area”.</i></p> <p>Although supportive of the thrust of policy, our client objects to the emerging retail hierarchy. We consider it imperative that planning policy guiding development within the area recognises the strength of the existing retail provision at GRSP and the potential for its enhancement through the provision of appropriate additional retail floorspace. It would not be appropriate for development at GRSP – including that for which consent has already been granted – to be frustrated by the OAPF.</p> <p>In addition, it is critical for the strategic success of the OA that recognition is given to the fact that Barking Town Centre may not be able to accommodate all necessary retailing. Whilst we recognise that other emerging centres within the OA are identified, it seems at best a lost opportunity not to direct additional retail floorspace to an established and growing retail centre – Gallions Reach Shopping Park. At worst, failure to do so would threaten the vitality and viability of the existing centre and compromise established planning policy.</p>		
45	Chapter 4: Transport (river crossings)	<p>Figure 4.2 identifies potential transport infrastructure for London Riverside. The diagram includes the identification of a potential river crossing at Gallions Reach.</p> <p>On behalf of our client, Montagu Evans submitted representations to consultation undertaken by TfL in September 2014 on options for new river crossings in east London. These representations</p>	<p>TfL welcomes the in principle support for the crossing at Gallions Reach.</p> <p>The current plans for the Gallions Reach crossing do not propose to utilise any land outside that which has been safeguarded and therefore there is not expected to be any</p>	<p>No action to document.</p> <p>TfL will contact relevant stakeholders to clarify proposals.</p>

		<p>stressed support for the principle of an additional bridge river crossing on the basis that this would better connect businesses and people, and would facilitate new development as well as improving circumstances for existing development.</p> <p>Importantly, however, it is considered that the specific alignment of the proposed bridge is critical given the potential implications for GRSP. We do not intend to reproduce the content of our representations to TfL within this letter, but given the cross over in terms the emerging policy, we append our letter in full at Enclosure 1.</p>	<p>interaction with Gallions Reach Shopping Park land.</p>	
46	<p>Chapter 5: Urban design strategy</p> <p>Tall buildings</p>	<p>Figure 5.2 does not identify Gallions Reach as a key development area within London Riverside. We consider this a missed opportunity given the potential for the site identified within the London Borough of Newham’s Core Strategy.</p> <p>Figure 5.14 illustrates existing buildings heights within the OA. It is recognised that GRSP includes some buildings of between 15 and 35 metres (4 – 10 storeys). Given this, we consider that it should be reflected within the emerging LROAPF that Gallions Reach may be a suitable location for taller or more dense development, where considered appropriate and subject to detailed design proposals.</p> <p>To this end, we recommend the amendment of the fourth paragraph of section 5.5.4 (wherein added text is underlined) such that it reads:</p> <p><i>“Using this information, Figure 5.16 indicates broad locations for high density developments and tall buildings in London Riverside and shows where there are emerging clusters of tall buildings in the OA.</i></p> <p><i><u>Proposals for tall or dense development outside of these locations will be considered on a case by</u></i></p>	<p>Gallions Reach will be removed from LR and put into the Royal Docks OAPF.</p> <p>Comment has been passed onto officers dealing with the Royal Docks OAPF.</p> <p>Agree that some flexibility over wording should be included.</p>	<p>Amend 4th paragraph of section 5.5.4:</p> <p><i>“Using this information, Figure 5.16 indicates broad locations for high density developments and tall buildings in London Riverside and shows where there are emerging clusters of tall buildings in the OA.</i></p> <p><i>Proposals for tall or dense development outside of these locations will be considered on a case by case basis, with consideration given to the specific proposals, their location and context, and detailed design proposals”.</i></p>

			<i>case basis, with consideration given to the specific proposals, their location and context, and detailed design proposals”.</i>		
47		Chapter 7: Development capacity	<p>Figure 7.1 refers to the Development Capacity Study (2011), illustrating key sites, proposed land use and applied residential and employment typologies. Gallions Reach is not identified within this plan, with surrounding land identified as ‘employment sites where no change is proposed’, with the exception of land to the south east which is identified as a vacant employment site ‘where comprehensive redevelopment is proposed’.</p> <p>As per our comments on figure 5.2, above, we consider that failure to designate GRSP is a missed opportunity and fails to protect and preserve the established policy position set out in Newham Council’s adopted Core Strategy.</p>	<p>As above – the LR boundary will be moved to exclude Gallions Reach and add it to the Royal Docks.</p> <p>The 2011 Development Capacity Study will remain in the LROAPF (including Beckton) but additional wording included to reflect that Fig 7.1 reflect the 2011 position.</p>	Action as ref 34.
48	John Biggs AM London Assembly Labour Group	Chapter 3: Land use strategy	<p>I welcome the recognition that a new approach is needed to ensure that development consists of sustainable communities which are well connected to the residential hinterland and are not cut off from them by intervening industrial use. The integration of these residential areas is to be achieved by releasing or relocating industrial locations that currently act as barriers between communities (3.1).</p> <p>Whilst I support this approach, I encourage the OAPF to make clear that the majority of Strategic Industrial Locations (SIL) must be relocated, and not simply released with no replacement. The loss of industrial land in the wider area has been significant and above benchmarks; for example, across LB Barking and Dagenham 74.7 ha of industrial land was released 2006-2010, which is seven times the benchmark loss of 10.4 ha (GLA “Industrial Land Demand and Release Benchmarks</p>	<p>De-designation of SIL would only take place through the Local Plan adoption process, whereby an evidence base (i.e.: employment land review) would be required to justify the release. The OAPF only sets a direction of travel of future land uses in order to regenerate the area.</p> <p>The document adequately promotes the existing employment areas at Dagenham, Rainham plus the LSIP and GED as future growth areas for industry.</p> <p>The issue of SIL release is a pan-London issue that will be looked at in greater detail in the forthcoming London Plan review and in partnership with boroughs through</p>	None.



			<p>in London.” December 2011: Table 2.1).</p> <p>To counter this trend and ensure that only genuinely redundant industrial land is lost, the planning framework should estimate the maximum level of industrial land that could be lost, based on London Plan Policy 2.17, the Land for Industry and Transport SPG, and the boroughs’ relevant core strategy policies. It should also state that, where SIL is to be relocated, the replacement land must be designated as SIL before the old land can be released.</p> <p>The draft OAPF’s ambition to consolidate the offer of industrial land to promote a Green Enterprise District incorporating the London Sustainable Industries Park at Dagenham Dock is welcome (3.5), as is the guidance on the utilisation of the network of wharves within the opportunity area (3.6), but the document as a whole fails to provide sufficient protection for new and emerging industries in London Riverside. It may well be that the proposals in the draft strategies are manageable, but the release of employment land must be evidence-based.</p> <p>Forfeiting too much of our industrial land will lock London into a post-industrial state too dependent on financial and business services. If London is to develop a 21st-century industrial base, such as in the secondary materials economy or clean-tech and digital industries, it must provide the land for these types of firms to emerge.</p>	<p>their own local plans.</p>	
49			<p>The housing target must not be met at the expense of the jobs target. Unfortunately, the draft OAPF includes language which suggests that future industrial growth should be a secondary priority. For example, paragraph 3.6.1 suggests that protected wharves will need to be de-designated in order to facilitate residential</p>	<p>The intention is not to de-designate any wharves that are in use. However, many have not been in use for some years and are not making efficient use of the river frontage.</p>	<p>None.</p>

			development.	Any future wharf de-designation would need to go through a separate, thorough process and assessment on future need to determine the demand for its use.  Section 3.6.2 explains the process that would need to be followed.	
50	Chapter 5: Urban design strategy (Pylons)	<p>The draft OAPF recognises that the area’s industrial legacy poses a constraint to the construction of high-quality residential communities. For example, the emphasis on connecting residential areas that are currently cut off from one another by intervening industrial locations is thoroughly addressed.</p> <p>Another constraint is the prominence of pylons across London Riverside. The problem is particularly acute in Barking Riverside, with a concentration of National Grid pylons and overhead lines. These pylons impair the visual amenity and make London Riverside a less attractive place to live. Therefore chapter 5 of the OAPF should include planning guidance suggesting the removal of redundant pylons as far as possible and giving consideration to the undergrounding of live lines. A first step could involve an exercise identifying those lines which continue to bring in power from facilities in Kent and Essex, as well as those which are no longer functioning, and involving National Grid and other actors in the development process.</p>	<p>Three pylons adjacent to Barking Riverside are no longer used for electricity supply due to the closure of Barking Power Ltd. BRL and National Grid have agreed a programme for their removal.</p> <p>The document will be updated to reflect this.</p>	<p>Additional text required in 5.3 to reflect the future removal of the three pylons as a result of Barking Power Station closing.</p> <p>Figure 5.5 also needs amending to show the planned removal of this line of pylons.</p>	
51	Chapter 4: Transport DLR safeguarding DLR vs.	<p>I am concerned by the draft OAPF’s dismissal of the potential extension of the DLR from Beckton to Dagenham Dock. I welcome the important contribution to connectivity that the Gospel Oak to Barking line extension to Barking Riverside will make, but it should not be mutually exclusive to</p>	<p>The OAPF does not dismiss the DLR extension. It instead notes the amendment to the London Plan which removes reference to the DLR and instead refers to the London Overground extension to Barking</p>	<p>None.</p>	

		Overground	<p>the DLR extension.</p> <p>The DLR extension would serve a different purpose, including provision of new stations at Creekmouth and Goresbrook (formerly Dagenham Vale) that will not be provided by the Overground extension. It would connect new and existing communities to other parts of east London such as the Royal Docks and Canary Wharf as well as provide an interchange with other transport services at Dagenham Dock station.</p> <p>TfL, which noted that the funding of the Overground extension makes it unlikely that the DLR extension will be built, has made clear: <i>“TfL is proposing to extend the Overground in a way that would not prevent the delivery of the DLR extension, should more rail capacity be needed to support additional growth in the area.”</i> (Source: TfL “Barking Riverside Extension: Transport for London’s response to key issues raised in the autumn 2014 consultation.” 12 January 2015: <a href="https://consultations.tfl.gov.uk/london-overground/gobe/user_uploads/response-to-issues-raised.pdf">https://consultations.tfl.gov.uk/london-overground/gobe/user_uploads/response-to-issues-raised.pdf</a>)</p> <p>Additionally, in response to a written question, you assured me that <i>“the Overground extension will be built to allow safeguarding of the DLR alignment, should additional rail capacity be necessary to support future growth in the area and when the Mayor’s Transport Strategy is revised, consideration will be given to whether the DLR scheme should remain as a longer term aspiration.”</i> (Source: Mayors Question 2014/3699)</p>	Riverside.	
52			It is inappropriate to use a planning document such as the draft OAPF to signal that the DLR extension should not be safeguarded, especially considering the above comments. Removal of	<p>The OAPF recognises the Overground extension is essential to unlock development at Barking Riverside with TfL progressing the design of the scheme with a Transport and Works Act order application proposed to be made in winter 2015/16.</p> <p>The Overground extension will be built in such a way as to not preclude the DLR from being extended in the future should additional rail capacity be necessary to support additional growth in the area.</p>	

		safeguarding should require proper consultation followed by revision of the Transport Strategy.		
53		<p>Removal of the safeguarding would raise additional questions. Is the 26,500 minimum housing target in the draft OAPF based on a PTAL calculation which presumes additional DLR stations? If so, the level of housing will need to be reconsidered, particularly in those areas which would have been served by the DLR. For example, the proposed DLR extension includes a new station at Creekmouth, which is currently protected as SIL but is proposed to be changed to residential by the draft OAPF. Is the scale of development expected at Thames Road in Creekmouth sustainable without the connectivity provided by the DLR?</p>	<p>The OAPF does not remove any DLR safeguarding and instead supports the principal of the London Overground Extension as the strategic transport intervention to support the development of Barking Riverside. The Overground extension will be built in such a way as to not impede on the DLR alignment should this project be brought forward in the future. When the Mayor's Transport Strategy is revised future consideration will be given to whether the scheme should remain as a longer term aspiration, but as the DLR extension is not actively being considered the alignment has not been illustrated in the maps included within the OAPF. Other transport improvements are identified in the OAPF to support growth including a potential crossing of the River Roding which would improve connections to the DLR and Crossrail, and a potential second station on the London Overground Extension at Renwick Road would provide access to a station within a 10 minute walk from Thames Road. The public accessibility of both sites could also be improved by revisions to the bus network which the OAPF supports. Furthermore TfL is leading on a study to assess the current and future transport capacity in the East</p>	<p>Chapter 4 to be updated by TfL.</p>

			London sub-region, as part of the next revision to the Mayor's Transport Strategy. This work will take into account the predicted population and employment growth, and explore the scale of future demand growth, in order to recommend solutions appropriate to the transport capacity gap identified.	
54		<p>The DLR extension would also have addressed the physical barrier posed by the River Roding, which severs London Riverside from the opportunity area at the Royal Docks, as noted by the draft OAPF. Regardless of the mode of transport, there must be serious consideration given to a new crossing at the River Roding in order to enhance connectivity to, from, and within key locations in the opportunity area, which will improve access to jobs for those new residents. I understand that TfL is currently undertaking a study of the A13 corridor which will consider the options for crossing the River Roding (Source: Mayors Question 2014/3698).</p> <p>The final OAPF should refer to this study and make the case for a crossing.</p>	This barrier to movement is noted and TfL is carrying out studies looking at potential crossings over the Roding.	Study to be commissioned in Summer 2015 – results expected after that, timeline to be confirmed.
55		<p>The draft OAPF acknowledges that a “major part of this area lies in the flood plain of the River Thames or its tributaries and is therefore at risk of flooding” (5.3), but it fails to include any planning guidance on the appropriate response.</p> <p>As much of the land proposed for residential development is within zone 2 or 3 of areas at risk of flooding, all applications will likely require Flood Risk Assessments (FRA). One objective of FRAs is to determine whether the measures</p>	<p>Noted.</p> <p>Both Council's will be doing a Strategic Flood Risk Assessment to support the work on the Local Plan reviews which will include detailed guidance for the major sites.</p>	See point 24 – further info to be added to section 5.3.

			proposed to deal with these effects and risks are appropriate. The planning framework should therefore include references to existing strategies and planning guidance which address residential development in areas at risk of flooding and provide examples of measures that can reduce the risks of flooding.		
56	John Cox	General - layout	<p>Why have you published PDFs (Transport at least) that are not vertical? It is fine to use landscape and it is fine to use portrait for reports. But why are these such an unreadable mixture?</p> <p>Since London Riverside images are naturally wider than they are high, why isn't everything done in landscape?</p>		<p>Consider altering layout to all landscape – scope of work to be balanced with the programme for adoption.</p> <p>Document orientation not to be changed.</p>
57	London Borough of Barking and Dagenham	Figure 1.1	Remove reference to South London Waste Management – this should be East London Waste Authorities Joint Waste Plan.		
58		Fig 1.3	I think we can now say ‘potential tunnel’ rather than ‘potential major scheme to reduce severance’.		
59			Should show freight connection into HS1 as this is a major asset for economic development.		
60		Para 1.3	The first principle needs to say something about not only consolidating existing SIL but also intensifying what is left in LR otherwise how will the 16,500 jobs be delivered?		
61		Fig 1.8	Need to show North Circular as TfL say more traffic turns onto the A406 than heads into London on A13 westbound. The A406 jcn with the A13 is already a congestion hotspot and will be put under more stress when the Gallions Reach bridge is built.		

62	Para 2.4.2	LBBB CIL will be effective from 3 April 2015.		
63	Para 4.2	Refer to the freight connection into HS1 at Box Lane which is a major asset.  Emphasis that Barking is 15 mins from the City and 20 mins from Canary Wharf.		
64	Fig 4.2	Show freight link into HS1 at Box Lane.		
65	Para 4.3	Transport challenges should include reducing environmental impact of travel. This could be incorporated into the first challenge of reducing physical barriers to travel and covered in 4.3.1, especially the issue of air pollution from major roads such as the A13.		
66	Para 4.3.3	Should also highlight congestion at A406/A13 jcn.  Correction – C2C are committed to delivering the station improvements by 2017.		
67	Para 4.3.4	Emphasise that freight link is available at Box Lane into HS1 line enabling freight to be received from the continent.		
68	Para 4.3.5 second paragraph	After transport nodes enter “at Barking, Dagenham Dock and Rainham stations”.		
69	Para 4.4.2 first paragraph	Investment will also be needed at A406/A13 jcn.  Last sentence reword to: “TfL are currently investigating the long term option of undergrounding part of the A13 and interim options in advance of this to improve access to the areas south of the A13, reduce north-south severance for public transport, pedestrians and cyclists and removing an east-west pinch point for		

			vehicles.”		
70		4.4.2 third paragraph	Could commit to delivering these river crossings by 2025 which is what TfL has announced (I believe), to give some certainty about when they will be built.	This is a Mayoral desire but not a commitment from TfL as further studies are being undertaken.	Include a reference in the Mayor’s foreword on the desire to deliver river crossings by 2025.
71		Fig 5.2	Ford Stamping Plant typo – replace with DSTO.		
72		Fig 5.3.2 second para	Before Mill Pond insert ‘Barking Abbey’, which is a scheduled ancient monument.  Also some reference should be made to the areas industrial heritage which is reflected in our Local List and includes for example Algor Wharf.		
73		Fig 5.19	Ford Stamping Plant (DSTO) should be shown as high density residential-led mixed use so it is consistent with supporting text.		
74		Page 90, sixth paragraph	Gallions Reach not Galleons Reach`		
75	London Borough of Tower Hamlets	Chapter 4: Transport strategy	1. The study fails to identify likely impacts on the highway network outside the identified study area (which does not include LBTH); indeed it is unable to identify specific impacts on the highway network from the OA altogether. However, considering the road network serving the OA provides good access to the North Circular and the A13 (which links direct with the M25), we would expect the majority of traffic generated by development in the OA to be assigned to these strategic roads. While there is a possibility that some additional traffic will impact LBTH and SE London, consequently adding to congested roads in LBTH, and particularly the Blackwall Tunnel, we would not expect this to be significant. However, without the appropriate studies this expectation	1. TfL is reviewing the operation of the whole A13 Corridor, and a strategy is due to be completed in late 2015. This strategy will take into account the growth across the sub-region including that generated from London Riverside.  TfL, LBTH and LLDC have also just concluded a study of the section of the A12 that passes through the respective local authority’s boundaries. This study took into account the forecast growth across the sub region in its conclusions.	None.



			<p>cannot be confirmed.</p> <p>2. Car parking restraint for office developments at Canary Wharf should mean that the level of additional commuting car trips to the estate is managed. This has been borne out in recent Canary Wharf employee surveys.</p> <p>3. We note the proposed transport interventions are almost universally supporting enhanced bus and rail access to the OA and highway interventions are access based rather than capacity based. Therefore LBTH has only minor concerns over the highways impacts of the LROAPF on the borough.</p> <p>4. In regard to river transport, we are, of course, supportive of new facilities to encourage the use of the river to transport people and particularly freight, as HGV's contribute disproportionately to road collisions and environmental harm.</p>	<p>2. Noted</p> <p>3. Noted</p> <p>4. Noted</p>	
76	London Forum of Amenity & Civic Societies	General – existing constraints	<p>The required standards expected in acknowledgement of the very particular constraints imposed by the flood plain location and by the legacies of the industrial past, should also be clear and the expectations high. Bold policy making is required.</p> <p>Careful judgment is required in relation to land use, density, scale, design principles and Thames flood plain location, taking into consideration potential long-term effects on London's flood resilience as a whole.</p> <p>The development is very much needed, not least for the convenience and long-term benefit of its residents and local business. It is also, more broadly, one of the few pieces of unfinished business in the mature city in which we live, offering London a chance to redistribute its resources productively, while maintaining its city</p>	See ref 24 and 29 – additional text to be included to highlight the constraints of flood plain and contamination.	

			status, with all that that implies, rather than becoming a mere conurbation.		
77	Chapter 5: Urban design (Building heights and design in relation to heritage assets)	Barking Town Centre's two tower blocks, a stone's throw from the (listed) Abbey and its cemetery and gate house afford their historical context no acknowledgement. The encouragement of further high-rise development similarly failing to integrate existing terrain or historic built environment remains. There is no sign of generosity in the brutalist design of the residential tower, nor in the formulaic blocks of the East London University Campus on the banks of the Thames.	Section 5.5.4 acknowledges that any tall building around Barking and the River Roding need to consider heritage assets.  Additional wording suggested.	Amend 5.5.4 (1. Barking town centre and river Roding), third bullet point:  <i>"Tall buildings proposals around the Mill Pond will require careful consideration of the impacts on heritage assets at Barking Abbey, Abbey Green and the Malthouse. Such proposals must give special regard to the setting of these assets."</i>  Continue from "...Tall buildings should be considered as key local landmarks..."	
78	Chapter 5. Green spaces network	How generous is the green network? And how secure is this policy from whittling away, with open space in one location traded for open space in another which may, in the end, not materialise? The Framework should ensure that generosity in these directions is embedded in policy, all the more so due to the particular function of the terrain as part of the Thames floodplain. The conservation of the Rainham Marshes in its entirety, along with the provision of a buffer zone, following environmental best practice, should also be assured, a benefit to local amenity.	The OAPF is clear on the protection for and contribution the open space network provides to the area and how access to it can be improved.	None.	
79	Clarification	Clarify the difference between the OAPF's figures at paragraph 1.2 - over 116,000 residents and	The figures quoted in paragraph 1.2 are estimates of the area's current	None.	

		39,000 jobs and those in Para 7.1.2 (pg 105), which estimate the resident population at 57,120?	resident population and number of jobs.  Chapter 7 provides the development capacity study undertaken in 2011. The figures quoted are estimates of the new resident population that the area could see as a result of the regeneration.	
80	Chapter 3: Land use strategy (Housing)	The high percentage of publicly-owned land could enable the construction of high-quality, low-rise social housing, setting an example for other London boroughs and reflect the balance of social housing provision in the west.	Affordable housing will be sought in new development in accordance with the London Plan and borough policies. This is generally based on the maximum reasonable approach determined through development viability in order to encourage rather than restrain development.  The OAPF allows flexibility in the quantum and tenure mix of affordable housing, and in some instances, it may be preferable to deliver only market units, shared ownership and other affordable products such as DMS, in order to re-balance the community where there is an existing high proportion of social rent (such as in areas of Barking and Dagenham which has the fourth highest proportion of social housing in London).	
81	Chapter 7: Social infrastructure	Although small primary schools tend to be seen as pedagogically preferable, here (7.1.2 social infrastructure requirements) the 'rule of thumb' is 3,000 pupils per primary school. Smaller schools have the advantage of being more accessible on foot or cycle.	The DIF study and the work both the Councils have carried out on social infrastructure will determine the social infrastructure requirements (including schools)	

82	<p>General – flood risk</p>	<p>There is little in the Framework, however, giving priority to the ‘imperative to plan for flood risk management’ stated in the London Plan (acknowledged in Policy Context 2.3) as a requirement, for example, that construction meet the highest standards of flood resilience.</p> <p>It would also be useful to have an analysis given of the adequacy of the green spaces illustrated to absorb the run off to be expected from the high-density developments proposed, and of their water requirement. (Have they been taken into account in the GLA’s recent work on London’s water requirements for the coming decades?) Paragraph 4.4 Key Design Principles 3 Green Network states ‘A comprehensive sustainable urban drainage system will be an essential component of any development.’ This ‘essential component’ could usefully be mentioned within the Policy and Land Use Strategy sections. Permeable hard surfaces will be essential.</p>	<p>The London Plan policies are adequate to ensure that flood risk is considered and mitigated on a site by site basis. The OAPF is a broad strategic overview showing the direction of travel of high level matters such as land use and transport infrastructure to support growth. The document acknowledges in various places that the land within LR is physically and environmentally constrained and states that flexibility will need to be applied.</p> <p>Additional wording has already been suggested in ref 24 and 29 to alter Section 5.3.</p>	
83		<p>The Framework acknowledges (4.3.4) that there is an opportunity to make better use of the Thames for freight, transport and leisure, but this does not seem central to policy. Safeguarded wharves are addressed in 3.6, but they are seen as contingent upon safeguarded industrial land designation which may be reviewed and land released, especially where wharves are deemed under-used or in poor repair or if tensions develop between their continued existence and proposed development.</p> <p>3.6.4 responds to proposed industrial growth by continuing to safeguard Dagenham Dock and asserts the dock’s importance but only in relation to the London Sustainable Industries Park. 3.6.1 proposes, quixotically in the face of still evolving policy for river use, the de-designation of wharves</p>	<p>See ref 48 and 49.</p>	

		<p>which can be declared redundant. It is unreasonable to expect that there can be grounds for de-designation in the absence of a comprehensive, long-term cross-borough (both banks) policy for the river and for its multiple possible uses (travel, transport and leisure).</p>		
84		<p>The Framework showcases the large-scale residential development-led plan for the Opportunity Area, described in the Executive Summary as lying between the City, Canary Wharf (30 minutes away), Tilbury and London Gateway. It is shown to be under-pinned by infrastructural investment and the release of significant quantities of safeguarded industrial land.</p> <p>This begs the question of the methodology used to test future requirements for industrial land, and to show that future needs will be catered for adequately in the Sustainable Industries Park and in the other designated spaces, as any land which is so released must be able to be demonstrated, according to the London Plan, to be surplus not just or the moment but for the future.</p> <p>It is important that the balance between residential use and significant employment opportunity latent within legacy local planning policies should not be lost. Wide distribution of employment opportunities will aid walkability (a Key Design principle), prevent an increase in commuting and the development of dormitory suburbs. Space currently wasted on out-of-town superstores should urgently be reclaimed for more productive use, with superstores in relocated town centre locations.</p>	<p>Disagree – the OAPF showcases the locational characteristics of the area in the context of both residential and industry capacity and potential. It also promotes transport infrastructure improvement to the industrial areas.</p> <p>As noted elsewhere de-designation of SIL would only take place through the Local Plan preparation and adoption process, whereby an evidence base (i.e.: employment land review) would be required to justify the release. The OAPF only sets a direction of travel of future land uses in order to facilitate the regeneration of the area.</p>	
85		<p>The OAPF’s preferred location for tall building clusters at transport hubs/stations, suggests their appropriateness at each and every instance of</p>	<p>Noted. The flat landscape characteristic is noted, and any proposals for tall building would</p>	

			<p>mass public transport provision, for example at the proposed Beam Park station.</p> <p>Neither the over-dominant visual impact, within such a flat landscape, of several such clusters ('wayfinders') nor their structural instability during flood conditions, has been sufficiently taken into account. Benefits from such clusters are hard to discern, as the Framework acknowledges that high densities can be achieved without high rise buildings (Urban Design Strategy 5.4.4 Built Form).</p>	<p>need to be assessed in terms of visual impacts. The London Plan policies in Chapter 7 indicate that tall buildings are most appropriately located in town centres and around transport hubs, which this strategy follows. However, development proposals must also be judged against local policies where more detailed policies will indicate the acceptability or otherwise of tall buildings in particular character contexts.</p>	
86	<p>National Grid Property (owns Beckon gas works)</p> <p>Agent: Carter Jonas</p>	General	<p>NGP supports the exclusion of the Beckton area from the remainder of the London Riverside area as the character and the issues that arise with respect to its development are very different.</p>	<p>Beckton is to be excluded from LR OA and included within the RD OA as the strategies for these areas differ.</p> <p>All other comments have been passed onto officers dealing with the emerging RD OAPF.</p>	<p>Alter the LR boundary on all maps to exclude Beckton and run the boundary between LR and RD OA's along the Roding.</p> <p>Remove Newham Council from Chapter 2.</p>
87		<p>Chapter 3: Land use</p> <p>Chapter 1: Introduction</p>	<p>The OAPF's aspiration of employment redevelopment at the Site must be reversed because it is outdated and fails to grasp the development potential of this major strategic site. NGP objects to all references to the Beckton Riverside site for SIL and waste facility uses because they have their roots in the historic extent and designation of the site, and because protecting the land for this purpose fails to capture the very significant development opportunity that exists. Specifically, NGP objects to the following:</p> <ol style="list-style-type: none"> <li>1. SIL shown in Figure 1.6. The SIL should be deleted for the reasons given above.</li> <li>2. Figures 1.7 and 3.1 show the potential SIL</li> </ol>	<p>Noted.</p>	<p>Fig 1.6 – change label of Beckton gas works to "potential SIL release to mixed use"</p> <p>Fig 1.7 remove arrow showing Thameside West release to Beckton gasworks</p> <p>Paragraph 3.5.1 – remove Beckton as it is no longer part of LR and alter "three sites" to "two sites". Boundary alteration will remove</p>

		<p>release to housing at the Thameside West. The arrow from Thameside West's SIL pointing to the Beckton Riverside site implies that SIL will be relocated to the Beckton Riverside site. This should be deleted as it is neither necessary nor appropriate.</p> <p>3. Figure 3.4 and Paragraph 3.5.1 indicate the Beckton Riverside site to prove new waste infrastructure. This should be deleted because such a use would be incompatible with the more appropriate development strategy for the land.</p>		Beckton from map.
88	Chapter 4: Transport and Chapter 1: Introduction (River Roding link)	<p>NGP objects to the arrow on Figures 1.3, 1.5, 1.6, 1.8 and 4.2 annotating Roding link to Royal Docks/City Airport which is unjustified and vague in nature. There is no explanation or details about the link, how it will be secured and why it is needed.</p> <p>Therefore, such an indication will only serve to blight the site as has been the case for so many recent years as a consequence of other uncertain transport infrastructure proposals. The indications must therefore be deleted.</p>	<p>The potential for this link is key to improving cross river connections between Barking Riverside and the Royals and is consistent with the desire to release SIL at Beckton and Creekmouth to connect communities with access to public transport.</p> <p>The reference to a potential link is not however considered to be committal enough to blight the land, given the status of the document as SPG and its high-level nature.</p> <p>TfL are currently carrying out further work looking at the detail on what this link could comprise and any potential landing points.</p>	None.
89	Ferry pier	<p>In terms of the proposed river crossing at Gallions Reach, all references to a ferry should be deleted.</p> <p>Because of its potential land take it would severely constrain the redevelopment potential of the site and, unless and until this option is ruled out, the blighting effect will discourage any form of redevelopment taking place. To reiterate, a bridge crossing is supported.</p>	<p>TfL welcomes the support of a bridge at Galleons Reach. Given the limited capacity of a ferry when compared to a fixed link crossing, TfL has put proposals for a ferry at Gallions Reach on hold until further investigations in to the benefits and impacts of a fixed link crossing at that location are complete. Until this</p>	None.

				investigation is complete however, proposals for a ferry cannot be totally discounted.	
90		Chapter 3 – Land use – Beckon gas works	<p>The OAPF references ‘The All London Green Grid - Project map’ in relation to Figures 5.7 and 5.9.</p> <p>However, the reference numbers used are confusing and do not appear to relate to the referenced document. In addition, the block plan layout on the Beckton Riverside site is not current and must be deleted.</p>	Chapter 5: Urban Design will be amended to reduce reliance and reference to the ALGG. Projects will be updated.	<p>Remove ALGG sub-area maps.</p> <p>Check that the whole area ALGG map is up to date</p>
91	Natural England	Chapter 5 – urban design strategy (ALGG)	<p>The LROAPF area is within an area that Natural England considers could benefit from enhanced green infrastructure (GI) provision. As such, Natural England would encourage the incorporation of Green Infrastructure (GI) into developments in this area.</p> <p>GI can be designed to maximise the benefits needed for this area, for example it can be used to promote opportunities for recreation, improve links between communities and enhance flood-water management to protect surrounding homes and businesses. It can also be used to improve connectivity to other green spaces and to improve conservation and biodiversity.</p>	<p>The area is well served by green infrastructure, and the ALGG projects and the OAPF promote enhancement to these spaces, and improved access to them.</p> <p>No action.</p>	
92	Newham Council	General	<p>The proposals in the document generally reflect the Council’s adopted Local Plan. However there are some discrepancies, particularly relating to the green space designations taken from the Mayor of London’s All London Green Grid SPG; this includes, for example, a proposed ‘Lower Roding Metropolitan Park Opportunity’ covering the Beckton Sewage Treatment Works and surrounding area.</p>		<p>See ref 91 above. Check ALGG projects are up to date and remove Beckton from boundary.</p>
93			There are a number of specific development	The OAPF sets a vision and direction	



			<p>projects proposed which have no costings attached and no indication of how they might be delivered. Given the requirement to address issues of deliverability and viability in Local Plans, the inclusion of these might be questioned.</p>	<p>of travel for future policy, and is high level in nature.</p> <p>Viability and deliverability would be considered at a more detailed site specific stage, and will be looked at strategically in the DIF study.</p>	
94			<p>Since the first draft of this document in 2010, the majority of the largest of the development sites in East Beckton have either been built on or now have planning permission. The value of including LBN in this document is questionable and might be more appropriately removed from this OAPF and included as a part of the proposed Royal Docks OAPF.</p>	<p>Agreed. Beckton to be removed from LR and included within the Royal Docks OAPF.</p>	
95	NHS Property services		<p>No comment on document, but would like to be involved in the production of the Development Infrastructure Funding Study (DIFS).</p>	<p>Noted.</p>	
96	Peabody (Land owner - Thamesmead)	<p>Chapter 4 – transport</p> <p>River crossings</p>	<p>We broadly support the options for new river crossings at Belvedere and Gallions Reach.</p> <p>We support the proposals to maximise potential future river crossings to create new public transport links across the river. This would allow the large proportion of residents in Thamesmead and the wider area without car ownership to benefit from a new river crossing, and help mitigate against the potential adverse effects upon traffic levels and the environment that new river crossings might bring.</p> <p>However, we believe that the fixed river crossing options at Gallions Reach and Belvedere should incorporate the possibility of <u>tunnel crossings, rather than bridges</u>, in order to ensure that the possible benefits in helping to unlock development are not offset by the physical impact of a bridge. Whilst we would welcome the benefits</p>	<p>TfL welcomes the support for new crossings east of Silvertown.</p> <p>To determine the option that maximises the benefits of the crossings, TfL is currently investigating the costs and benefits of both tunnels and bridges at each of the proposed locations as well as considering the opportunity to incorporate fixed public transport on these links.</p>	<p>None.</p>

			<p>of a bridge crossing, this would mean use of substantial amounts of land that could otherwise be available for development and would need to be of a height that would have a substantial impact on the surrounding area and upon adjoining residents. A tunnel crossing could avoid these issues, and in doing so maximise the amount of land available for housing, public realm and commercial use, therefore increasing the potential benefits of an east London river crossing.</p> <p>The Planning Framework also recognises the potential for connecting London Riverside to wider transport networks by extending the Overground south to Abbey Wood. This would not just be of benefit to London Riverside, but also the wider area by allowing for a more interconnected transport network north and south of the river, breaking down the barrier that the Thames currently forms and linking the area with the forthcoming introduction of Crossrail to Abbey Wood. We also believe that the Planning Framework should be an opportunity to appraise other options for new transport infrastructure linking north and south of the river, in particular a DLR extension or tram crossing from Gallions Reach to Thamesmead and Abbey Wood, utilising the proposed river crossing at Gallions Reach.</p>		
97		Chapter 7 - Utilities infrastructure	<p>We also believe that other forms of infrastructure including utilities are likely to be a barrier to growth in this part of the East Thames corridor and believe that the partners and GLA should undertake an exercise looking at constraints to bringing forward development and supports the funding of these necessary improvements.</p>	<p>Impact on utilities and utilities infrastructure demand in the future will be looked at through the DIF study.</p>	
98	Persimmon	Chapter 3 – Land	<p>As a residential developer Persimmon welcomes the shift in the overall land use designations</p>	<p>Noted.</p>	

	Homes Essex (Agent: Icen Projects Ltd) Land interests – Dovers Corner	use strategy	<p>proposed within the Draft LR OAPF.</p> <p>In the case of Dovers Corner, Rainham the Draft LR OAPF proposes the potential release of Locally Significant Industrial Land for residential development. This proposal, as defined in Figures 1.6, 1.7 and 3.1 ensures consistency with both the Site Specific Policy Allocation for Rainham West (SSA12) and the Council’s recent submission to the GLA for ‘Housing Zone’ status for this area. The land uses proposed will support the aspiration to provide high quality homes in this area of the Borough. Persimmon is therefore supportive of this policy approach and the identification of a growth area around Rainham (Figure 1.10).</p>		
99		Chapter 5 - Urban design	<p>Persimmon welcomes the GLA’s designation of ‘Rainham West’ as key development site in the Draft LR OAPF (as noted in para. 5.4.2). In the case of Rainham West, Persimmon is supportive of the GLA’s view to remove the requirement to retain 33% of the land in this area for employment uses.</p> <p>This will go some way in assisting with land values and the overall deliverability of schemes in this area.</p>		
100			<p>Persimmon are supportive in principle of the GLA’s aspiration to bring forward residential development in a variety of urban forms and acknowledge that there is scope to provide more traditional housing types with front doors directly onto the streets. Whilst traditional houses are Persimmon’s primary product, Persimmon wishes to highlight that it is important to recognise that whilst traditional housing should be provided, there are a number of existing physical and environmental constraints that may prevent development of this type being delivered in</p>	<p>Agreed.</p> <p>Greater recognition will be given to the need for flexibility over housing typologies, building heights, layouts etc given the physical and environmental constraints on sites in the area, and local heritage considerations such as listed buildings and conservation areas..</p> <p>Links with refs 12, 17, 24, 36.</p>	

		<p>certain locations within the LROA, this relates to both i) physical delivery and ii) financial viability.</p>		
101		<p>In the case of the Dovers Corner site, it would not be feasible to deliver traditional housing units across the full extent of the site. As you may be aware the northern and southern boundaries of the site are constrained by environmental factors relating to noise and air quality specifically in relation to the existing HS1 and c2c railway lines and the A1306 highway. Therefore in this location there is a requirement to deliver some flats which should be considered complementary to the traditional residential houses. Further, there are a number of existing environmental and physical constraints within the site that fundamentally affect the viability of delivering large scale housing across the full extent of the site. For example, within the Dovers Corner site alone there is an existing culvert along the eastern and northern boundary of the site, an existing drainage channel running north to south through the centre of the site, a medium pressure gas main along the northern boundary of the site (as noted in Figure 5.4) and flood risk constraints (Figure 5.5). Further, due to the industrial legacy of the site, there are also land contamination issues. All of these factors have individual planning restriction zones and physical constraints that both prevent development in certain areas, and incur considerable costs to relocate or address.</p> <p>Persimmon is therefore supportive of the general urban design strategy for the site however the need for design flexibility needs to be recognised in the LR OAPF. Whilst Persimmon has sought to highlight that there is a requirement for some flatted development on the Dovers Corner site, it</p>	<p>Noted – as above.</p>	

	<p>supports the GLA's view that taller, high density buildings are not inappropriate in this location (Figure 5.16).</p>		
102	<p>Persimmon is supportive of the GLA's aspiration to transform the A1306 corridor into an attractive route which connects future residential development in this area and has no objection in principle to the creation of the linear park along the A1306 which will ultimately improve the outlook for new and existing residential properties. However subject to ensuring that sufficient access is maintained to new residential developments along the A1306, Persimmon also welcomes further clarification of the details of the linear park as there appears to be some inconsistency between the text within the Draft LR OAPF and the section figures included within Section 5 of the document.</p>	<p>The OAPF and the section drawings give an indication of how a linear park could be created. Havering Council are however in the process of preparing a design/development brief for its stretch of the A1306 looking at more detailed designs and feasibility studies for the linear park. In addition, it is exploring the scope for a TfL major scheme focussed on the A1306.</p>	
103	<p>The current Draft LR OAPF includes a figure relating to Rainham Village at Figure 5.12. The supporting annotation '4.11.09' refers to 'New Road to Rainham Station' and includes a red dotted route diagonally through the Dovers Corner site. Figure 5.7 refers to this route through the Dovers Corner site as a 'pedestrian and / or cycle connection' – although this is shown with a slightly different orientation to that in Figure 5.12. Whilst it is likely that Figure 5.12 is also making reference to a potential pedestrian or cycle route through the Dovers Corner site to 'New Road' (the A1306), Persimmon have concerns that the annotation at 4.11.09 could be misleading to those who are not familiar to the site and the policy background, and could be taken to imply that a new road (physical infrastructure) is proposed through the Dovers Corner site. Therefore to avoid any confusion,</p>		<p>Check ALGG projects for accuracy in relating to Dovers Corner site and new routes.</p> <p>Remove ALGG sub-area plans from document.</p> <p>Adapt Fig 5.19 as annotated on hard copy.</p>

		Persimmon encourages the GLA to ensure that Figure 5.12 is consistent with that shown at Figure 5.7 and that annotation 4.11.09 includes reference to the 'A1306' after 'New Road'.		
104		The Draft LR OAPF places considerable emphasis on the creation of a linear park along the A1306 in order to create walkable neighbourhoods. It is however important to note the adopted local planning policy for this area which requires the provision of an east-west route through the centre of all sites (within Havering) to the south of the A1306. Persimmon has facilitated this route as part of the Masterplan for the Dovers Corner site. This site will form the first step in creating walkable neighbourhoods in this area and will provide a connection between New Road and Rainham Village and should not be overlooked in light of the A1306 improvements.	The provision of an east-west route through the A1306 sites may not be appropriate for all sites (due to plot sizes/depth etc and other constraints). The OAPF has enough flexibility in this regard.  Havering Council will explore this further in its more detail development framework for the A1306 and the linear park options.  Havering Council is keen to ensure that there is comprehensive redevelopment because piecemeal redevelopment may not provide the necessary access.	
105		At present page 81 (final paragraph) and the section drawings at 5.21 and 5.22 refer to a green corridor with a drainage ditch channel and landscape bund parallel to the railway on the southern boundary of the Dovers Corner site. Due to the environmental constraints associated with the southern boundary of Dovers Corner, Persimmon are looking to utilise this area for car parking. As such, sufficient flexibility should be incorporated into these sections which acknowledge the existing development constraints, and to allow for a greater level of flexibility for developers.	Sufficient flexibility will be tied into the rest of the document acknowledging the constraints imposed by existing environmental and physical constraints. The urban design principles seek the best possible design solution to create a walkable, welcoming neighbourhood.	
106	Chapter 7 - Development capacity/buildin	Figure 7.2 of the Draft LR OAPF identifies the Dovers Corner site as an appropriate location for 2-3 storey houses of c. 86 dwellings per hectare	The development capacity study is not an urban design tool and does not indicate building heights and	

	g heights	similar to that delivered at Ingress Park and Barking Riverside. Whilst Persimmon agree that this is an appropriate typology and density for the Dovers Corner site, Persimmon encourages the GLA to acknowledge the requirement for 4-5 storey apartments/flats on the northern and southern boundaries of this site within this figure. This would change the housing typology in parts of the site more towards the typologies shown for 'Granville Homes' and 'Kings Wharf' on page 103 of the Draft LR OAPF.	densities that are necessarily appropriate for individual sites. It is a tool to roughly estimate potential development capacity across the OA applying very broad housing typologies. It is not expected that each site will only accommodate the typology applies for the study.	
107		Persimmon acknowledges the importance of providing a mix of tenures across this area and will seek to deliver a level which is financially feasible within the wider development context. However, as noted above, sites such as Dovers Corner are constrained by a number of existing physical and environmental factors. These factors all have an impact on the overall development viability and feasibility of delivery. As such, Persimmon encourages the GLA to incorporate a flexible view in its approach to affordable housing delivery on heavily constrained sites which are supported by an independently verified viability appraisal.	The document already says that flexibility will be applied to the provision of affordable housing – section 3.2.	Include additional text in 3.2 on the need for flexibility on AH given the physical and environmental constraints on many sites within the OA.
108	Chapter 4: Transport and General	<p>Persimmon is supportive of the improvements set out within the Draft LR OAPF towards rail, highways and public transport. Further, as a residential developer, Persimmon are supportive of improvements to pedestrian and cycle facilities in order to enhance walkable communities.</p> <p>The OAPF could be strengthened further in this regard by the inclusion of a statement which confirms that the local authorities will look to use their powers to help in facilitating and implementing improved linkages, for example in providing for bridges across existing waterways.</p>		Small reference included in 4.3.2 stating that the GLA, boroughs and TfL are willing to help facilitate and implement improved linkages.

109	Chapter 6 – Energy Heat network	<p>Dovers Corner is identified in Figure 6.3 as an area with potential for a gas fired CHP heat source. There is also a requirement with para. 6.3.2 for local planning authorities to ensure that new developments are future-proofed to allow connection to district heating networks.</p> <p>Whilst Persimmon are supportive of the GLA’s approach to creating sustainable, green communities and requirements for sustainable and renewable energy sources this also needs to be considered in light of the viability and deliverability issues associated with specific sites.</p>	<p>This would be a requirement of London Plan policy anyway following the energy hierarchy of ‘be lean, be clean, be green’.</p> <p>No action.</p>	
110	Chapter 3 – urban design strategy	<p>Persimmon notes that the GLA has commissioned the production of a 3D model of London Riverside and intend to use this for planning consultation purpose and as part of a 3D model that will eventually cover all of London. Section 5.1 of the Draft LR OAPF states that developers will be expected to provide 3D models of their schemes and will also be expected to contribute to the cost of locating the scheme within the GLA’s wider model. Persimmon notes these requirements and will seek to assist where possible. However, the requirement to prepare a 3D model which is compatible with the GLA’s own model is an additional burden on developers which will necessitate additional costs. It is therefore important that the GLA publish technical guidance for developers regarding the preparation of this model before introducing this requirement. The guidance should include details on matters such as file format, software compatibility, rendering requirements, model importing process etc. Persimmon encourages the GLA to consult with developers on the preparation of such guidance.</p>	<p>GLA officers will be able to provide further technical support/guidance to developers on how this can be achieved.</p> <p>However, it is not expected that a guidance document will be produced at this stage.</p>	



111	Port of London Authority	<p>Para 1.3</p> <p>Figure 1.7</p> <p>Figure 3.1</p> <p>Chapter 3 – Land use</p> <p>SIL release</p> <p>Wharf use</p>	<p>The Thameside West area contains a number of safeguarded wharves. The most recent Mayoral review recommends maintaining the status of the majority of these wharves. The proposed approach adopted within the draft LROAPF is the potential relocation of Strategic Industrial Land (SIL) – and presumably the uses within it – from Thameside West eastwards to the LROA. However, there is no further detail within the draft as to what uses or land are potentially to be released, where within LROA they will go and how such an approach will be implemented. Current and potential operators of wharves in Thameside West, due to the cargoes handled and added value processes undertaken on site, rely on the area’s proximity to inner east London and the City of London. These locational advantages – which are a viability criteria under the London Plan - are not obtained from locations further east; this is particularly fundamental in relation to concrete batching. Whilst crucial to wharves, the specific locational factors do not appear to be significant for most industrial processes. Any approach needs to take this into account. The proposed release of SIL at River Road will be considered elsewhere in these representations. The PLA recommend that if this approach is taken forward, then a comprehensive study on wharfage needs to be undertaken, perhaps in conjunction with that proposed at 3.6.1. The PLA would be pleased to work alongside the GLA and others in this this work.</p>	<p>The OAPF sets a direction of travel for strategic land uses including wharf usage. It does not necessarily create new policy and further, more detailed studies would need to be carried out by the Council’s in preparation for adopting its Local Plan to inform the policies, including employment land and wharf reviews.</p> <p>Wharfs are recognised in the document as being crucial for continued viable industrial land, but this also needs to be balanced with their extent of use and the significant demand for new housing in London. It also does not necessarily follow in all cases that wharves and SIL must go together.</p>	
112		Fig 1.8 – Roding link error	Figure 1.8 (and elsewhere). The proposed ‘Roding link to the Royal Docks’ is shown on the Transport Plan, but does not appear to be referenced on the key.	Link is adequately shown and can be clearly understood – no action.	

113	<p>Para 3.2 Figure 3.2 River Road SIL release</p> <p>Juxtaposition – industrial use/wharf use with resi</p>	<p>The proposed study in to the potential de-designation of SIL at the southern end of River Road would need to fully consider the potential impact on the two wharves recommended for continued safeguarding in this area; the text’s references to the importance of this is noted and welcomed. Again, the location specific nature of wharfage is paramount to any consideration and the PLA would be willing to assist in this work. Notwithstanding this, the London Plan accepts that wharves will be surrounded by other land uses as London expands and intensifies and that development around wharves – and wharf operators – should develop these appropriate approaches rather than moving wharfage ever eastwards. The tensions caused by this juxtaposition have been considered successfully and mitigated through a partnership approach between the PLA, operators, developers and local planning authorities at both Greenwich (Greenwich Millennium Village Phase 3,4 &amp; 5) and Wandsworth (Battersea Power Station). As such, the PLA believes that relocation is not the only policy approach to be considered. <b>Again, connections across Barking Creek are shown and referred to in the text. Barking Creek is a heavily trafficked tributary of the River Thames, with vessels of up to 100 metres using it at or near the top of the tide. Any crossing would need to ensure that navigational access is not prejudiced.</b></p>	<p>Agree – include some additional text referring to the need to ensure navigational access is not prejudiced by a link over the Roding/creek, and recognising that in certain circumstances wharf retention and management will be required where there is juxtaposition with other land uses, such as residential.</p>	<p>Add at Para 4.3.4 (Supporting the efficient movement of freight) – wording placing the importance of safeguarding navigational access to Roding/Creek in light of any future links/crossings over the Roding.</p> <p>Add text to 3.6.1 (underused wharf and those in poor repair) recognising that de-designation/relocation of wharfs is not the only solution.</p>
114	<p>Para 3.6 - wharves</p>	<p>The emphasis and generally constructive approach on wharves within the LROAPF is noted and welcomed.</p> <p>The objectives of the proposed review of wharves within LROA remains unclear, although – as noted above - so many are operational, expanding and</p>	<p>Refer to point 112 above.</p>	

			have a significant positive impact on the local and wider economy is testament to the success of the location for cargo-handling and associated industries. As noted above, the PLA would be pleased to work with the GLA on any study brought forward.		
115		Para 3.6.4	Whilst the imports of waste to the LSIP in Dagenham Dock might be small, exports of processed materials from them may well – as the text implies – be a growing feature of the area. The existing ro ro links from Ford’s terminal in Dagenham provide a direct service with mainland Europe and the PLA recommends that this be explored in greater detail. The PLA would be pleased to work with the GLA on any study brought forward.	This level of detail would be looked at in greater detail through a future wharf review.	
116		Para 4.3.2	As noted above, any crossing of Barking Creek (and indeed the River Thames and the PLA is already working with TfL on the Mayor’s proposed package of river crossings) would need to maintain navigational access to Barking Creek.	Noted – see point 114 above.	
117		Para 4.3.4	The PLA supports the approach taken in this paragraph and would note that there is the potential to improve the use of the Thames for the transport of freight, although this can only take place if the wharves and terminals within the LROA have security to invest and develop. The disparate range of cargoes handled and increasing volumes indicate the success of the area for cargo-handling.	Noted – as point 116 above.	
118		Para 5.4	Whilst the PLA notes the objective (4) to develop a continuous pedestrian and cycle path along the river from Gallions Reach to Rainham Marshes, this must be subject to the constraints imposed by either operational or security requirements of the	Agreed.	

			wharfage operations undertaken within the LROA.		
119		Figure 7.2	Albeit that it's noted that this is for the purposes of development capacity, is the assumption – as it appears to be – that the southern part of River Road will be changed from SIL to residential? If this is the case, notwithstanding that the LROAPF elsewhere notes that it will be subject to more detailed study, what are the assumptions made in relation to the two wharves? How does this link with the approach to be taken at 3.6.1?	No assumptions are made about wharf usage in chapter 7. It is merely a tool to calculate development capacity, which was originally carried out in 2011  New sites post 2011 and/or future potential areas of SIL release such as River Road have not been calculated in detail, but estimates on development capacity have been made.	
120	Quintain (Agent: AECOM)  Land interest: Carlsberg Tetley and Thames Wharf (CTTW)	Chapter 1: Introduction	Quintain supports the land use planning objective set out in Section 1.3 of taking a strategic approach to the relocation and consolidation of Strategic Industrial Land (SIL) further east and the identification of new housing land. CTTW is a key housing land opportunity which would be supported by this policy approach in the Riverside OAPF.	Newham's part of London Riverside will be removed from the LR OAPF and included within the emerging Royal Docks OAPF.  Representation has been passed on to relevant officers for inclusion within the RD OAPF.  Only references specific to LR OAPF have been included here.	
121			The location of safeguarded wharves within Riverside and beyond – such as at CTTW - and the potential for relocation could usefully be indicated on figure 1.6 and 1.7.	Figs 1.6 and 1.7 shows the broad land uses only. The wharf map is held separately in the document (Fig 3.7, chapter 3) and this approach is appropriate.	
122		General	In view of the identification of potential SIL relocation and the need for an updated approach to wharves, it would also be helpful to include additional commentary in the document to explain the implications further and highlight the need for updated and additional policy for the Royal Docks including Thameside West and the	See point 121.	

		<p>whole of CTTW.</p> <p>This would usefully take the form of another OAPF document which would be helpful to deliver the planning objectives for this area. An OAPF for the Royal Docks area could help promote a coordinated policy approach and provide impetus to address key outstanding planning policy issues and other constraints which are currently holding back development. Quintain would however only support an additional OAPF if it can be prepared and published within a swift timeframe (i.e. within 12 months), as a significantly longer time period for preparation could potentially be counterproductive in terms of encouraging delivery.</p> <p><b>In this context additional text should be inserted in Section 1.1 as follows: <i>“The Riverside OAPF will be complemented by a similar framework to be produced for the Royal Docks Opportunity Area in the next 12 months, which will include the potential for relocation of Strategic Industrial Land (SIL) and a coordinated approach to relocating or consolidating safeguarded wharves from key sites such as Carlsberg Tetley – Thames Wharf”.</i></b></p>		
123			As above.	1.2 – Text re-worked to reflect similar wording for RD OAPF introduction with reference to the city in the East.
124	Chapter 2: Policy context	<p>To reflect the recommended reference to the production of an OAPF for the Royal Docks in Section 1, Section 2.1 could be amended include the following:</p> <p><i>“Given this complexity, this OAPF presents a timely opportunity to provide some indication on the direction of travel going forward in respect of the London Plan (2015), the NPPF (2012), a potential Opportunity Area Planning Framework for the Royal Docks and the forthcoming borough</i></p>	Newham’s part to be removed from LR and included in Royal Docks OA.	Alter wording in 2.1 to <u>two</u> boroughs, not three. Additional wording at the end: “...and the draft Royal Docks OAPF currently underway”.

		<p><i>plan reviews.”</i></p> <p>Section 2.4 refers to planning policy in Newham including the approach to development at Beckton. However, the policy approach set out in the Newham Core Strategy (January 2012) to the Royal Docks should also be referenced given the indication of SIL relocation from this area shown in Figures 1.6 and 1.7.</p>		
125	Chapter 3: Land use strategy	<p>The land use strategy for the London Riverside is broadly supported by Quintain. Section 3.1 states:</p> <p>Parts of London Riverside will continue to provide the location for some of London’s largest industrial uses and in particular will help to accommodate the growing Green Industries and further industrial location from the Royal Docks.</p> <p>3.19 Given the area is specifically identified on the plans in the OAPF, this paragraph would however benefit from a specific reference Thameside West:</p> <p>Parts of London Riverside will continue to provide the location for some of London’s largest industrial uses and in particular will help to accommodate the growing Green Industries and further industrial location from the Royal Docks, such as Thameside West including the Carlsberg Tetley and Thames Wharf sites.</p>	Disagree – not necessary to quote specific sites.	
126		As with Figures 1.6 and 1.7, Figure 3.1 showing the SIL relocation from Thameside West should be amended to include the whole of CCTW, not just Carlsberg-Tetley as shown in Section 1.	See ref 125.	
127		Within Section 3.2 – Housing, discussion should be included in respect of unlocking housing development potential on the Royal Docks sites facilitated by enhanced employment development	This will be dealt with in the draft Royal Docks OAPF.	

		<p>in Riverside Area in the same way as for Thames Road in Creekmouth.</p> <p>Additional text in Section 3.2 should read:</p> <p><i>“The release of Strategic Industrial Land (SIL) from the Royal Docks area with potential relocation of industrial uses to London Riverside will help unlock wider housing development opportunities such as at Carlsberg-Tetley and Thames Wharf.”</i></p>		
128		<p>Section 3.6 should refer to safeguarded wharves at Thameside West where relocation/consolidation is indicated in the Core Strategy. A coordinated approach to the relocation of safeguarded wharves in the Royal Docks area would help unlock significant development opportunities.</p> <p>Figure 3.7 could therefore usefully include an inset diagram showing wharf designations in the Royal Docks.</p>	See ref 125.	
129	Chapter 7: Infrastructure delivery, delivery mechanisms	<p>Quintain supports the delivery mechanisms outlined in Section 7.3, in particular working proactively with the private sector, utilisation of public sector land and coordination of strategy and investment decisions. As indicated previously, Quintain especially wishes to see a greater coordination and a strategic approach to release and relocation of safeguarded wharves within or from the Royal Docks area.</p> <p>Section 7.3 should include an additional bullet point:</p> <p><i>“Reviewing existing safeguarded wharf designations, considering potential for relocation and consolidation to unlock development opportunities both at London Riverside and in the</i></p>	Agree.	<p>Include additional bullet point at 7.3:</p> <p><i>“Review wharf usage, industrial operations, proximity to end markets and safeguarded wharf designations. Consider the potential for de-designation of redundant/under-used wharfs in collaboration with relocation and consolidation of industrial land to unlock development</i></p>

			<i>Royal Docks</i> ".		opportunities".
130	Segro	General	Given the complexity of the planning policy context within the boundaries of the OAPF, we consider that the scope and remit of the document should be broadened and essentially act as an overarching Masterplan to allow for the prompt delivery of early sites to maximise the initial momentum. The document has the potential to promote appropriate uses for key regeneration sites, including both residential and industrial sites, which would provide a robust policy context for the individual local authorities and provide increased certainty, speed and flexibility for developers, whilst mitigating risk.	Disagree. The area is too vast to be a detailed masterplan and there aren't the resources to undertake this level of work.  The OAPF provides a strategic vision only for the broad land use and infrastructure, and design objectives for the area. Detailed masterplan/site specific briefs will be considered by the relevant Council as part of their Local Plan.	
131			We note that the OAPF refers to a number of different documents and studies. It would assist the clarity of the London Riverside OAPF document if key designations and details are brought forward for inclusion in this document.	Disagree – the OAPF is an SPG and it is not necessary to repeat policy held elsewhere given the complexity and the range of policies that apply.	
132		Chapter 3: Land use strategy	The OAPF is primarily focussed on the delivery of new housing and needs to increase the emphasis on the importance of ensuring a pro-business planning environment. The OAPF has the opportunity to create a positive policy context for the delivery of industrial development in the area. The continued protection and promotion of key industrial sites in the OAPF area is critical not only to meet local and future employment needs, but it is also fundamental in meeting the need of a growing London population and economy. The OAPF for London Riverside should identify and promote the industrial and logistics sites needed to accommodate those sectors which will help London to maintain its World City status. For example, the industrial sites being promoted in the OAPF area should play a major role in	The OAPF adequately recognises that areas industrial legacy and its locational characteristics to continue to provide land for and support viable industries. This includes the growing demand for green enterprises and SME/tech business who require more diverse and flexible employment land.	



		<p>accommodating the boom in eCommerce. Products and services ordered on-line by consumers and businesses must be processed quickly and efficiently and London Riverside provides an ideal destination for industrial occupiers to respond to this demand. Without this investment, London as a whole could suffer.</p>		
133		<p>The OAPF should include greater flexibility for future development changes. Industrial occupiers are increasingly looking for enhanced facilities as part of their development. This can range from office or studio accommodation as part of an industrial unit, increased car parking for light vehicle deliveries associated with ecommerce, and welfare facilities for employees. The OAPF should allow for these future changes and provide sufficient flexibility. The ability to meet specific requirements will play an important role in improving the attractiveness and deliverability of a site to potential occupiers and their employees.</p>	As above – see section 3.3.	
134		<p>We support the GLA’s strategic aspirations to enable the London Sustainable Industries Park (LSIP) to become the largest concentration of environmental industries and technologies in the UK. However, we consider that the aspiration to develop the area for environmental industries and technologies should be balanced with a need to allow flexibility for alternative industrial uses to come forward on certain sites. This will enable the area to respond to changing market requirements, and to bring forward development which will act as a catalyst to assist with the delivery of the aspirational strategy for the area. A flexible approach to industrial uses is also particularly important in the context of the aspiration to release a significant amount of Strategic Industrial Land (SIL) on sites in close proximity to the LSIP.</p>	<p>Section 3.3 states that the LSIP will be promoted as a hybrid IBP/PIL, therefore recognising the diverse range of industries that could relocate there. The wider Dagenham/Rainham Employment area will continue to provide more traditional PIL type uses and the closure of Barking Power Station provides a significant opportunity for further employment intensification in the area.</p>	<p>Expand text in Section 3.3 to refer to the wider Dagenham/Rainham employment area, its intensification for traditional PIL uses, in an improved environment, closure of Barking power station, locational characteristics etc.</p> <p>Clarify that Barking Power Station is not within the LSIP boundary.</p>

			The LSIP could therefore provide alternative accommodation for displaced businesses. We note the OAPF outlines that as the area develops, it is expected that significant investment is expected from other industrial sectors and possibly businesses. We consider that the OAPF should explicitly state alternative uses that are acceptable in the LSIP.		
135		Chapter 7: Development capacity	We note that Figures 7.1 and 7.2 illustrate key sites which have the potential to deliver an intensification of uses or comprehensive redevelopment, as identified in the Development Capacity Study (2011). We consider that the OAPF should update this plan to identify key employment sites which should be brought forward to deliver new development.	Agreed.	Update Fig 7.2 with more recent land use assumptions (Barking power station, Rippleside, Freightmaster site etc)
136	St William (JV with National Grid – Beckton gas works)	General	In considering opportunities for this site within the OAPF, the Newham part of the OA does not seem to display any particular characteristics with Barking Riverside, Dagenham Dock or Rainham. Whilst aspirations to link these areas with Newham are supported, particularly in relation to the proposed crossing of the River Roding, St William considers that East Beckton is more closely linked with the Royal Docks and should in fact form part of the emerging OAPF for that area, and not be included within the LR OA. The timing of the emerging Royal Docks OAPF will enable St William, the GLA and other landowners in East Beckton to work collectively to promote a comprehensive regeneration of the area through the emerging OAPF.	See earlier notes – Newham to be removed from LR and included within RD OAPF.  All other references to Royal Docks/Beckton are not included here and have been passed onto to officers writing the RD OAPF.	
137		Chapter 4: Transport	St William supports the proposed new river crossing and the Roding link between Barking Riverside and the Royal Docks. However, we would like further clarity in the OAPF as to the	TfL are currently carrying out further work looking at the detail on what this link could comprise and any potential landing points.	

			GLA's aspirations regarding the form of the link – i.e.: vehicular or pedestrian. In addition, in regard to the new river crossing further certainty is required in relation to this aspiration. The continued uncertainty regarding delivery of the crossing will adversely impact upon regeneration proposals for the area.		
138	Thames Gateway Kent Partnership	Chapter 1: Introduction	We note that the only reference to the Thames Gateway in the Introduction (Section 1) is in the map reproduced from the London Plan at Figure 1.4. We suggest that, in addition, in Section 1.2, there should be a specific reference to London Riverside's position as a key location within the Thames Gateway. The Thames Gateway remains a national priority area for growth and London Riverside contains some of the most important development sites in the Thames Gateway, such as Barking Riverside. We would welcome the Mayor's continued recognition of the Thames Gateway as a national priority area for growth being highlighted in the Framework.	Agreed.	Add text to 1.2 within first paragraph: "It encompasses the southern parts of the boroughs of Barking and Dagenham and Havering, and forms part of the nationally recognised Thames Gateway growth area."
139		Chapter 1: Introduction and Chapter 4: Transport	Section 1.5 refers to "new river crossings and other potential options being considered to support development in the longer term, such as Crossrail extension to Bexley Riverside Opportunity Area and Ebbsfleet Garden City." It is TGKP's view that consideration of the possible extension of Crossrail should look beyond Ebbsfleet to Gravesend. In addition, we would suggest that the draft be amended so as not to imply that the issue of Crossrail extension is something that can be left for the "longer term". TGKP considers that, given the major plans for Ebbsfleet Garden City, the proposed London Paramount entertainment resort at Swanscombe Peninsula and the ongoing growth and regeneration across North Kent, an early re-	TfL is leading on a study to assess the current and future transport capacity in the East London sub-region, as part of the next revision to the Mayor's Transport Strategy. This work will take into account the predicted population and employment growth, and explore the scale of future demand growth, in order to recommend solutions appropriate to the transport capacity gap identified. This study may consider future extensions of Crossrail within the wider south-east as part of this project.	No action.

			examination of the business case for Crossrail extension is essential.		
140	Thames Water	Chapter 3: Land use strategy	<p>We own and operate two large wastewater/sewage treatment works (STW) in the LROAPF area, one of which is one of the largest in Europe, Beckton STW in Jenkins Lane, IG11 OAD (London Borough of Newham) and Riverside STW in Creekside RM13 8QS (London Borough of Havering). Both of these STWs have recently been upgraded to meet new effluent consents and to increase capacity. We consider the strategic importance of the Beckton and Riverside STWs should be recognised in the LROAPF.</p> <p>There are two large strategic sewage pumping stations in the area at Gascoigne Road IG11 OAZ and Gallions Reach E6 4PL that play a crucial role in transporting foul and storm flows. Change of land use adjacent to these assets should be considered carefully as by their nature they may cause odour.</p> <p>Where development is being proposed within 15m of a sewage pumping station, the developer or local authority should liaise with Thames Water to consider whether an odour and / or noise and / or vibration impact assessment is required as part of the promotion of the site and potential planning application submission. Any impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a pumping station.</p>	<p>Noted. The OAPF does not categorise between the employment/industrial type land uses as it is a strategic document.</p> <p>The land use strategy seeks to improve the relationship between conflicting residential and industrial land uses. The need for environmental impacts assessments such as for noise/odour/vibrations would be standard for planning applications close to such uses.</p>	<p>Additional text required in 5.3.</p> <p>The land use strategy seeks to improve the relationship between conflicting residential and industrial land uses by relocating SIL elsewhere where it can be intensified with other complimentary uses, allowing residential neighbourhoods to be reconnected.</p> <p>Nonetheless, no doubt there will be occurrences where homes will be in close proximity to industrial/employment type uses, including waste, and the impacts will need to be carefully assessed and mitigated in terms of noise, vibration, odour etc.</p>
141		General Chapter 7: DIFS	We consider that an Integrated Water Management Strategy (IWMS) is required similar to that set out in the Environment Strategy and Policy E1: Water of the draft Old Oak and Park	The DIF study will look at water infrastructure and Thames Water will be invited to attend the steering group and feed into the	Add text to 5.3 on the need for all developments to include SUDS, and refer to April

		<p>Royal Opportunity Area Planning Framework.</p> <p>An IWMS should be commissioned to highlight the long term infrastructure requirements for water demand and drainage in the LROAPF. We would like to work closely with the GLA and Boroughs in leading on the drafting of the IWMS.</p> <p>We consider that the scope of IWMS should include:</p> <ul style="list-style-type: none"> <li>• Assessment of the existing water supply infrastructure in the London Riverside area;</li> <li>• Assessment of the existing sewerage and drainage infrastructure in the London Riverside area;</li> <li>• Consideration of the likely range of demands for water supply, sewerage and drainage through the redevelopment of the London Riverside area;</li> <li>• Proposals for a range of options to minimise drinking water demand, maximise grey/rainwater re-use, maximise the use of sustainable drainage systems and minimise discharge to the Combined Sewer system; focusing on what the best</li> <li>• Consideration a range of sensitivity tests for the above options;</li> <li>• Assess the spatial implications of any required infrastructure;</li> <li>• Appraise and align the options against other OA strategies and</li> <li>• Assess the outline costs of any required infrastructure.</li> </ul> <p>Critically we would expect that the IWMS would be developed alongside and be considered with other strategies for the Opportunity Area, including Transport, Landscape and Open Space. This would help to ensure that options selected in</p>	<p>infrastructure needs.</p>	<p>2015 Government requirement for these.</p>
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			the IWMS are realised.		
142	The Anderson Group (bidder – DSTO site)	Chapter 4: Transport	We support the aspirations set out in figure 4.3 to improve linkages/access to Crossrail and links between Rainham Village, Beam Park and CEME. We do believe that the document could be more explicit on Rainham Village to CEME links being pedestrian and cycle links which are grounded in a residential environment with a focus on access to Dagenham Dock train station.	Fig 4.3 refers to indicative bus corridors and so would be suitable for pedestrians and cyclists too.	
143		Chapter 5: Urban design strategy	<p>We support figure 5.16 which identifies Chequer’s Corner for high density development and tall buildings. We also agree with the sentiment of the supporting text on page 74 which states ‘Higher density development in this area should improve legibility of Chequer’s Corner and Dagenham Dock Station and should take advantage of the site’s higher accessibility. A more dense form of development would help provide the critical mass to deliver a vibrant district centre. The redevelopment of the DSTO site will be central to establishing a new street based urban form. Tall buildings proposals will be subject to local heritage considerations’.</p> <p>We would like to see the quote above slightly amended to read ‘Higher density residential development in this area.....’ We are concerned that the existing paragraph could be misconstrued as higher density logistics and warehousing development which we do not believe could contribute to a vibrant district centre.</p> <p>For consistency with the rest of the LROAPF we request that the key that relates to the DSTO site is amended by including the word ‘residential’: <i>‘High density residential led mixed use development.’</i></p>	<p>Partly agree. The vision for the DSTO site and Chequers Corner is for high density residential-led mixed use, but due to the site constraints, flexibility is needed over the balance of land uses and the site layout. The current wording is appropriate, as the sub-heading refers to Chequers Corner/Dagenham Dock. The document more specially states that resi-led development is appropriate for the DSTO site.</p> <p>This section also refers to building heights and densities, and land uses are covered elsewhere.</p>	Alter Fig 5.11 to show DSTO as high density resi-led mixed use.

144	Thurrock Council	General Exec summary Section 1.1	<p>The LROAPF on page vi and page 3 makes reference to close cooperation with Thurrock. Thurrock Council seeks clarification as to what matters have been discussed previously and under what arrangements? The Council would wish to be satisfied that any comments made on behalf of the Council represent a formal view and are part of the Duty to Co-operate process on this matter.</p> <p>Thurrock Council is not satisfied that prior to this draft consultation that sufficient consultation and engagement on the matters in the London Riverside Opportunity Area has actually taken place with Thurrock as part of the Duty to Cooperate process.</p> <p>In particular officers and members representing planning and transport would have wanted to be engaged on a range of issues including those outlined below prior to the publication of the draft document.</p>	<p>Thurrock Council have attended the LR Strategic Board where updates have been presented on the progress of the OAPF and the scope of the strategies etc, so there have been opportunities for the Council to be involved pre-consultation.</p> <p>Nonetheless it is accepted that Thurrock Council has not collaboratively worked on the document in the same way as LBBD and Havering.</p> <p>The Mayor has a duty to consult and inform under the GLA Act, rather than a duty to cooperate with authorities outside London, and has fully exercised his duty in that regard.</p>	Page vi and page 3: Delete reference to collaborative working with Newham and Thurrock Council.
145			Page viii, second paragraph first sentence should replace reference to "...in Essex at Bluewater..." with "...in Thurrock at Lakeside..."		Alter wording to "...and those at Lakeside in Thurrock and Bluewater in Essex..."
146		Figure 1.3	Proposed urban regeneration hub at Purfleet in Thurrock should be added to the map with text indicating proposals for up to 2,600 dwellings, film studios, and commercial and retail development.		Add Purfleet in Thurrock to Fig 1.3 with text stating housing projection (2,600 dwellings, film studios and commercial/retail development)
147		Figure 1.8	<p>Should be amended to include:</p> <ul style="list-style-type: none"> <li>- Identification of Junction 30 and Junction 31 of M25</li> <li>- A13 extended eastwards on map</li> </ul>	Fig 1.8 only looks at transport interventions for the LR area and slightly beyond. Extending the A13 on the map any further would be	Include J30 and J31 of the M25

			taking it too far out of its context. Agree to include M25 junctions.	
148	Page 10, Key principle – Improved Transport connections	Add after "...improvements to the A13" the following words "and its junctions with the M25 (J30 and J31)..."	These junctions are outside the GLA boundary. Improvements to these junctions would be promoted by Highways England.	None.
149	Maps - Figures 1.3 to 1.8	On several of these maps it is not clear if Beam Park station is on the C2C line or the HS1 line. The maps should clearly indicate what line the proposed station is on i.e.: the C2C line and the C2C route itself should be highlighted more clearly on some of the maps.	Fig 1.3 clearly states that Beam Park will be on the C2C line. The text in Chapter 4: Transport Strategy also explains the Beam Park proposals.	Amend Figs 1.6 and 1.8 to clearly define that Beam Park will be on the C2C line (not HS1 as it currently shows).
150	Page 44, Paragraph 4.31, fifth bullet point	East and west are wrong way around. Text should be amended to read "...trips originating from the OA have to travel west to the Blackwall Tunnel or east to the Dartford Crossing;"		Amend
151	Page 10	On page 10 of the draft London Riverside OAPF document there is reference to five key principles, one of which is titled Land Use Planning. It refers to the consolidation of SIL uses further to the east, including within Essex. It is not clear whether this relates to Thurrock and if it does on what basis and evidence this approach is being suggested. Certainly if the relocations involves non-landfill waste facilities this could conflict with existing waste polices in the Thurrock adopted Core Strategy which do not support such approach unless under certain special circumstances.	Tilbury Docks, Thames Enterprise Park and DP World Logistics Park provide new and planned facilities for industries to locate with excellent access to the river, road and rail networks, and provide extensive opportunities for industries to relocate further east.  In addition the retained and intensified employment areas in Dagenham, Rainham and LSIP will provide relocation space for SIL uses displaced from elsewhere in the OA.	
152	Chapter 4:	The scale and size of development covered by the London Riverside OAPF will have a significant	The OAPF makes an inherent link between the need to invest in	



	Transport	<p>impact on the strategic and local highway network in the surrounding areas. It is considered the LROAPF should make reference to appropriate mitigation measures as required to reduce the adverse impact of additional traffic generated by the developments on roads and junctions including the M25 (Junc 30 and Junc 31), A13 (including east of the M25) and the A1013 and A1090.</p>	<p>transport to unlock growth. The focus is investing in public transport but the OAPF does recognise the importance of highway improvements. It recommends investment should consider the range of options set out in the Roads Task Force Report for reducing the severance caused by arterial roads, public realm improvements and enabling the provision of new homes and jobs.</p>	
153		<p>If an announcement by the Government and TfL support a Belvedere Bridge crossing of the Thames and its early opening how will this impact on the Havering Riverside (Housing Zone) in the London Riverside OAPF and in particular the proposals for housing and employment? It has been suggested during previous consultation by TfL that such a scheme could be built and open in a timescale that would be during the period covered by the London Plan and Havering new Local Plan. The proposal could have implications for the mix and scale of development on Havering Riverside and in particular level of housing and how would this be addressed?</p>	<p>TfL is engaging with the local authorities impacted by the proposed river crossings.</p>	
154		<p>The Government is currently giving further consideration to Options A and C for the future Lower Thames Crossing. The announcement of the route of the Lower Thames Crossing will have a range of economic, environmental and transport implications for the Thames Gateway including the London Riverside area. Depending on the nature of the crossing option and junctions it could create both positive and negative development pressures on the boroughs adjoining the route. The GLA and London Boroughs</p>	<p>The options being considered for the potential Lower Thames Crossing are well outside of the OA boundary. Whilst it is accepted that the announcement may have a range of impacts on the OA and indicative proposals for other river crossings within east London, it is not necessary to include them on the OAPF maps. TfL and the boroughs will consider these future</p>	<p>Include an indicative line of the crossing options on the wider SE context map.</p>

		involved in the London Riverside OAPF may wish to consider the future implications of the Lower Thames Crossing following the Government's announcement of the preferred option which is anticipated to be later in 2015/early 2016 and following earlier consultation on revised options.	implications.	
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