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OAPF Transport Strategy

MAYOR OF LONDON

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I Introduction

London's population is forecast to continue growing and there is significant pressure to deliver more homes and jobs, together with a need to provide a high quality of life for all Londoners.

The current London Plan identifies the need to deliver 49,000 new dwellings each year over the period 2011 to 2036. Over the last ten years however, an average of 25,000 homes a year have been delivered. The result of this shortfall has been rapidly increasing housing costs and diminishing affordability. Given the housing shortage, the draft new London Plan sets out a need to increase the rate of housing delivery in future to address the backlog of under-supply.

London needs to bring forward new sites for residential development as well as increase densities on existing sites where this is achievable. The availability of public transport is critical to delivering housing in areas with strong development potential.

The Thames Estuary Corridor has long been identified as having substantial potential for housing and employment growth. The level of growth that could be accommodated is estimated to be approximately 250,000 new homes and 200,000 new jobs by 2041. However, progress in

realising growth in the corridor has historically been limited by poor transport connections. Delivering the scale of growth identified depends on improvements in transport connections and capacity, and a reduction in barriers to movement across the area.

The majority of potential growth identified within the Thames Estuary Corridor can be accommodated within eight Opportunity Areas (OAs) that lie to the north and south of the River Thames, as set out in the draft new London Plan and illustrated in Figure 1. Thamesmead & Abbey Wood sits between Woolwich to the west and Bexley Riverside to the east. Across the Thames, Thamesmead & Abbey Wood is bordered by Royal Docks & Beckton Riverside to the north-west and London Riverside to the north.

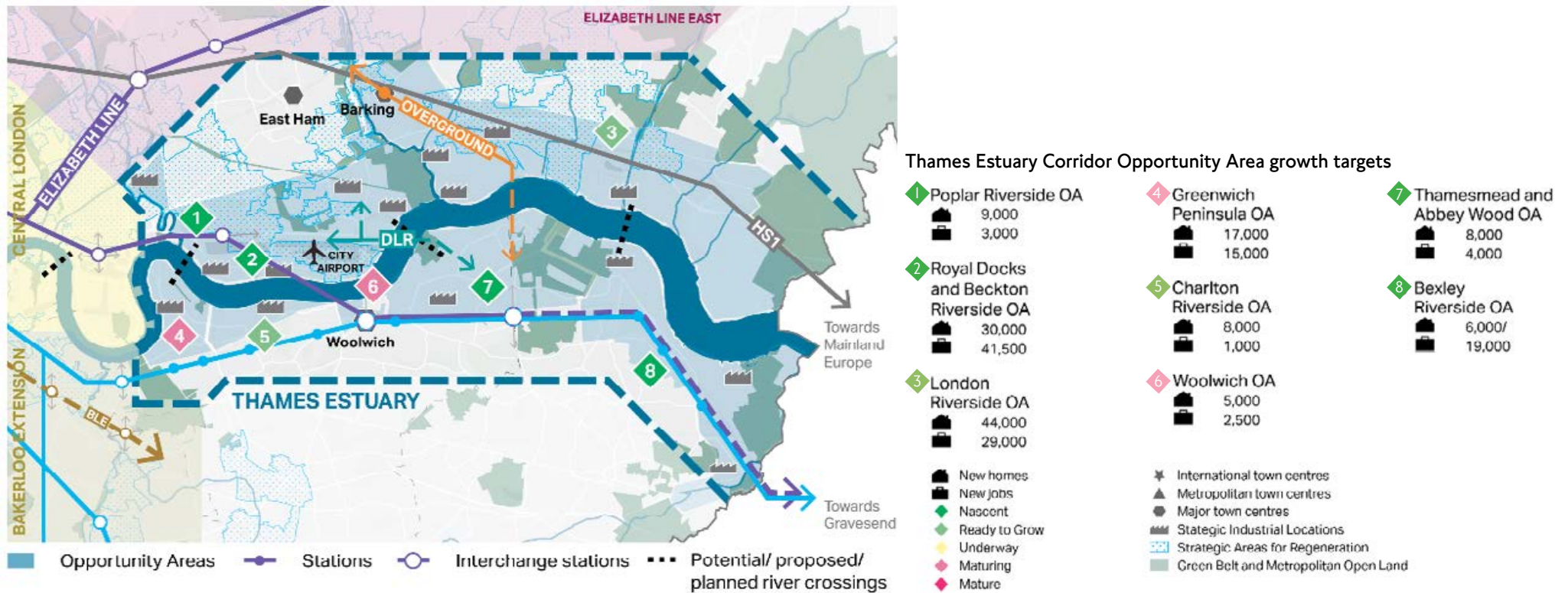


Figure 1. Draft new London Plan growth areas – Thames Estuary Corridor (source: GLA)

At 811 hectares, Thamesmead & Abbey Wood OA is one of the largest growth areas identified in the draft new London Plan, with indicative growth potential of 8,000 new homes and 4,000 new jobs by 2041.

However, by adopting the principles of Good Growth and significantly improving public transport connectivity, notably more homes and jobs could be unlocked in Thamesmead & Abbey Wood, beyond the level envisaged in the draft new London Plan. With a new package of transport measures in place, the OA has capacity to support around 15,500 new homes and 8,000 new jobs.

The draft new London Plan estimates that in the Royal Docks and Beckton Riverside OA, to the north-west of Thamesmead & Abbey Wood (T&AW), there is potential to deliver 30,000 new homes and 41,500 new jobs and in Bexley Riverside OA, to the east, there is potential for 6,000 new homes and 19,000 new jobs. These OAs are closely linked with Thamesmead & Abbey Wood due to the potential for possible new transport interventions to serve and support growth in all three areas.

Transport for London (TfL) has been working in partnership with the Greater London Authority (GLA), Royal Borough of Greenwich and London Borough of Bexley to plan the transport improvements required to support the potential levels of growth in T&AW. Together we have considered how new developments can be integrated with existing communities, as well as with the wider boroughs in the Thames Estuary Corridor.

The Mayor's Transport Strategy and draft new London Plan set out a vision for Good Growth in London, a concept that proposes that plans for growth should improve the health and quality of

life of all Londoners, reduce inequalities and make the city a better place to live, work and visit. Key themes of Good Growth include planning for the right number of homes and using London's growth as an opportunity to deliver higher levels of affordable housing and mixed-use developments, in order to spread London's economic success and create stronger communities. Good Growth identifies the importance of planning new developments in a way that reduces car dependency and encourages active travel in order to improve Londoners' health; increase access to opportunities by providing better public transport; and make the city a better place to live.

Transport is fundamental to achieving Good Growth in the T&AW OA. Providing high quality public transport connections and safe and attractive walking and cycling routes will enable people to choose active and healthy ways to travel, while supporting the delivery of high-density development. To support the growth ambition set out in the T&AW Opportunity Area Planning Framework (OAPF), a holistic transport strategy is required to address the needs of both existing and new communities.

Figure 2 shows how this transport strategy forms part of a suite of documents that together make up the OAPF for the area, which in turn will inform local policy.

The transport strategy explores the current transport challenges facing the OA and assesses the ability of the existing transport network to support the level of growth proposed. It identifies the transport infrastructure that is needed in the short, medium and long term to enable growth to happen, while also addressing the needs of existing communities.

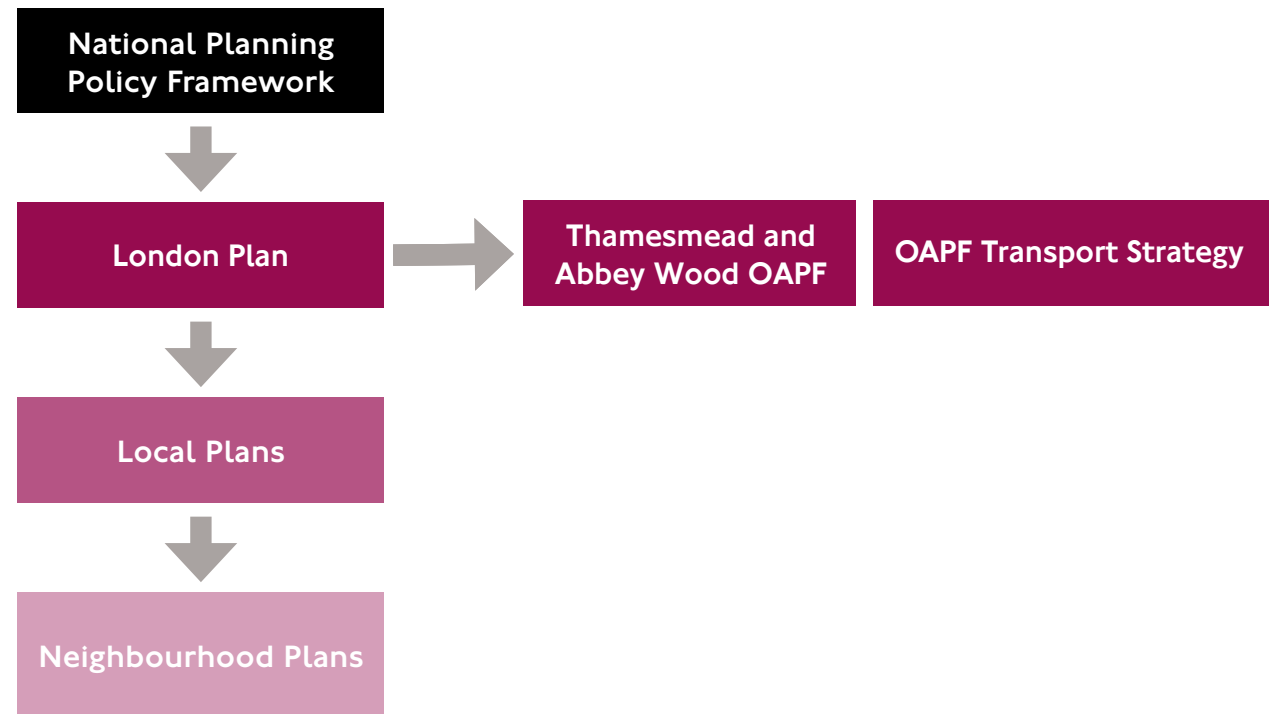


Figure 2. Planning policy framework diagram (source: GLA)

Supporting growth in T&AW

Several scenarios have been considered in the T&AW OAPF, based on different levels of transport investment. These scenarios have been developed and tested as agreed by TfL, GLA, Royal Borough of Greenwich and London Borough of Bexley.

In this Strategy, produced by TfL, we consider which transport interventions best support an intermediate stage of growth and which best support a high level of growth in the OA. The reference case, the two preferred transport interventions and the associated levels of development that they would unlock are illustrated in Figure 3.

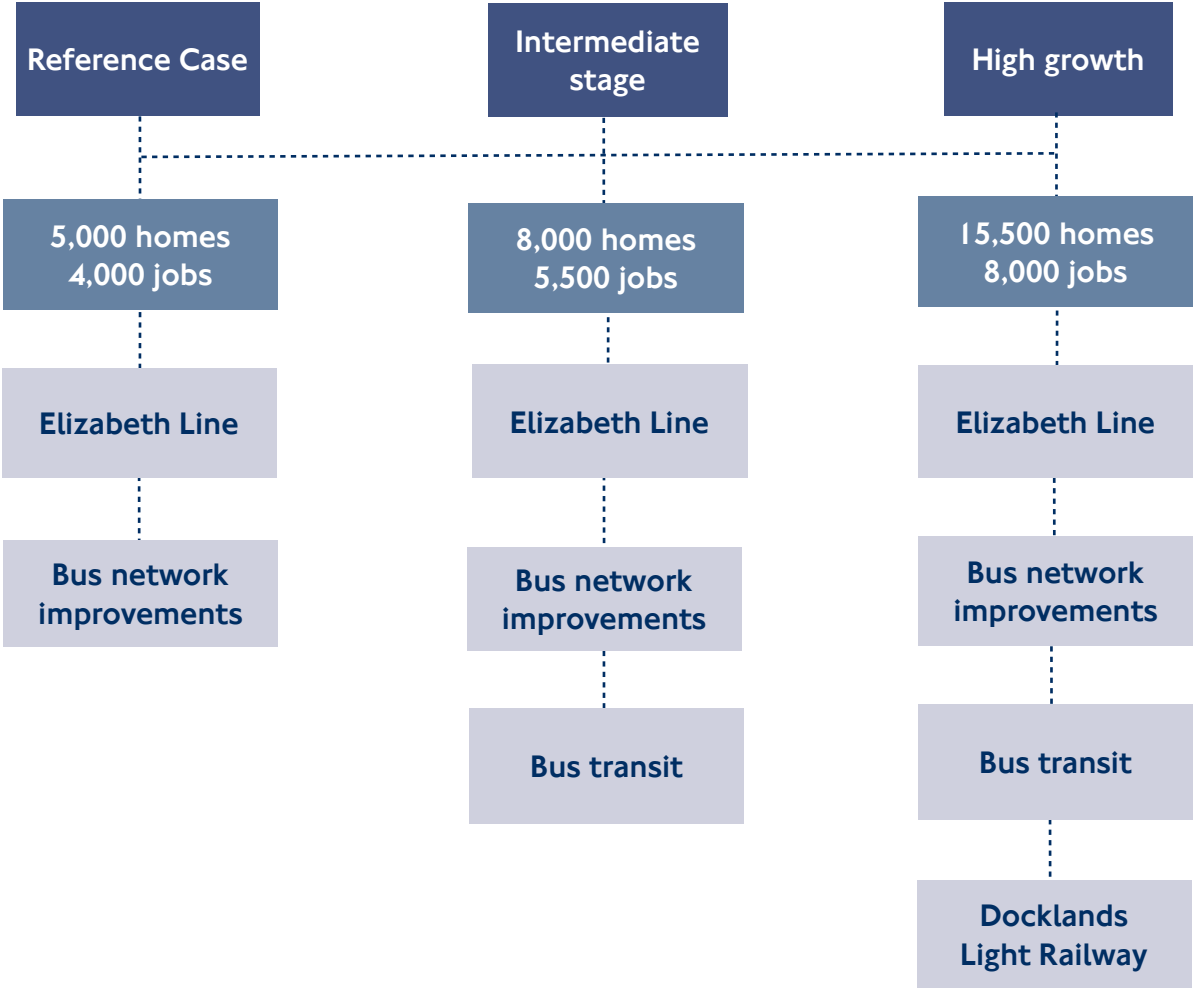


Figure 3. Preferred transport infrastructure to support growth

Transport modelling

The development of this Strategy has been informed by strategic transport modelling, which has allowed us to forecast the impact of different growth scenarios on the transport network, and to test the ability of potential new transport interventions to serve demand in a way that supports and promotes Good Growth.

This has been modelled:

Baseline (2015) the transport network in its existing form with 2015 levels of population and employment.

Reference Case (2041) the existing transport network with the addition of the Elizabeth line and supporting local bus service enhancements, new developments that are soon to be or already in the planning process, and background growth in population and employment (unplanned growth).

Intermediate growth (2041) Reference Case plus an additional 3,000 housing units and 1,500 jobs, and transport interventions to support an intermediate level of growth.

High growth (2041) Reference Case plus an additional 10,500 housing units and 4,000 jobs, and transport interventions to support a high level of growth.

London Overground extension (2041) Reference Case plus an additional 4,000 housing units and 2,000 jobs, and transport interventions to support a higher level of growth.

By modelling travel demand under intermediate and high growth scenarios, it is possible to test the ability of new public transport services to cater for increased demand and to identify the services that would achieve the greatest shift away from private vehicle trips. Despite part of the OA being in outer London, a target of 80 per cent of journeys to be made by public transport, walking and cycling is considered achievable to in the OA if supported by the right level of investment.

2 Transport provision and patterns of use

Historic transport infrastructure development

Thamesmead is the principal town within T&AW OA. It has a unique history as London's only post-war New Town, designed in the 1960s to help address London's housing shortage. It has been progressively developed since then.

In the south of the OA, Abbey Wood grew gradually throughout the late 19th and early 20th century as a result of the construction of the North Kent railway line and tram services to Woolwich. At this time, much of the land to the north of Abbey Wood belonged to the Royal Arsenal site, which extends across Plumstead Marshes between Woolwich and Erith. After the majority of this land was vacated by the military, the Greater London Council developed plans for the creation of an urban extension in Thamesmead, to address London's housing shortage.

The area was developed between the 1960s and 1980s in a number of stages and sectors, of which Thamesmead South was the main housing zone, leading to further population growth in Abbey Wood. Thamesmead East was initially designated for industry and commerce, while Thamesmead

Central functioned as a local town centre, providing retail and other services. Later phases of residential development were located in North Thamesmead and West Thamesmead, which saw low density private development on a major scale.

The concentration of strict land use zoning within Thamesmead, together with spatial segregation of social homes built in the early phases and private homes built in the later stages, means that patterns of development the OA are not typical of other parts of London. The OA also has different economic characteristics to the boroughs of Greenwich and Bexley in which it is situated.

Improving connectivity to and from Thamesmead & Abbey Wood was identified as a key strategic component in supporting development in the original 1960s Thamesmead masterplan. The masterplan proposed a new rail station east of Plumstead and included a central highway (now Eastern Way) with three lanes of traffic in each direction to allow residents to reach central London via a new river crossing.

The original proposals for a new rail station and road tunnel or bridge across the Thames were

dropped from the masterplan, due to the high cost of the schemes. Later proposals came forward in the 1970s to extend the Jubilee line to Thamesmead town centre, but these plans were changed and an alternative Jubilee line extension terminating at Stratford was built instead. As a result, despite the proximity of the OA – and in particular Thamesmead – to central London, the area remains largely isolated and disconnected from London's rail-based public transport network.

Existing public transport connections

Figure 4 shows the existing public transport network serving T&AW. The North Kent rail line forms the southern boundary of the OA with stations serving the area located at Plumstead and Abbey Wood and trains to central London every 5 to 10 minutes at peak times. Southeastern and Thameslink services provide connections from these stations to central London rail stations including London Bridge (25-30 minutes), Blackfriars (30-40 minutes), Charing Cross (40-45 minutes), and St Pancras (40-50 minutes).

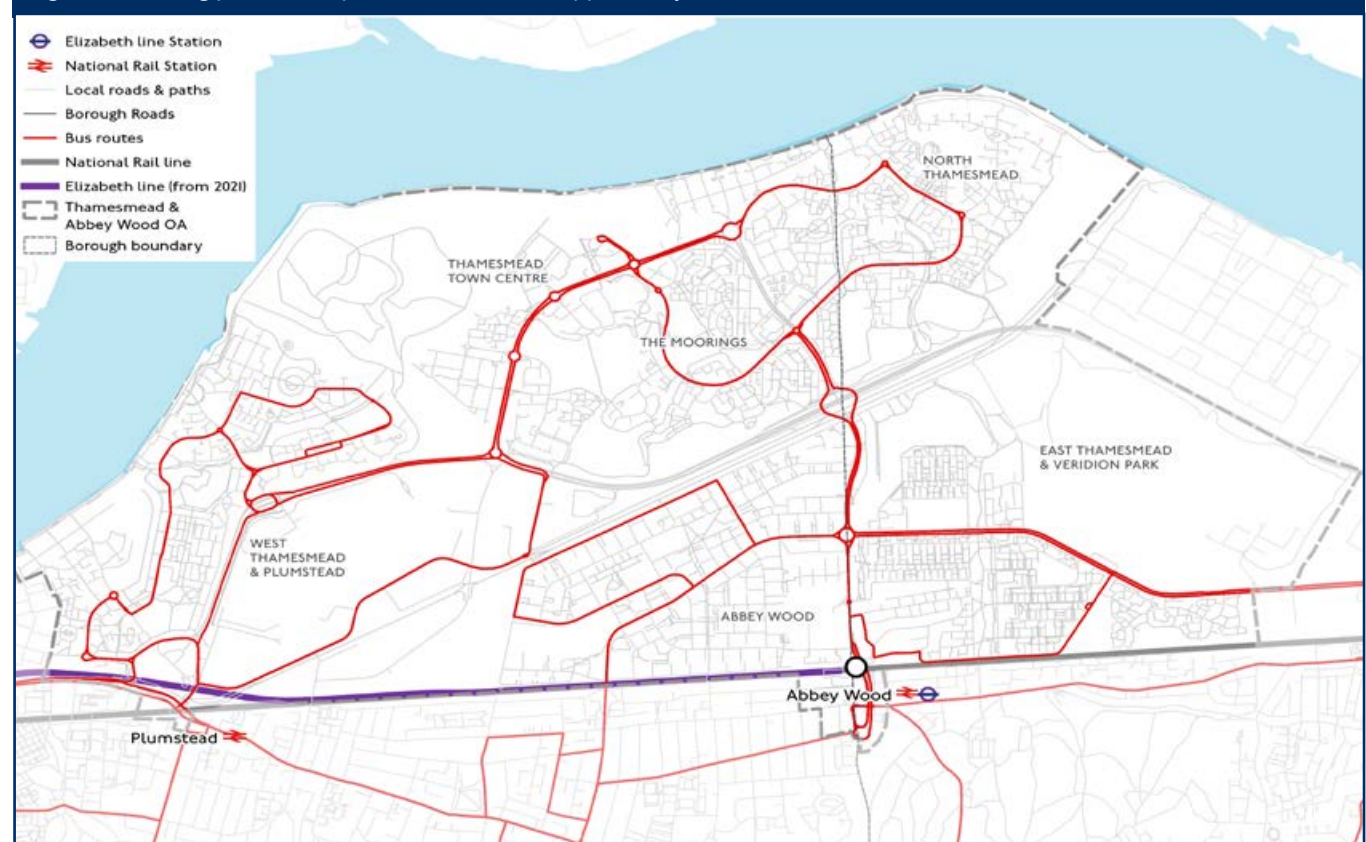
Once open, the Elizabeth line will serve Woolwich and Abbey Wood stations, providing a quick and frequent service with 12 trains per hour to destinations such as Canary Wharf (11 minutes), Liverpool Street (17 minutes) and Tottenham Court Road (23 minutes).

The OA is served by 18 local bus routes, providing access to a range of destinations including North Greenwich, Woolwich, Belvedere, Bexleyheath, Lewisham, Peckham, Sidcup and Bluewater. The existing bus interchange facilities in Thamesmead town centre are limited, however, with no dedicated bus station and existing bus

stops and stands at or near capacity. The town centre performs poorly as a bus interchange and investment is required to improve passenger

experience and to make buses a more attractive option.

Figure 4. Existing public transport services in the Opportunity Area



Walking and cycle environment

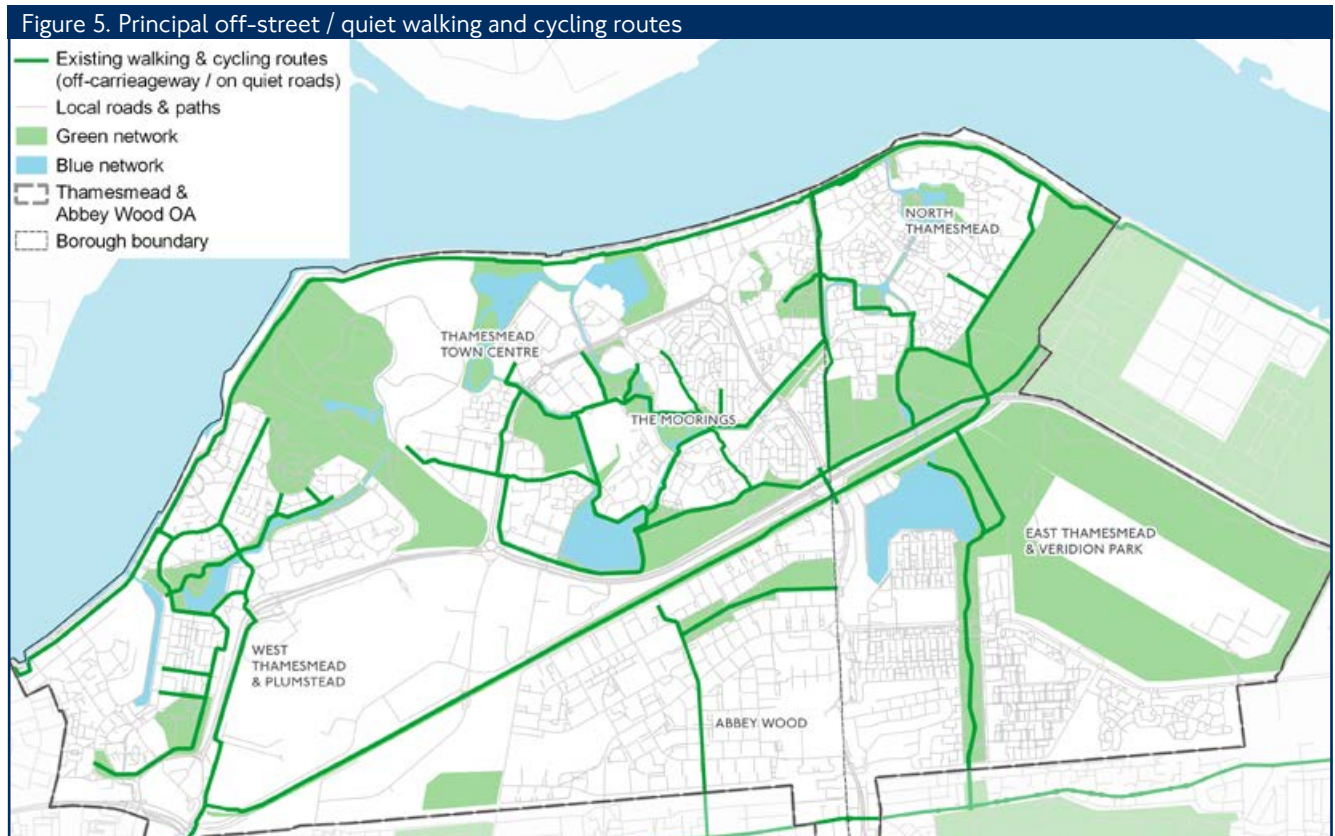
Figure 5 shows existing walking and cycling networks in the OA, parks and other green spaces and rivers, lakes and canals (the green and blue network).

A network of off-road walking and cycling routes exists within the OA although its quality is variable and much needs upgrading. The primary routes are the Thames Path and the Ridgeway, an outfall sewer that creates a raised 3.5 mile linear foot and cycle path through the area. The Ridgeway is poorly integrated with the wider walking and cycling network, and it adds to severance between the north and south of the OA.

Although walking and cycling on much of the highway network is possible, key design principle of the 1960s Thamesmead masterplan was to segregate motorists and pedestrians by means of an elevated network of walkways and bridges. These were intended to enhance the mobility and safety of residents by removing potential conflicts between different road users, and to provide quick, free-flowing roads uninterrupted by pedestrian crossings. However, many of the off-road routes do not feel safe or comfortable. Concerns about noise from traffic led to the

highest density housing in South Thamesmead being placed well away from major roads through the area. Combined with the separation of pedestrian routes, this policy has contributed to high vehicle speeds on the highways and, with an

incoherent network of footways, few pedestrians using the streets, limited natural surveillance, anti-social behaviour and a road environment which in places actively discourages walking and cycling.



Highway network

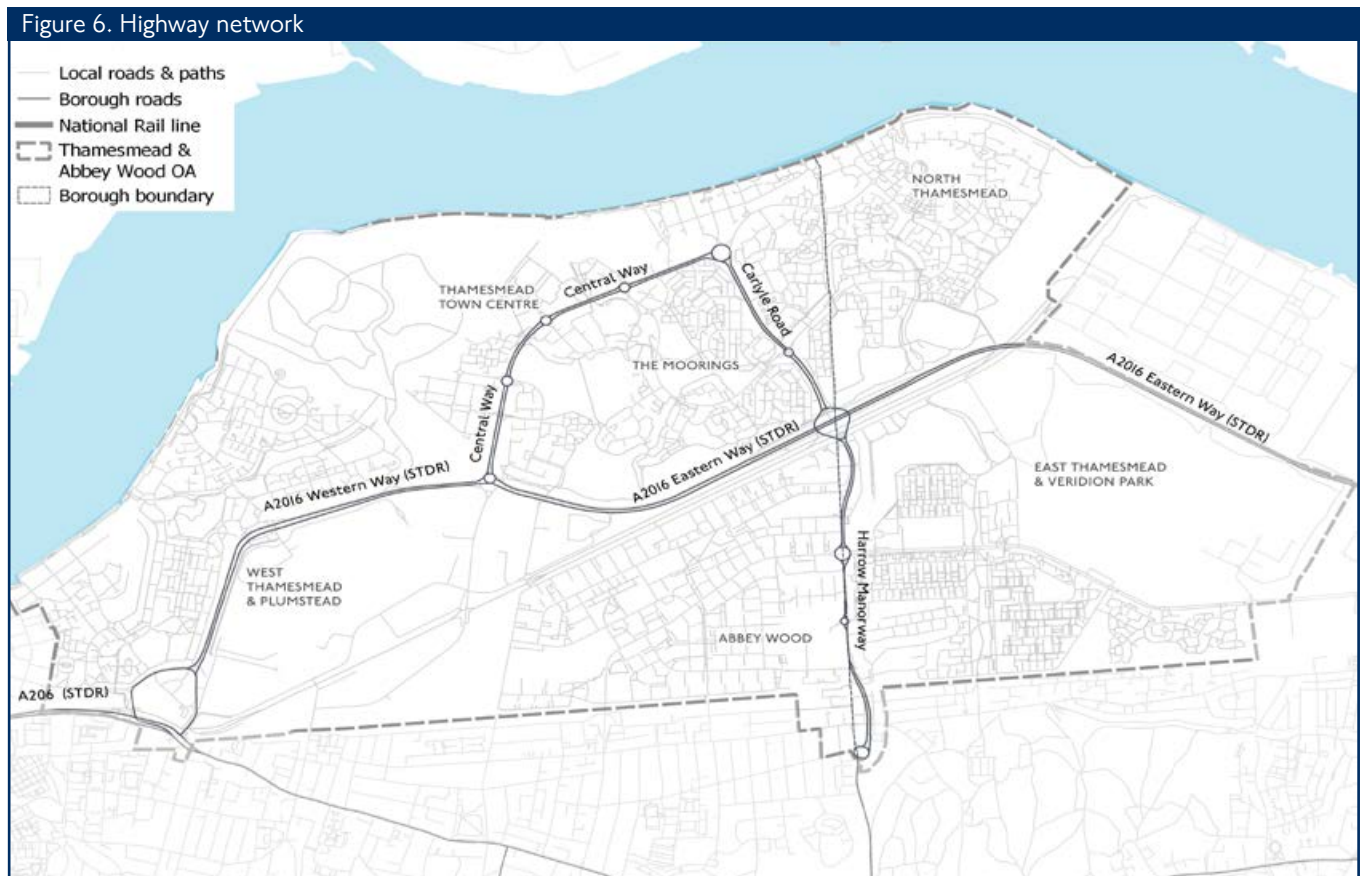
Figure 6 shows the location of key distributor roads within T&AW. The area is predominantly served by the South Thames Development Route (STDR), an important road corridor which forms part of London's Strategic Road Network and by the Borough Principal Road Network, comprising Central Way, Carlyle Road and Harrow Manorway, Easter Way and Western Way.

The STDR provides a key east-west corridor south of the Thames, linking the Blackwall Tunnel in Greenwich to the A2 near Bluewater in Kent. The A2016 Western/Eastern Way is part of the STDR, which passes through the centre of the OA connecting Plumstead and Belvedere, via the A206 Pettman Crescent/Plumstead Road.

These strategic roads are large scale highways that are heavily dominated by motor traffic, resulting in an intimidating environment for pedestrians and cyclists as well as structural severance (neighbourhoods being cut off from one another by main roads or railways) within the OA.

Off the main roads, cul-de-sacs are typical in residential areas of Thamesmead. While there are many walking and cycling routes within these

areas, they are not always inviting or well-maintained. The urban layout is generally not very legible and does not lend itself to short, direct walking and cycling trips.



Socio-economic factors influencing travel patterns

Between 2001 and 2011, the most recent Census years, the population of T&AW OA rose dramatically from just over 33,000 to just over 46,000, a 40% increase. This sharp rise has resulted in a significant increase in population density – from 45 people per hectare in 2001 to 63 people per hectare in 2011.

Figure 7 shows the change in age profile of

residents within T&AW compared with the Royal Borough of Greenwich and the London Borough of Bexley between 2001 and 2011. The age profile of T&AW is relatively young, with 75% of residents aged under 45 in 2011 compared to 69% in the Royal Borough of Greenwich and 59% in the London Borough of Bexley.

Figure 8 shows that the ethnic profile of residents is relatively diverse, with 55% of T&AW residents from BAME backgrounds. The proportion of

BAME residents increased notably, from 30% in 2001 to 55% in 2011. With an increasingly young and ethnically diverse population, the travel requirements of the OA have changed in recent years: fewer people own cars and are choosing to drive. This should be taken into account as part of the OAPF by ensuring good quality public transport services and walking and cycling infrastructure are planned for people living in the OA.

Figure 7. Age Profile, 2001-2011 (source: Census 2011)

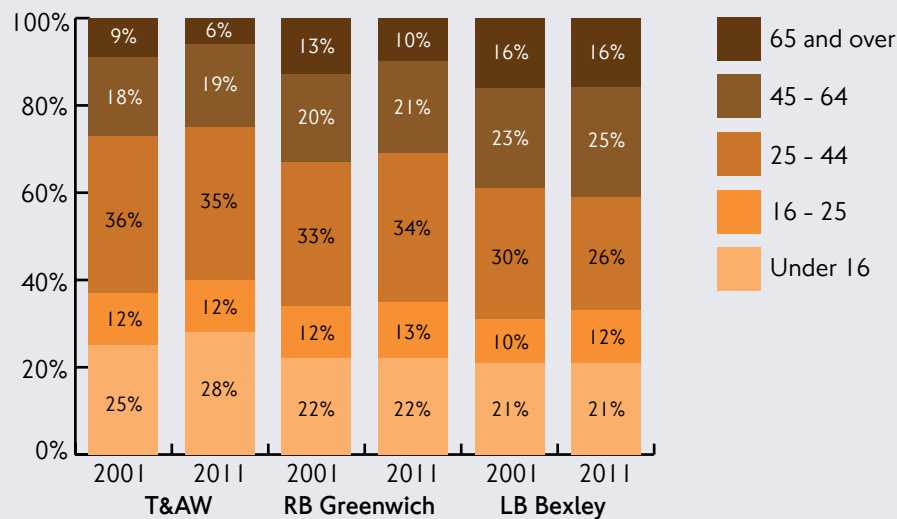
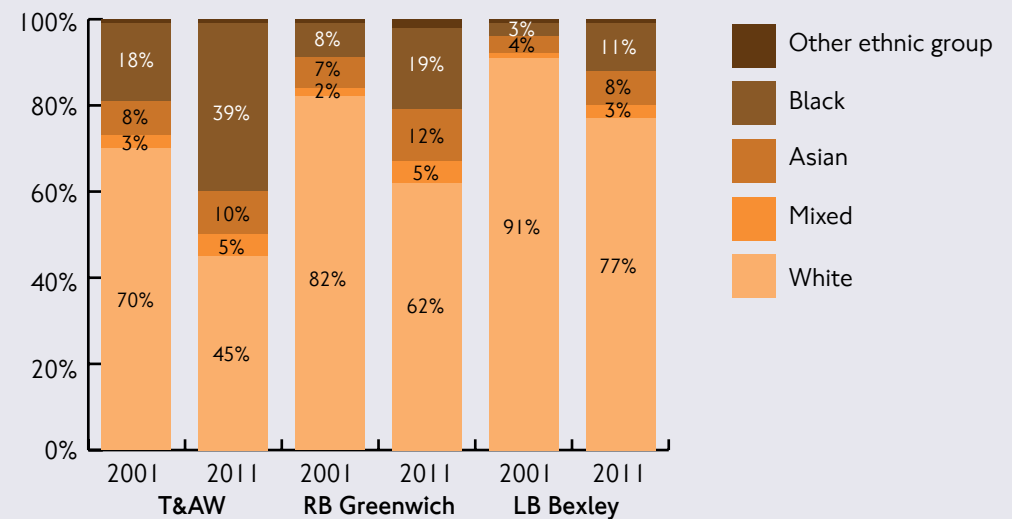


Figure 8. Ethnicity Profile, 2001-2011 (source: Census 2011)



Household income levels observed within T&AW are lower compared with both borough-wide and London-wide averages. 60% of households in T&AW have a household income under £25,000, which is notably higher than the corresponding percentages in Bexley and Greenwich (50% and 51% respectively).

Patterns of employment in the OA reflect the limited extent of the public transport network that serves it, with just under 30% of T&AW residents working in central London. While there are areas of local employment within and close to the OA, other nearby centres of employment such as the Royal Docks and Isle of Dogs that offer a large and growing number of high quality jobs are currently poorly connected to the OA.

Improving public transport access to these centres of employment and, across London more generally, could transform the prospects of those living in the OA and encourage new residents to move into the area. The creation of new homes in Thamesmead will also create new local jobs, for example in local retail, education, health and other servicing industries, providing new employment opportunities in the OA.

Current travel patterns

Figure 9 shows the levels of car ownership and Figure 10 shows mode share in T&AW compared to the Royal Borough of Greenwich and London Borough of Bexley.

Car ownership in the OA fell between 2001 and 2011. Census data shows that the proportion of households with a car fell from 61% in 2001 to 57% in 2011, with average car ownership falling from 0.78 cars per household to 0.73 over the same period. More recent data from the London Travel Demand Survey (LTDS) indicates that the level of car ownership has remained broadly static since 2011.

In line with car ownership, journey to work data from the Census shows that commuting by car fell in the OA between 2001 and 2011. A higher proportion of T&AW residents now use public transport to commute. This data only considers the mode of travel used for the longest part of the trip, however, and does not take into account walking and cycling as part of a multi modal trip, so the number of existing walking and cycling trips within the OA is likely to be underestimated.

As shown in Figure 10, car usage is higher across trips made for all purposes (commuting and other). LTDS data shows that 40% of all trips made by T&AW residents between 2012 and

2015 were made by car. The remaining 60% of trips were made by other modes of transport (30% public transport, 25% walking, 2% cycling and 3% other).

Figure 9. Current car ownership (source: Census 2011)

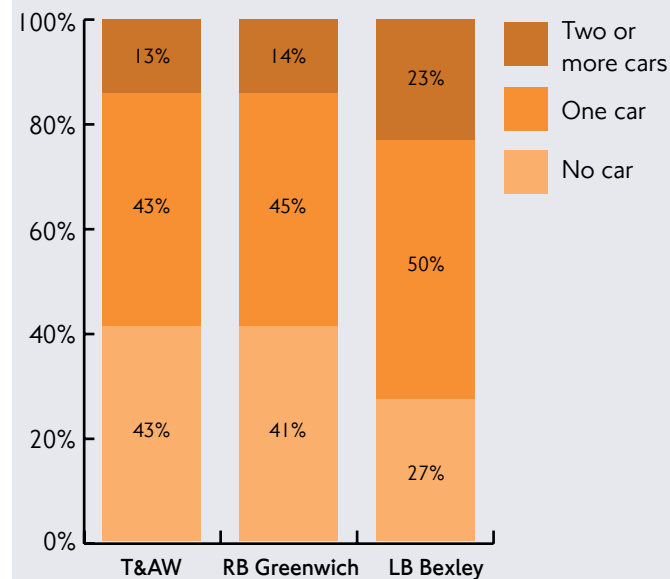
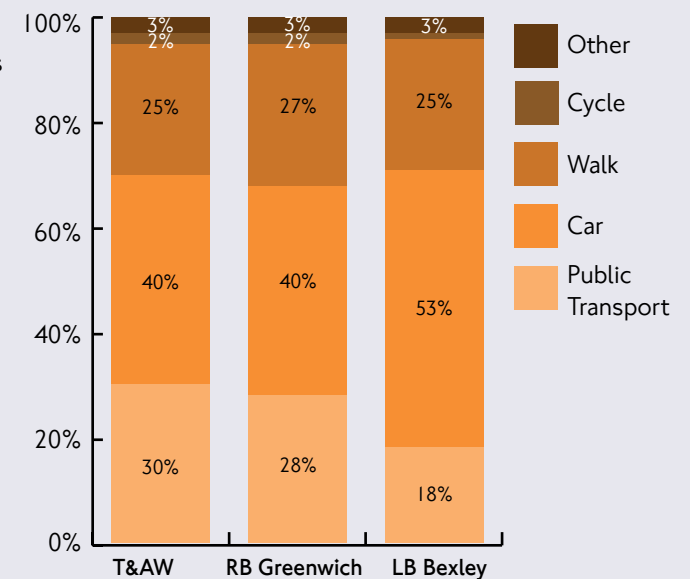


Figure 10: All day mode shares (source: LTDS 2012-2015)



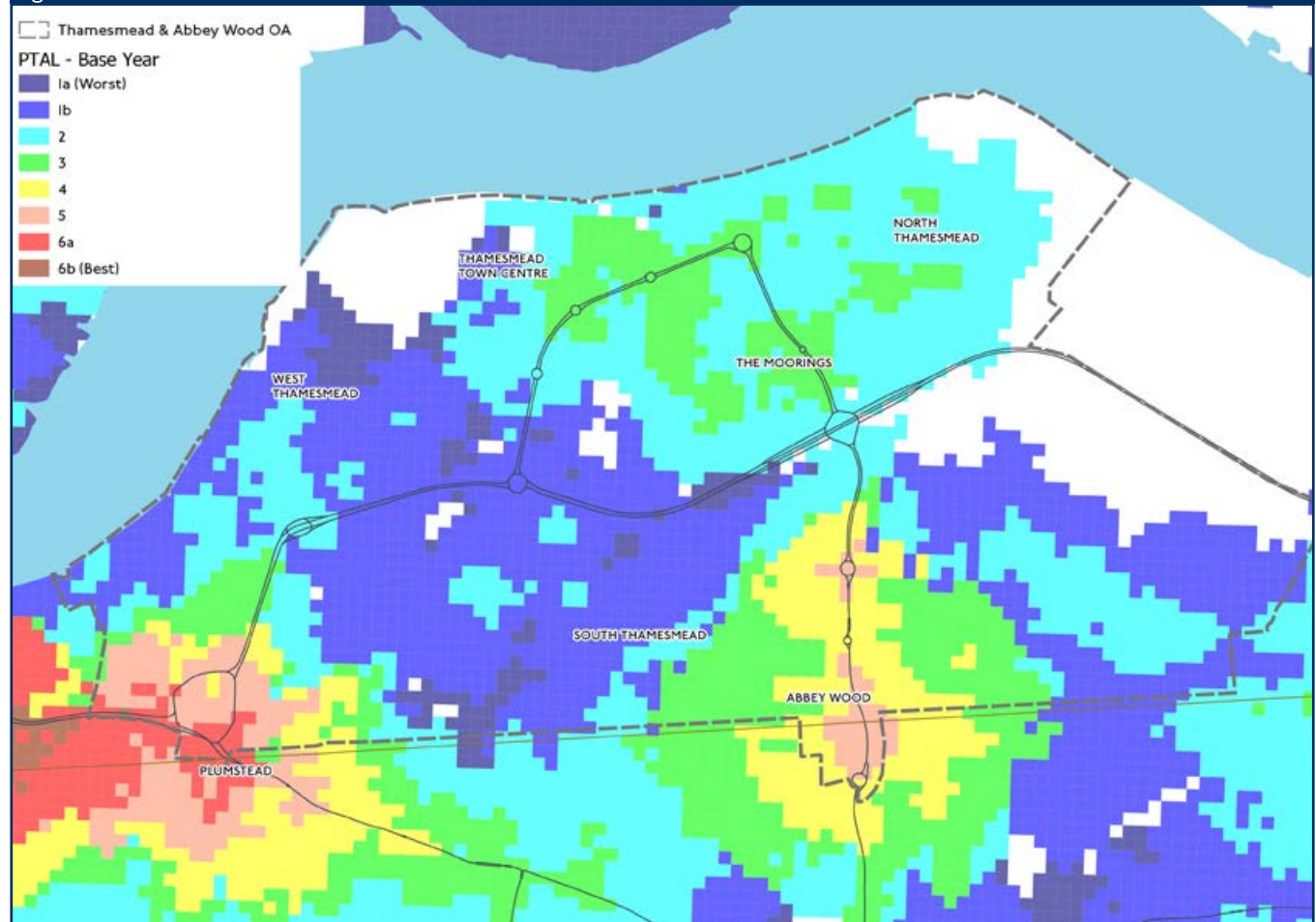
Access to public transport

Access to public transport varies significantly across the OA, as shown in Figure 11. Public Transport Accessibility Levels (PTALs) are highest in the south of the area, around Woolwich, Plumstead and Abbey Wood stations on the North Kent rail line. Accessibility in these areas will be further increased when the Elizabeth line opens.

PTALs are moderate along Harrow Manorway and in Thamesmead town centre, due to the concentration of bus routes serving this corridor. However, throughout much of the OA – particularly around North and West Thamesmead – PTALs are low, indicating very poor access to public transport. These areas are typically beyond a 1,500m (15-20 minute) walk from the rail network in the south of the OA. Coupled with problems of structural severance (e.g. the combined barrier of the Ridgeway and Eastern Way which separate the north and south of the OA, much of Thamesmead has no direct access to rail services).

Assessment of PTALs highlights the need to introduce new public transport connections in Thamesmead in order to bring forward sustainable development.

Figure 11. Baseline PTALs (2015)



Future travel patterns

Once open, Elizabeth line services will commence from Abbey Wood, directly connecting the OA with Canary Wharf, the City, the West End and, further afield, Heathrow Airport and Reading, as shown in Figure 12. The introduction of the Elizabeth line will result in significant improvements to journey times from Abbey Wood station near T&AW to key centres of employment such as Canary Wharf (11 minutes), Liverpool Street (17 minutes) and Heathrow (51 minutes). With trains every five minutes in the peak periods, this will represent a step-change in transport connectivity for the area.

The forthcoming arrival of the Elizabeth line has already generated significant development in the south of the OA. In 2018, there were over 3,300 new homes permitted or considered 'active' in the planning process. These are centred around Abbey Wood, in response to the connectivity enhancements the Elizabeth line will bring. This growth will stimulate new employment opportunities, with a need for social infrastructure to support new housing developments. A

portion of the potential 4,000 new jobs in T&AW identified in the draft new London Plan will result from upcoming developments.

An extension of the Elizabeth line to the Bexley Riverside OA and potentially beyond is being considered by the London Borough of Bexley, TfL, GLA and neighbouring local authorities outside London. This would benefit T&AW OA by further improving access to employment and other opportunities to the east of the area.

Figure 12. Elizabeth line route map

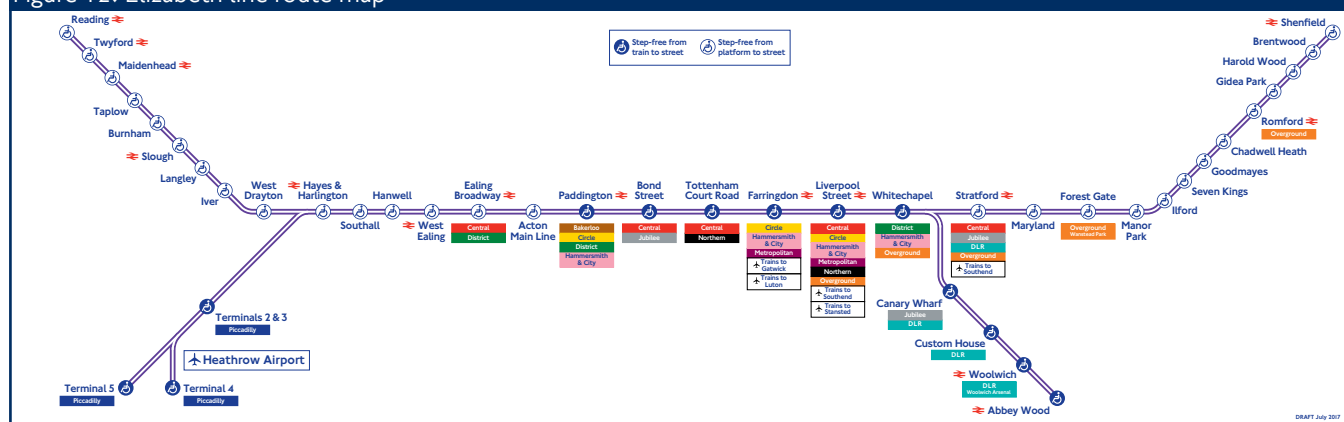
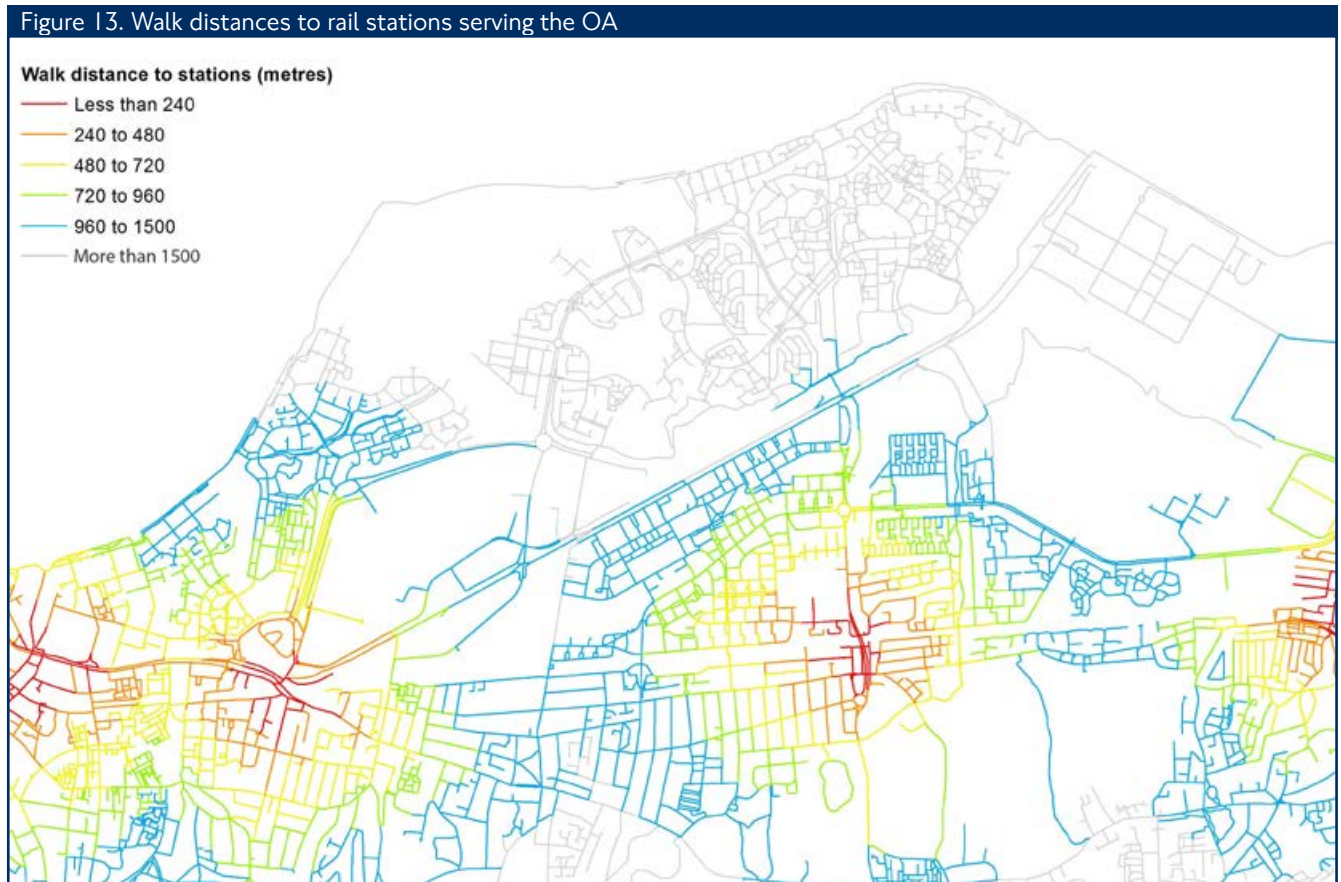


Figure 13 demonstrates that while the Elizabeth line will deliver a step change in transport connectivity around Plumstead and Abbey Wood, the majority of residents in the OA live further than 1,500m (or a 15-20 minute walk) from these rail stations. This is roughly the limit assumed to how far people will be prepared to walk to reach a station. Long walk distances combined with severance in the OA will mean the north of the OA will continue to have poor access to rail services.

With the potential introduction of new public transport services (set out in Chapter 5), there is an opportunity to significantly improve accessibility across the northern half of OA.

Detailed information about the transport challenges and opportunities in T&AW, including cross-river connectivity and access to employment, bus capacity and journey time reliability, uptake of walking and cycling, and safety and air quality, is provided in Appendix A. Chapter 3 provides an overview of these issues.



3 Summary of transport challenges and opportunities

The analysis presented in Chapter 2 and Appendix A can be summarised under five challenges and opportunities which the Opportunity Area Planning Framework transport package seeks to address.

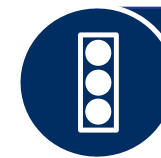


Improve strategic connectivity

There is potential in T&AW to deliver significant growth in housing and employment, particularly in northern parts of the OA, but poor public transport connectivity has historically acted as a constraint.

With Elizabeth line services soon to commence from Abbey Wood, new housing developments are coming forward in the south of the OA. However due to its size much of the OA is beyond a 1,500m walk (15-20 minutes) from Abbey Wood and other rail stations, with PTAL values of 2 or lower, so the introduction of Elizabeth line services will have a limited impact in the north of the area. Despite improvements to local bus services to maximise the connectivity benefits of the Elizabeth line, this part of the OA will remain fairly isolated.

Investment in new strategic public transport connections serving Thamesmead is required to act as a catalyst for development and regeneration in the north of the OA.



Manage the performance of the highway network to protect essential journeys and improve safety

While the scale of growth potential is a great opportunity for the OA, achieving the OAPF's vision for Good Growth will be a significant challenge.

The scale of development potential within the OA is such that some increase in traffic demand is likely. Addressing the safety and pollution impacts that arise from use of the existing highway network will be key challenges, along with encouraging mode shift to active and public transport modes of transport in order to minimise congestion and ensure essential traffic, in particular buses and freight, is not subject to excessive delays.

Additionally, measures are required to improve the operation and safety of the highway network for active and public transport modes. In line with Vision Zero, competing pressures on road space need to be managed in order to provide safe routes for people walking and cycling.



Improve local connectivity and reduce severance

Local connectivity on foot and by cycle within the OA is fragmented due to physical barriers to travel including road and rail infrastructure, the urban form, and in places the green and blue network. Despite the number of off-road foot and cycle paths, wayfinding is poor and making use of these routes can be challenging. As a result, many short distance trips that should be easily made on foot or by cycle are being made by car.

Ideally, all local needs would be served in a way that minimises the need to travel – people might choose to walk to a local centre and be able to access quick and reliable public transport to get to a more distant town centre. The existing town and local centres in the OA generally struggle to offer good quality, accessible services and social amenities because of the urban form and severance that exists, preventing easy movement through the area. Investment in the existing centres is needed to help enhance their offer, reinforce their identities and help to attract people from within the OA and further afield.



Improve the health of residents and facilitate travel by sustainable modes

Current travel patterns are unsustainable against a backdrop of high levels of population and employment growth across London, high levels of obesity and low levels of physical activity in the OA. There is potential for a number existing trips made within T&AW to be walked or cycled, based on their length, however car use remains high.

A clear challenge for the OA is therefore to support behaviour change and encourage more people to walk and cycle as their first travel choice, or for part of a longer journey, to support the Mayor's aspiration for 80% of all trips to be made using sustainable modes of transport.

Implementing the Healthy Streets Approach, which puts human health and experience at the heart of planning the city, will be key to encouraging behaviour change for existing residents and active and healthy travel choices for new residents.



Integration of land use and transport

Where investment in public transport unlocks new development in the OA it will be important to integrate new homes and jobs with the transport network in order to minimise negative impacts of extra transport demand. Similarly strengthening links to new and existing transport hubs including Abbey Wood would positively influence the transport choices made by existing communities in the OA.

Incorporating the Good Growth principles set out in the draft new London Plan, such as building new developments in places well served by public transport and good quality walking and cycling routes, and limiting the number of parking spaces at new developments, will help to promote active lifestyles in T&AW and tackle some of the key challenges facing the OA including the dominance of vehicles in the area.

4 An integrated transport strategy for Thamesmead & Abbey Wood

Interventions and solutions

In response to the challenges summarised in Chapter 3, this chapter details the potential transport interventions that have been considered and the extent to which each option might unlock extra development capacity and support growth in the OA. The interventions have been assessed through application of specialist knowledge and evidence, together with stakeholder liaison.

To support the level of growth promoted by the OAPF, a number of transport connectivity, accessibility and capacity improvements will be required to make sure that development and transport in the OA are fully integrated. To ensure the most appropriate transport interventions are made, the suitability of these has been considered against:

- i) the objectives of the Mayor's Transport Strategy;
- ii) challenges and opportunities for the OA; and
- iii) the outcomes of strategic transport modelling, to ensure that the preferred package of improvements is suitable and effective in the short, medium and long term.

Supporting the delivery of new homes and jobs

Growth and new transport connections are intrinsically linked in T&AW. Large-scale new developments will not come forward in the OA without new strategic transport connections, and likewise there would not be a case for new transport infrastructure in the OA without the delivery of growth.

Northern parts of the OA, including the areas around Thamesmead town centre, represent the greatest opportunity to accommodate new homes and jobs. However, improved public transport connections to other parts of London are required to unlock and support this growth, as these locations are among the furthest from existing public transport services.

In addressing this challenge, a range of strategic public transport interventions has been identified that would make travel to and from isolated parts of the OA easier and more convenient. The interventions identified vary in terms of the investment required to deliver them and the scale of growth in housing and employment they could support, as shown in Figure 14.

The public transport interventions that best serve growth in the OA are later taken forward and modelled under intermediate growth and high growth scenarios to provide an understanding of how the transport network would perform with the new public transport services and associated levels of growth.

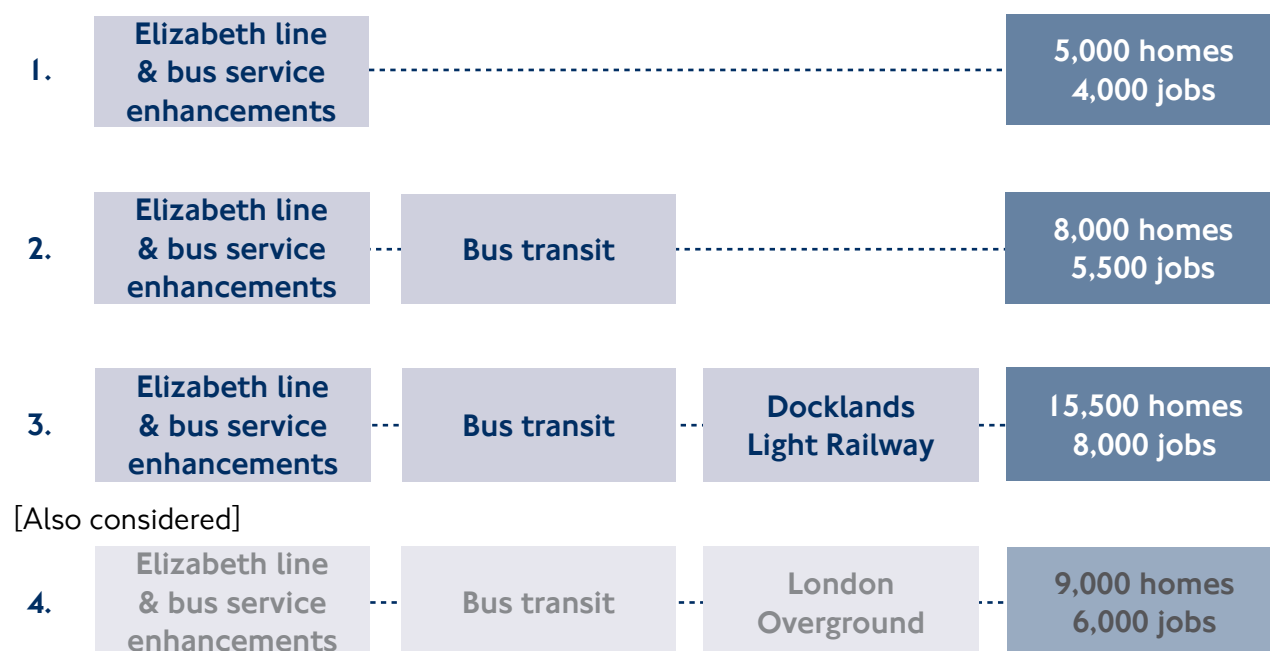


Figure 14. Transport infrastructure to support growth in T&AW

The interventions included in each transport option considered in this chapter are colour coded as follows, to illustrate the way in which they should support the delivery of the MTS.

To support the creation of **new homes and jobs** in T&AW, improved public transport connections are required to increase connectivity, accessibility and capacity, and link the area with key economic centres such as Canary Wharf and the City.

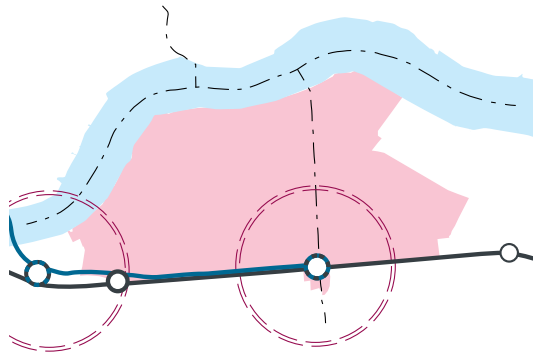
In promoting a **good public transport experience** for residents of T&AW, an increase in the availability, quality and reliability of public transport services is required.

Interventions are necessary to make travel within the OA easier and more attractive for people on foot, cycle and public transport in order to create **healthy streets for healthy people** and encourage a mode shift away from the car.

More detail on key local connections and public realm projects across the OA can be found in Part 5 - Places of the T&AW OAPF.

More detail about the interventions to support the needs of T&AW can be found in Appendix B.

I. Bus service improvements



5,000 HOMES



4,000 JOBS

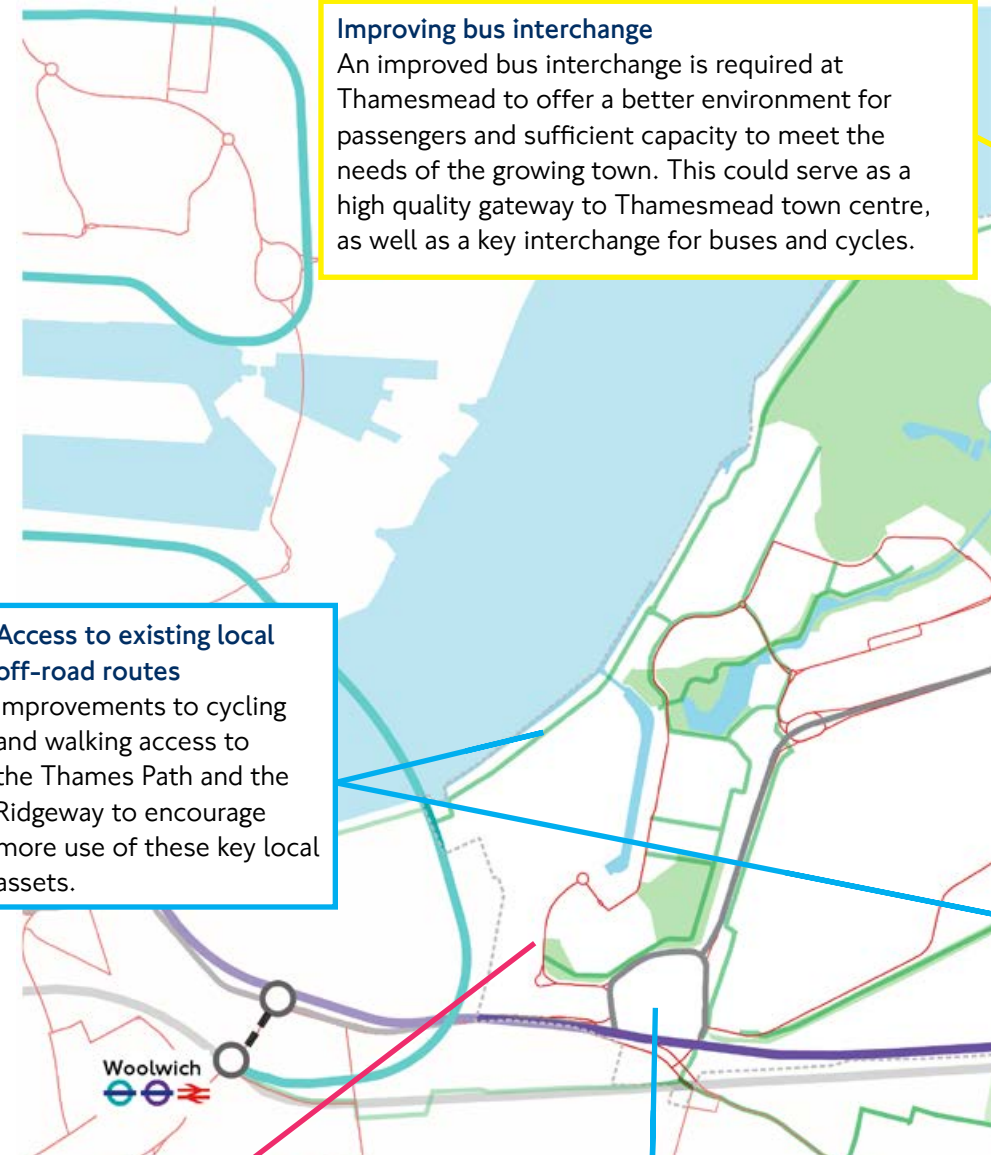
A number of bus service changes will be introduced to coincide with the start of Elizabeth line services from Abbey Wood. This option would look to supplement these bus service enhancements, either by introducing entirely new routes to serve OA or by increasing the frequency of existing services to cater for increased demand.

This is the lowest cost option of the four considered and would be relatively quick to implement, since it would not require building any significant new infrastructure.

Bus service improvements, on their own, would make a relatively small difference to the quality of the local public transport network, namely improving links to Abbey Wood and Woolwich for access to Elizabeth line. This scenario would not deliver a transformation in the OA's connections to other parts of London.

It is unlikely that this option alone could unlock significant growth in the OA as it would not provide the step-change in public transport connectivity that is required to stimulate large scale regeneration. As such this option is not considered to support additional growth in the OA beyond that already identified in the London Plan, which is associated with the introduction of the Elizabeth line.

The adjacent map provides more information about this option, along with the wider transport requirements to support growth in the OA and the needs of existing residents.



Improving bus interchange

An improved bus interchange is required at Thamesmead to offer a better environment for passengers and sufficient capacity to meet the needs of the growing town. This could serve as a high quality gateway to Thamesmead town centre, as well as a key interchange for buses and cycles.

Access to existing local off-road routes

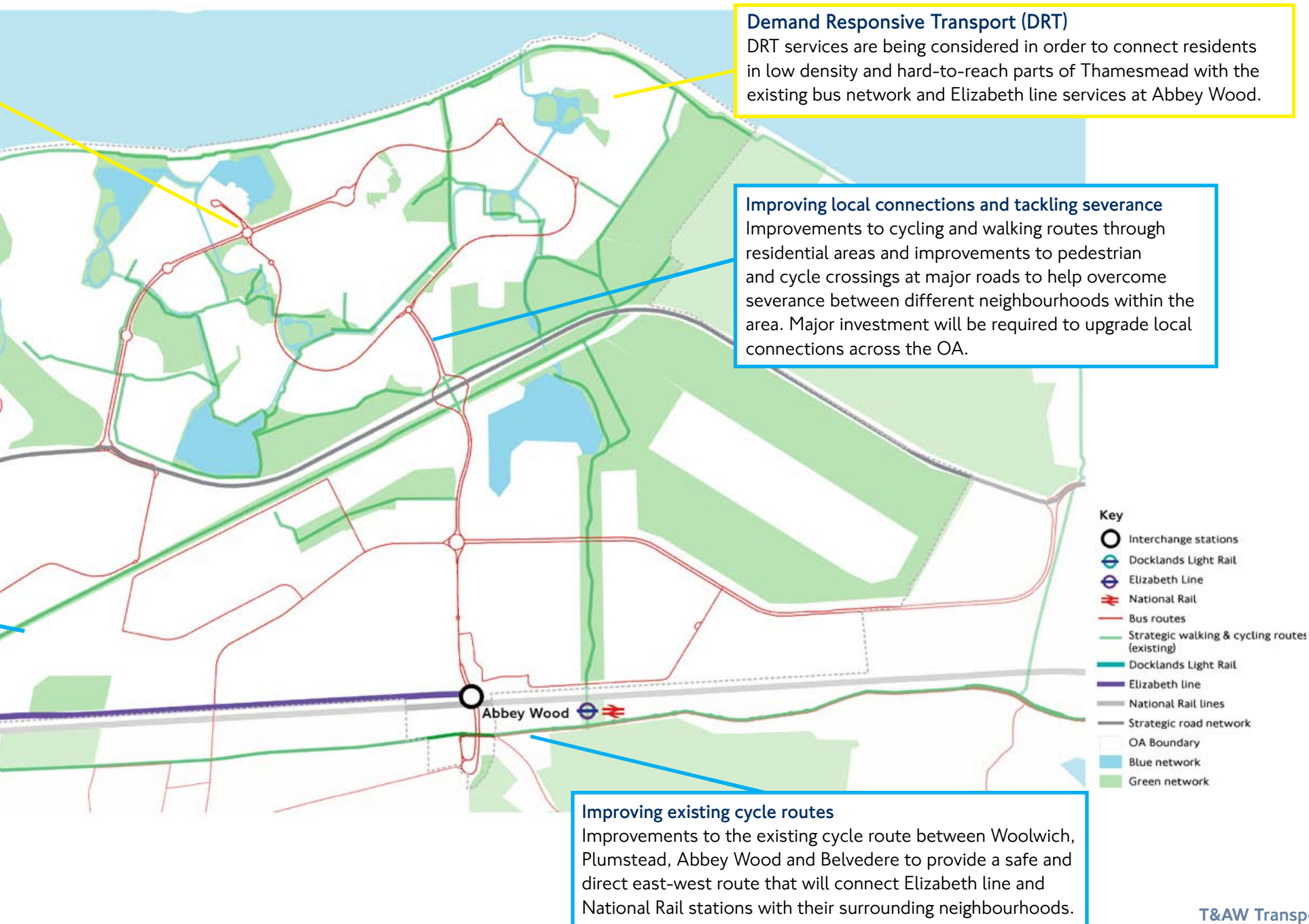
Improvements to cycling and walking access to the Thames Path and the Ridgeway to encourage more use of these key local assets.

Bus service improvements

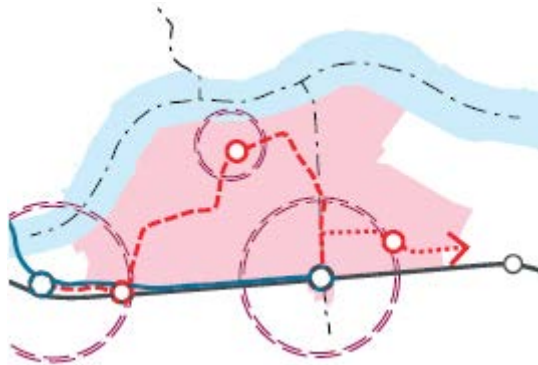
Enhancements to the local bus network will be made in response to the opening of the Elizabeth line. These could include new routes connecting Thamesmead with destinations beyond Woolwich and Abbey Wood.

Encouraging mode shift

Significant investment is required at major junctions in the OA to improve the experience of people walking, cycling and accessing the bus network.



2. Intermediate stage - Bus transit



8,000 HOMES



5,500 JOBS

The second transport option to support an intermediate level of growth in T&AW, over and above the level of growth identified in the London Plan, is bus transit. By providing quick and frequent connections to Elizabeth line services and delivering dedicated, fixed infrastructure, this option is estimated to unlock in the region of 3,000 additional homes and 1,500 additional jobs in the OA.

This option would constitute a complementary and intermediate stage to the high growth scenario which is considered in more details in the next section.

The adjacent map provides more information about the proposed bus transit system along side wider transport improvements to the walking and cycling network and to the urban realm.

What is bus transit?

Bus transit can take many different forms, with a range of potential types of vehicle, passenger facilities and ways of operating. Differences between a conventional London bus service and bus transit include speed, dedicated lanes, reliability, and quality of vehicles and stops. The possible bus transit service in T&AW would aim to offer a similar level of service to a tram.

Bus transit, or Bus Rapid Transit, has been used elsewhere in the world to open up development opportunities, by providing a frequent and reliable bus-based public transport service at relatively low cost. More information about bus transit can be found in Part 2 of the T&AW OAPF.

Figure I 4 Bus transitway in Metz, France



Bus Transit

TfL is developing proposals for a high capacity, quick and frequent bus transit system, with stops spaced further apart than on ordinary bus routes to ensure quick and reliable passenger journeys. The bus transit service would be segregated from general traffic, running in its own lanes for as much of the route as possible, connecting Thamesmead to Elizabeth line and other rail services at Woolwich and Abbey Wood.

Improving bus interchange

An improved bus interchange is required at Thamesmead to serve as a high quality gateway to the centre.

Active travel corridor

There is a great opportunity to introduce a high-quality walking and cycling route alongside the bus transit corridor, which would provide an active travel route through the OA and help to integrate the bus transit system with walking and cycling networks. TfL will look to make the bus transit corridor into a 'active travel corridor' to support mode shift within the OA.

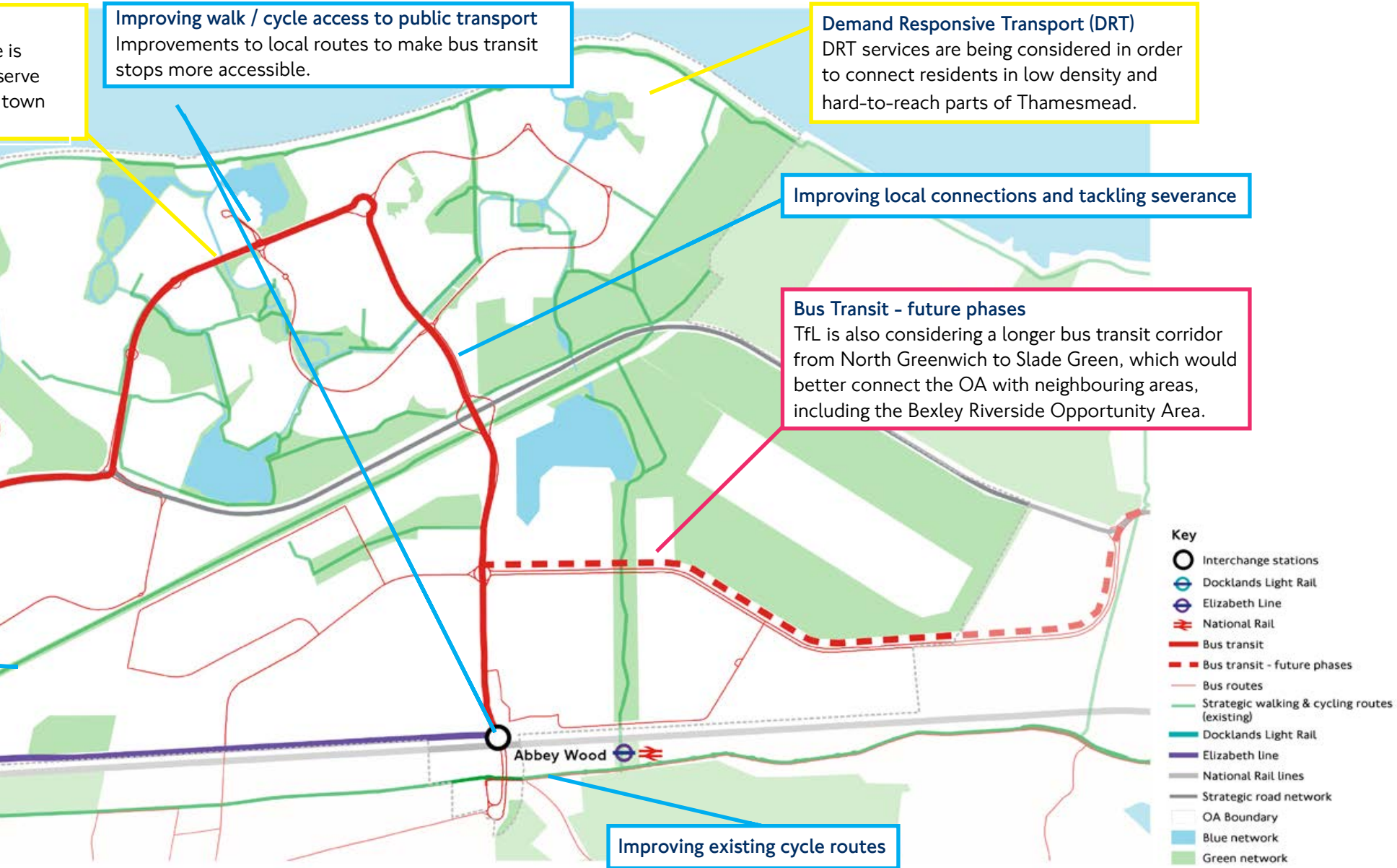
Access to existing local off-road routes

Bus service improvements

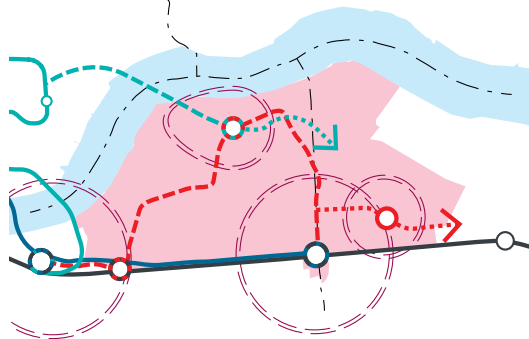
In addition and complementary to the bus transit service.

Encouraging mode shift

Junction improvements to transform the experience of walking and cycling in the OA.



3. Docklands Light Railway and bus transit



 15,500 HOMES

 8,000 JOBS

In addition to the transport interventions set out in options 1 & 2, a potential extension of the Docklands Light Railway (DLR) from Gallions Reach to Thamesmead is being considered, via the Thamesmead Waterfront site. This would better address the transport challenges and is considered to be the best value approach to delivering a high level of growth in the OA.

The adjacent map provides more information about the DLR extension considered. The transport interventions illustrated in options 1 & 2 would be delivered alongside a DLR extension.

Connectivity benefits

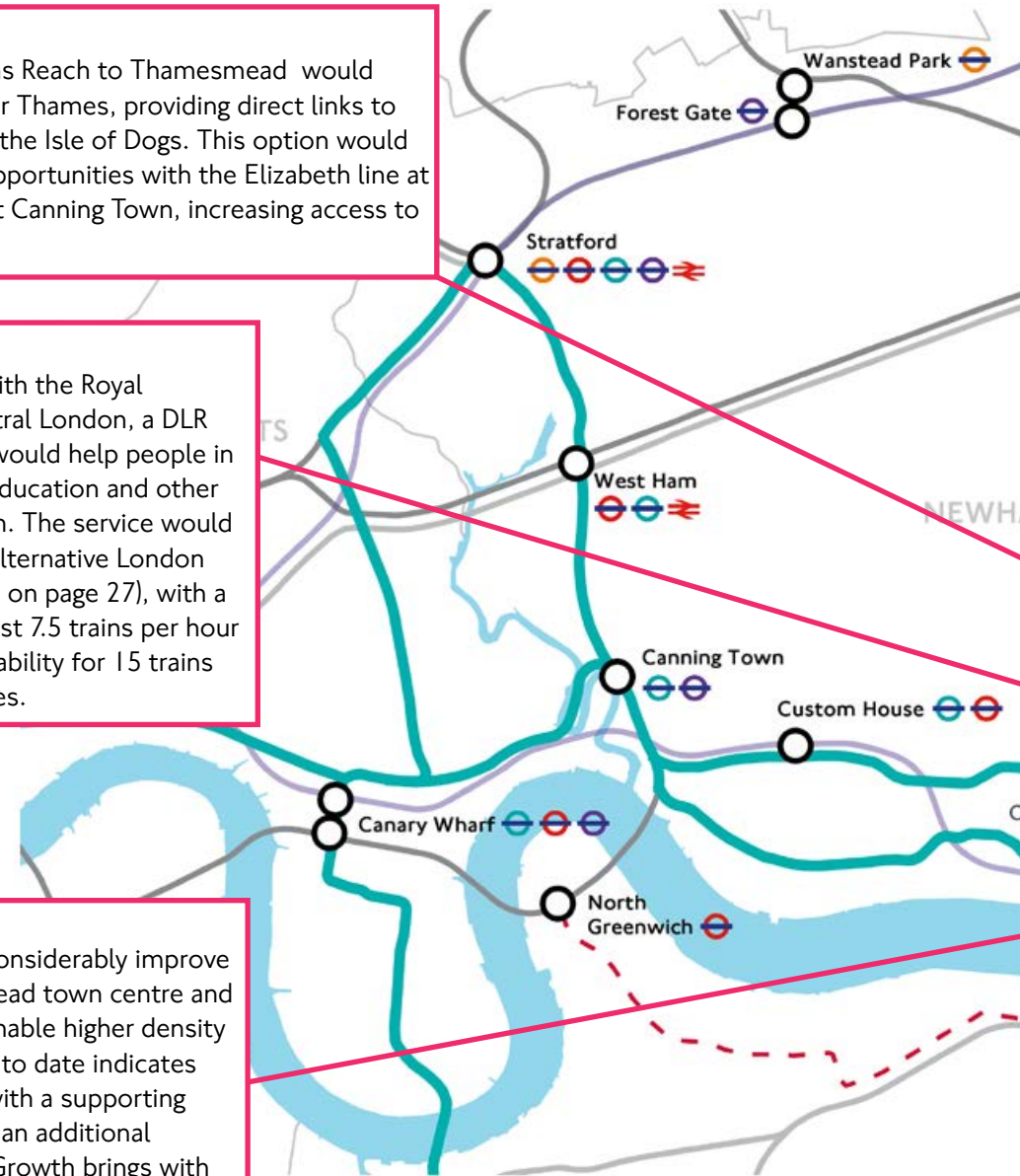
An extension of the DLR from Gallions Reach to Thamesmead would reduce the severance caused the River Thames, providing direct links to the Royal Docks and easier access to the Isle of Dogs. This option would also create convenient interchange opportunities with the Elizabeth line at Custom House and the Jubilee line at Canning Town, increasing access to central London and beyond.

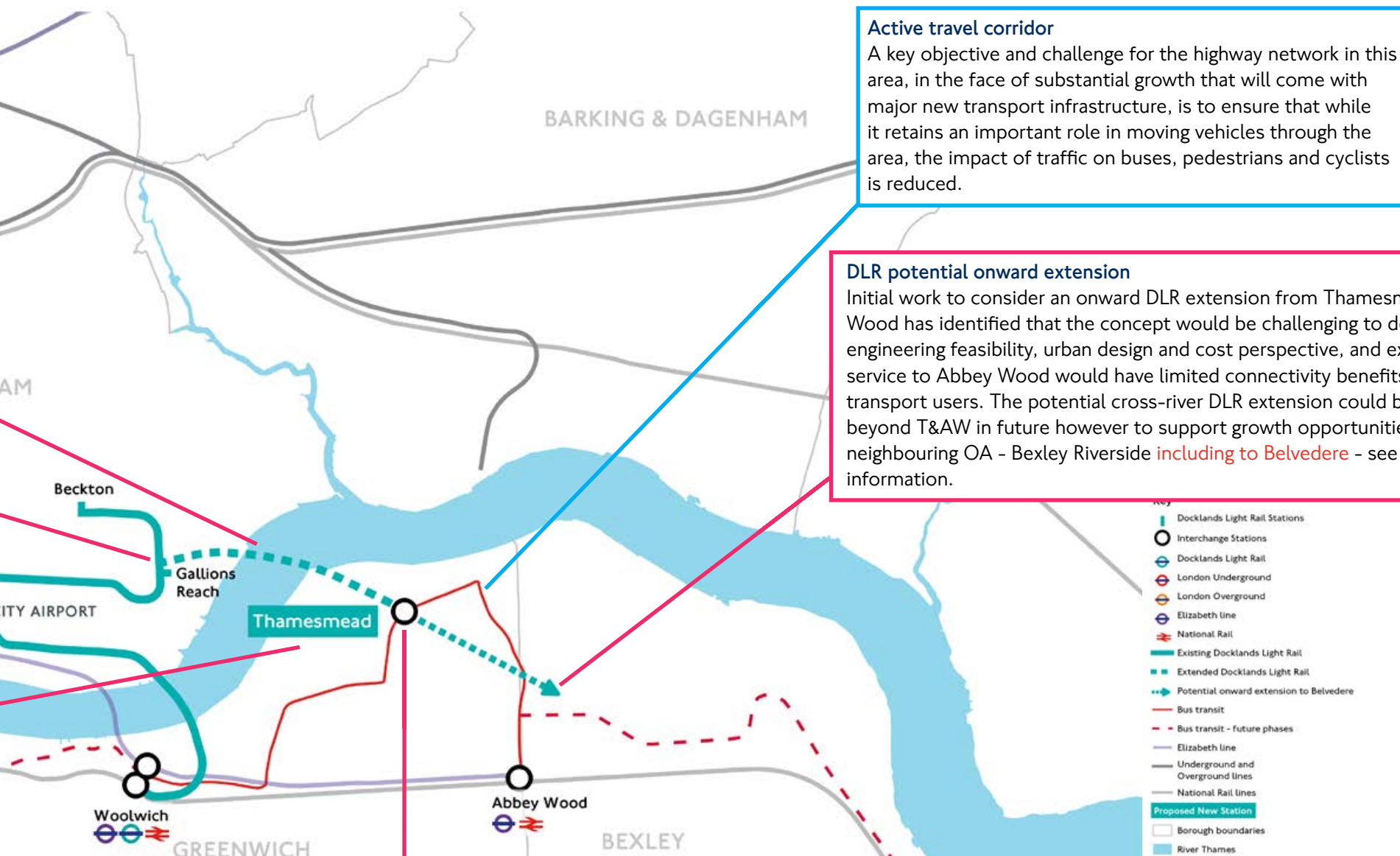
Journey time savings

By improving connectivity with the Royal Docks, Isle of Dogs and central London, a DLR extension to Thamesmead would help people in Thamesmead access jobs, education and other opportunities across London. The service would be more frequent than the alternative London Overground option (detailed on page 27), with a current assumption of at least 7.5 trains per hour in the peak periods, but capability for 15 trains per hour as demand increases.

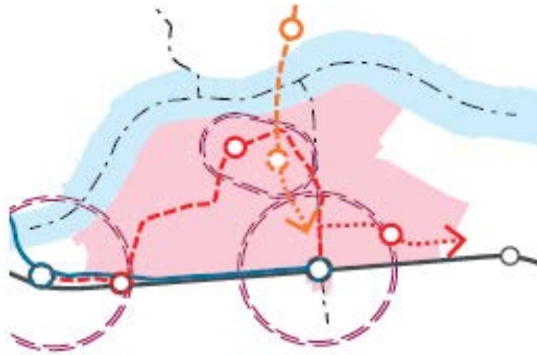
Impact on growth

A DLR extension to Thamesmead would considerably improve access to public transport from Thamesmead town centre and at the Thamesmead Waterfront site and enable higher density developments around the station(s). Work to date indicates that extending the DLR to Thamesmead, with a supporting bus transit service, would support at least an additional 10,500 homes and 4,000 jobs in the OA. Growth brings with it more extensive opportunities to improve local connections, tackle severance and improve the quality of public realm at local centres. It enables the creation of a more joined-up and attractive walking and cycling network.





4. Also considered London Overground and bus transit



9,000 HOMES



6,000 JOBS

As an alternative to the DLR extension, a London Overground (LO) extension connecting Barking Riverside to outer south east London via Thamesmead has been considered. This would help to address transport challenges in T&AW and support a higher level of growth in the area than the bus based options. It has been rejected as the preferred option to serve the OA however, as the connectivity benefits of a LO extension would be lower than that of a DLR extension and it would cost significantly more to build and operate.

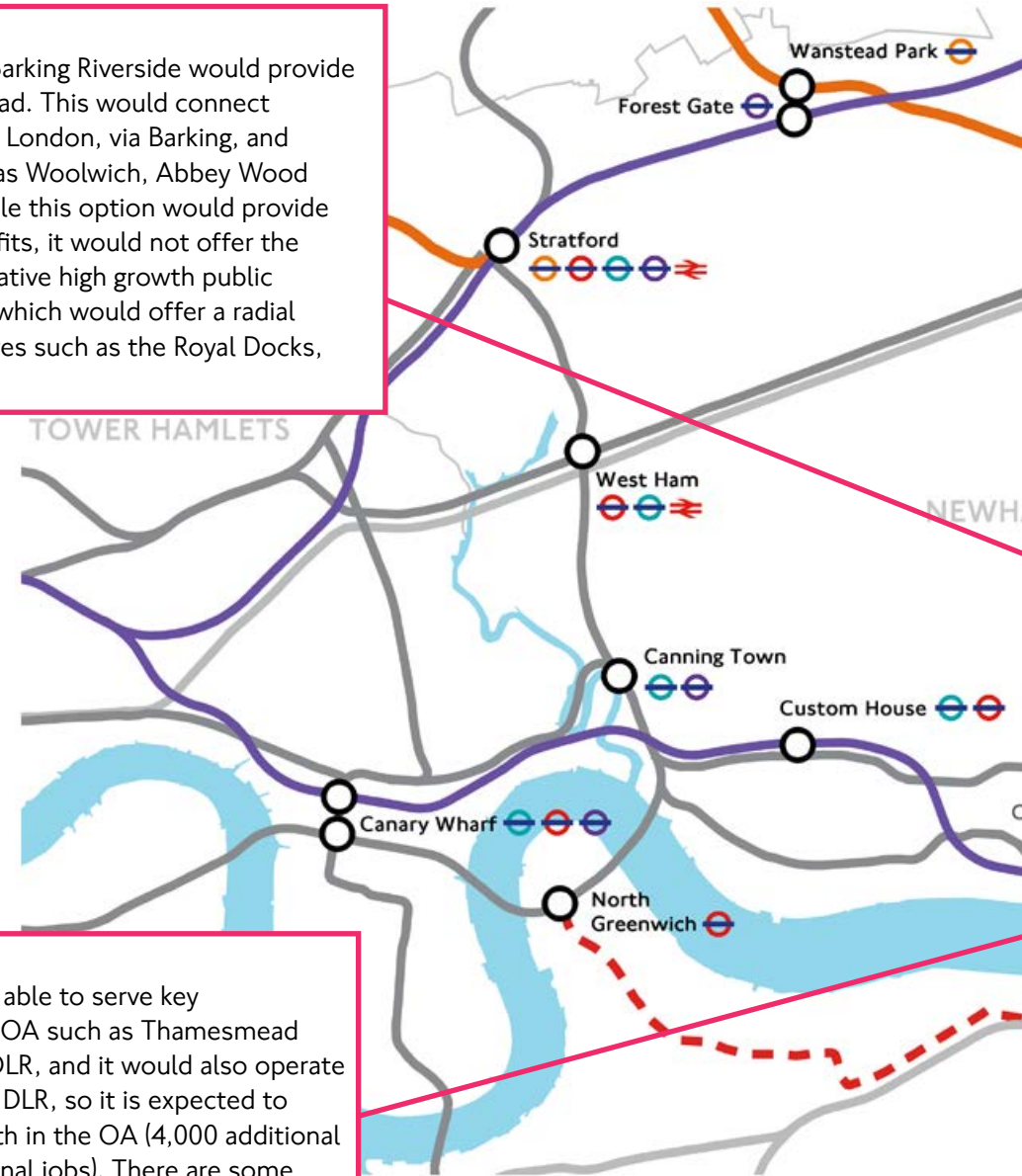
The adjacent map provides more information about the LO extension.

Connectivity benefits

An extension of the LO network from Barking Riverside would provide a new cross-river rail link to Thamesmead. This would connect Thamesmead with Gospel Oak in north London, via Barking, and potentially onwards to a location such as Woolwich, Abbey Wood or Belvedere in south east London. While this option would provide outer London orbital connectivity benefits, it would not offer the same level of connectivity as the alternative high growth public transport option considered (the DLR), which would offer a radial connection to major employment centres such as the Royal Docks, Isle of Dogs and central London.

Impact on growth

A LO extension would not be able to serve key development sites within the OA such as Thamesmead Waterfront as closely as the DLR, and it would also operate at a lower frequency than the DLR, so it is expected to support a lower level of growth in the OA (4,000 additional new homes and 2,000 additional jobs). There are some opportunities to improve local walking and cycling routes at locations where development takes place, and to improve conditions for walking and cycling generally.

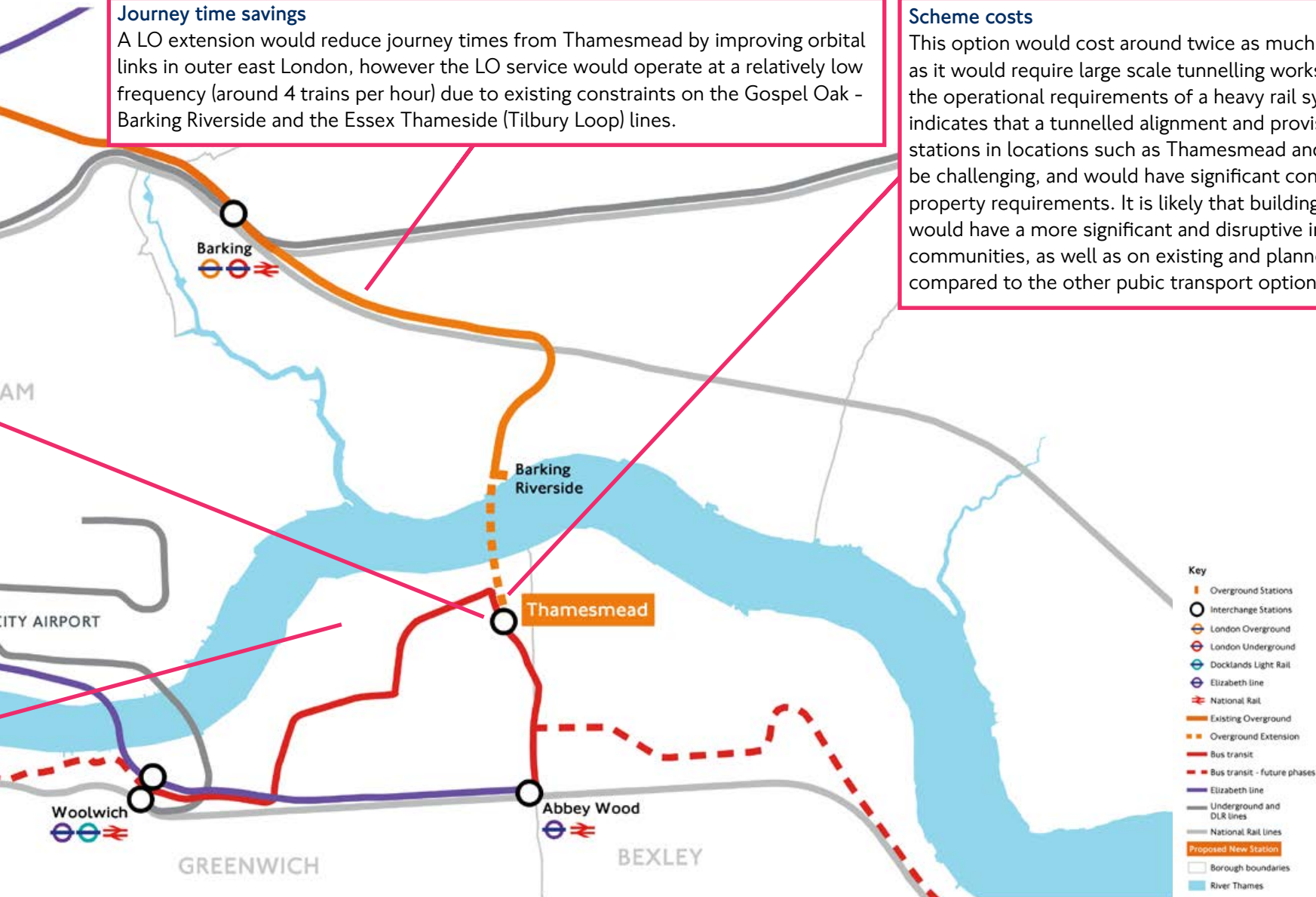


Journey time savings

A LO extension would reduce journey times from Thamesmead by improving orbital links in outer east London, however the LO service would operate at a relatively low frequency (around 4 trains per hour) due to existing constraints on the Gospel Oak - Barking Riverside and the Essex Thameside (Tilbury Loop) lines.

Scheme costs

This option would cost around twice as much as the DLR option, as it would require large scale tunnelling works to accommodate the operational requirements of a heavy rail system. Initial work indicates that a tunnelled alignment and provision of underground stations in locations such as Thamesmead and Abbey Wood would be challenging, and would have significant construction, land and property requirements. It is likely that building a LO extension would have a more significant and disruptive impact on local communities, as well as on existing and planned development compared to the other public transport options considered.



Preferred options to unlock growth

High growth

A DLR extension in addition to bus transit and enhancements to conventional bus services is the public transport package considered best to support high growth in T&AW. This option is estimated to deliver around 10,500 homes and 4,000 jobs in addition to the level of growth in the Reference Case.

In fulfilling the growth vision of the OAPF, a DLR extension to Thamesmead is preferred over a LO extension because it would offer greater connectivity and capacity benefits, and is likely to cost significantly less to deliver and operate. However, it is recognised that an extension of the LO could provide wider strategic connectivity benefits beyond the Thamesmead and Abbey Wood OA, as part of the long term development of orbital rail links in outer London.

Intermediate growth

Of the strategic public transport options considered to support an intermediate level of growth, bus transit is the intervention that maximises connectivity and growth potential, as it supports the delivery around 3,000 homes and 1,500 jobs in addition to the level of growth in the Reference Case.

In addition to bus transit, enhancements to conventional bus services would be required to support an intermediate growth scenario in order to maximise the connectivity benefits of bus transit.

This potential intermediate stage would improve connections and kick-start development ahead of rail improvements.

Local connection interventions

Both scenarios in T&AW would also include delivering a package of significant walking and cycling improvements to facilitate Good Growth and encourage a shift to active and public transport modes among both existing communities and new residents.

The adjacent map summarises the proposed transport interventions designed to improve the provision of public transport and support Good Growth in T&AW under the preferred, high growth scenario.

More detailed proposals can be found in Part 4 Places in the OAPF. It illustrates how each of the five places identified in the OA could change through Good Growth. It presents a walking and cycling network that would be easy to follow and safe with links to stations and other local destinations.



across the OA



Other considerations

Along with the packages of transport measures designed to improve transport connectivity, capacity and accessibility and unlock growth in T&AW, wider strategic interventions are being considered by TfL and other planning authorities that would benefit people in the OA. These interventions are not considered necessary to deliver the level of growth in T&AW identified in the OAPF but in future could positively impact the area.

Potential onward extensions

To further improve connectivity and support growth in the wider Thames Estuary Corridor, there are a number of ways the transport interventions proposed in T&AW could be extended in future, as shown in Figure 15.

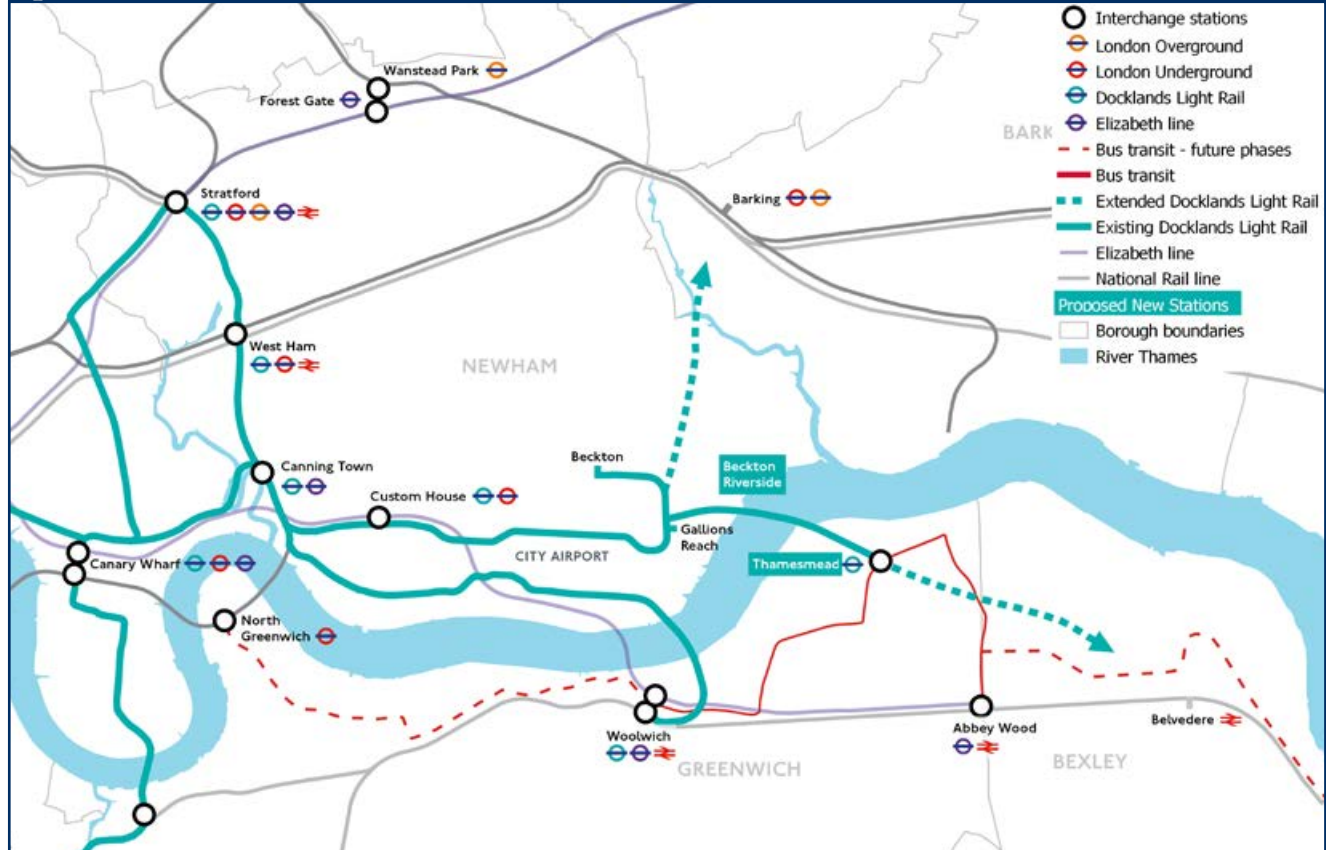
As a later phase, TfL is considering a longer bus transit corridor from North Greenwich to Slade Green, which would better connect T&AW with its neighbouring areas. A longer scheme would support growth in both the Charlton Riverside and Bexley Riverside Opportunity Areas.

As part of the extension to Thamesmead, a DLR

stop could be incorporated at Beckton Riverside to support growth in the Royal Docks & Beckton Riverside OA.

In the longer-term, a DLR connection from Barking to Belvedere could create a new orbital rail link between outer east and south east

Figure 15. Potential onward extensions



London, increasing public transport capacity and improving connectivity to support new housing and employment development across the Thames Estuary Corridor. This orbital link would improve access to existing employment centres such as the Royal Docks from the surrounding areas.

A potential onward extension of the DLR to Belvedere could help unlock growth in Bexley Riverside. Further work is needed to demonstrate how improved public transport connectivity would support the delivery of substantial housing growth. This includes assessing a range of options, considering alternative schemes and evaluating the additional development opportunities each option offers. Proposals for this concept are at an early stage of development, and the delivery of an extension to Thamesmead is a critical first step in providing a cross-river DLR connection.

Extending the DLR to Abbey Wood has also been considered as an alternative onward extension from Thamesmead, however providing a DLR extension through South Thamesmead and integrating it with a new station at Abbey Wood would conflict with the housing development currently being delivered as part of the ongoing transformation of Abbey Wood.

Additionally any DLR extension could be above ground, which in Abbey Wood would create a series of adverse environmental impacts for existing and future residents including potential loss of open space, and adverse noise and visual impacts. Furthermore, the connectivity benefits of introducing a DLR link to Abbey Wood would be limited given that the area will already be served by the Elizabeth line, which offers quicker links to the Royal Docks (Custom House), Canary Wharf and central London

Elizabeth line service enhancement

Longer-term consideration is being given to capacity enhancements on the Elizabeth Line. This could be achieved through looking at options for lengthening trains by 20% or running more frequent services. Enhancement to the Elizabeth line services would further improve the public transport provision in the south of the OA.

Crossrail extension to Ebbsfleet (C2E)

Longer-term there is also potential to extend the Elizabeth line from Abbey Wood to Ebbsfleet along the North Kent line. This would better connect people in T&AW with neighbouring town centres in the London Borough of Bexley and further afield

into Kent, as well as unlocking development potential in these areas.

Metroisation

The general service quality and performance of suburban National Rail services is consistently below that of equivalent TfL-run services on three key metrics:

- Public Performance Measure;
- Right Time; and
- Cancelled or Significantly Late.

Along with the complexity of service patterns, this means many people in T&AW opt to drive or use other local public transport services, such as taking the bus to the access the Jubilee line at North Greenwich.

The MTS sets out an ambition to create a London suburban metro, with the aim of bringing the frequency and reliability standards of suburban rail services in line with that of other TfL-run lines. While some network capacity constraints would remain on rail services through the OA, 'metroisation' or simplification of services could create a more attractive travel option and support mode shift away from the car.

Transport Modelling

The future operation of the transport network in T&AW with DLR, bus transit and bus service, walking and cycling improvements has been modelled and the results are explored in the following sections.

Reference Case for the Elizabeth line

Before the network with new public transport services is assessed, a future year Reference Case is set out to provide an indication of how the transport network would perform in 2041 with the opening of the Elizabeth line and associated development, but no additional development or transport interventions within the OA.

The Reference Case model includes upcoming developments around Abbey Wood and Plumstead stations. A greater number of homes will lead to an increase in the number of people departing the OA on a daily basis, mostly to the west, adding to the number of people travelling towards central London.

Assessment of the Reference Case scenario indicates that the introduction of Elizabeth line services and the associated capacity enhancements to the local bus network are sufficient to accommodate the expected level of growth within the OA in the short term. The Elizabeth line and associated bus service enhancements are expected to increase the proportion of trips made by active modes and public transport to 68% of all trips (up from 64%

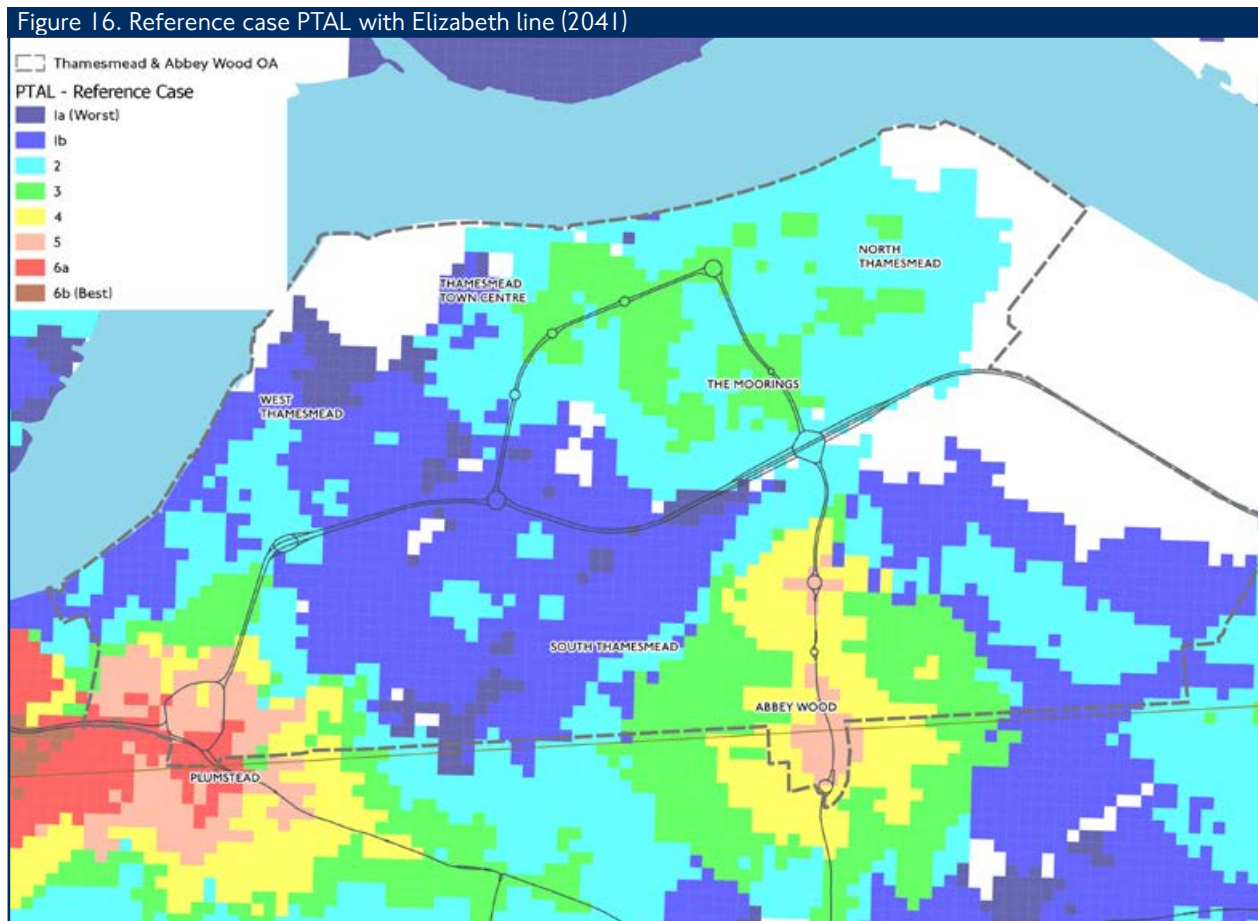
in 2015). This is substantially lower than the target of 80% of trips to be made by active and public transport modes within the OA by 2041.

Some local bus services are likely to experience greater crowding post-2021, which could be addressed through the provision of increased capacity on these services. On the highway network, although the proportion of active and public transport modes increases, the assessment of the Reference Case scenario shows that total vehicle kilometres travelled within the OA will also continue to increase.

Reference Case PTAL

Figure 16 shows Public Transport Access Levels (PTALs) across the OA in 2041, with the introduction of Elizabeth line services. PTALs improve compared to the 2015 baseline scenario (see page 17), particularly in the areas surrounding Pettman Crescent, Plumstead and Abbey Wood.

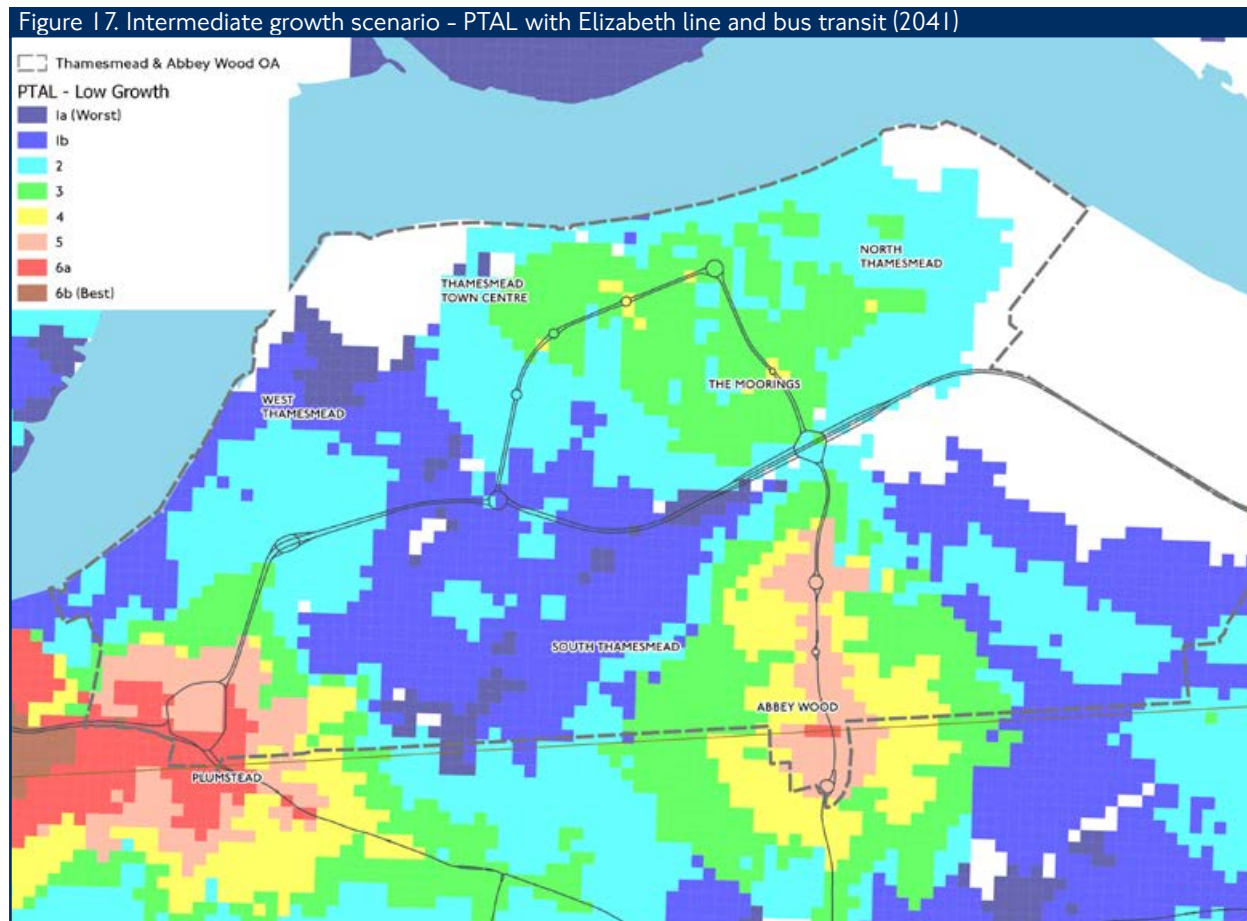
The Elizabeth line has a more limited impact on PTALs in the north of the OA, however, as much of the OA lies beyond the walk catchment of Elizabeth line stations.



Intermediate growth scenario

The 2041 scenario with intermediate growth has been modelled with additional homes at sites across the OA, particularly around north Thamesmead, and investment in bus transit linking Woolwich, Thamesmead town centre and Abbey Wood.

Figure 17 shows PTAL levels within the OA with the introduction of bus transit. The new service would bring a greater proportion of Thamesmead up to PTAL 3 and parts of Thamesmead town centre to PTAL 4. This is an improvement compared to Reference Case PTALs, but still lower than PTALs around Abbey Wood. To the south of the OA, the introduction of bus transit increases PTAL to 5 in areas along Harrow Manorway towards Abbey Wood.



The introduction of bus transit in T&AW is forecast to increase the share of trips made by active and public transport modes (walking, cycling and public transport) to 75% of all trips within the OA, up from 64%.

The bus transit corridor and onward connections via the Elizabeth line are expected to provide significant journey time improvements for people travelling by public transport from Thamesmead. Compared to today, journey times from Thamesmead Central to Woolwich would fall by 5 minutes (22% reduction) while journey times to Canary Wharf via the Elizabeth line, would fall by 22 minutes (37% reduction). Bus transit would offer improved journey times and journey time reliability for people in T&AW, providing a more attractive option than the conventional bus services.

Due to demand, crowding on bus transit services occurs in the intermediate growth scenario, particularly on the approach to Thamesmead town centre from Plumstead, and between Thamesmead and Abbey Wood.

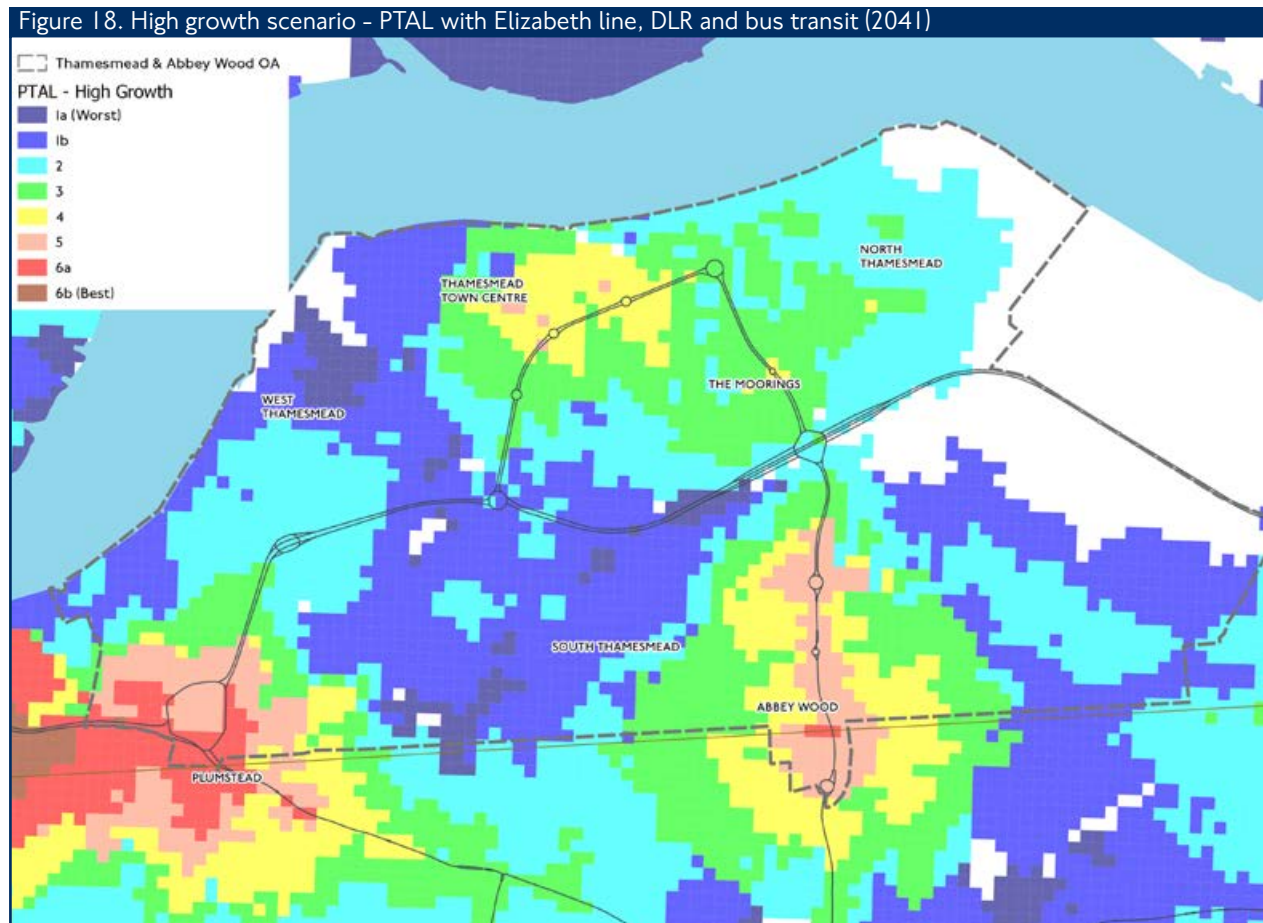
On the highway network, a small increase in traffic volumes can be seen in the intermediate growth scenario compared to the Reference Case. The greatest increase in traffic occurs in the inter peak period (5% increase)¹.

¹ Note that while strategic modelling provides an indication of the change in traffic flows, it is not designed for the assessment of individual roads and junctions. More detailed modelling would be required to test the performance of the highway network at a further stage of the bus transit scheme development.

High growth scenario

The 2041 scenario with high growth tests how well a higher level of development can be supported with the introduction of new strategic public transport connections along with a wider package of transport improvements. The full investment package of transport improvements would include a cross-river DLR connection, bus transit linking Woolwich, Thamesmead town centre and Abbey Wood, along with a reduction in highway capacity associated with bus transit, significant improvements to walking and cycling infrastructure, improvements to local bus services and car parking restrictions.

Figure 18 shows PTAL scores across the OA for the high growth scenario. The DLR extension represents a step-change in transport connectivity in Thamesmead, with much of the area around Thamesmead Central increasing to PTAL 4 in this scenario. The DLR extension in conjunction with bus transit increases the reach of connectivity benefits in Thamesmead; much of the area is rated at least PTAL 3 in this scenario. With DLR and bus transit, the PTALs in Thamesmead are more comparable to those of Abbey Wood, but still well below PTALs in Woolwich.



In the preferred high growth scenario (DLR extension to Thamesmead and bus transit corridor connecting Thamesmead with Woolwich and Abbey Wood), the share of trips made within the OA by active and sustainable modes increases to 79%. This is broadly in-line with the MTS target of 80%. It is important to note that other elements of the higher growth package of transport interventions, such as improvements to walking and cycling infrastructure and car parking restrictions, will have an important role to play to fully realise the 80% MTS target. For more information about the wider package of interventions, see Chapter 6.

In both the AM and PM peaks, the DLR serves a high level of demand between Thamesmead and Custom House, and Thamesmead and Canning Town, where passengers can access Elizabeth line and Jubilee line services. The availability of DLR and bus transit services, along with the Elizabeth line at Woolwich and Abbey Wood, results in significant journey time savings, compared to today, with journey time savings between Thamesmead Central and key centres of employment such as Stratford (20 minute / 31% reduction) and Bank (15 minute / 23% reduction) .

Additionally, the DLR would provide a quick and direct connection to the Royal Docks, which is set to see a significant increase in employment opportunities in the coming years.

In the high growth scenario, despite the provision of DLR, bus transit, bus service, walking and cycling improvements and restrictions on car parking and the associated reduction in car mode share in the OA, strategic modelling of the highway network indicates that total vehicle kilometres through T&AW will increase compared to the Reference case. The greatest increase in traffic occurs in the inter-peak period (13% increase).

In order to tackle London's housing shortage, TfL, the GLA and the boroughs support the delivery of a high growth scenario in T&AW OA. To overcome the challenges that this level of growth will bring, and ensure development in the area is brought forward in a sustainable way, TfL has developed a robust package of transport measures to support the vision of high growth up to 2041. This package supports a target of 80% of all trips in the OA being made by sustainable modes.

The preferred package of transport interventions, set out in Figure 19, aims to address the transport challenges identified in Chapter 3, taking into account the overarching themes of the Mayor's Transport Strategy and the results of Strategic Transport Modelling.

Overleaf - Figure 19. Preferred transport strategy for the Thamesmead & Abbey Wood OA.

Preferred transport and movement strategy for Thamesmead & Abbey Wood, to support the vision for growth within the OAPF up to 2041.

New homes and jobs

Forthcoming opening of **Elizabeth line**



Increased **bus capacity** to support the Elizabeth line & other potential new services



A **bus transit** system providing a step change in public transport accessibility and **supporting early growth**

Extension of Docklands Light Railway services into the OA to support up to **15,500** new homes and **8,000** new jobs and provide new **cross-river connectivity** in south-east London



Advocate for increased **train frequencies & extension** of the Elizabeth line



Future proof any rail extension to provide **orbital & radial links** beyond Thamesmead



A good public transport experience

Protecting **bus service reliability** and improving journey times



An improved **bus interchange** in Thamesmead town centre providing increased capacity & an enhanced passenger environment



Rebalance highway space to support active and sustainable modes



Investigate the role of **Demand Responsive Transport** to better serve North Thamesmead



Advocate for the **devolution** of suburban rail services



Healthy streets, healthy people

80% sustainable travel to, from and within the Opportunity Area

Major capital investment in delivering **better streets for people** including a strategic healthy streets route alongside the bus transit corridor.



Delivering **active, safer & greener streets** that encourage more people to walk and cycle



Secure high quality active travel infrastructure and reduce car dependency through the **planning process**



Redesigning streets to encourage **reduced speed**



Overcome severance between North & South Thamesmead / Abbey Wood on foot and by bike



5 Infrastructure investment and implementation

An integrated approach to the delivery of new homes and transport connections is required to ensure the OAPF's vision is viable and deliverable. This means that in order for the new public transport connections to be progressed, new development is required; the public transport options would not be viable without this new development. Similarly, without new transport infrastructure additional growth, beyond that identified in the draft new London Plan, will not come forward.

The purpose of this chapter is to outline how we will look to fund and deliver the infrastructure needed to support a higher level of growth within T&AW.

The delivery of this Strategy will be reliant on all relevant stakeholders working together. Collaboration between TfL, the GLA, the Royal Borough of Greenwich, the London Borough of Bexley and other stakeholders such as local landowners is required for the OAPF vision to come to fruition.

Delivering a transport system that meets the needs of the existing communities and future residents will require a substantial funding package. Without this in place, the significant growth potential of Thamesmead and Abbey Wood OA will not be realised, and existing communities will not benefit from improved public transport connectivity and the creation of Healthy Streets.

Funding of infrastructure

A detailed Development Infrastructure Funding Study (DIFS)² is recommended to identify costs for providing infrastructure and potential funding mechanisms for its delivery. This should comprise of a review of the Bexley Growth Strategy DIFS and a new commission for areas within Greenwich. This work should be conducted as a single, comprehensive study that covers the entirety of the OA to ensure delivery recommendations are coordinated as a number of key infrastructure project will require cross-boundary consideration and collaboration.

The indicative costs set out in Appendix B would be refined during the course of carrying out a DIFS. There are a number of sources of

funding that could support the delivery of the infrastructure identified within this Strategy, as shown in Figure 20.

As has been the case for other major infrastructure projects (such as the Elizabeth line and the Northern Line Extension), any funding package for the new public transport connections is likely to include contributions from the new residential and commercial developments that the routes would serve.

Developer contributions would also be expected, where appropriate, to help fund more local transport improvements such as improvements to bus services, new or improved walking and cycling routes and public spaces.

²DIFS are used to identify future infrastructure requirements to support the proposed level of development across an area, and they provide recommendations for how to fund the delivery of this infrastructure.

Strategic measures: These include the DLR extension to Thamesmead and bus transit corridor linking Woolwich, Thamesmead and Abbey Wood. Strategic measures will be funded through sources such as developer contributions and the TfL Business Plan, which plays an important role in delivering transport infrastructure. Other funding sources will also be explored, such as central government's Housing Infrastructure Fund.

Local measures: These include new or improved walking and cycling routes and public realm improvements. At the more local level, achieving the vision for Healthy Streets across the area will require the boroughs, TfL, developers, statutory undertakers and other stakeholders to work together to harness available funding sources to ensure the much needed infrastructure is delivered. A DIFS would highlight whether further sources of funding will be required to deliver the OAPF up to 2041 (including third party, developer works and other sources).

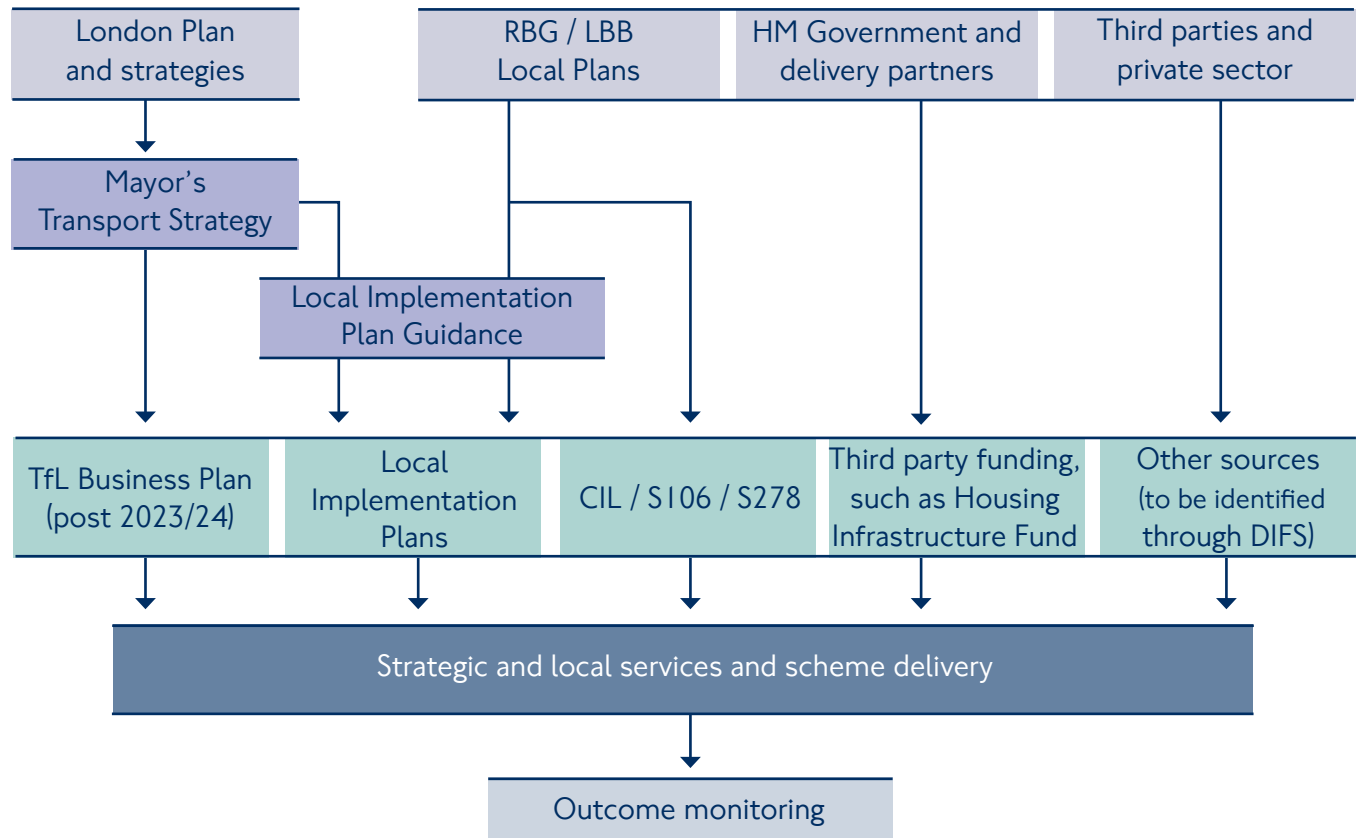


Figure 20. Transport strategy funding and delivery process

How will it be delivered?

The delivery of the OAPF will be managed by a Strategic Delivery Board comprising of partners including the GLA, TfL, and the local boroughs.

Given the delivery of new development is critical to ensuring the viability of the potential new public transport interventions, there is a direct link between these potential schemes and the development and implementation of the OAPF. A number of the other schemes identified in this Strategy are linked to London-wide initiatives such as the Healthy Streets Approach, and these will be progressed in parallel to the OAPF by the boroughs of Bexley and Greenwich, in partnership with TfL.

The Mayor's Transport Strategy commits to supporting good growth in the T&AW OA through the integrated delivery of improved public transport connections, alongside the creation of new homes and jobs. Building on the Mayor's Transport Strategy, this T&AW Transport Strategy identifies a bus transit corridor and DLR extension to Thamesmead as central to a package of transport measures to support the OAPF vision of delivering 15,500 new homes and 8,000 jobs across the OA.

In identifying the strategic public transport connections required to serve T&AW, TfL has undertaken an initial phase of option identification and multi-criteria assessment, focussing on a broad range of public transport options, including potential heavy / light rail extensions and bus based options.

The projects and programmes identified in this Strategy remain at an early stage of development, and significant technical work and stakeholder engagement is required before they could be progressed towards delivery. Figure 21 summarises the typical approach adopted in developing and implementing transport schemes, and highlights which parts of the Public Transport to Thamesmead programme TfL has completed at this stage, which parts are underway and which are yet to begin.

Next steps

The next stage of TfL's DLR scheme development will identify and assess potential alternative route alignments and station locations, taking into account the engineering feasibility, likely transport benefits - including new public transport connections - and environmental impacts.

For bus transit, the next stage of TfL's scheme development will examine its feasibility in further detail, taking account of the opportunities offered by the existing highway network and potential constraints along the route. The work will also identify the transport benefits of a transit scheme for existing and future residents of the OA, and consider the impact of the scheme on other road users along its route.

Further design development and engineering assessment will help identify the potential cost of the DLR and bus transit schemes in greater detail.

Public and stakeholder engagement

Feedback from the draft OAPF consultation will influence the future design development of the potential transport schemes, including consideration of the schemes' impacts. As these schemes continue to be developed, TfL will carry out further stakeholder and public consultation to help identify the preferred option to improve connectivity and support growth in the OA. Due to the regional scale of the strategic interventions proposed in this Strategy, engagement with neighbouring boroughs will be important.

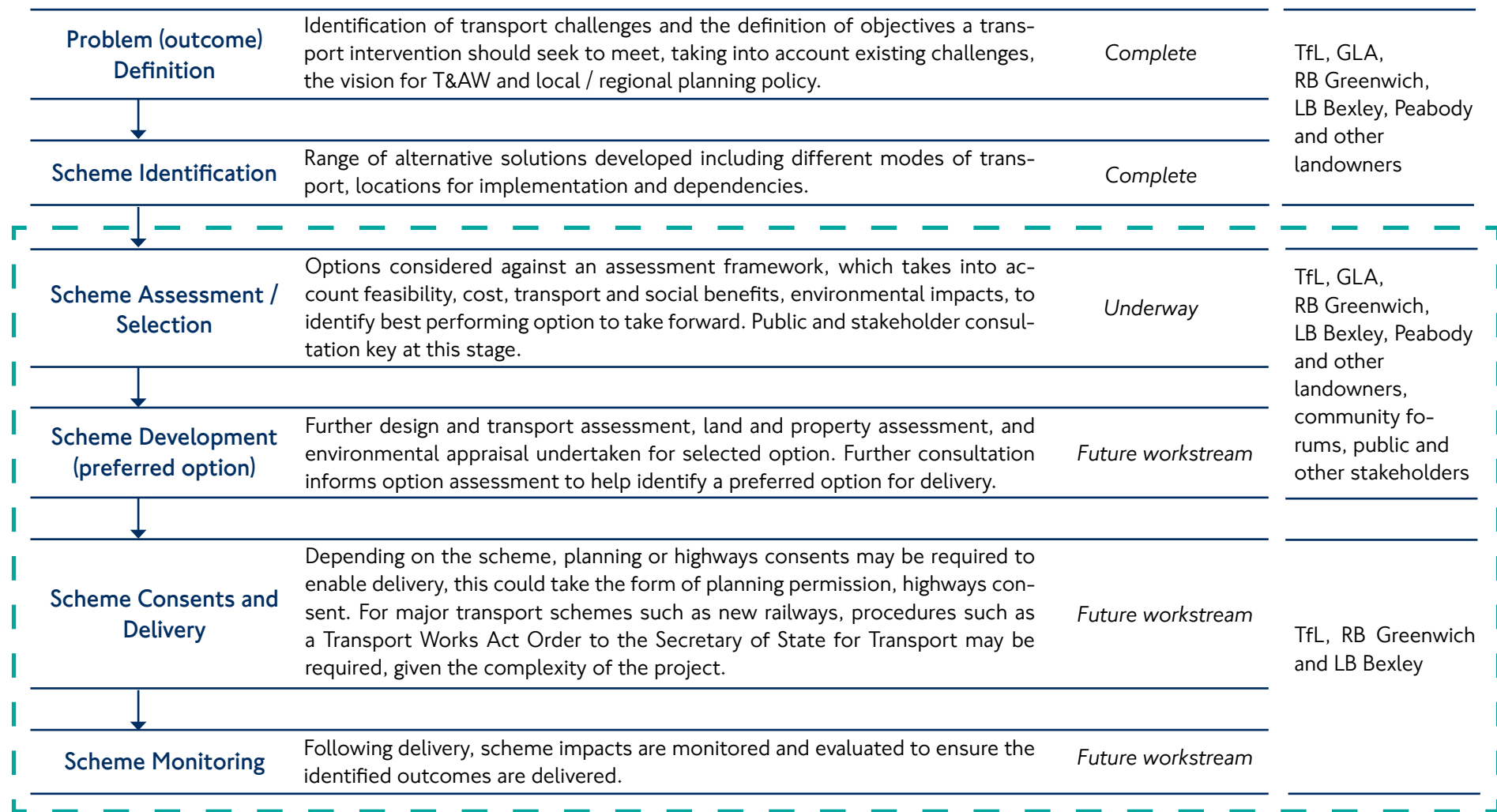


Figure 21. Transport scheme development process

Appendix A Transport challenges and opportunities

Introduction

The current and future transport challenges and opportunities in T&AW are set out in this Appendix, including:

- cross-river connectivity and access to employment;
- bus capacity and journey time reliability;
- uptake of walking and cycling;
- safety; and
- air quality.

An overview of these issues can be found in Chapter 3.

Cross-river connectivity & access to employment

Over the past two decades, there has been a step-change in rail provision in inner east London, with new rail lines, such as the Jubilee line, Docklands Light Railway (DLR) and London Overground creating significant transport hubs and centres of growth such as Canary Wharf and Stratford. However, no new cross-river

rail connections have been provided east of Woolwich, and as a result orbital connectivity in outer east London remains very poor. Many potential journeys are not made due to the lack of realistic public transport options, or otherwise very long and circuitous journeys are made, often by car, through congested crossings at Blackwall and Dartford.

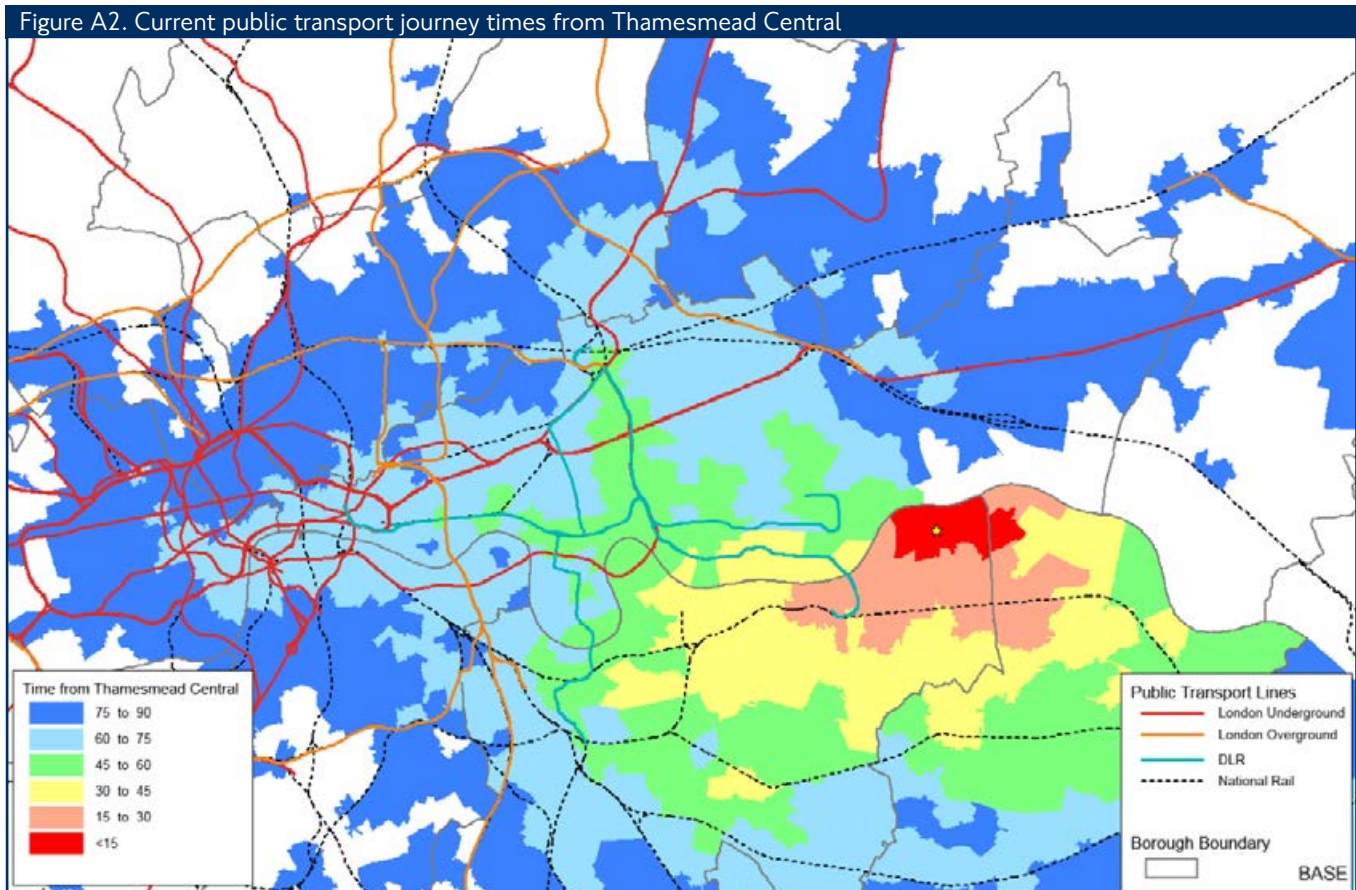
Figure A1. Change in access to employment from Thamesmead & Abbey Wood		
Location	Number of jobs within 45 minutes (2015)	Number of jobs within 45 minutes with Elizabeth line (2031)
Abbey Wood	115,000	1,275,000
Thamesmead Moorings	100,000	855,000
Thamesmead Central	75,000	255,000
West Thamesmead	65,000	185,000

As a result of poor access to direct public transport services in the OA, access to employment, education and social opportunities is often limited. Improving access to nearby centres of employment, as well as ensuring good local connections to new jobs within the OA, could transform the opportunities available to people living around Thamesmead and help attract new people to this area.

Despite the forthcoming opening of the Elizabeth line, without new strategic connections access to employment and other opportunities elsewhere in London will remain relatively poor from the north of the OA, as shown in Figure 13.

Due to the reliance on bus-based public transport to access rail services, journey times from Thamesmead to central London and the Isle of Dogs are notably longer than from the southern parts of the OA that are better connected.

Figure A2 shows the journey times to access employment from Thamesmead Central. The majority of places outside the boroughs of Greenwich and Bexley take over 60 minutes to travel to.



Bus capacity and journey time reliability

The local bus network plays a crucial role in connecting the northern parts of the OA with nearby town centres, such as Woolwich and Bexleyheath, and provides the main connection to rail services that enable residents to access employment and social opportunities located in other parts of London.

The OA's urban form, including the highway network, layout of residential streets and physical severance such as the Ridgeway, restricts residents' access to bus services and limits the extent to which the bus network can offer a high quality connection with surrounding centres and transport hubs. Bus services are unable to penetrate some residential areas, primarily in Thamesmead East, due to the existence of cul-de-sacs and roads that are unsuitable for buses.

As a result, some residents experience long walks to/ from bus services and buses are required to follow circuitous routes in order to serve all parts of the OA. As such, journey times by bus are often long through the OA.

Further challenges include the variability of bus journey times through the Pettman Crescent Gyratory and Woolwich town centre, which impacts on headways (time between buses) at peak times and cause high levels of crowding on services. Poor reliability and slow speeds reduce passenger demand for bus services, which in turn reduces fare revenues within the OA. Congestion in areas including Plumstead Road, the Blackwall tunnel approach and Woolwich Ferry also impact on local bus routes serving the OA.

The opening of the Elizabeth line is expected to increase demand on the bus corridors into Abbey Wood and Woolwich as shown in Figure A3. To address this increased demand, TfL will be implementing changes to the local bus network to ensure bus capacity is sufficient to meet passenger demand when the Elizabeth line opens, up to 2021.

Post 2021, some local bus services are likely to experience increased crowding pressures which could be addressed through the provision of increased capacity on these services.

Figure A3. Change in bus demand with opening of the Elizabeth line (2021, AM Peak)



Local connectivity

Connectivity within the OA is fragmented due to physical barriers to travel including the road and rail infrastructure, features of the green and blue network such as the Ridgeway, and the urban form. Existing communities have developed in a way that means local services such as schools and healthcare centres tend not to be easily walkable or accessible by public transport.

Despite the number of off-road walkways that exist throughout the OA, wayfinding is poor and making use of these routes is not encouraged for people unfamiliar with the area. As a result, a high number of short distance trips that should be easily made on foot or cycle are predominantly being made using motorised modes of transport.

There is an opportunity in the area for streets to function as social spaces and places that actively encourage walking and cycling, as well as corridors for vehicular movement. In order to realise this potential, the following issues need to be addressed:

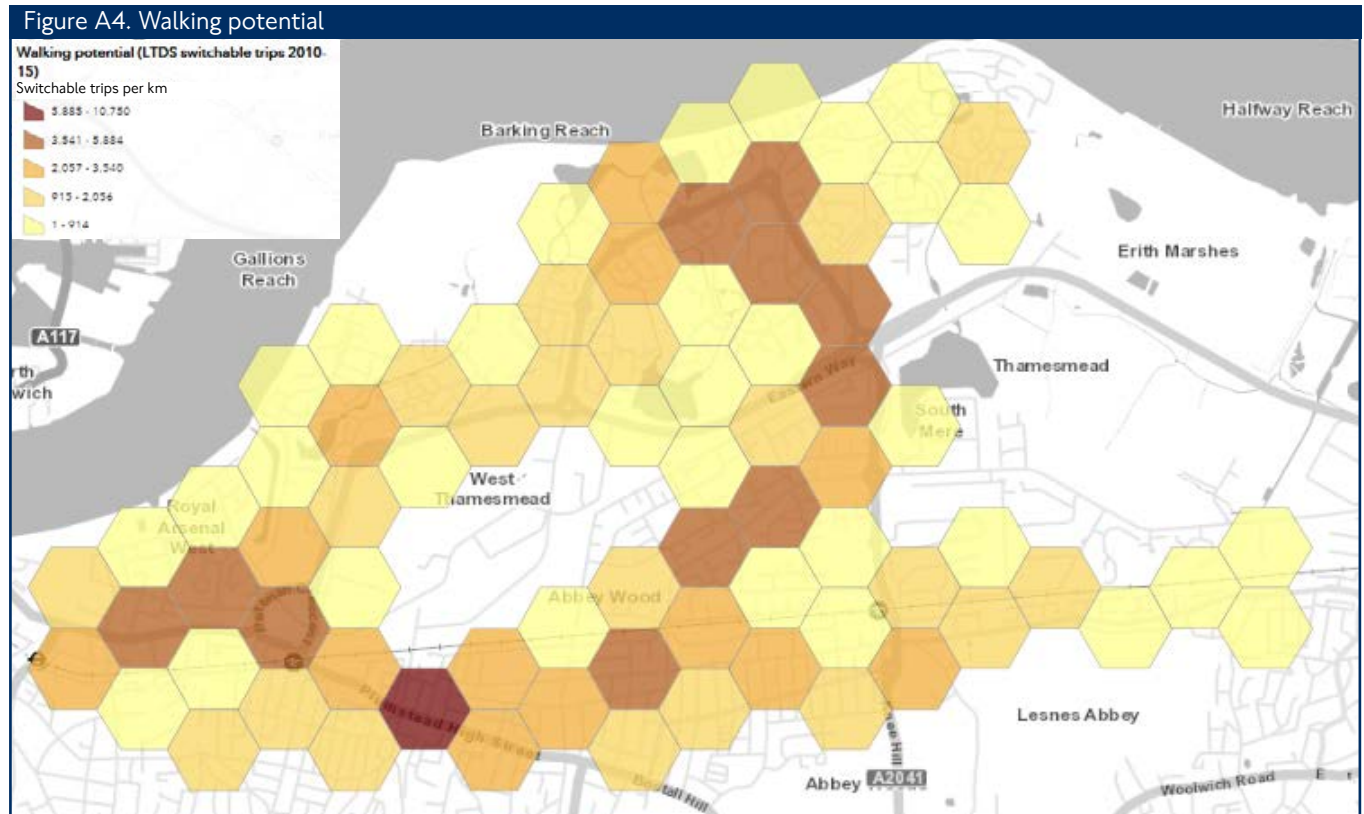
- Lack of legibility
- Lack of infrastructure, particularly on-street
- Severance
- Poor quality, hostile and unsafe street environments

More information on improving local connections in T&AW can be found in the Part 5 - Places of the OAPF.

Walkability and walking potential

Walkability is a measure of the extent to which the public realm provides for movement and other activity on foot in ways that are both efficient and enjoyable. Across the Royal Borough of Greenwich as a whole, the Thamesmead area has been identified as one of the main areas of poor walkability.

Thamesmead Moorings, Thamesmead town centre, South Thamesmead and Plumstead have all been identified as areas where there is strong potential to switch the number of trips currently made by car or public transport to walking based on trip distance. A shift to walking could be realised through improvements to the pedestrian environment, in particular reductions in severance which is most pronounced around Western, Eastern and Central Way.

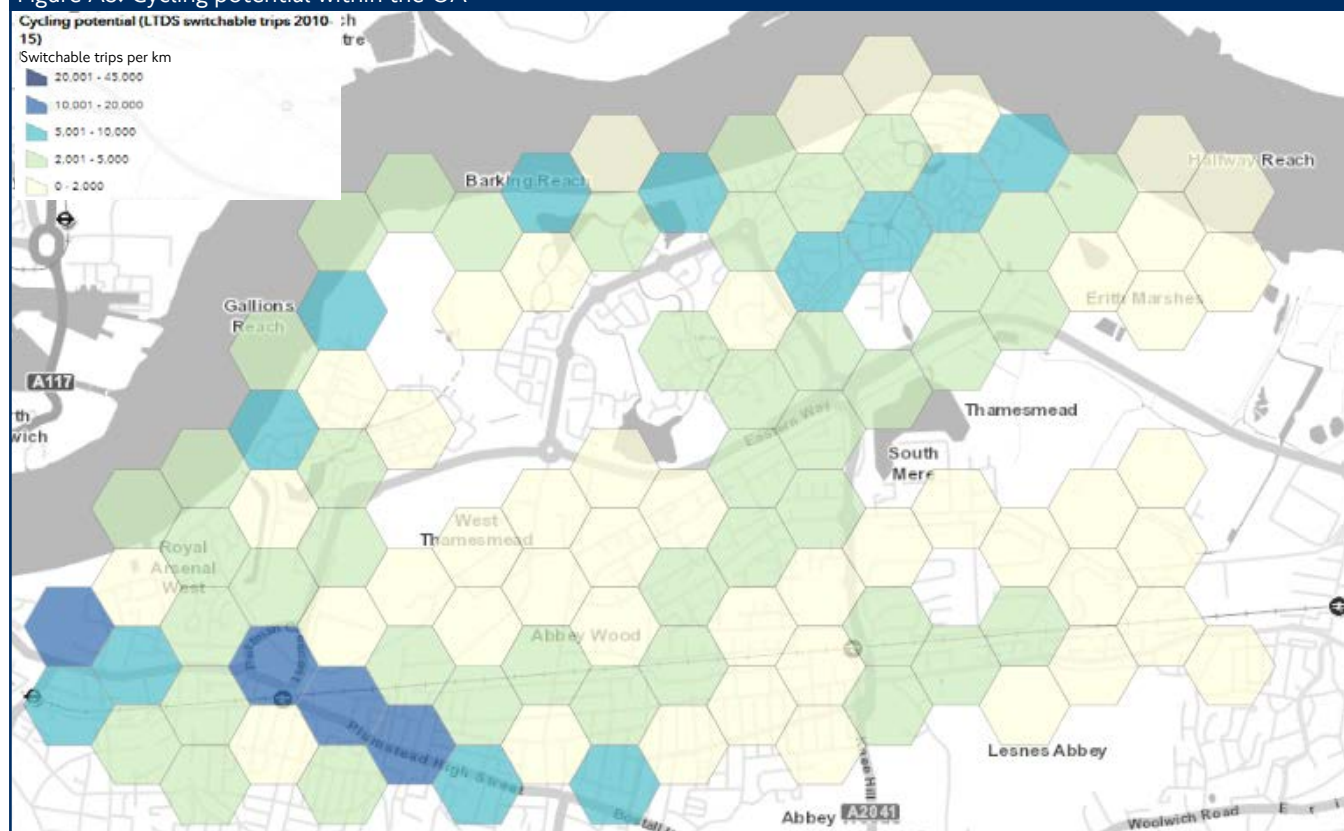


Cycling potential

LTDS data indicates that there is a high potential for uplift in cycling across the OA. A high density of cyclable trips could be made to / from Plumstead, Thamesmead East and Thamesmead town centre as shown in Figure A5. This includes trips that could be cycled in their entirety as well as part of multi-modal trips, e.g. accessing rail stations for onward journeys, which are currently being made by car and public transport. By improving the cycling environment and providing a coherent cycle network, there is the potential to reduce car travel and free up additional capacity on local bus services for those who are more reliant on these modes of transport.

TfL's Strategic Cycling Analysis identifies high potential cycling demand between Woolwich and Thamesmead town centres, and classifies this as a corridor that would benefit from cycle infrastructure to serve trips currently being made using motorised modes. Providing cycle infrastructure between Woolwich and Thamesmead would link the OA into London's strategic cycle network, with plans in development to build a new cycle route between London Bridge and Woolwich.

Figure A5. Cycling potential within the OA



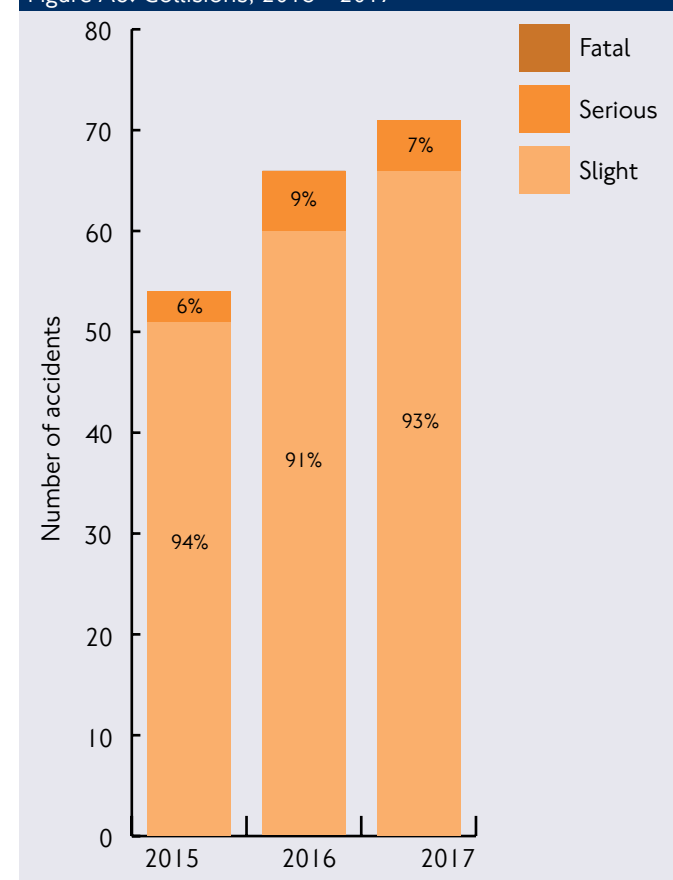
Safety

Safety and perceptions of safety are key barriers to uptake of walking and cycling. The number of collisions within the OA increased between 2014 and 2015 but fell again in 2017. During this period a total of 191 collisions were reported within the OA. None of these collisions were fatal, but 14 were serious and 177 were slight. Looking at longer term trends, the number of collisions involving pedestrians and cyclists within the OA has remained fairly constant between 2009 and 2017.

The majority of reported casualties (81%) on the highway network (all modes, 2014 - 2016) were centred in four key areas: Pettman Crescent, Thamesmead town centre, Harrow Manorway, and at the Eastern Way/ Central Way junction. Casualties in the Pettman Crescent area accounted for almost 40% of all accidents reported. Pettman Crescent is also identified in the poorest 20% performing areas in London for walking and cycling safety, based on the total number of collisions involving these modes.

To help support the Mayor's aim of having zero killed or seriously injured on London's roads by 2041, and to create a more attractive environment for walking and cycling to support a shift to active travel, improvements should be targeted in these four areas.

Figure A6. Collisions, 2015 - 2017

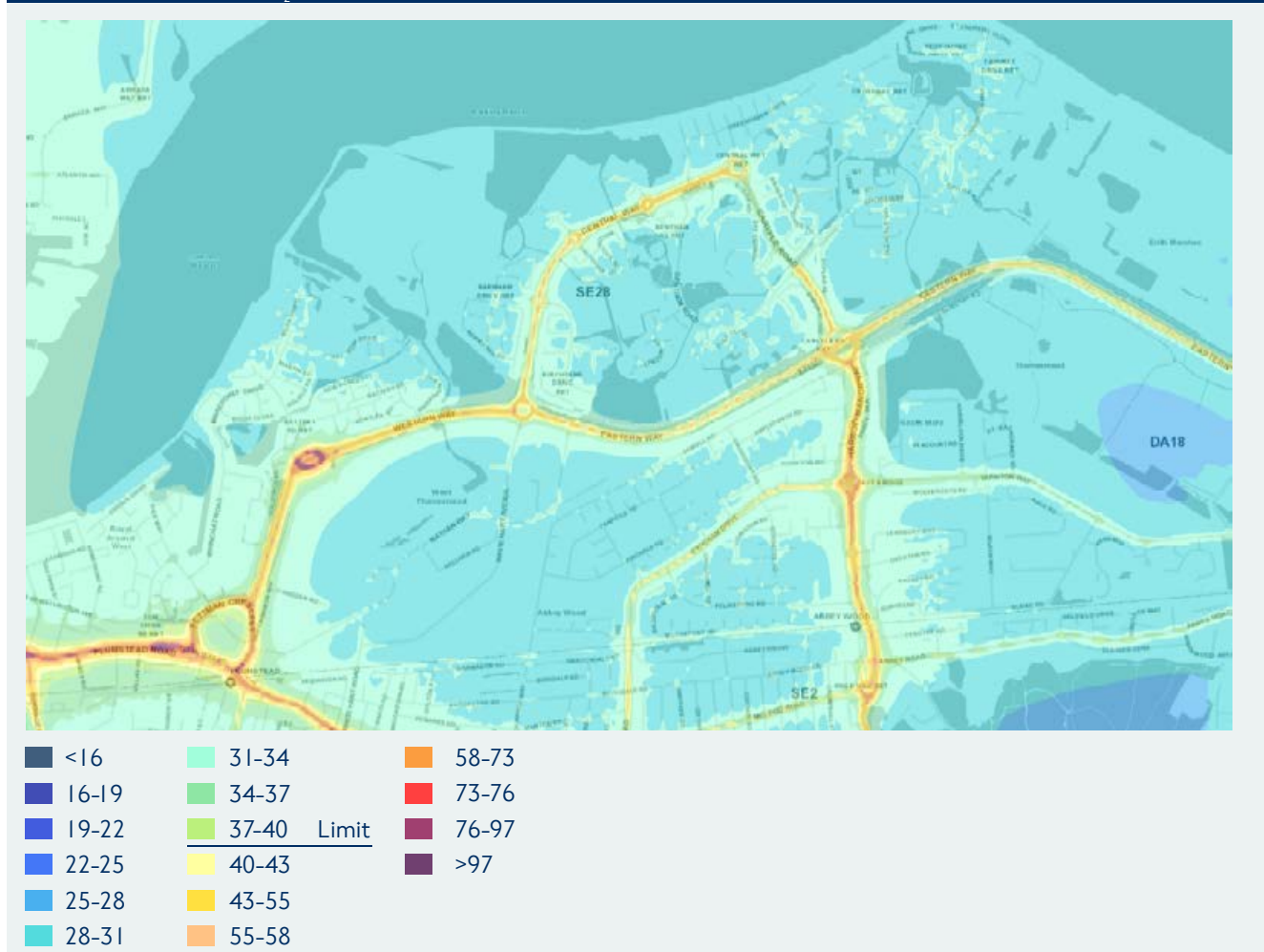


Air quality

The MTS highlights the scale of the air quality across London. Air pollution caused by carcinogenic diesel emissions, high levels of nitrogen dioxide (NO₂) and particulate matter exacerbate health conditions and shorten the lives of Londoners. The OA will need to contribute to meeting London's legal air quality levels in the future, thereby protecting the health of Londoners and demonstrating a commitment to tackling climate change.

In addition to initiatives set out within the MTS, such as the Ultra Low Emission Zone (ULEZ), this Strategy proposes a significant package of walking, cycling and public transport measures to support a shift away from private car use and restrict the growth of total vehicle kilometres travelled. The remaining vehicles need to be as clean and energy efficient as possible to support further improvements in air quality, with the Mayor's aim for all road vehicles driven in London to be zero emission by 2040, and the entire transport system to be zero emission by 2050. Diesel is the most significant source of nitrogen oxides (NO_x) emissions, which contribute to illegal levels of NO₂, as highlighted in Figure A7.

Figure A7. Air quality - NO₂ (µg/m³)



Appendix B Transport Implementation and Delivery Plan

This chapter sets out the package of strategic and local infrastructure to support Thamesmead & Abbey Wood, whilst addressing the challenges up to 2041.

The key transport infrastructure identified in this Strategy as necessary to support a high growth scenario in T&AW is illustrated in Chapter 4, Figure 16.

Given the scale of growth envisaged within T&AW, the delivery of new homes will need to be phased alongside the delivery of the interventions proposed in this Strategy, to ensure that new developments are planned and delivered in a way that encourages sustainable travel choices.

In support of the high growth OAPF development scenario, it is envisaged that in the short term, the potential bus transit route would improve connectivity and bring forward housing in advance of rail investment, whilst embedding the principles of good growth at new developments. In the longer term, a DLR extension to Thamesmead would provide the necessary step-change in public transport connectivity, accessibility and capacity to support

high-density development of currently isolated parts of the OA.

This Appendix provides more detail about the individual projects proposed in the T&AW Transport Strategy to support good growth in the OA.

The delivery tables that follow describe the projects in detail, along with:

- the challenges that projects will address;
- a high level estimated project costs;
- the current funding status of projects;
- the priority of projects (based on their ability to unlock growth and encourage a shift to active and sustainable modes of transport); and
- estimated timeframes for delivery.

KEY	
Challenge	A. Development – Unlock development sites B. Public transport – Improve access to public transport C. Highways – Reduce congestion & improve resilience of the highway-based public transport network D. Local connectivity – Improve local connectivity & reduce severance E. Health – Improve health of residents & enable travel by active & sustainable modes
Outline cost	£ - Up to 5M ££ - Up to 20M £££ - Up to 150M £££+ - Greater than 150M
Funding	F – Funded FF – Assumed to be funded in the future or potential funding source identified PF – Partially funded UF – Unfunded
Priority	Priority refers to how critical the infrastructure element is for the OAPF as follows: 1: critical enabling 2: essential mitigation 3: high priority 4: desirable.
Phasing period	Phasing refers to when the infrastructure should come forward within the short term (ST: Up to 2025); medium term (MT: Up to 2030); and long term (LT: post 2030 and 2031).

i Strategic transport to unlock growth¹

Ref.	Thamesmead & Abbey Wood Interventions	Details	Challenge	Outline cost	Funding	Priority	Phasing period
A1	Elizabeth line						
i	Elizabeth line	Introduction of the new Elizabeth line with 12 trains an hour.	Development, Public Transport	£££+	F	1	ST
ii	Elizabeth line service patterns	In addition to A1i, longer-term consideration is being given to capacity enhancements to the Elizabeth line.	Development, Public Transport	£££+	FF	2	LT
iii	Elizabeth line complementary bus network changes	A series of changes will be implemented to local bus services to accommodate additional demand generated by the opening of the Elizabeth line, to ensure sufficient bus network capacity to 2021.	Development, Public Transport, Health	£	F	2	ST
iv	Abbey Wood cycle hub	Cycle routes should be planned to ensure access to public transport hubs in the OA, with cycle parking provided at these locations to allow for onward travel. In the short term, a cycle hub will be introduced at Abbey Wood station, offering secure cycle parking for people making onward connections via Elizabeth line and National Rail.	Public Transport, Highways, Health	£	F	2	ST
A2	DLR						
i	DLR extension	DLR extension from Beckton to Thamesmead (incl. Thamesmead DLR Station). This could include a stop at Beckton Riverside.	Development, Public Transport	£££+	UF	1	MT
ii	Further DLR extension	Above ground DLR extension from Thamesmead into Bexley (Belvedere).	Development, Public Transport	£££+	UF	4	LT

¹A London Overground extension does not form part of this Strategy for the reasons set out in Chapter 5, although it could come forward at a later stage as part of a larger scheme to tackle orbital connectivity in outer London.

i Strategic transport to unlock growth

Ref.	Thamesmead & Abbey Wood Interventions	Details	Challenge	Outline cost	Funding	Priority	Phasing period
A3	Bus transit						
i	Bus transit - phase I	Amendments to the highway between Plumstead, Thamesmead and Abbey Wood to provide priority for Bus Transit services and a high quality stops/stations.	Highways, Local Connectivity, Health	£££	UF	I	ST
ii	Bus transit - active travel corridor improvements	Provision of supporting pedestrian and cycle improvements in the form of crossings, paths/tracks, cycle parking etc. to provide good local links to/from new bus transit stops/stations. High quality public realm should also be incorporate around transit stops.	Local Connectivity, Health	£	UF	I	ST
iii	Completion of North Greenwich to Slade Green bus transit corridor - later phases	Following the successful implementation of a pilot bus transit service, the system could be extended, with potential for bus transit to extend further into both Bexley and Greenwich.	Highways, Local Connectivity, Health	£££	UF	4	LT

ii Other public transport improvements

Ref.	Thamesmead & Abbey Wood Interventions	Details	Challenge	Outline cost	Funding	Priority	Phasing period
A4	Bus service enhancements						
i	Short term bus enhancements	A number of changes to the existing local bus network are planned following the start of Elizabeth line operations from Abbey Wood, to maximise its benefits.	Development, Public Transport, Health	£	UF	2	ST
ii	Medium to long term bus enhancements	Continued development of the bus network and services to support growth in the OA in the medium and long term (to 2041). This could include further increases in services, together with other capacity increases on routes, and potentially new routes to serve the area. Suitable bus priority will be needed to support continued route development and reliability. A strategy will be developed to identify the need of the bus network in the medium and long term, to ensure it supports and integrates with new public transport services in the area as these come forward.	Development, Public Transport, Health	££	UF	2	LT

ii Other public transport improvements

Ref.	Thamesmead & Abbey Wood Interventions	Details	Challenge	Outline cost	Funding	Priority	Phasing period
B1	Metroisation of southeastern rail services	Building on Policy I and Proposal 64 of the Mayor's Transport Strategy, TfL will continue to work with the DfT, Network Rail and Southeastern with the aim of bringing the frequency and reliability standards of rail services serving Abbey Wood in line with that of other TfL-run lines. While some network capacity constraints would remain on rail services through the OA, 'metroisation' or simplification of services could create a more attractive travel option and support mode shift away from the car.	Public Transport, Highways, Health	TBC	UF	3	MT
B2	Improvements to Thamesmead town centre bus interchange	An improved bus interchange in Thamesmead town centre is being considered to provide a significant improvement on the existing facilities, providing an enhanced passenger environment together with sufficient capacity to meet the transport needs of a growing and increasingly sustainable town. This could serve as a high quality gateway to Thamesmead town centre, as well as a key interchange for bus transit, buses and cycles.	Public Transport, Highways, Health	TBC	UF	3	ST

ii Other public transport improvements

Ref.	Thamesmead & Abbey Wood Interventions	Details	Challenge	Outline cost	Funding	Priority	Phasing period
B3	Demand Responsive Transport (DRT)	LB Bexley has identified North Thamesmead in its shortlist of areas within the borough that would benefit from a more flexible and innovative form of public transport. TfL will work with LBB to identify opportunities to introduce DRT services into this area. The role of Demand Responsive Transport in enabling further sustainable development will also be explored more broadly in the OA.	Public Transport, Highways, Health	£	UF	3	ST
B4	Riverbus pier	A new river service for the OA would create new and more diverse journey opportunities for residents, and create a more enjoyable passenger experience and positive perception of new developments in the area. It is not envisaged that new Riverbus services in Thamesmead would result in strong modal shift due to the relatively high cost of fares, however the infrastructure required to introduce this service is modest and improving access to central London by river would improve the resilience of the public transport network serving the OA. TfL will work with Peabody to explore the potential for constructing a new pier at the Thamesmead Waterfront development and integrating this with London's River Bus services.	Public Transport, Local Connectivity, Health	£	UF	4	LT

iii Interventions to promote healthy streets and healthy people

Ref.	Thamesmead & Abbey Wood Interventions	Details	Challenge	Outline cost	Funding	Priority	Phasing period
C1	Major projects to tackle severance	This includes projects that are unlikely to be delivered directly through new development, such as: new bridge connections over Eastern Way and Ridgeway; a new bridge over the North Kent line at Waldrist Way; remodelling of junctions on Central Way, Crossway and Yarnton Way to improve conditions for walking and cycling; and potential reconfiguration of the elevated junction Eastern Way/Carlyle Road/Harrow Manorway junction.	Highways, Local Connectivity, Health	££	UF	4	MT
C2	Local connections – street and public realm improvements	This complements the healthy streets improvements that come with the transit works. It includes: improving other key routes for walking, cycling and public transport, such as Bentham Road and Eynsham Drive; high quality public realm at local centres, such as Thamesmead Central and The Moorings; and public realm improvements for key connectors such Crossway, Nathan Way and Alsike Road.	Public transport, Development, Highways, Local Connectivity, Health	££	UF	3	ST
C3	Local connections – joining up on-street walking and cycling networks	This is about ensuring that strategic walking and cycling connections away from the transit route are enhanced, particularly ‘Connecting to Crossrail’ improvements to on-street walking and cycling networks that connect to Plumstead and Abbey Wood stations.	Highways, Local Connectivity, Health	£	UF	3	ST

iii Interventions to promote healthy streets and healthy people

Ref.	Thamesmead & Abbey Wood Interventions	Details	Challenge	Outline cost	Funding	Priority	Phasing period
C4	Local connections – improvements to off-carriageway networks	Enhancing the quality and accessibility of existing walking and cycling routes, such as Claridge Way and the link to Lesnes Abbey, ensuring that the network joins up key local destinations. Improving accessibility to existing strategic links, particularly access to the Ridgeway.	Local Connectivity, Health	£	UF	3	ST
C5	Local connections – new green links	Taking opportunities to deliver new walking and cycling links in the network that provide for utility and leisure trips, and create well-signed and attractive circuits, such as the Broadwater to Crossway and Crossway to Crossness links. This includes integrating local landmarks, such as Gallions Hill, Crossness and Lesnes Abbey, as well as parks and green spaces more effectively within the local walking and cycling networks. While some of this can be delivered through new development, it is likely to need further funding from other sources to complete gaps in the network.	Development, Local Connectivity, Health	£	PF / FF	3	MT

iii Interventions to promote healthy streets and healthy people

Ref.	Thamesmead & Abbey Wood Interventions	Details	Challenge	Outline cost	Funding	Priority	Phasing period
C6	Measures to improve air quality	Building on Policy T6 of the draft new London Plan and Policy 7 of the Mayor's Transport Strategy, where parking is provided at new residential developments, infrastructure for electric or Ultra-Low Emission vehicles must be provided. At least 20 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces. The provision of car clubs at new developments and in existing residential areas will be promoted as a way to reduce car ownership and accelerate the cleaning of the vehicle fleet in the area. Vehicle charging facilities and car club bays should also be introduced at town centre locations and other key locations within the OA to facilitate a move to a cleaner vehicle fleet and lower levels of car ownership. A Freight Area Management Plan (see D1-D5) will be drawn up to identify opportunities to reduce the emissions associated with freight in the OA, particularly during the construction of new developments.	Highways, Health	TBC	FF	2	ST

iv Freight Area Management Plan

Ref.	Thamesmead & Abbey Wood Interventions	Details	Challenge	Outline cost	Funding	Priority	Phasing period
D1	Develop freight evidence base	As new developments come forward in the OA, it will be important to minimise the impact of construction traffic along the STDR and set up measures to ensure that delivery and servicing trips associated with new homes and jobs in the area are minimised. Building on Policies S11 and T7 of the draft new London Plan, the OAPF Delivery Board will lead on the development of a sound freight evidence base to inform freight management decision making in the OA. The evidence base should be kept updated as an ongoing process that feeds into the decision making body (see D2). A piece of work could be commissioned to set up the evidence base and for process for keeping it updated. This will enable the creation of a robust Freight Area Management Plan for the OA to support growth and minimise the impact of development in the OA going forward, as well as provide quality of life for existing communities. It will look to inform the development of D2 and D3 below.	Highways, Health	£	UF	I	ST

iv Freight Area Management Plan

Ref.	Thamesmead & Abbey Wood Interventions	Details	Challenge	Outline cost	Funding	Priority	Phasing period
D2	Strategic freight infrastructure	The OAPF freight coordination forum will assess the need for strategic freight infrastructure and put forward evidence backed proposals for intervention. Intervention may include the delivery of a pier for delivery of construction materials	Highways, Health	TBC	UF	2	ST
D3	Freight mitigation coordination	An OAPF freight coordination forum is to be set up to consider the information provided by the evidence base, coordinate mitigation delivery (see D4) and assess the need for strategic infrastructure intervention, for example a consolidation centre. The Councils will lead on the drafting of a Freight Area Management Plan to pull this information together, with support from TfL. The forum will be made up of community groups, developers, the Councils, TfL and freight industry groups.	Highways, Health	£	UF	1	OAPF lifespan

iv Freight Area Management Plan

Ref.	Thamesmead & Abbey Wood Interventions	Details	Challenge	Outline cost	Funding	Priority	Phasing period
D4	Strategic freight infrastructure	The OAPF freight coordination forum will assess the Freight Area Management Plan and the need for strategic freight infrastructure, and put forward evidence backed proposals for intervention. Intervention may include the construction of a pier for delivering construction materials and removing waste at key development sites, and consolidation solutions to optimise day to day freight movements. As intervention proposals come forward, land should be safeguarded through the OAPF to support their delivery.	Highways, Health	TBC	UF	I	OAPF lifespan
D5	Freight coordination / collaboration measures	The OAPF freight coordination forum will provide a space for the OA freight stakeholders to collaborate, coordinate and consolidate their freight activity. For example, consolidation could be achieved by reviewing delivery vehicle routes and loads with a view to sharing vehicle capacity where the opportunity exists. The forum will also engage and inform the community on freight matters.	Highways, Health	TBC	UF	I	OAPF lifespan

v Planning policy, travel demand management and behavioural change

Ref.	Thamesmead & Abbey Wood Interventions	Details	Challenge	Outline cost	Funding	Priority	Phasing period
E1	Planning for good growth	The OAPF, including this Strategy, look to improve the health and quality of life of all Londoners, reduce inequalities and make the city a better place to live, work and visit. Transport plays a vital role in supporting and ensuring the Good Growth Policies laid out in the new London Plan are achieved.	Development, Public Transport, Highways, Local Connectivity, Health	N/A	N/A	I	OAPF lifespan
E2	Strategic approach to transport planning	Building on Policies T1 and GG2 of the draft new London Plan and Policy 1 of the Mayor's Transport Strategy, the T&AW OA should support and facilitate the delivery of at least 80 per cent of all trips to, from and within this area to be made by foot, by cycle or using public transport by 2041.	Development, Public Transport, Highways, Local Connectivity, Health	N/A	N/A	I	OAPF lifespan
E3	Travel Demand Management Strategy for T&AW	Detailed business-as-usual work to increase the scope and depth of behaviour change initiatives for the area, in concert with the infrastructure improvements.	Development, Public Transport, Highways, Local Connectivity, Health	N/A	N/A	I	OAPF lifespan

v Planning policy, travel demand management and behavioural change

Ref.	Thamesmead & Abbey Wood Interventions	Details	Challenge	Outline cost	Funding	Priority	Phasing period
E4	Parking						
E4i	Cycle parking	Building on Policy T5 of the draft new London Plan, Development Plans and proposals should help remove barriers to cycling and create a healthy environment in which people choose the cycle. This will be achieved through the delivery of a network of cycle routes through the OA, with new routes and improved infrastructure. In addition to this, we need to secure the provision of appropriate levels of cycling parking which should be fit for purpose, secure and well-located. Developments should provide cycle parking at least in accordance with the minimum standards set out within the draft new London Plan and designed and laid out in accordance with the guidance contained in the London Cycling Design Standards. Minimum levels of secure and accessible cycle parking should also be provided at town centres within the OA, a key public transport interchanges and other key destinations to facilitate a greater uptake of cycling.	Development, Public Transport, Highways, Local Connectivity, Health	N/A	N/A	I	OAPF lifespan

v Planning policy, travel demand management and behavioural change

Ref.	Thamesmead & Abbey Wood Interventions	Details	Challenge	Outline cost	Funding	Priority	Phasing period
E4ii	Car parking	Building on Policy T6 of the draft new London Plan, car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity. The potential introduction of bus transit and DLR to poorly connected parts of the OA provides an excellent opportunity to deliver highly accessible and 'car-lite' developments. The provision of car clubs at new developments within the OA will be promoted to encourage car sharing as an alternative model to car ownership, paired with a reduction in the availability of private parking. New retail development should avoid being car-dependent and should follow a town centres first approach, as set out within Policy SD8 of the draft new London Plan. For more detail refer to Policy T6 of the draft new London Plan. Additional changes in parking policy within the OA could include introducing new or extending existing controlled parking zones; incentivising residents to give up parking spaces; and introducing charging schemes to manage private car use key locations such as at local centres and public transport hubs.	Development, Public Transport, Highways, Local Connectivity, Health	N/A	N/A	I	OAPF lifespan

v Planning policy, travel demand management and behavioural change

Ref.	Thamesmead & Abbey Wood Interventions	Details	Challenge	Outline cost	Funding	Priority	Phasing period
E5	Funding transport infrastructure through planning	Building on Policy T9 of the draft new London Plan, the Mayor will charge the Mayoral Community Infrastructure Levy (MCIL) to secure funding towards transport infrastructure of strategic importance. Planning obligations, including phasing of development, financial contributions, will be considered and sought to mitigate impacts from development, which may be cumulative.	Development, Public Transport, Highways, Local Connectivity, Health	N/A	N/A	I	OAPF lifespan

Dependencies

Many schemes reported here are part of wider programmes and will be progressed in parallel to this OAPF. These interventions, particularly the strategic interventions, will impact this OA. For example, possible capacity enhancements to the Elizabeth line.

Ref	Interventions	Details	Phasing period
1	DLR Rolling Stock Replacement Programme (additional and replacement rail cars), more frequent services and associated infrastructure works)	Procurement of new rolling stock to enable additional capacity to be provided on the network. This will achieve more on train capacity and enable high levels of services to be provided (working towards achieving 30tph network-wide). Trains would be delivered from 2022 onwards.	ST
2i	DLR Beckton Depot stabling enhancements	To accommodate and support the new proposed DLR Rolling Stock.	ST
2ii	DLR Amplified Growth Programme	Addition of 14 trains to the DLR RSRP and expansion of Beckton Depot to accommodate them	ST
3i	Elizabeth line service patterns	Longer-term consideration is being given to capacity enhancements to the Elizabeth Line (through looking at options for lengthening trains by 20% versus running more frequent services). Funding for this would come from the TfL Business Plan.	LT
3ii	Elizabeth line extension (C2E)	Elizabeth line extension between Abbey Wood and Ebbsfleet along the North Kent line.	MT
4	Silvertown Tunnel	New cross-river road tunnel at Silvertown. Construction is set to begin in 2019/20, with 2024 the earliest estimated opening date. Once open, tolls will be introduced to both Silvertown Tunnel and Blackwall Tunnel in order to ease congestion and improve the reliability of cross-river journeys.	ST

Dependencies

Ref	Interventions	Details	Phasing period
5	Safeguarded land for Gallions Reach crossing	Land in the north of T&AW OA is safeguarded for a previously proposed road crossing. However, a key objective of this Strategy is to promote a shift away from car use and to increase use of public transport and active travel in order to support the delivery of good growth within the OA. As such, the road crossing does not form part of this Strategy.	N/A
6	Future Cycle Route 11	A segregated cycle way from Greenwich town centre through to Woolwich via Charlton.	MT
7	East and south east London public transport capacity	TfL-led study to review the need for further strategic public transport capacity across east and south east London, including supporting Thamesmead and Abbey Wood.	LT

Appendix C Glossary

Accessibility

In the context of this Strategy, accessibility refers to how easy it is for people to use London's streets and public transport to get to places, jobs, homes and services, considering particularly the needs of older and disabled people.

Active travel

Trips undertaken by physical means, such as walking and cycling.

Bus transit

Bus transit is a form of public transport that can take many different forms, with a range of potential vehicles, passenger facilities and guidance systems. Differences between a conventional bus service and bus transit include speed, level of priority, reliability, and quality of stop infrastructure.

Buses per hour (bph)

Bph indicates bus service/schedules for a particular bus route/stop.

Business Plan

A five year plan which sets out how TfL will deliver the Mayor's ambitious plans for transport across London.

Capacity

The capacity of a transport system is the number of passengers, weight or volume of a load that can be carried by the system. For public transport systems, the capacity is a function of the frequency of services as well as the number of passengers that can be carried.

Community Infrastructure Levy (CIL)

A non-negotiable charge, which allows local authorities (including the Mayor) to help fund infrastructure needed to support the development of an area in line with local development plans.

Connectivity

The general term for how easy it is for people to get to places, jobs, homes and services.

Consolidation

The process of rearranging and combining deliveries to reduce the number of van and lorry journeys made in London.

Consolidation centre

A centre where deliveries can be brought for more efficient onward movement to their final destinations. It enables organisations and planning authorities to improve operational efficiency, resulting in reduced congestion, fewer delays and improved safety.

Cycling potential

An analytical TfL tool designed to understand the potential for growth in cycling as mode of travel.

Design Manual

One of the suite of OAPF documents. This presents the shared priorities for walking and cycling improvements, in order to deliver Healthy Streets.

Development capacity scenarios

Scenarios undertaken to look at potential for residential and employment growth in the OA in the future.

Development Infrastructure Funding Study (DIFS)

DIF studies identify future infrastructure requirements to support the proposed level of development across an area. DIF studies include a set of recommendations for how to fund delivery of this infrastructure.

Evening / PM peak

The period in the afternoon and evening when travel demand is highest (4pm-7pm).

Greater London Authority

The strategic regional authority for Greater London.

Healthy Streets Approach

The Mayor and TfL's approach to prioritising people and their health in decision-making to create a healthy, inclusive and safe city for all. The

approach seeks to make London a more attractive place to walk, cycle and use public transport, and reduces the dominance of motorised transport.

Green and blue network

A network of parks and other green spaces, rivers, lakes and canals.

Growth Area

Specific areas for new residential development to accommodate future population growth, as outlined in the Government's Sustainable Communities Plan. Within London these include the Thames Gateway and the London-Stansted-Cambridge-Peterborough Corridor.

Inner London

The boroughs of Camden, City of London, Hackney, Hammersmith & Fulham, Haringey, Islington, Kensington & Chelsea, Lambeth, Lewisham, Newham, Southwark, Tower Hamlets, Wandsworth and the City of Westminster, as defined by the Office for National Statistics.

Liveable Neighbourhoods

The Liveable Neighbourhoods programme provides a new funding stream that will apply the Healthy Streets Approach on the ground to make our streets places where people choose to walk and cycle, not to drive.

Local Implementation Plan (LIP)

A statutory transport plan produced by London boroughs, which brings together transport proposals to implement the strategy at a local level.

Local Plan

This plan sets out local planning policies and identifies how land is used, determining what will be built where.

London Atmospheric Emissions Inventory (LAEI)

A database of emissions sources and information about rates of emissions for air pollutants within and around London.

London Borough of Bexley

The London Borough of Bexley is a London Borough in outer south east London. T&AW OA sits partially within this borough.

London Plan

The Mayor's spatial development strategy for London.

Londoners

Permanent and temporary residents of London and, where also applicable, commuters from outside London, visitors and tourists.

London Transportation Studies model (LTS)

LTS is a strategic multi-modal four stage aggregate model for London and its surrounding area. It is used to prepare forecasts of growth in total travel, change in travel patterns, the transport mode chosen and the routing of trips through the road and public transport networks.

London Travel Demand Survey (LTDS)

LTDS is an established annual household travel survey of London residents that has been running on a continuous basis since 2005/06. The survey seeks to understand and quantify, in a statistically-robust way, the travel behaviour of Londoners and the relationships of this to a range of socio-demographic, spatial and transport network factors.

Mayor's Transport Strategy

This document sets out the Mayor's policies and proposals to reshape transport in London over the next 25 years.

Mode share

The relative use of each mode of transport. The calculation of mode share in the strategy is based on trips.

Mode shift

A change in behaviour whereby a person changes the mode of transport they use either for a specific journey (e.g. their journey to work) or more generally.

Multi-modal trip

A trip that involves using more than one mode of transport, e.g. cycling to a train station then continuing the journey by train.

Morning / AM peak

The period in the morning when travel demand is highest (7am-10am).

Opportunity Areas

London's principal areas of opportunity for accommodating large-scale development to provide substantial numbers of new jobs and homes. Each typically has more than 5,000 jobs and/or 2,500 homes, with a mixed and intensive use of land, assisted by good public transport accessibility.

Opportunity Area Planning Framework (OAPF)

Strategic spatial plans for Opportunity Areas in London, as designated in the London Plan.

Particulate matter

A complex mixture of extremely small particles and liquid droplets that get into the air and can be inhaled.

Public realm

Publicly accessible space between and within buildings, including streets, squares, forecourts, parks and open spaces. Streets make up the greatest part of the public realm in most cities.

Public transport accessibility level (PTAL)

A measure of connectivity to the public transport network. For any given point in London, PTALs combine walk time to the network (stations, bus stops) with service wait time at these stops to give an overall accessibility index. There are six accessibility levels (1=poor, 6=excellent).

Section 106 (s106)

These agreements confer planning obligations on persons with an interest in land in order to achieve the implementation of relevant planning policies as authorised by Section 106 of the Town and Country Planning Act 1990.

Royal Borough of Greenwich

The Royal Borough of Greenwich is a London Borough in inner south east London. T&AW OA sits partially within this borough.

Section 278 (s278)

These are agreements are formed between the highway authority and the developer when developments require improvements or changes to the highway network. S278 of the Highways Act 1980 allows a developer to carry out works to the public highway.

Step-free network

The network of Underground, London Overground and/or national rail stations that provide step-free access from the street to the platform or train, such as through the provision of lifts or ramps.

Severance

Severance, or community / physical severance, occurs where features such as roads, railways, waterways and street networks act as a barrier to movement through an area, particularly on foot or by bicycle.

Trains per hour (tph)

Tph indicates train service/schedules for a particular railway route/station.

Transport for London (TfL)

One of the GLA group of organisations, accountable to the Mayor, with responsibility for delivering an integrated and sustainable transport strategy for London.

Transport model

A transport model is a mathematical representation of all or part of a transport system. It is used to evaluate existing conditions and to project future effects and needs.

Travel Demand Management

The application of strategies and policies to reduce travel demand, or to redistribute this demand in space or time.

Trip

A one-way movement from one place to another to achieve a single main purpose. Trips may be further sub-divided into journey stages.

Ultra Low Emission Zone (ULEZ)

Charging zone in which vehicles that do not comply with emissions standards for air pollutants will be subject to a daily charge.

Walking Potential

An analytical TfL tool designed to understand the potential for growth in walk travel

Walkability

Walkability is a measure of how easy and appealing an area is to walk in.

Appendix D Modelling assumptions

Development capacity assumptions

To test the residential and employment capacity for T&AW OA, two transport scenarios were agreed between TfL, GLA, the Royal Borough of Greenwich and the London Borough of Bexley to help identify the impact of growth.

The first scenario considered an intermediate growth scenario, assuming an additional 8,000 homes and 5,500 jobs across the OA compared to the 2015 baseline, along with background growth in the area, to be delivered by 2041.

The second scenario assessed a high growth scenario, assuming an additional 15,500 homes and 8,000 jobs across the OA compared to the 2015 baseline, along with background growth in the area, again to be delivered by 2041.

Potential growth scenarios tested

Scenarios with and without these levels of growth were developed for the strategic transport model, LTS. These were used to assess whether the transport networks could accommodate the development capacity growth scenario in the AM peak.

The size of LTS model zones does not match the size and shape of T&AW OA. All LTS zones that are partially within the OA have been included in the modelling study area, so the population and employment figures are greater than for the OA alone. There is a significant increase in the number of homes and jobs between the baseline and Reference Case scenarios, a reasonable proportion of this growth takes place in neighbouring OAs, such as Charlton Riverside, it is not all in T&AW.

2041 T&AW Reference Case

The first scenario that was developed for modelling was to represent 2041 with forecast growth included everywhere outside and within the OA itself.

A large proportion of the growth that makes up the future growth scenarios is growth associated with the Elizabeth line (5,000 homes and 4,000 jobs) and is included in the Reference Case, it has been added to the model again when testing future growth scenarios in order to 'stress test' the network.

In terms of new transport infrastructure, the 2041 Reference Case scenario includes committed schemes such as the Elizabeth line, the nearby Silvertown tunnel, and bus service improvements associated with these schemes.

2041 T&AW Intermediate Growth Scenario

This scenario starts with the 2041 T&AW Reference Case and adds in further populations and employment growth that could occur in the OA in an intermediate growth scenario. This represents:

- Prospective housing sites
- Jobs

This scenario adds population growth of 18 per cent and employment growth of 17 per cent above the T&AW Reference Case.

	Population	Homes	Difference from preceding (homes)	Housing scenario
2015 Baseline	85,000	34,000		LTS 2015 Reference Case
2041 T&AW Reference Case	111,000	49,000	+26,000* +44%	plus newly built + permitted homes by 2015
2041 T&AW with intermediate growth	132,000	58,000	+8,000 +18%	plus a further 'intermediate' level of growth

	Employment	Difference from preceding	Employment assumption
2015 Baseline	30,000		LTS 2015 Reference Case
2041 T&AW Reference Case	35,000	+ 5,000* + 17%	2015 employment level used for T&AW
2041 T&AW with intermediate growth	41,000	+ 5,500 + 17%	plus employment space unlocked by bus transit

All numbers above rounded to nearest 1,000.

Values shown are for the study area LTS zones, which comprise a greater area than the T&AW OA.

Average household size is specified depending on the borough. The assumed household size is 2.56 for new development in RB Greenwich and 3.04 in LB Bexley.

* As mentioned in the previous section some of this growth occurs outside the Opportunity Area

2041 T&AW High Growth Scenario

This scenario starts with the 2041 T&AW Reference Case and adds in further populations and employment growth that could occur in the OA in an intermediate growth scenario. This represents:

- Prospective housing sites including additional sites that could not come forward without a DLR extension to Thamesmead, and higher densities at sites that would be closely served by the DLR.
- Jobs

This scenario adds population growth of 29 per cent and employment growth of 22 per cent above the T&AW Reference Case.

	Population	Homes	Difference from preceding (homes)	Housing scenario
2015 Baseline	85,000	34,000		LTS 2015 Reference Case
2041 T&AW Reference Case	111,000*	49,000*	+26,000* +44%	plus newly built + permitted homes by 2015
2041 T&AW with high growth	155,000	66,000	+15,500 +34%	plus a further 'higher' level of growth

	Employment	Difference from preceding	Employment assumption
2015 Baseline	30,000		LTS 2015 Reference Case
2041 T&AW Reference Case	35,000*	+ 5,000* + 18%	2015 employment level used for T&AW
2041 T&AW with developments	43,000	+ 8,000 + 22%	plus employment space unlocked by bus transit & DLR

All numbers above rounded to nearest 1,000.

Values shown are for the study area LTS zones, which comprise a greater area than the T&AW OA.

Average household size is specified depending on the borough. The assumed household size is 2.56 for new development in RB Greenwich and 3.04 in LB Bexley.

* As mentioned in the previous section some of this growth occurs outside the Opportunity Area

Bus transit

A bus transit service was modelled at 12 buses per hour in each direction throughout the day, and was modelled to represent a 18m articulated bus. For modelling purposes the transit was added to the public transport network without amending the route or frequency of existing bus services.

Highway capacity

In order to give the bus transit quicker journey times and increased reliability it was assumed in the modelling that road space would need to be re-allocated from general traffic to the transit. For modelling purposes the transit is assumed to be fully segregated between Plumstead Station to Eastern Way via Thamesmead Central, and partially segregated from Woolwich to Plumstead Station, and from Eastern Way to Abbey Wood Station. Highway capacity is reduced by 50% on fully segregated sections and by 10% on partially segregated sections, while at junctions, capacity is reduced by 15% on fully segregated sections and by 5% on partially segregated sections. Further work will be required to progress the design of the transit and calculate the actual reductions in highway and junction capacities to facilitate the scheme.

DLR extension

The DLR extension modelled connects to the Beckton branch of the DLR and provides additional stations at Armada Riverside and Thamesmead Central. The extension is modelled as operating at 15 trains per hour throughout the day.

Car ownership levels

A general value of 0.1 cars per head was used for new development across the OA, however, in areas with higher PTAL values a lower cars per head figure was used ranging from 0.03 to 0.04 depending upon the exact location.

Appendix B

Engagement and Consultation Summary Thamesmead and Abbey Wood OAPF

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Introduction

1. Name of Guidance Document

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

2. Purpose of OAPF

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

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

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

4. How were people consulted?

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

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

Public Consultation

5. Public consultation publicity

5.1 Publicity for consultation was undertaken via the following activities:

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

6. Consultation comprised of the following:

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

Photos from Public Consultation



Consultation event at Sainsbury’s Abbey Wood



Thamesmead Leisure Centre



Questionnaire’s by ‘themes’ and ‘places’



Sports Club Thamesmead

ABBEY WOOD

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

Please tell us why?

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

☐ Community spaces

☐ Flood management

☐ Better walking/ cycling

☐ Connection to water

☐ Parks and public spaces

☐ Night-time activities

☐ Affordable housing

☐ Better public transport

☐ Job opportunities

☐ Less traffic

☐ Shops and retail

☐ Broadband and Wi-Fi

☐ Other

SOCIAL & COMMUNITY USES

THAMESMEAD & ABBEY WOOD OAPF

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

See board 4, or page 105

Please tell us why?

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

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

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

Name:

Postcode:

Email:

Example of questionnaire forms

8. Consultation Website Views

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

9. Consultation Event Attendees

8.1 Total number of comments received during events: 115

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

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

10. Representations received

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

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

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

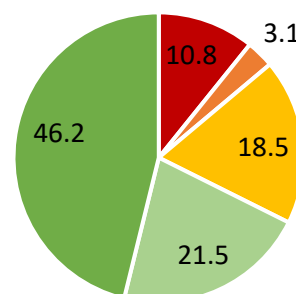
11. Feedback from local people

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

10.2 Transport and Growth

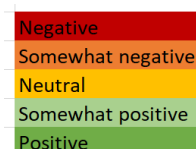
How do you feel about the two potential transport schemes, and the number of homes and jobs they may bring?

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



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

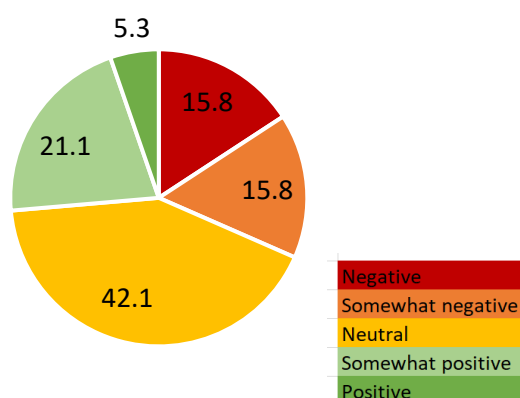
- 1) **Better public transport**
- 2) **Community uses (recreational, young people, family)**
- 3) **More shops & retail (local conveniences, restaurants)**
- 4) **Job opportunities**
- 5) **Better walking and cycling (lighting, safety)**
- 6) Park and public spaces
- 7) Less traffic
- 8) Affordable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



10.3 Social and Community Uses

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

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



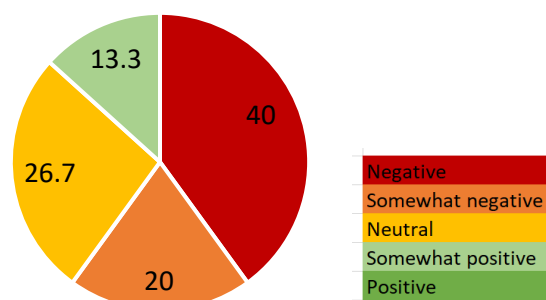
Key comments received

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

10.4 Town Centre and Employment

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

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



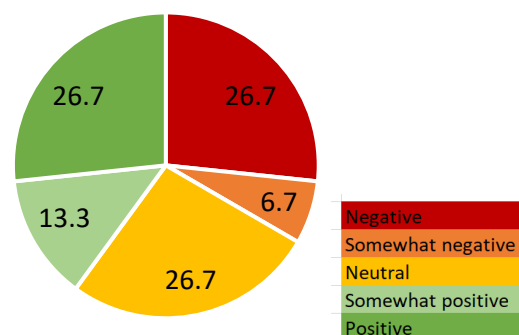
Key comments received

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

10.5 Environment, energy and utilities

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

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



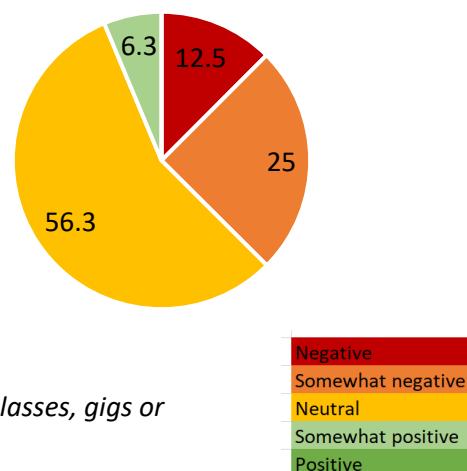
Key comments received

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

10.6 Culture and Heritage

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

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



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

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

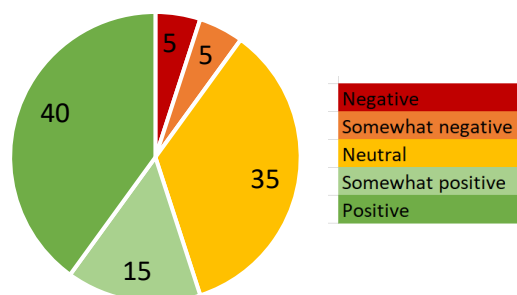
Key comments received

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

10.7 Thamesmead Town Centre

Key comments received

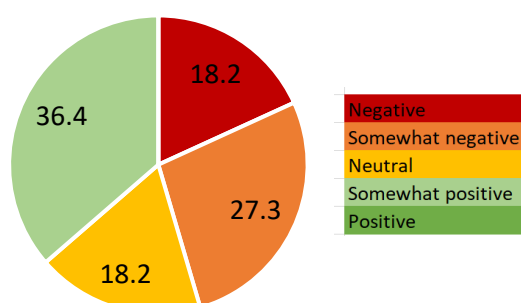
- More places to socialise
- Better quality shops and restaurants
- Leisure activities for families (cinema, theatre)
- More shop front business spaces for B1 rather than A1
- Not clear how river will be used (leisure, accessibility)



10.8 North Thamesmead and Moorings

Key comments received

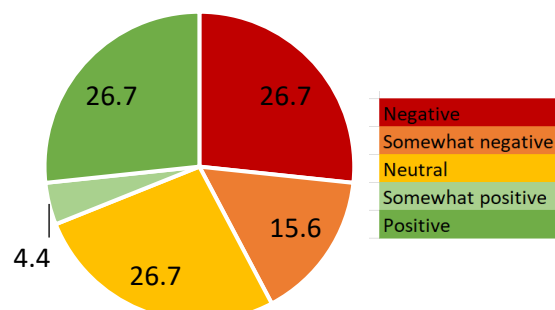
- Anti-social behaviour, poor perception of safety
- Training & employment opportunities for young people
- Bus transit doesn't adequately serve Crossway
- Nature reserve is a positive improvement
- Lack of local conveniences (corner shop, post box)
- Poor Wifi



10.9 Abbey Wood

Key comments received

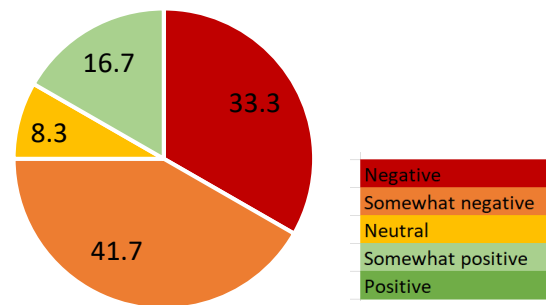
- Abbey Wood estate is excluded (Co-op & AW estate)
- Lack of understanding of Abbey Wood
- Proposals are vague and lack detail
- New station is disconnected from AW village. Concerns proposals are shifting activity north of the station, away from AW village.
- Poor perception of safety at night (better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



10.10 West Thamesmead and Plumstead

Key comments received

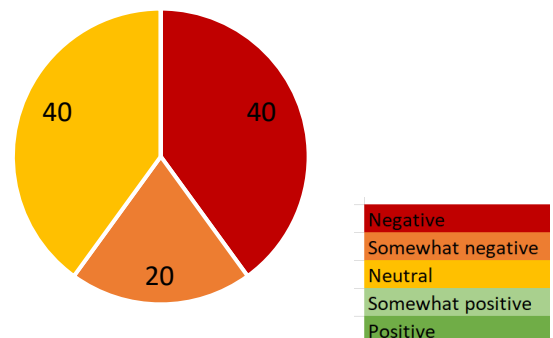
- West Thamesmead and Plumstead are distinct areas. Community provision in Plumstead does not meet the needs of those in W. Thamesmead
- Lack of proposals
- Ridgeway poorly maintained, lack of lighting (SINC)



10.11 East Thamesmead and Veridion Park

Key comments received

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



Early Engagement Events

12. Early engagement

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

13. Consultation comprised of the following:

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

14. Engagement Website Views

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

15. Engagement Event Attendees

Total number of comments received during events: 43

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

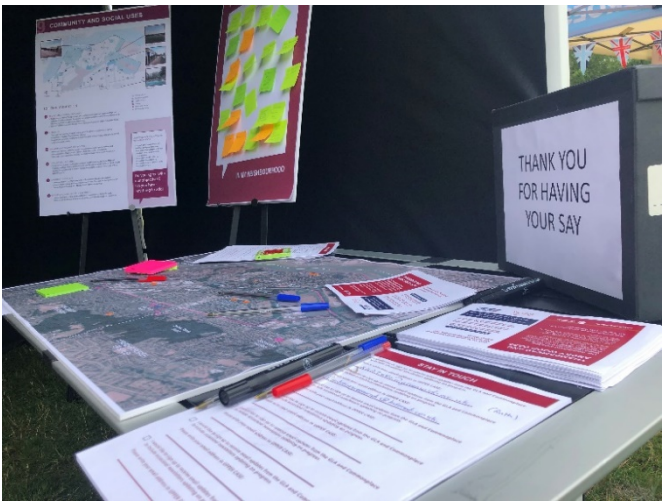
Photos from Early Engagement Events



Consultation event at Southmere Lake during Southmere Sunday



Thamesmead Music Festival summer 2019



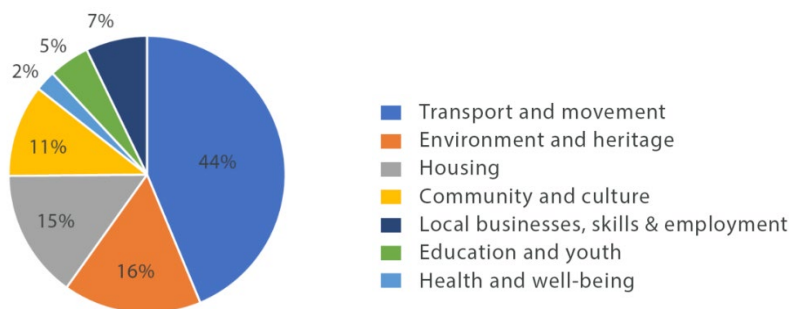
Consultation boards and maps



Exhibition at Peabody's Thamesmead Information Hub

16. Feedback from local people

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



Percentage of comments received by theme

15.2 The top three priorities for the area were to:

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

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

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

15.4 Transport and Movement

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

15.5 Environment and Heritage

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

15.6 Housing

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

15.7 Communities and Culture

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

15.8 Local Businesses & Employment

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

15.9 Education and Youth

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

16.0 Health and Well-being

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

17. Engagement boards

1 THAMESMEAD AND ABBEY WOOD OAPF

HOW TO GET INVOLVED

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

This community engagement event will run from 2nd August to 15th September 2018. You will be able to see the draft OAPF and have your say on it.

Join the process on www.london.gov.uk/thamesmead-abbey-wood

WHAT IS AN OAPF?

The Mayor of London's draft London Plan identifies Thamesmead & Abbey Wood as an 'Opportunity Area'. There are plans to build new homes, jobs, and facilities in the area for the future.

WHAT DOES THIS MEAN FOR THAMESMEAD AND ABBEY WOOD?

- Thamesmead and Abbey Wood is one of the largest Opportunity Areas (OAs) in London.
- It forms one of four identified OAs in the Thames Estuary, where the Mayor of London is working with partners to promote investment in the area's built, social, and natural environment.
- Thamesmead and Abbey Wood has been identified as being the potential for 40,000 homes and 4,000 jobs, and with transport improvements this could be even more.

WHAT WILL THIS FRAMEWORK DO?

- Set out strategic planning, regeneration and design guidance.
- Be a guide for emerging development in the area.
- Provide a plan for future development in the area.
- Be a strategic consultation to planning decisions that fall within its boundary. It does not establish new policies and must be used in the context of the London Plan and the relevant Strategic Development Plan.

NEXT STEPS

2018: Draft OAPF
2019: Consultation
2020: Final OAPF

OPPORTUNITY AREA BOUNDARY

The Thamesmead & Abbey Wood Opportunity Area boundary is shown in red on the map. The boundary is based on the current OAPF boundary.

MAYOR OF LONDON
TRANSPORT FOR LONDON
ROYAL GREENWICH
BEXLEY

2 WHAT COULD HAPPEN AROUND YOU?

WHAT'S HAPPENING IN YOUR AREA?

- Thamesmead and Abbey Wood is one of the largest Opportunity Areas (OAs) in London.
- It forms one of four identified OAs in the Thames Estuary, where the Mayor of London is working with partners to promote investment in the area's built, social, and natural environment.
- Thamesmead and Abbey Wood has been identified as being the potential for 40,000 homes and 4,000 jobs, and with transport improvements this could be even more.

WHAT WILL THIS FRAMEWORK FACILITATE?

- Improved public transport connections.
- Up to 10,000 new and affordable homes for Londoners. This is dependent on significant public transport improvements.
- New development around rail and DLR stations.
- New development around rail and DLR stations.
- Before use of industrial land and more local jobs.
- Before use of industrial land and more local jobs.

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

3 A 20 YEAR VISION

A 20 YEAR VISION

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

How do you feel about the 20 year vision for your area? Which principles are most important to you?

GOOD GROWTH PRINCIPLES IN THAMESMEAD & ABBEY WOOD

- BUILDING STRONG AND INCLUSIVE COMMUNITIES**
 - Ensuring local people have a say in the future of their area.
 - Ensuring developments are planned to be accessible and inclusive for all.
 - Enhancing the existing local character.
- MAKING THE BEST USE OF LAND**
 - New and enhanced transport connections could support a series of vibrant mixed-use centres.
 - Conserving social infrastructure close to community hubs, town and neighbourhood centres.
- CREATING A HEALTHY CITY**
 - Encourage walking and cycling.
 - Create a vibrant mix of uses that link to destinations (e.g. the green space, public transport and other local destinations).
- DELIVERING NEW AND AFFORDABLE HOMES**
 - Provide a diverse mix of 10,000 new and affordable homes for Londoners.
 - These homes should be supported by transport and social infrastructure.
- GROWING A GOOD ECONOMY**
 - Create more jobs and vibrant, thriving industrial spaces.
 - Consider potential facilities for further education and training.
 - Invest in existing services, high streets, and employment centres.
 - Improve access to natural and historic assets.
- INCREASING EFFICIENCY AND RESILIENCE**
 - Protect and improve the quality of green and blue spaces, as well as enhancing biodiversity.
 - Contribute towards London becoming a greener city.
- OVERCOMING DEVERANCE**
 - Improve the area's reputation for Thamesmead and Abbey Wood.
 - Improve walking and cycling along and across major road corridors.
- CREATING USEFUL AND ATTRACTIVE NEIGHBOURHOOD CENTRES**
 - Improve the area's reputation for Thamesmead and Abbey Wood.
 - Improve walking and cycling along and across major road corridors.
- MAKING BEST USE OF INDUSTRIAL LAND**
 - Improve the area's reputation for Thamesmead and Abbey Wood.
 - Improve walking and cycling along and across major road corridors.

4 POTENTIAL TRANSPORT OPTIONS

POTENTIAL PUBLIC TRANSPORT OPTIONS

Work to date shows that a bus transit corridor connecting Thamesmead to and from Thamesmead and Abbey Wood would be a strong option for the area. This corridor would be a strong option for the area. This corridor would be a strong option for the area.

INTERMEDIATE GROWTH: BUS TRANSIT

HIGHER GROWTH: DLR + BUS TRANSIT

KEY FEATURES & BENEFITS

- Potential for up to 10,000 new homes.
- New public transport corridor.
- New public transport corridor.
- New public transport corridor.
- New public transport corridor.

NEXT STEPS

Delivering an major new public transport scheme in the area will depend on the scale of growth to make a strong case for the area. This corridor would be a strong option for the area. This corridor would be a strong option for the area.

Do these options reflect your aspirations for the area?

5 HOW WE SEE THE FUTURE...

DO YOU AGREE?

THAMESMEAD TOWN CENTRE AND WATERFRONT

- A vibrant waterfront town centre with a mix of uses.
- A vibrant waterfront town centre with a mix of uses.
- A vibrant waterfront town centre with a mix of uses.

WEST THAMESMEAD AND PLUMSTEAD

- A vibrant waterfront town centre with a mix of uses.
- A vibrant waterfront town centre with a mix of uses.
- A vibrant waterfront town centre with a mix of uses.

THE MOORINGS AND NORTH THAMESMEAD

- A vibrant waterfront town centre with a mix of uses.
- A vibrant waterfront town centre with a mix of uses.
- A vibrant waterfront town centre with a mix of uses.

SOUTH THAMESMEAD AND ABBEY WOOD

- A vibrant waterfront town centre with a mix of uses.
- A vibrant waterfront town centre with a mix of uses.
- A vibrant waterfront town centre with a mix of uses.

EAST THAMESMEAD AND VERIDON PARK

- A vibrant waterfront town centre with a mix of uses.
- A vibrant waterfront town centre with a mix of uses.
- A vibrant waterfront town centre with a mix of uses.

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

6 EXISTING TRANSPORT

EXISTING CONDITION

FOUR RAIL CONNECTIVITY

- Public transport connectivity is poor.
- Public transport connectivity is poor.
- Public transport connectivity is poor.

BARRIERS TO MORE WALKING AND CYCLING

- Public transport connectivity is poor.
- Public transport connectivity is poor.
- Public transport connectivity is poor.

LIMITS TO BUS NETWORK COVERAGE

- Public transport connectivity is poor.
- Public transport connectivity is poor.
- Public transport connectivity is poor.

DO YOU AGREE WITH OUR OBJECTIVES?

- Public transport connectivity is poor.
- Public transport connectivity is poor.
- Public transport connectivity is poor.

7 CENTRES AND EMPLOYMENT

EXISTING CONDITION

- 1 THAMESTAIT TOWN CENTRE**
 - The proposed Thamestait Town Centre is a local centre serving the wider Opportunity Area.
 - A local food and drink centre is located in the town centre.
 - The town centre is located in the town centre.
 - A local food and drink centre is located in the town centre.
- 2 ABBEY WOOD LOCAL CENTRE**
 - Abbey Wood is a local centre serving the wider Opportunity Area.
 - A local food and drink centre is located in the town centre.
 - The town centre is located in the town centre.
 - A local food and drink centre is located in the town centre.
- 3 PLUMTREE AND HIGH STREET**
 - This is a local centre serving the wider Opportunity Area.
 - The town centre is located in the town centre.
 - A local food and drink centre is located in the town centre.
 - The town centre is located in the town centre.
- 4 WELL-USED AND COMPETITIVELY PRICED INDUSTRIAL SPACES**
 - The town centre is located in the town centre.
 - A local food and drink centre is located in the town centre.
 - The town centre is located in the town centre.
 - A local food and drink centre is located in the town centre.

OBJECTIVES FOR THAMESTAIT TOWN CENTRE AND ABBEY WOOD

- Create a mix of well-used, vibrant and distinctive local and town centres, including:
- Support and encourage local businesses and enterprises to flourish.
- Support and encourage local businesses and enterprises to flourish.

Do you agree with our objectives? Do you have anything to add?

8 ENVIRONMENT AND HERITAGE

EXISTING CONDITION

- 1 ABUNDANT, BUT UNDER-USED OPEN SPACES AND WATERWAYS**
 - The area has a high amount of open spaces and waterways.
 - Many of these spaces are under-used, under-maintained, or poorly maintained.
 - There is a need to improve the quality and accessibility of these spaces.
- 2 UNIQUE HERITAGE ASSETS**
 - The area has a rich heritage of buildings and structures.
 - Many of these buildings are under-used, under-maintained, or poorly maintained.
 - There is a need to improve the quality and accessibility of these buildings.
- 3 THE RIVER**
 - The River is a key feature of the area.
 - It provides a natural barrier and a source of inspiration.
 - There is a need to improve the quality and accessibility of the River.
- 4 FLOOD RISK**
 - The area is at risk of flooding.
 - There is a need to improve the quality and accessibility of the area.
 - There is a need to improve the quality and accessibility of the area.
- 5 CONTAMINATED LAND**
 - There is a need to improve the quality and accessibility of the area.
 - There is a need to improve the quality and accessibility of the area.
 - There is a need to improve the quality and accessibility of the area.

OBJECTIVES FOR THAMESTAIT TOWN CENTRE AND ABBEY WOOD

- Improve the quality and accessibility of open spaces and waterways.
- Improve the quality and accessibility of open spaces and waterways.
- Improve the quality and accessibility of open spaces and waterways.
- Improve the quality and accessibility of open spaces and waterways.
- Improve the quality and accessibility of open spaces and waterways.

Do you agree with our objectives? Do you have anything to add?

9 COMMUNITY AND SOCIAL USES

EXISTING CONDITION

- 1 SPORTS AND LEISURE FACILITIES**
 - There are a number of sports and leisure facilities in the area.
 - There is a need to improve the quality and accessibility of these facilities.
 - There is a need to improve the quality and accessibility of these facilities.
- 2 LIBRARIES**
 - There are a number of libraries in the area.
 - There is a need to improve the quality and accessibility of these libraries.
 - There is a need to improve the quality and accessibility of these libraries.
- 3 PRIMARY AND SECONDARY SCHOOLS**
 - There are a number of primary and secondary schools in the area.
 - There is a need to improve the quality and accessibility of these schools.
 - There is a need to improve the quality and accessibility of these schools.
- 4 HEALTHCARE FACILITIES**
 - There are a number of healthcare facilities in the area.
 - There is a need to improve the quality and accessibility of these facilities.
 - There is a need to improve the quality and accessibility of these facilities.
- 5 COMMUNITY CENTRES**
 - There are a number of community centres in the area.
 - There is a need to improve the quality and accessibility of these centres.
 - There is a need to improve the quality and accessibility of these centres.
- 6 ISOLATED COMMUNITIES IN THE NORTH**
 - There are a number of isolated communities in the north of the area.
 - There is a need to improve the quality and accessibility of these communities.
 - There is a need to improve the quality and accessibility of these communities.

OBJECTIVES FOR THAMESTAIT TOWN CENTRE AND ABBEY WOOD

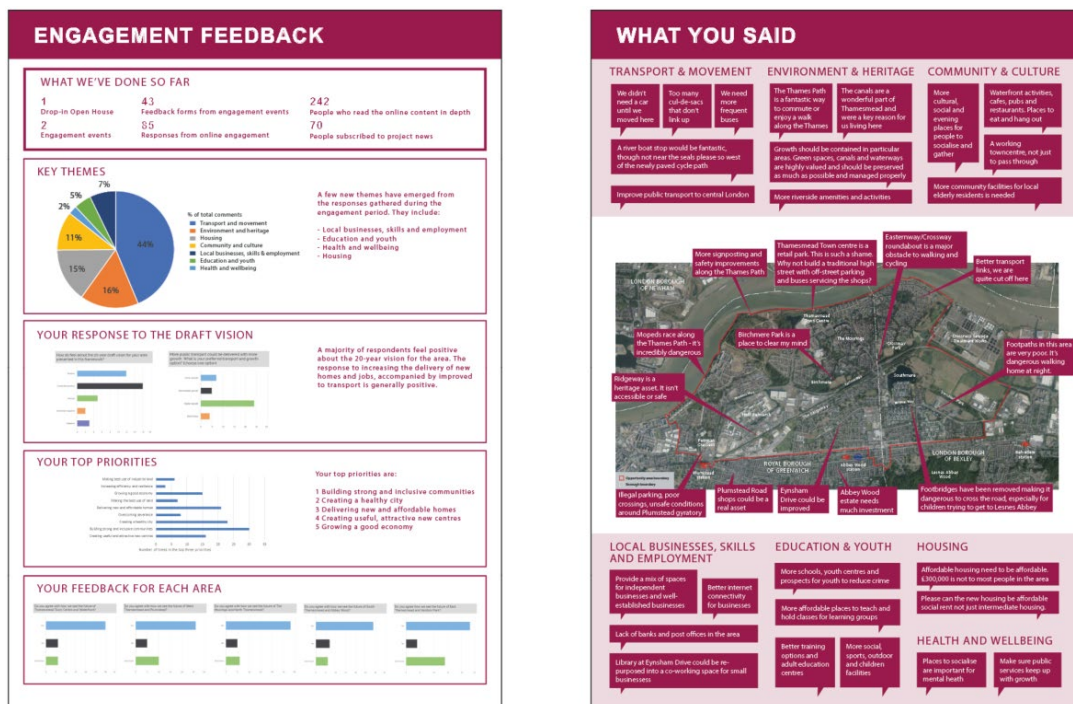
- Support existing community facilities and promote new ones.
- Support existing community facilities and promote new ones.
- Support existing community facilities and promote new ones.
- Support existing community facilities and promote new ones.
- Support existing community facilities and promote new ones.

Do you agree with our objectives? Do you have anything to add?

I WANT

IN MY NEIGHBOURHOOD

18. Engagement feedback boards



19. Community Workshop

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

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

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

20. Summary of Community Workshop

19.1 Community and Culture

Opportunities/assets:

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

Challenges:

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

Proposals:

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

19.2 Environment and Heritage

Opportunities/assets:

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

Challenges:

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

Proposals:

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

19.3 Movement, Health and Well-being

Opportunities/assets:

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

Challenges:

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

Proposals:

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

19.4 Education and Youth

Opportunities/assets:

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

Challenges:

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

Proposals:

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

19.5 Local Businesses, Skills and Employment

Opportunities/assets:

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

Challenges:

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

Proposals:

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

21. Public consultation stakeholder responses

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Environment Agency	13 3	VISION FOR THAMESMEAD TOWN CENTRE & WATERFRONT This place seems to be key in delivering the improved flood defences to protect the new place and the existing communities to the south. We support the opening up of the riverside and improved access but this must be done in a way which provides the increased flood defence heights required. It would be sensible to plan these into the streetscape now and knit them into the placemaking for the new town centre and waterfront.	None
Environment Agency	13 4	Vision for north Thamesmead and the Moorings- We strongly support the link to green infrastructure (GI) and planning with sustainable water management in mind and being key to placemaking here.	None
Environment Agency	13 5	If land contamination is an issue for water quality (see Fig 4.12) in the west of Thamesmead and Abbey Wood, what are the plans to tackle this? Will this be addressed in the recommended 'Waste management and circular economy study? How will the evidence studies' recommendations be incorporated in the OAPF in future? Suggest commitment to review, and the review process be made clear.	None
Environment Agency	13 6	We would want to be represented appropriately on the officer level forums due to the complex water environment within the Opportunity Area (OA).	None
Environment Agency	13 7	We are pleased that Riverside Strategy and waste and circular economy are recommended. There is also an opportunity to take a strategic approach to remediation of contaminated land and could be included as a future study. This could help to realise environmental net-gain but also reduce emissions by remediating land efficiently.	Addition

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

Gerald Eve on behalf of Peabody and Berkeley Homes East Thames	140	Notwithstanding the support generally for the consultation draft OAPF, our clients specifically support the following elements of the draft OAPF: - The identification that the SIL area closest to Plumstead station is a prominent location with potential to improve the arrival experience into the wider SIL and the opportunities to consolidate industrial land to support the release of land for non-industrial uses at this location; - The anticipated vision for West Thamesmead and Plumstead; - The North Plumstead transit hub proposals; - The Pettman Crescent gyratory and highway works to improve the transition between Plumstead station, existing residential areas and new sites; - Nathan Way upgrades; and Improvements to Ridgeway accesses.	None
Gerald Eve on behalf of Peabody and Berkeley Homes East Thames	141	Our clients support the recognition that the Plumstead - West Thamesmead site is an 'Area of Change' as identified within several of the images within the draft OAPF. However, there is some inconsistency within the document in this regard, with certain images failing to identify the site as an 'Area of Change' or 'Potential Area of Change'. Now that the planning application for the Plumstead - West Thamesmead site has been submitted, it is considered that all references within the document should identify the site as an 'Area of Change' or 'Potential Area of Change'.	Amended

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

L&Q	206	Veridion Park SIL Option 1 - Whilst L&Q understand the need to protect and maintain industrial uses, this option does not allow for the release of any land for housing. L&Q would suggest that if this option is pursued, the additional industrial land is used to re-locate businesses that are displaced from West Thamesmead SIL as a result of land release for residential uses.	None
L&Q	207	Veridion Park SIL Option 2- L&Q welcome the principle of releasing industrial land for housing however would anticipate that this option requires long term phasing and could be challenging given multiple land ownerships. Further information would be welcomed on this option.	None
L&Q	208	L&Q support the objective to plan for good quality social infrastructure people can easily access to support their day-to-day needs. L&Q agree that it is especially important to invest in existing communities as well as new communities, and to try and create relationships between the two. L&Q support the GLA's aims for a range of facilities across the OA which will enable and support active, vibrant and engaged communities. We understand the need to protect existing community facilities where there is a clear local demand.	None
L&Q	209	We support the key infrastructure priorities set out in the OAPF which are education, health, community centres, park and leisure. We agree that these facilities should be located in town centres and close to transport connections to ensure they are accessible. We would welcome further information on how social and community infrastructure will be funded.	Acknowledged
L&Q	210	L&Q support the GLA's objective to improve the quality, functionality and accessibility of existing green spaces. We agree that the OA's natural assets- green spaces, water bodies and Sites of Importance for Nature Conservation (SINC)- should be protected and enhanced as part of the regeneration of the area.	None

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

LB Bexley	26 4	• decants from current homes Regeneration schemes require considerable resources to undertake and often do not provide a significant additional supply of housing by unit count and put pressure on existing affordable housing allocations to accommodate decant requirements. To reduce the impact of such schemes and ensure there are sufficient resources to deliver them, partnership working is required to develop a managed and fully funded programme of estate renewal, phased in such a way as to enable a practicable decant strategy which does not reduce the overall supply of affordable housing and increases it wherever possible. The use of outline applications incorporating a large site or more than one site can provide an opportunity to explore the phasing of development so as to mitigate the some of the impacts of decanting.. The 'right of return', as required by the Mayor, also needs to be considered as part of the decant strategy.	Addition
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LB Bexley	26 5	• the importance of phasing and demolition in terms of housing delivery numbers and any potential loss of New Homes bonus Consider the implications of the proposed decant strategy and the phasing of demolition and rebuild to ensure impacts on the overall affordable stock and loss of any New Homes Bonus, is minimised. This should ensure that new housing provided through estate renewal will re-provide the existing level of affordable housing with equivalent habitable floorspace, or if potentially increase provision, on site or as part of a programme approach and with a dwelling mix of homes that meets current and projected housing need. To assess the maximum level of affordable housing that a scheme can deliver, applications should follow the Viability Tested Route. Adhering to this guidance would satisfy draft London Plan policy H8 on the loss of existing housing and estate redevelopment, particularly Part D which prohibits demolition of affordable housing as part of estate regeneration where it is not replaced by an equivalent amount of affordable housing floorspace.	Addition
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LB Bexley	26 6	• additional requirements for social and physical infrastructure including school place planning If supporting social and physical infrastructure investment is not secured, the borough's capacity for sustainable growth will decline significantly. It is expected that major housing schemes will need to safeguard space for the transport infrastructure of the future. Within Thamesmead, schemes close to the North Kent Line will need to be designed to ensure they do not preclude future four-tracking, and schemes along Yarnton Way will need to provide sufficient space to accommodate the proposed BRT. Applications for schemes which fail to safeguard space identified as potentially required for future transport infrastructure should be refused. It will also be necessary to plan for additional social and community infrastructure such as school place and obtain resources to do this - for example, Peabody are contributing the cost of a 1 x FE (First Entry) in the Housing Zone.	Addition
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LB Bexley	26 7	• potential for meanwhile use pending redevelopment Review the benefits/disbenefits of any ‘meanwhile’ use on sites pending redevelopment guided by planning policy as appropriate. The provision of a meanwhile use is a material consideration in the determination of planning applications; schemes that would provide temporary public realm, meanwhile use for housing, or pop-up spaces for cultural or creative activities are considered to provide a public benefit in line with a number of draft London Plan policies (D8 part M, H3 and HC5 part 4). Some sites in Thamesmead have been cleared and might represent opportunities to utilise the space. There will always be a requirement for some element of temporary accommodation (TA) while more permanent arrangements are secured. In this context schemes should consider the potential to supply good quality TA to meet our requirements. This could also include the use of short-term lettings in regeneration scheme properties that are empty awaiting redevelopment. The use of modular housing on ‘meanwhile sites’ should also be considered; sites awaiting redevelopment, but only in locations offering quality, accessible local accommodation for families	Addition
LB Bexley	26 8	• resident engagement and securing buy-in for regeneration In planning for growth and regeneration, residents should stay close to friends and family maintaining informal support networks as their circumstances change. A mix of accommodation types will ensure the local housing stock provides choice in terms of size and tenure, creating options for existing residents to stay in the area if they wish and for new residents to join local communities that are strong, vibrant, stable and self-sufficient. Effective engagement with the existing community will be essential. The impact on community cohesion and opportunities to create new welcoming communities should be considered through appropriate appraisals.	Addition

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Montagu Evans on behalf of Aberdeen Standard Investments	317	The OAPF recognises that the lack of river crossing in this area is a barrier to the highest level of growth in Thamesmead and Abbey Wood being achieved. The growth options for the OA are detailed on pages 12 and 13 with further discussion in Section 3 and the accompanying OAPF Transport Strategy. The Higher Growth Option is facilitated by a 'new crossriver DLR connection (mayoral priority) and new partially segregated bus transit corridor' (pg. 13). This Higher Growth Option shows how growth in Thamesmead and Abbey Wood can be enhanced through a cross-river DLR connection between Thamesmead and Beckton We strongly support the location of the proposed cross-river DLR linking the two growth areas (as shown on figure 2.1) and we support the recognition that such a crossing has potential to unlock greater growth in the OA and promote connectivity with Beckton Riverside OA.	None
Montagu Evans on behalf of Aberdeen Standard Investments	318	The Growth Options detailed in the OAPF show new homes figures and new jobs figures that can be unlocked by transport infrastructure. The OAPF sets out that the Higher Growth Option could deliver 15,500 new homes and 8,000 new jobs. It is noted that the OAPF Transport Strategy accompanying the OAPF (Appendix E) advises the figures come from transport modelling undertaken by TfL. Appendix D of the OAPF Transport Strategy advises that the size of the model zones does not directly correlate with the Thamesmead and Abbey Wood OA and as a consequence the increase in the number of jobs and homes stem from an area wider than Thamesmead and Abbey Wood OA alone. We would welcome further clarification as to whether these figures include growth potential in Beckton.	Acknowledged

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

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

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

MP Abena Oppong-Asare	330	The first is the affordability of housing. The delivery of 15,500 new and affordable homes is extremely welcome. I am also glad that families are a priority, with 35% of housing being allocated to three to four-bedroom units. However, as you will know, there is a distinction between affordability and genuine affordability, especially in London. I will always push for the largest possible proportion of genuinely affordable housing, so that those on lower incomes receive the largest share in the fruits of the development. In fact, the desire for genuinely affordable housing was something that was noted in the Engagement Feedback Summary on page 21. This is particularly pertinent in the context of rising homelessness. As I raised in the House of Commons on the 29th, the scourge of homelessness should shame us all. We have a moral and political responsibility to satisfy everybody's human right to a safe and secure existence. The OAPF must play a substantial role in this regard.	Acknowledged
MP Abena Oppong-Asare	331	The second, intimately connected issue is the environment. The report shows a detailed and fervent commitment to sustainability and environmental protection, notably through an increase in green spaces, and walking and cycling routes. More broadly, I was pleased to see that the new developments will contribute towards London becoming zero carbon by 2050. Firstly, however, you will be aware that the Labour Party wants to aim for net-zero emissions by 2030. This is a target I would strongly encourage the OAPF to meet. Secondly, the weight of the environmental pledge would be significantly increased if there was an indication of how the housing itself will be energy-efficient.	Acknowledged

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

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

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

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

Port of London Authority	35 1	Transport: Welcome reference to the proposed DLR extension from the London Borough of Newham into Thamesmead and Abbey Wood as part of the high growth scenario for the OAPF. The PLA must be involved in discussions on such a crossing at an early stage, particularly on the type of crossing (bridge/tunnel) proposed. The OAPF also includes some references to the potential London Overground extension from Beckton to Thamesmead and Abbey Wood and the proposed Gallions Reach Crossing. Again whilst the PLA is supportive of additional river crossings which will help to improve cross river connectivity for people, these need to be sited and designed to allow the full range of river uses to continue and the PLA must be involved in early discussions for any proposed crossings.	Acknowledged
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Port of London Authority	35 2	Support the references within the consultation documents to the potential for a new pier to the north of Thamesmead Town Centre. This is supported by the Thames Vision, which includes the goal to see double the number of people travelling by river by 2035, with Thamesmead mentioned as a specific location for a potential new pier, Thamesmead is also included as a location for a potential new pier in Transport for London's (TfL) Passenger Pier Strategy (2019). However, it is disappointing that references to the pier within the OAPF documents are inconsistent. Whilst the potential new pier is included within the associated Transport Strategy and on figure 1.3 (key proposals) the pier is not included in the descriptions of the two different growth scenarios as a piece of required infrastructure and is also missing from the vision for Thamesmead Town Centre and Waterfront area and associated figure 2.1 (Opportunities in Thamesmead and Abbey Wood Opportunity Area). The PLA considers that the potential new pier for Thamesmead must be regarded as a key piece of infrastructure for the area, which will help to open up and promote increased activity along the riverside, and will also help to promote modal shift from car use to other sustainable forms of transport including via river, in line the objectives of the OAPF to improve connections and access to opportunities within and outside the OA (Opportunity Area). This is particularly important for the northern parts of the OA which the Transport Strategy identifies in figure 13 (Walk distances to rail stations serving the OA) as an area which has poor access to rail services.	Amended
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Port of London Authority	35 3	Throughout the OAPF documents there are a several references to the following required strategies: . Construction and Freight Strategy in the air quality section of chapter 4; . Construction logistics strategy and Infrastructure Delivery Plan in recommendation two (Ongoing studies) of the OAPF; and . A Freight Area Management Plan, in Appendix B of the Transport Strategy. It must be clarified as to whether these are all separate documents or will form one coordinated strategy. On any future freight strategy for the OAPF the PLA considers that this must include full consideration to the potential use of the River Thames for the transportation of construction materials and freight, either directly to riverside sites or via the supply chain, particularly as there are a number of Safeguarded Wharves located to the east of the OAPF area in Belvedere and Erith. The use of the River Thames for the transportation of construction materials and freight will help to improve air quality and reduce congestion for the wider area, in line with objective 3 of the OAPF, to overcome obstacles and promote safe, accessible routes for active travel.	Acknowledged
Port of London Authority	35 4	In addition, the PLA consider that the OAPF must also acknowledge the role the potential passenger pier could play as part of the delivery of small-scale freight, particularly given its proposed location to the north of Thamesmead Town Centre and within an identified 'site of change' where significant growth is proposed. This is supported by the Mayors Transport Strategy (2018) and associated passenger pier strategy which both promote the potential use of passenger piers for small-scale deliveries and business servicing, to further help promote modal shift from road to more sustainable forms of transport and improve air quality.	Addition

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

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

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

Port of London Authority	36 1	Future Documents: In addition to the proposed freight plan mentioned above, there are several other supporting documents recommended to be developed to support the OAPF, including: . A detailed Development Infrastructure Funding Study (DIFS): to identify the cost of infrastructure required to support development in the OA. This must consider further details both on the proposed passenger pier and potential sports and recreational uses on the River Thames; . A Riverside Strategy which will specifically look at flood risk and drainage, and the incorporation of green infrastructure as part of development plans and local master plans in riverside areas; . Green and Blue Infrastructure Strategy; . Wayfinding Strategy; . Creative and Cultural Strategy; and . Detailed Area Masterplans (particularly of the Thamesmead Waterfront and Town Centre area). The PLA request to be able to view and comment on these documents as they are developed.	Acknowledged
Savills on behalf of Thames Water Planning Policy	36 2	Thames Water are the water and sewerage provider for the area. Crossness Sewage Treatment Works is located immediately to the East of the opportunity area and consideration to its ongoing operation should be taken into account when allocating development adjacent to it, ensuring that future occupiers of new development would not be adversely affect by issues of noise or odour.	Acknowledged

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

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

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

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

Sport England	37 9	I would note that the SFC looks at demand for facilities and does not take into account any existing supply of facilities. The SFC should not be used for strategic gap analysis; this approach is fundamentally flawed as the SFC has no spatial dimension with the figure that is produced representing total demand for the chosen population. It is important to note that the SFC does not take account of facility location compared to demand, capacity and availability of facilities and their opening hours, cross boundary movement of demand, travel networks and topography and attractiveness of facilities. For these reasons total demand figures generated by the SFC should not simply be compared with facilities within the same area; this should be clear within the document.	Acknowledged
Sport England	38 0	As they only provide an indication, results from the SFC really need to be looked at alongside local authority's own local knowledge and findings from an evidence base such as a robust and up-to-date Playing Pitch Strategy and Built Facilities Strategy, where they exist and are up to date. In particular, a PPS will provide important information on playing fields in the area, how they are used and where the deficits are/where improvement works are most needed.	Acknowledged
Sport England	38 1	I understand that Bexley currently has these documents as part of their evidence base and they should be used to inform the OAPF with regard to sporting need as they are up to date and carried out to Sport England guidance.	Acknowledged
Sport England	38 2	As I mentioned at the meeting, Sport England is of the view that Greenwich's evidence base is well out of date given how quickly the landscape can change – we would certainly not support using documents from 2015 to inform this OAPF and will be objecting to their Local Plan later on in the year on this basis if there is no movement towards developing new, up to date documents.	None

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

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

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

Appendix C

Integrated Impact Assessment (IIA) Thamesmead and Abbey Wood OAPF

Integrated Impact Assessment

Thamesmead and Abbey Wood Opportunity Area Planning Framework

September 2020

This document is the final report on the Integrated Impact Assessment (IIA) of the Thamesmead and Abbey Wood Opportunity Area Planning Framework (OAPF).

Integrated Impact Assessment

The IIA process involves an assessment which follows the stages of the Strategic Environmental Assessment (SEA) methodology outlined in the Environmental Assessment of Plans and Programmes Regulations (EAPP) 2004.

SEA guidance informs and structures the IIA components, drawing together the assessment streams to present a common and fully integrated assessment of the OAPF. The assessments forming the IIA of the OAPF are:

- Strategic Environmental Assessment
- Equality Impact Assessment
- Health Impact Assessment; and
- Community Safety Impact Assessment.

Drawing these together within an IIA contributes to a more balanced and inclusive assessment and better informed OAPF. An overview of the individual requirements and methodologies required for each of these assessments is presented below.

To confirm whether the OAPF is likely to have a significant effect on any European Sites a separate Habitats Regulations Assessment (HRA) Screening Report has also been prepared by the GLA to accompany the OAPF. This demonstrates that the OAPF has been prepared in compliance with Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild

Fauna and Flora (the 'Habitats Directive') as implemented by the Conservation of Habitats and Species Regulations 2010 as amended ('the Habitats Regulations'). There is however no direct link between the HRA Screening Report and this IIA Report prepared in respect of the OAPF.

Strategic Environmental Assessment (SEA)

The SEA Directive¹ requires the assessment of the likely significant environmental effects arising from a plan or programme. This requirement has been implemented into domestic legislation in England and Wales through the Environmental Assessment of Plans and Programmes Regulations 2004.

SEA allows the individual objectives and policies of the OAPF to be tested against defined environmental topics, to identify significant effects. The SEA, as part of the IIA, assesses the environmental effects of the strategic options presented in the OAPF and states the reasons for selecting the preferred options. Where significant effects are predicted, the SEA also identifies the measures required to mitigate them and the indicators that will be used to monitor them once the OAPF is adopted.

Equality Impact Assessment (EqIA)

EqIA is a tool to help meet legal duties to ensure that equality issues are fully considered as part of the decision-making process, by systematically identifying and assessing the potential effects arising from

the design and implementation of a proposed plan, policy, or project for people sharing one or more protected characteristic. The Equality Act imposes a duty on public bodies to have due regard to the

need to:

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. This means having particular regard to the need to:
 - Remove or minimise disadvantages suffered by people who share a protected characteristic that are connected to that characteristic.
 - Take steps to meet the needs of people who share a protected characteristic that are different from the needs of people who don't have that characteristic.
 - Encourage people who share a protected characteristic to participate in public life or in any other activity in which their participation is disproportionately low.
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it. This means, having regard in particular to the need to:
 - tackle prejudice; and
 - promote understanding.

¹ The SEA Directive (Directive 2001/42/EC) <http://ec.europa.eu/environment/eia/sea-legalcontext.htm>

The EqIA identifies the likely effects of discriminatory practices, the potential to alter the opportunities of certain groups of people, and/or the effect on relationships between different groups of people which could arise as a result of the proposed new policies. The Equality Act identifies the following as “protected characteristics”:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation.

Although low-income groups are not identified within the ‘protected characteristics’ under the Equality Act (2010), they have been included as part of this assessment because low-income and deprivation typically overlap with other equalities characteristics and form relevant considerations in the context of achieving inclusive growth. Similarly, working patterns have been included within the identified equalities groups, to ensure that adequate consideration is given for residents undertaking shift work, including night shifts. This type of working can disproportionately be undertaken by low-income communities, and forms part of the wider equalities assessment. In line with the statutory requirements of the Equality Act (2010), the IIA has given due regard to the need to remove or minimise disadvantages, discourage discriminatory practices and proactively accommodate the needs of equalities groups. This has been carried out by identification of groups, who may be disproportionately impacted as a result of policy implementation, along with recommending how policies could be strengthened to promote equitable opportunities. The key guide questions serve to assess the multiple dimensions of inequality, disadvantage and discrimination, and ensure policies are promoting inclusive, accessible and equitable opportunities across higher risk groups.

EqIA is two-stage process:

Stage 1, screening: the impacts of the proposed new policies are assessed against a defined set of protected characteristics. If no negative effects are identified during screening, no further assessment is required. If there are effect that cannot easily be mitigated, a full EqIA will be undertaken.

Stage 2, full EqIA: an in-depth assessment of the impacts of any policies which cannot easily be mitigated, the recommendation of mitigation measures, definition of monitoring and evaluation measures and public consultation.

Health Impact Assessment (HIA)

There is currently no statutory guidance for how to undertake an HIA. The scope, approach and methodology are driven by a range of factors including non-statutory guidance and best practice, stakeholder interests, and site or project or plan-specific issues. The overarching aim of an HIA is to ensure that plans and policies minimise negative impacts and maximise positive health impacts. The approach to the health element of the IIA has been based on the London Healthy Urban Development Unit (HUDU) (footnote) Rapid Health Impact Assessment Matrix.

This sets out a framework for evaluating projects, plans and policies under 11 broad topic or determinant headings. A completed HUDU Rapid Health Assessment is attached at Appendix B

Community Safety Impact Assessment (CSIA)

The Crime and Disorder Act 1998 (as amended) and Police and Justice Act 2006 place a duty on the Mayor to consider community safety.

During the scoping stage, crime and disorder aspects associated with the London Plan were identified, including:

- baseline crime and nuisance statistics, against which impacts associated with options and policies can be assessed;
- the types of crime associated with the overarching strategies including environment, infrastructure, housing, and transport in London; and
- developing the crime and disorder aspects of the IIA objectives.

The Thamesmead and Abbey Wood Opportunity Area Planning Framework

The OAPF is being prepared as a long-term planning framework to support and guide emerging development in the Thamesmead and Abbey Wood Opportunity Area. It responds directly to the requirements in Policy 2.13 – Opportunity Areas and Intensification Areas of the current London Plan (2016) and Policy SD1 of the draft London Plan (2019). The new draft London Plan states that:

Housing Zone status and investment by Peabody in estate renewal in the area will improve the quality of the environment and bring new housing opportunities. To deliver wider regeneration benefits to Thamesmead, other interventions to support the growth of the Opportunity Area are needed. These include: the redevelopment and intensification of employment sites to enable a range of new activities and workspaces to be created in parallel with new housing development; a review of open space provision in the area to create better quality, publicly accessible open spaces; the creation of a new local centre around Abbey Wood station, the revitalisation of Thamesmead town centre and Plumstead High Street; and improved local transit connections. The Planning Framework should ensure that there is no net loss of industrial floorspace capacity.

Alongside the opening of the Elizabeth Line, major investments in transport infrastructure such as the proposed DLR extension from Gallions Reach are also needed to support high density development and provide access to areas of significant employment growth, such as the Royal Docks for existing and new residents of Thamesmead. To accommodate the expected growth in the area, utility infrastructure -in particular water and electricity supply, broadband and a local heat network -should be upgraded and/or planned for accordingly. In view of the low-lying nature of parts of the area, particular attention should also be given to flood risk management.

OAPF preparation process

The OAPF is being prepared by the Mayor of London (the GLA), Transport for London, the Royal Borough of Greenwich and the London Borough of Bexley. During the summer of 2019 the GLA undertook early engagement with local communities and key stakeholders to understand key priorities and challenges in the area. This work is summarised in the adoption draft OAPF and has been used to inform proposals. The adoption draft OAPF was subject to a 12-week consultation. A draft IIA scoping report was submitted to the SEA consultation bodies in October 2019 and is available alongside this report.

Form and content of the OAPF

The OAPF comprises the following linked sections:

Part 1 Introduction (what is an OAPF, evidence, engagement, context, analysis)

The introduction chapter of the OAPF describes the scope of this planning framework and its relation to other planning documents such as the London Plan and other national and local level policies. It provides context on London's growing population and explains what this means for the Thamesmead and Abbey Wood Opportunity Area.

Engagement with local communities has played an important role in compiling this consultation draft OAPF. Details of the public engagement programme and the feedback received can be found in Part 1.3 Engagement and Consultation. Key findings from the baseline analysis and evidence-base can be found in Part 1.5.

Part 2 Vision, Principles and Objectives

The OAPF sets out a long-term vision and objectives for the Opportunity Area (OA). The vision and objectives for Thamesmead and Abbey Wood have been informed by earlier engagement with stakeholders and feedback from local communities. They have also been guided by the following six Good Growth objectives that are set out in the draft London Plan.

Part 3 Unlocking Good Growth with Transport

This chapter sets out two transport and growth scenarios that have been explored through the OAPF. These scenarios consider change over the next 20 years: intermediate growth with a bus transit, and higher growth with bus transit and an extension to the Docklands Light Railway (DLR).

Part 4 Spatial Strategies

This chapter reviews the social, community and environmental infrastructure requirements that are needed to support growth in the OAPF.

Part 5 Places

Ideas for the future of individual places within the Thamesmead and Abbey Wood Opportunity Area are contained in Part 5 Places. These visions for the future are set within a high-level Urban Design Framework, and build on our baseline analysis, public engagement and growth scenarios to show how strategic opportunities for new homes, jobs and infrastructure could combine at a local scale to embody Good Growth, and create places which people choose to live and work in.

Part 6 Delivery

Part 6 Delivery sets out how the strategic vision for the Thamesmead and Abbey Wood Opportunity Area contained within this OAPF could be delivered. This would involve a variety of projects and initiatives in the short, medium and long term.

Relationship with other relevant plans and programmes

The IIA scoping report listed the relevant plans and programmes. This is attached as appendix a to this IIA report. The review of relevant plans, programmes and policies has identified a number of key messages that need to be taken into consideration when developing the OAPF and IIA objectives:

- **Demography** – both boroughs’ populations are significantly increasing and their composition is changing, becoming more diverse with a significant increase in the proportion of older people.
- **Equality and Social Integration** – there is a need to reduce inequalities and promotion inclusion and participation opportunities for those groups with protected characteristics to promote social integration and cohesion.
- **Health and Health Inequalities** – there is a need to improve the overall health and healthy life expectancy of the Opportunity Area’s population and reduce inequalities in the health of the population. This includes promotion of active travel and the Mayor’s Healthy Streets approach.
- **Crime, Safety and Security** – the design of the built environment and mix of activities can significantly impact on fear and actual crime.
- **Housing** – there is a need to significantly increase the delivery of housing, including a mix of size, tenures, affordable products and choice, and address the complexity of issues around barriers to housing delivery.
- **Sustainable Land Use** – there is a need to ensure the most efficient use of land which adheres to the principles of sustainable development and considers the area’s relationship to the wider city region.
- **Connectivity** – Integration of land use and transport planning is critical to ensure growth is sustainable and optimises connectivity throughout the area and its relationship with London as a whole. The green network also provides connections which have many health and environmental benefits.
- **Accessibility** – it is important for people to be able to easily and independently access jobs, housing, public spaces, education, public transport, healthcare and amenities; and be able to easily and independently navigate their way through the built environment.
- **Economic Competitiveness** – it is important to maintain London’s position as a leading global city and to support a strong, diverse and resilient economic structure providing opportunities for all.
- **Employment** – employment growth in different sectors should ensure a diverse economy providing opportunities for all.
- **Education and Skills** – it is important to ensure adequate access to education as the local population expands quickly over time, so that locals have the right skills to access a diverse range of jobs
- **Culture** – it is important to make the most of the economic and social benefits of culture.
- **Air quality** – there is an urgent need to meet mandatory standards for air quality and meet the Mayor’s air quality priorities through the promotion of air quality neutral and positive developments.
- **Climate Change** – there is a need to design buildings and spaces to adapt and mitigate the effects of climate change, including overheating, flooding, droughts and more extreme weather events. The Mayor has committed to reduce London’s CO2 emissions by 60 per cent by 2025 and achieve zero net carbon emissions by 2050.
- **Energy Use and Supply** – there is a widening supply and demand gap. There is a need to make greater efficiencies and use of renewable energy sources, and take into account the importance of the low carbon economy.
- **Water resources and quality** – there is an identified need to focus on the protection, improvement and sustainable use of the water environment.
- **Flood Risk** – there is a need to ensure that development is designed not to increase flood risk, to encourage the use of Sustainable Urban Drainage Systems (SUDS) and review all elements of policy to ensure that flood risk is integrated with the management of the rest of London’s environment.
- **Natural Environment and Natural Capital** – opportunities should be facilitated to integrate biodiversity and the network of green spaces to provide a range of sustainability benefits, i.e. healthy living, improving air and water quality, cooling the urban environment, enhancing biodiversity and improving ecological resilience. This could include both enhancing existing habitats and providing new areas for biodiversity as opportunities arise.
- **Townscape, Landscape and Public Realm** – it is important to create and maintain a safe and attractive, well-designed public realm which encourages people to walk and cycle, promoting a sense of place and reducing the need to travel.
- **Historic Environment** – the social, cultural and economic benefits of the historic environment need to be taken into account, along with the importance of conserving and enhancing designated and non-designated heritage assets and their settings.
- **Geology and Soils** – there is a need to focus on prevention and remediation of environmental damage, including land contamination. There is also a need to increase efforts to reduce soil degradation and remediate contaminated sites.
- **Materials and Waste** – the principles of the circular economy should be applied when aiming for waste reduction, re-use, re-manufacturing and recycling in all construction and operational practices. A review of London’s waste management capacity should be projected alongside expected waste arisings to inform infrastructure gaps and need.
- **Noise and Vibration** – there is a need to minimise noise and vibration levels and the number of people exposed to high levels of noise from development, activities and use.

Baseline Information

Scope and purpose of the baseline

The Environment Assessment of Plans and Programmes Regulations 2004 require a discussion of the ‘...relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme’ (Annex 1 (b)). For IIA, the baseline and identification of key issues must also consider social and economic aspects in addition to the environmental issues specified in the SEA Directive.

Key issues from the baseline review are set out below. The full baseline, contained in the Scoping Report, is attached as Annex A. The Scoping Report was subject to consultation with the statutory consultation bodies in November/December 2019. Responses were received from the Environment Agency, Historic England, Port of London Authority, Sport England, Natural England, and Highways England. The Report has been updated to take account of their comments.

Demographic Change

GLA ward-level projections for the wards of Thamesmead Moorings, Thamesmead East, Glyndon, Plumstead and Abbey Wood, illustrate that the population within the OA will increase from 87,592 in 2017 to 105,923 by 2041. This represents a 21% increase over the plan period. Current data suggests the OA has a higher proportion of 0-15 year olds than the London average (26.7% vs 20.55) and lower than average proportion of over 65's (6.8% vs 11.8%). By 2041 there is estimated to be a significant increase in the cohort aged over 40 and those between the ages of 5 and 20. The 90+ population is expected to increase significantly.

Social integration and inclusion

The OA has a higher proportion of BAME residents than the London average, as well as a slightly higher proportion of residents born outside the UK. The area has a lower proportion than the London average of households where no one speaks English as a first language. It has a significantly higher proportion of Black or Black British residents (42%) than the London average (13%), the majority identifying as Black African from Nigeria or Ghana.

A higher proportion of children than the London average live in poverty in this area, from 25% in Plumstead to 31.4% in Abbey Wood. The London average is 23.7%. 10.7% of households with dependent children have no adults in employment, higher than the Bexley (4.5%), Greenwich (7.1%) and London (5.7%) averages.

Health and health inequalities

The average life expectancy for residents within the OA is lower than the London average. There are a higher proportion of children who suffer from obesity, than the London average.

There are two air quality focus areas to the west and south west of the OA. These locations not only exceed the EU annual mean limit for nitrogen dioxide, but are also locations with high human exposure. According to the London Atmospheric Emissions Inventory (LAEI) the greatest contributors to NOx emissions in Bexley come from industrial processes, and Bexley experienced a significant increase in NOx between 2010 and 2016. For Greenwich, the LAEI states that the greatest source of NOx emissions were from road transport in 2016, and that overall NOx emissions have declined since 2010.

Crime, Safety and security

For the period Aug 2017 to July 2019 the crime rate in the OA was lower than the London average. Violence against the person is the most commonly reported crime, and a relatively high proportion of crimes are recorded under theft and vehicle offences.

Housing

In Bexley, according to the 2014 SHMA, net annual affordable housing need is 837 units per annum. One third is estimated to be for intermediate tenure housing. The largest demand was for 2-bed units, followed by 3-beds. Bexley had the second lowest rate of overcrowding, the second lowest number of households in temporary accommodation, and second lowest number of concealed households in South East London

In Greenwich, the 2014 SHMA identified a need for 835 units per annum, 43% for intermediate tenure housing. The largest demand in the social-rented sector was for 3-bed units, and in the intermediate sector for 2-beds. Greenwich had the second highest rate of overcrowding and highest number of concealed families in South East London.

Sustainable land use

The OA contains significant areas of designated Strategic Industrial Land. These are given strategic protection as they are critical to the effective functioning of London's economy. Both Bexley and Greenwich are defined as 'retain' boroughs in the London Plan (Intend to Publish version) and should seek to intensify industrial floorspace following the general principle of no net loss across designated SIL and LSIS.

Connectivity and accessibility

The majority of the OA has a Public Transport Accessibility Level (PTAL) rating of 1a to 2, the lowest categories. Accessibility improves closer to Abbey Wood and Plumstead stations. 43.5% of households do not own a car. 56.4% of individuals aged 16-74 in employment use public transport to get to work. This is higher than the London average of 47.9%. The proportion of residents within the OA who travel to work by bicycle is 1.2%, lower than the London average of 4%.

Economic competitiveness

Business data demonstrates that start-up businesses in Bexley and Greenwich generally fare better than London as a whole.

Thamesmead town centre is a vital and viable centre, but does not function as a typical traditional district centre as its offer and character is more akin to an out-of-centre shopping park. The West Thamesmead Strategic Industrial Location (SIL) comprises small to medium sized industrial units which are older stock, and larger, newer units. The SIL has good strategic road links to central London and Kent. At present Thamesmead SIL operates at a lower rental level than its competitors to the East of central London, including Essex and Kent Thames Gateway.

This may provide a competitive advantage in terms of attracting occupiers at present but signals that there may be issues which need to be addressed in order to improve the conditions for industry to thrive in the area.

Employment

56.9% (or 18,482 residents) of the working population (16 to 74) within the Opportunity Area are in employment and 8% (or 2,595 residents) are unemployed. This is lower than the borough averages for Bexley and Greenwich. The highest proportion of residents, living in the Thamesmead East and Thamesmead Moorings, are employed in the Professional sector (16.6% for Thamesmead East and 16.9% in Thamesmead Moorings). This is followed by the Elementary Occupations, Personal Services and Administrative and secretarial occupations. The lowest occupation sector is Managers and Senior Officials. Out-of-work benefit claimant rates for the local area are slightly above London averages. Thamesmead East and Thamesmead Moorings rates are 3.7% and 3.1% respectively. This compares to the London claimant average rate of 2.9% (August 2019).

Education and Skills

Greenwich school place planning for the area noted that the area experienced one of the fastest rates of growth of the population of primary school age children in the period after 2009 but is expected to fall by over 7% by 2023. The demand for school places in this part of the borough declined markedly between 2017/18 and 2018/19 and is anticipated to reduce further to 2021/22, after which it is expected to revert to an upward trend over the medium term.

Bexley noted that Thamesmead was the first area of the borough to be affected by rising birth rates and increased migration. The number of Reception places was increased by 65 in 2010/11 at Jubilee and Castilion Primary Schools (both were expanded permanently in 2011/12) and the Business Academy Bexley, and by a further 70 in 2011/12 by the opening of Willow Bank Primary School, a new Academy on the site of a closed school and a small expansion at Lessness Heath Primary School.

Culture

Peabody produced a Thamesmead Culture Plan in 2017. This was founded on extensive public engagement, and sets out three key principles to support and strengthen the existing cultural offer in Thamesmead:

- Represent and celebrate the diverse communities of Thamesmead
- Make a direct impact here and now
- Create a better Thamesmead in the future

Cultural destinations in Thamesmead include:

- Crossness Nature Reserve
- Crossness Pumping Station
- Lakeside Centre with Bow Arts
- Lesnes Abbey
- The Link Thamesmead
- Sporting Club Thamesmead
- Thamesmead Library
- Thamesmere Library Thamesmead Town Centre
- Theatre Street Performing Arts
- Tump 53

Air Quality

There are two air quality focus areas to the west and south west of the OA. These locations not only exceed the EU annual mean limit for nitrogen dioxide, but are also locations with high human exposure. According to the London Atmospheric Emissions Inventory (LAEI) the greatest contributors to NOx emissions in Bexley come from industrial processes, and Bexley experienced a significant increase in NOx between 2010 and 2016. For Greenwich, the LAEI states that the greatest source of NOx emissions were from road transport in 2016, and that overall NOx emissions have declined since 2010.

Climate Change

Of the London emissions, Bexley accounted for 2.5% of the total emissions and Greenwich 2.6%. The breakdown of emissions by industry is as follows:

Breakdown of CO2 emissions:

	Domestic	Industrial and Commercial	Transport	Total emissions (CO2e) (kt)
Bexley	46%	27%	27%	770
Greenwich	41%	30%	29%	812
London	37%	37%	26%	30,870

Energy Use and supply

London consumed an estimated 131,713 GWh of energy in 2016. This is an 18 per cent reduction on 1990 levels, despite a population increase of 27 per cent. In 2016, 40 per cent of energy was for domestic use, 36 per cent for workplaces (the industrial and commercial sector) and 24

per cent for the transport sector. The table below shows that Bexley and Greenwich had larger domestic markets, given the nature of the development in the two boroughs.

Breakdown of energy use by industry

	Domestic	Industry and commercial	Transport	Total emissions GWH
Bexley	50%	25%	25%	3,382.59
Greenwich	44%	29%	27%	3,548.81
London	40%	35%	25%	131,713

Of the total amount of energy consumed in London in 2016, 61 per cent was gas with 39 per cent electricity. Bexley and Greenwich have a higher gas use than the London average, again, perhaps reflecting their predominant residential character.

Breakdown of energy consumption energy type

	Gas	Electricity	Total (kWh)
Bexley	67%	33%	2,291,721,003
Greenwich	66%	34%	2,402,313,640
London	61%	39%	96,948,958,899

Fuel poverty continues to be an issue in London, with 11.8 per cent, or 397,924 households meeting the Government's 'low income high cost' definition of fuel poverty (compared to 11.1 per cent across England). Bexley and Greenwich are both below the London average with 9.8% and 11.3% household in fuel poverty, respectively.

Water resource and quality

The OA falls within the London Marsh Dykes and Thamesmead Catchment (MD&T) is included in the Thames River Basin Management Plan. The majority of waterbodies in the MD&T catchment are considered Heavily Modified or Artificial; meaning the appearance of the catchment has been significantly altered from its natural state and some of the waterbodies in the catchment are entirely artificial. The Thames river basin district river basin management plan states that the priority management issues to tackle in Marsh Dykes and Thamesmead Catchment are:

- de-silting and physical modifications to the Thamesmead canal and lake system
- water quality improvement and community engagement to accrue social and economic benefits
- addressing diffuse pollution and litter

Flood risk

Many parts of London, notably extensive areas on both north and south banks of the Thames, including the OA, are within Flood Zones 2 and 3. Most of the OA is within flood zone 3. The OA is protected by some of the 400 smaller barriers and movable flood gates downstream of the Thames Barrier and the extensive river walls and embankments stretching into Kent.

Natural environment and natural capital

The OA contains a number of Sites of Nature Conservation Interest (SINC). Accessible open space is concentrated in the east and west of the OA, with large areas of green space in the centre failing to make significant contribution towards accessible open space. Despite the presence of large areas of green and open space within the area, Thamesmead and Abbey Wood does suffer from a degree of open space deficiency.

Historic environment

The OA contains a number of protected heritage assets, and Crossness Conservation Area is south east London's most important site for industrial archaeology.

Geology and soils

Royal Greenwich's Regionally Important Geological and Geomorphological Site (RIGS) identifies Dog Rocks in Plumstead Common; and Greenwich's Locally Important Geological and Geomorphological Sites (LIGS) identifies Bleak Hill Sandpits and Wickham Valley Brickworks complex. Some soils in London have high levels of contamination from substances that are a legacy of former industry and the incorporation of rubble and waste into soils as a consequence of cyclical regeneration and renewal of London's built environment. This includes industrial land such as old gas works, chemical plants, oil refineries, petrol stations, metal works and munitions factories as well as former landfills, waste handling and disposal facilities.

Material and waste

In 2017/18 Greenwich managed 120,575 tonnes of municipal waste, and 80% of RBG waste was managed in London:

- 20% recycled
- 16.5% composted
- 61.5% incineration with energy recovery
- 2% to landfill

In 2017/19 Bexley managed 120,869 tonnes of municipal waste of which:

- 47.89% Recycled/composted
- 51.91% Incineration (energy from waste)
- 0.15% Landfill
- 0.05% other

In the OA there are two licensed waste management sites:

- Greenwich Integrated Waste Management Facility – licensed for 411,000 tones 2017
- Former Hunter Plastics site (currently vacant)

Noise and vibration

London is becoming an increasingly noisy city. The main source of ambient noise in London is road traffic, followed by rail. In urban areas, most vehicle noise comes from engines because, at low speed, engine noise dominates over the noise generated by tyres and road surfaces. However other activities such as construction, busy high streets, or a greater vibrant night time economy will also impact noise levels.

Methodology

The approach to identifying and assessing likely impacts from the OAPF has been derived from the IIA undertaken for the draft London Plan. It has been refined using information provided in the OAPF scoping report. This includes dedicated IIA Objectives and Guide Questions. Guide Questions are coloured to indicate which of the assessment elements of the IIA the question addresses in order to fully demonstrate how these assessments have been integrated as part of the IIA and ensure the relevant aspects of specific assessments are easily navigable.

The IIA Framework – objectives and key guide questions

Topic	IIA objective	Assessment guide questions <i>Will the strategy...? SEA/SA, EQIA, HIA, HRA, CSIA</i>
Equality and inclusion	1. To make the area inclusive by reducing inequality and disadvantage and addressing the diverse needs of the population	- Reduce poverty and social exclusion? - Promote a culture of equality, fairness and respect for people and the environment? - Promote an inclusive design approach ensuring a barrier-free environment for all, especially disabled people? - Provide opportunities for people to choose an active, fulfilling life? –
Social integration	2. To ensure the OAPF area has socially integrated communities which are strong, resilient and free of prejudice	- Provide opportunities for Londoners to actively participate in the city's life, decision-making and communities? - Provide opportunities for Londoners of every background to connect?
Health and health inequalities	3. To improve the mental and physical health and wellbeing of local residents and to reduce health inequalities across the area and between communities	- Improve access and equity of access to health and social care services and facilities? - Reduce differentials in life expectancy and healthy life expectancy across London? - Promote increases in physical activity, particularly in areas of health and social deprivation? - Reduce inequalities in levels of physical activity? - Improve the physical and mental health and wellbeing of communities? - Reduce inequalities in physical and mental health and wellbeing? - Support the provision of quality, affordable and healthy food?
Crime, safety and security	4. To contribute to safety and security and the perceptions of safety	- Reduce levels of crime? - Reduce the opportunity for crime and anti-social behaviour? - Create a travel environment that feels safe to all users during the day time and night time? - Increase security and resilience to major incidents? - Improve perceptions of safety and fear of crime to help remove barriers to activities leading to reduced social isolation?
Housing supply, quality, choice and affordability	5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision)	- Help to facilitate the delivery of house building that meets the needs of Londoners? - Reduce homelessness and overcrowding? Increase the range and affordability of housing?

Topic	IIA objective	Assessment guide questions <i>Will the strategy...? SEA/SA, EQIA, HIA, HRA, CSIA</i>
	to better meet demographic change and household demand and the needs of the community	- Promote accessible and adaptable homes, improving choice for people who require them? - Improve insulation and energy efficiency in housing to reduce fuel poverty and ill-health? - Provide housing that encourages a sense of community and enhances the amenity value of the community?
Sustainable land use	6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development?	- Make the best use of land through appropriate development on brownfield sites and use of existing transport network? - Ensure that higher densities development does not adversely impact on different groups of people? - Integrate land use and transport? - Promote regeneration and provide benefits for existing communities?
Design	7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing. Nurturing a sense of place and distinctiveness, reducing the need to travel by motorized transport	- Conserve and enhance the townscape/cityscape character? - Create and maintain a safe and attractive public realm which encourages people to walk and cycle? - Help to make people feel positive about the area they live in and promote social integration? - Encourage an inclusive design approach taking into account the needs of a variety of users - Help to improve the wider built environment and create a sense of place and 'vibrancy'? - Promote high quality design and sustainable design and construction methods? - Improve legibility and ease of use of the built environment for people with sensory or cognitive impairments? - Retain the spatial diversity of communities?
Accessibility	8. To maximise accessibility for all in and around London	- Improve accessibility to all public transport modes? - Increase equality of access to services and facilities ? - Improve links between areas, neighbourhoods and communities?
Connectivity	9. To enhance and improve connectivity for all to, from, within and around the area and increase the proportion of journeys made by sustainable and active transport modes. Improve connectivity and access to opportunities within the OA and to areas of significant employment growth, such as the Royal Docks. Overcome severance and promote safe, accessible routes for active travel	- Improve connectivity by public transport in outer London? - Improve connectivity across the River Thames by all modes of transport, particularly in east London? - Reduce traffic volumes and congestion on roads across all parts of London? - Reduce severance and consequent inequalities for those groups who are more greatly affected by severance (e.g. people on low incomes, disabled people, children and young people, older people and people dependent on walking and using public transport for travel)? - Encourage a modal shift to more sustainable forms of travel as well as encourage greater efficiency (e.g. through car-sharing)? - Reduce the overall need for people to travel by improving their access to the services, jobs, leisure and amenities in the place in which they live? - Encourage active travel by creating safe, attractive routes?
Economic		

Topic	IIA objective	Assessment guide questions <i>Will the strategy...? SEA/SA, EQIA, HIA, HRA, CSIA</i>
Economic competitiveness and employment	10. To maintain, strengthen and support the local economy, recognising the existing and historical economic base with regard to logistics, manufacturing and the Thames Estuary Production Corridor vision and building upon this as a priority. To enhance the existing economy by improving conditions for business to thrive. Plan for efficient use of employment land and safeguard protected industrial capacity	• Help maintain London as an internationally competitive city? • Increase London's productivity? • Facilitate the provision of the right type of employment land and floorspace in the right place to ensure that London remains economically competitive? • Help generate satisfying, secure and rewarding new jobs? • Create healthy, productive workplaces? • Help to provide employment opportunities in the most deprived areas, particularly to disadvantaged groups, and stimulate regeneration? • Minimise barriers to employment (e.g. transport, financial, childcare)? • Help reduce overall unemployment, particularly long-term and youth unemployment? • Improve the resilience of business and the economy? • Help to diversify the economy? • Encourage business start-ups and support the growth of businesses, particularly SMEs? • Enable people with physical and mental health conditions and disabilities to stay in employment? • Support social enterprise, voluntary and community sectors? • Support small, local retail offers? • Support working families?
Infrastructure	11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness	• Ensure that provision of environmental, social and physical infrastructure support economic competitiveness and housing delivery? • Unlock land that has capacity for housing development? • Provide accessible infrastructure to connect new housing developments to key services? • Ensure equity of access to environmental, social and physical infrastructure?
Education and skills	12. To ensure the education and skills provision meets the needs of area's existing and future labour market and improves life chances for all	• Help to improve learning and the attainment of skills to the right employment opportunities? • Ensure provision of sufficient school places to meet growing needs across London? • Support transitions from education to work? • Support London's status as an international city of learning, research and development? • Support adult education to improve social mobility and life chances for all ages? • Support early years education and support, particularly in areas of deprivation? • Encourage education and training that meets the needs of business, including vocational training?
Culture	13. To safeguard and enhance the area's cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen and build strong and inclusive communities In Thamesmead specifically,	• Improve accessibility for all to cultural venues? • Improve participation by all in cultural activities and support cultural activities that promote social integration? • Help to maintain and increase appropriate cultural facilities, both for consumption and production to sustain and strengthen a growing sector • Enable Londoners to develop skill and take up careers in the creative industries

Topic	IIA objective	Assessment guide questions <i>Will the strategy...? SEA/SA, EQIA, HIA, HRA, CSIA</i>
	Celebrate and protect existing cultural and heritage destinations while encouraging new offers.	Provide access to affordable cultural activities in areas of deprivation?
Environment		
Air quality	14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality, and reduce exposure	- Reduce NO_x, PM₁₀ and PM_{2.5} emissions? - Reduce inequalities in terms of access to clean air across London, particularly for those: - who live in deprived areas? - who live, learn or work near busy roads or construction sites? - who are more vulnerable because of their age or existing medical condition? - Reduce the number of people exposed to particulates and NO₂ concentrations, particularly vulnerable people? - Improve air quality around areas which may have high concentrations of vulnerable people such as schools, outdoor play areas, care homes and hospitals? - Help to achieve national and international standards for air quality? - Reduce costs to the economy resulting from premature deaths due to poor air quality?
Climate change adaptation and mitigation	15. To ensure that the area adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks through regeneration and development opportunities	- Protect London from climate change impacts? - Improve the microclimate and ameliorate the impact of the heat island effect on Londoners? - Help London to function during a flood event, heavy rainfall or tidal surge? - Help London to function during periods of drought? - Reduce impacts on groups more vulnerable to the effects of climate change e.g. older people are more vulnerable to excess heat?
	16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050	- Help to reduce London's CO₂ emission targets by 60% by 2025? - Reduce transport's contribution to CO₂ emissions? - Reduce the built environment's contribution to CO₂ emissions? - Facilitate investment in green technologies, equipment and infrastructure that reduce Green House Gas (GHG) emissions? - Promote the transition to a low-carbon economy? - Reduce carbon emissions by shifting to more sustainable modes of transport?
Energy use and supply	17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system	- Increase the proportion of energy both purchased and generated from renewable and sustainable resources? - Contribute to the provision of smart and affordable energy system for all? - Reduce the demand and need for energy? - Promote generation of energy locally?

Topic	IIA objective	Assessment guide questions <i>Will the strategy...? SEA/SA, EQIA, HIA, HRA, CSIA</i>
		• Ensure that any supply shortages are addressed? • Promote and improve energy efficiency? • Reduce impacts of fuel poverty, particularly for vulnerable groups? • Promote the transition to a low-carbon economy?
Water resources and quality	18. To protect and enhance the area's water resources by ensuring the highest levels of water efficiency and reuse, drainage and the sewerage system	• Improve the quality of the water environment, helping to meet the objectives of the Water Framework Directive? • Reduce discharges to surface and ground waters? • Support necessary improvements to the water systems infrastructure (water supply/sewerage)? • Reduce abstraction from surface and ground water sources? • Reduce water consumption through the promotion of demand management? • Protect and enhance the character and use of London's riverscapes and waterways?
Flood risk	19. To manage the risk of flooding from all sources and improve the resilience of property and infrastructure to flooding and reduce its effects and impacts on the community.	• Minimise the risk of flooding from all sources of flooding to people, property and infrastructure? • Manage residual flood risks appropriately and avoid new flood risks? • Seek to minimise new development in areas prone to flood risk or mitigate the potential for such risk? • Promote the integration of sustainable urban drainage systems? • Ensure that sites in areas of high tidal flood risk include provision for the creation or improvement of flood defences? • Ensure that no development prejudices the Environment Agency's ability to improve flood defences in line with its strategic plans?
Natural capital and natural environment	20. To protect, connect and enhance the area's natural capital (including important habitats, species and landscapes) and the services and benefits it provides linking it directly with the wider London green and blue network.	• Protect and enhance the character of local greenspaces? • Bring nature closer to people, particularly in most urbanised parts of the city and improve access to areas of biodiversity interest? • Help to acknowledge monetary value to natural capital of London? • Conserve, enhance or create natural and semi-natural habitats of recognised ecological value and/or the green corridors that link them enhancing the ecological function and carrying capacity of the greenspace network? • Avoid damage to sites, protected species and habitats, especially where there is a designation of international, national, regional or local importance? • Promote, educate and raise awareness of the enjoyment and benefits of the natural environment to all? • Promote and support the function of the Blue Ribbon Network? • Specifically address deficiencies in access to open space? • Create green spaces that are safe and accessible to all? • Promote sensory environments and play spaces?

Topic	IIA objective	Assessment guide questions <i>Will the strategy...? SEA/SA, EQIA, HIA, HRA, CSIA</i>
Historic environment	21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, rchaeological and cultural value in relation to their significance and their settings.	• Conserve and/or enhance heritage assets, their setting and the wider historic environment? • Contribute to the better management of heritage assets and tackle heritage at risk? • Improve the quality and condition of the historic environment? • Respect, maintain and strengthen local character and distinctiveness? • Increase the social benefit (e.g. education, participation, citizenship, health and well-being) derived from the historic environment? • Engage communities in identifying culturally important features and areas? • Provide for increased access to and enjoyment of the historic environment? • Provide for increased understanding and interpretation of the historic environment?
Geology and soils	22. To conserve and recognise the area's geodiversity and protect soils from development and over intensive use	• Promote the use of brownfield land? • Prevent further soil degradation or erosion? • Restore degraded soil? • Minimise the risk of health impacts through contamination? • Maximise the potential benefit of access to new employment and housing as a result of remediation?
Materials and waste	23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates	• Promote the principles of circular economy when aiming for waste reduction, reuse, re-manufacturing and recycling? • Maximise use of innovative waste management techniques including smart technology? • Help develop more efficient and sustainable freight transportation? • Minimise negative impacts of waste processing and disposal on vulnerable groups?
Noise and vibration	24. To minimise noise and vibration levels and disruption to people and communities across the opportunity area and reduce inequalities in exposure	• Reduce the number of people exposed to high levels of noise with the potential to cause annoyance, sleep disturbance or physiological effects? • Help reduce actual noise levels and disturbances from noise? • Minimise and reduce road, rail and aviation noise and vibration levels and disruption? • Improve people's access to quiet/ tranquil spaces? • Reduce night time noise in residential areas?

Each detailed assessment of the section is followed by a table of policy effects. In order to code the policy effects the following table was utilised:

Major positive	
Minor positive	
Neutral	

Minor Negative	
Major Negative	
Uncertain	?

Detailed assessment of the Thamesmead and Abbey Wood OAPF

Introduction and Vision, Principles and Objectives

IIA objective	Assessment guide questions <i>Will the strategy...? SEA/SA, EQIA, HIA, HRA, CSIA</i>	Assessment of OAPF component
1. To make the area inclusive by reducing inequality and disadvantage and addressing the diverse needs of the population	- Reduce poverty and social exclusion? - Promote a culture of equality, fairness and respect for people and the environment? - Promote an inclusive design approach ensuring a barrier free environment for all, especially disabled people? - Provide opportunities for people to choose an active, fulfilling life? – - Provide opportunities for Londoners to actively participate in the city's life, decision making and communities?	The OAPF objectives set out a framework to guide development in the Thamesmead and Abbey Wood OA. - Objective 1 aims to ensure local people have a say in their area which could be a positive opportunity for Londoners to actively participate and be involved in decision making. - Objective 3 promotes the 'Healthy Streets' approach - Objective 5 promotes facilities for further education and job training, and supports creating links between local people and employment which could reduce poverty and social exclusion.
2. To ensure the OAPF area has socially integrated communities which are strong, resilient and free of prejudice	Provide opportunities for Londoners of every background to connect?	The OAPF objectives set out a framework to guide development in the Thamesmead and Abbey Wood OA. Objective 8 encourages early engagement and inclusion which could be a positive opportunity for Londoners to actively participate and be involved in decision making. It also refers to protecting the existing Gypsy and Traveller provision.
3. To improve the mental and physical health and wellbeing of local residents and to reduce health inequalities across the area and between communities	- Improve access and equity of access to health and social care services and facilities? - Reduce differentials in life expectancy and healthy life expectancy across London? - Promote increases in physical activity, particularly in areas of health and social deprivation? - Reduce inequalities in levels of physical activity? - Improve the physical and mental health and wellbeing of communities? - Reduce inequalities in physical and mental health and wellbeing? - Support the provision of quality, affordable and healthy food?	The OAPF objectives set out a framework to guide development in the Thamesmead and Abbey Wood OA - Objective 2 seeks to improve connections and access within the OA, and create an active local centre with a range of amenities which could improve mental and physical health as it could encourage people out of their homes and to interact with others through the provision of local services. - Objective 3 promotes the 'Healthy Streets' approach which by improving the quality and safety of walking and cycling could improve the well-being of residents.. - Objective 4 seeks to improve the accessibility, amenity value, management and safety of open space which could encourage people out more, and especially to use open spaces which has been shown to improve wellbeing and mental health and social interaction - Objective 5 ensures social and community infrastructure supports growth
4. To contribute to safety and security and the perceptions of safety	- Reduce levels of crime? - Reduce the opportunity for crime and anti-social behaviour? - Create a travel environment that feels safe to all users during the day time and night time? - Increase security and resilience to major incidents?	The OAPF objectives set out a framework to guide development in the Thamesmead and Abbey Wood OA. - Objective 4 seeks to improve the accessibility, amenity value, management and safety of open space - Objective 3 promotes the 'Healthy Streets' approach, improving the quality and safety of walking and cycling

IIA objective	Assessment guide questions <i>Will the strategy...? SEA/SA, EQIA, HIA, HRA, CSIA</i>	Assessment of OAPF component
	Improve perceptions of safety and fear of crime to help remove barriers to activities leading to reduced social isolation?	
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand and the needs of the community	- Help to facilitate the delivery of house building that meets the needs of Londoners? - Reduce homelessness and overcrowding? Increase the range and affordability of housing? - Promote accessible and adaptable homes, improving choice for people who require them? - Improve insulation and energy efficiency in housing to reduce fuel poverty and ill-health? - Provide housing that encourages a sense of community and enhances the amenity value of the community?	The OAPF objectives set out a framework to guide development in the Thamesmead and Abbey Wood OA . - Objective 1 supports the delivery of homes and jobs, and ensures the area remains a mixed and inclusive place. It identifies potential for up to 15k new homes, many of which could be family homes. - Objective 4 seeks to improve the accessibility, amenity value, management and safety of open space - Objective 8 seeks to support existing communities and strengthen social integration and local character. It includes reference to the Mayor’s estate regeneration guidance, and protects existing Gypsy and Traveller plot capacity
6. To make the best and most efficient use of land so as to support sustainable patterns and forms of development	- Make the best use of land through appropriate development on brownfield sites and use of existing transport network? - Ensure that higher densities development does not adversely impact on different groups of people? - Integrate land use and transport? - Promote regeneration and provide benefits for existing communities?	The OAPF objectives set out a framework to guide development in the Thamesmead and Abbey Wood OA. - Objective 1 supports the delivery of homes and jobs, and ensures the area remains a mixed and inclusive place. It identifies potential for up to 15,500 new homes, many of which could be family homes. - Objective 6 seeks to plan for efficient use of employment land and safeguard protected industrial capacity.
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing. Nurturing a sense of place and distinctiveness, reducing the need to travel by motorized transport	- Conserve and enhance the townscape/cityscape character? - Create and maintain a safe and attractive public realm which encourages people to walk and cycle? - Help to make people feel positive about the area they live in and promote social integration? - Encourage an inclusive design approach taking into account the needs of a variety of users - Help to improve the wider built environment and create a sense of place and ‘vibrancy’? - Promote high quality design and sustainable design and construction methods? - Improve legibility and ease of use of the built environment for people with sensory or cognitive impairments? - Retain the spatial diversity of communities?	The OAPF objectives set out a framework to guide development in the Thamesmead and Abbey Wood OA. - Objective 3 promotes the ‘Healthy Streets’ approach, improving the quality and safety of walking and cycling - Objective 7 seeks to create vibrant, well-connected centres that support local business, commercial activity and encourage local employment - Objective 9 seeks to celebrate and protect the cultural and heritage environment while encouraging new offers. - Objective 8 seeks to support existing communities and strengthen social integration and local character
8. To maximise accessibility for all in and around London	- Improve accessibility to all public transport modes? - Increase equality of access to services and facilities ? - Improve links between areas, neighbourhoods and communities?	The OAPF objectives set out a framework to guide development in the Thamesmead and Abbey Wood OA. Objective 3 promotes the ‘Healthy Streets’ approach, improving the quality and safety of walking and cycling

IIA objective	Assessment guide questions <i>Will the strategy...? SEA/SA, EQIA, HIA, HRA, CSIA</i>	Assessment of OAPF component
		- Objective 5 ensures social and community infrastructure supports growth - Objective 7 seeks to create vibrant, well-connected centres that support local business, commercial activity and encourage local employment
9. To enhance and improve connectivity for all to, from, within and around the area and increase the proportion of journeys made by sustainable and active transport modes. To improve connectivity and access to opportunities within the OA and to areas of significant employment growth, such as the Royal Docks. To overcome severance and promote safe, accessible routes for active travel	- Improve connectivity by public transport in outer London? - Improve connectivity across the River Thames by all modes of transport, particularly in east London? - Reduce traffic volumes and congestion on roads across all parts of London? - Reduce severance and consequent inequalities for those groups who are more greatly affected by severance (e.g. people on low incomes, disabled people, children and young people, older people and people dependent on walking and using public transport for travel)? - Encourage a modal shift to more sustainable forms of travel as well as encourage greater efficiency (e.g. through car-sharing)? - Reduce the overall need for people to travel by improving their access to the services, jobs, leisure and amenities in the place in which they live? - Encourage active travel by creating safe, attractive routes?	The OAPF objectives set out a framework to guide development in the Thamesmead and Abbey Wood OA. - Objective 2 seeks to improve connections and access within and outside the OA, and create an active local centre with a range of amenities. - Objective 3 promotes the ‘Healthy Streets’ approach, improving the quality and safety of walking and cycling
10. To maintain, strengthen and support the local economy, recognising the existing and historical economic base with regard to logistics, manufacturing and the Thames Estuary Production Corridor vision and build upon this as a priority. To enhance the existing economy by improving conditions for business to thrive. To plan for efficient use of employment land and safeguard protected industrial capacity.	- Help maintain London as an internationally competitive city? - Increase London’s productivity? - Facilitate the provision of the right type of employment land and floorspace in the right place to ensure that London remains economically competitive? - Help generate satisfying, secure and rewarding new jobs? - Create healthy, productive workplaces? - Help to provide employment opportunities in the most deprived areas, particularly to disadvantaged groups, and stimulate regeneration? - Minimise barriers to employment (e.g. transport, financial, childcare)? - Help reduce overall unemployment, particularly long-term and youth unemployment? - Improve the resilience of business and the economy? - Help to diversify the economy? - Encourage business start-ups and support the growth of businesses, particularly SMEs? - Enable people with physical and mental health conditions and disabilities to stay in employment? - Support social enterprise, voluntary and community sectors? - Support small, local retail offers? - Support working families?	The OAPF objectives set out a framework to guide development in the Thamesmead and Abbey Wood OA. - Objective 6 seeks to plan for efficient use of employment land and safeguard protected industrial capacity. - Objective 7 seeks to create vibrant, well-connected centres that support local business, commercial activity and encourage local employment - Objective 2 seeks to improve connections and access within and outside the OA and create an active local centre with a range of amenities.

IIA objective	Assessment guide questions <i>Will the strategy...? SEA/SA, EQIA, HIA, HRA, CSIA</i>	Assessment of OAPF component
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness	• Ensure that provision of environmental, social and physical infrastructure support economic competitiveness and housing delivery? • Unlock land that has capacity for housing development? • Provide accessible infrastructure to connect new housing developments to key services? • Ensure equity of access to environmental, social and physical infrastructure?	The OAPF objectives set out a framework to guide development in the Thamesmead and Abbey Wood OA. • Objective 1 supports the delivery of homes and jobs, and ensures the area remains a mixed and inclusive place. It identifies potential for up to 15,500 new homes, many of which could be family homes. • Objective 5 ensures social and community infrastructure supports growth
12. To ensure the education and skills provision meets the needs of area's existing and future labour market and improves life chances for all	• Help to improve learning and the attainment of skills to the right employment opportunities? • Ensure provision of sufficient school places to meet growing needs across London? • Support transitions from education to work? • Support London's status as an international city of learning, research and development? • Support adult education to improve social mobility and life chances for all ages? • Support early years education and support, particularly in areas of deprivation? • Encourage education and training that meets the needs of business, including vocational training?	The OAPF objectives set out a framework to guide development in the Thamesmead and Abbey Wood OA. • Objective 5 ensures social and community infrastructure, such as schools, support growth
13. To safeguard and enhance the area's cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen and build strong and inclusive communities. In Thamesmead specifically, to celebrate and protect existing cultural and heritage destinations while encouraging new offers.	• Improve accessibility for all to cultural venues? • Improve participation by all in cultural activities and support cultural activities that promote social integration? • Help to maintain and increase appropriate cultural facilities, both for consumption and production to sustain and strengthen a growing sector • Enable Londoners to develop skill and take up careers in the creative industries • Provide access to affordable cultural activities in areas of deprivation?	The OAPF objectives set out a framework to guide development in the Thamesmead and Abbey Wood OA. • Objective 7 seeks to create vibrant, well-connected centres that support local business, commercial activity and encourage local employment • Objective 9 seeks to celebrate and protect the cultural and heritage environment while encouraging new offers.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality, and reduce exposure	• Reduce NO_x, PM₁₀ and PM_{2.5} emissions? • Reduce inequalities in terms of access to clean air across London, particularly for those: • who live in deprived areas? • who live, learn or work near busy roads or construction sites? • who are more vulnerable because of their age or existing medical condition? • Reduce the number of people exposed to particulates and NO₂ concentrations, particularly vulnerable people?	The OAPF objectives set out a framework to guide development in the Thamesmead and Abbey Wood OA. • Objective 2 seeks to improve connections and access within and outside the OA, and create an active local centre with a range of amenities. • Objective 3 promotes the 'Healthy Streets' approach, improving the quality and safety of walking and cycling

IIA objective	Assessment guide questions <i>Will the strategy...? SEA/SA, EQIA, HIA, HRA, CSIA</i>	Assessment of OAPF component
	• Improve air quality around areas which may have high concentrations of vulnerable people such as schools, outdoor play areas, care homes and hospitals? • Help to achieve national and international standards for air quality? • Reduce costs to the economy resulting from premature deaths due to poor air quality?	• Objective 4 seeks to improve ecological resilience and enhance access to and quality of natural assets, including improving air quality.
15. To ensure that the area adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks through regeneration and development opportunities	• Protect London from climate change impacts? • Improve the microclimate and ameliorate the impact of the heat island effect on Londoners? • Help London to function during a flood event, heavy rainfall or tidal surge? • Help London to function during periods of drought? • Reduce impacts on groups more vulnerable to the effects of climate change e.g. older people are more vulnerable to excess heat?	• Objective 4 seeks to improve ecological resilience and enhance access to and quality of natural assets, including managing the impacts of climate change, and addressing flood risk.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050	• Help to reduce London's CO₂ emission targets by 60% by 2025? • Reduce transport's contribution to CO₂ emissions? • Reduce the built environment's contribution to CO₂ emissions? • Facilitate investment in green technologies, equipment and infrastructure that reduce GHG emissions? • Promote the transition to a low carbon economy? Reduce carbon emissions by shifting to more sustainable modes of transport?	• Objective 4 seeks to improve ecological resilience and enhance access to and quality of natural assets, including achieving zero carbon by 2050 • Objective 3 promotes the 'Healthy Streets' approach, improving the quality and safety of walking and cycling • Objective 2 seeks to improve connections and access within and outside the OA, and create an active local centre with a range of amenities.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system	• Increase the proportion of energy both purchased and generated from renewable and sustainable resources? • Contribute to the provision of smart and affordable energy system for all? • Reduce the demand and need for energy? • Promote generation of energy locally? • Ensure that any supply shortages are addressed? • Promote and improve energy efficiency? • Reduce impacts of fuel poverty, particularly for vulnerable groups? • Promote the transition to a low carbon economy?	• Objective 4 seeks to improve ecological resilience and enhance access to and quality of natural assets, including achieving zero carbon by 2050 and energy efficient buildings.
18. To protect and enhance the area's water resources by ensuring the highest levels of water efficiency and	• Improve the quality of the water environment, helping to meet the objectives of the Water Framework Directive? • Reduce discharges to surface and ground waters?	• Objective 4 seeks to improve ecological resilience and enhance access to and quality of natural assets

IIA objective	Assessment guide questions <i>Will the strategy...? SEA/SA, EQIA, HIA, HRA, CSIA</i>	Assessment of OAPF component
reuse, drainage and the sewerage system	- Support necessary improvements to the water systems infrastructure (water supply/sewerage)? - Reduce abstraction from surface and ground water sources? - Reduce water consumption through the promotion of demand management? - Protect and enhance the character and use of London's riverscapes and waterways?	
19. To manage the risk of flooding from all sources and improve the resilience of property and infrastructure to flooding and reduce its effects and impacts on the community.	- Minimise the risk of flooding from all sources of flooding to people, property, infrastructure ? - Manage residual flood risks appropriately and avoid new flood risks? - Seek to minimise new development in areas prone to flood risk or mitigate the potential for such risk? - Promote the integration of sustainable urban drainage systems? - Ensure that sites in areas of high tidal flood risk include provision for the creation or improvement of flood defences? - Ensure that no development prejudices the Environment Agency's ability to improve flood defences in line with its strategic plans?	Objective 4 seeks to improve ecological resilience and enhance access to and quality of natural assets
20. To protect, connect and enhance the area's natural capital (including important habitats, species and landscapes) and the services and benefits it provides linking it directly with the wider London green and blue network.	- Protect and enhance the character of local greenspaces? - Bring nature closer to people, particularly in most urbanised parts of the city and improve access to areas of biodiversity interest? - Help to acknowledge monetary value to natural capital of London? - Conserve, enhance or create natural and semi-natural habitats of recognised ecological value and/or the green corridors that link them enhancing the ecological function and carrying capacity of the greenspace network? - Avoid damage to sites, protected species and habitats, especially where there is a designation of international, national, regional or local importance? - Promote, educate and raise awareness of the enjoyment and benefits of the natural environment to all? - Promote and support the function of the Blue Ribbon Network? - Specifically address deficiencies in access to open space? - Create green spaces that are safe and accessible to all? - Promote sensory environments and play spaces? - Support the protection of the priority species identified in the Greenwich and Bexley BAP? - Improve access to, and the connectivity of, the Green Chain?	Objective 4 seeks to improve ecological resilience and enhance access to and quality of natural assets

IIA objective	Assessment guide questions <i>Will the strategy...? SEA/SA, EQIA, HIA, HRA, CSIA</i>	Assessment of OAPF component
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.	- Conserve and/or enhance heritage assets, their setting and the wider historic environment? - Contribute to the better management of heritage assets and tackle heritage at risk? - Improve the quality and condition of the historic environment? - Respect, maintain and strengthen local character and distinctiveness? - Increase the social benefit (e.g. education, participation, citizenship, health and well-being) derived from the historic environment? - Engage communities in identifying culturally important features and areas? - Provide for increased access to and enjoyment of the historic environment? - Provide for increased understanding and interpretation of the historic environment?	Objective 9 seeks to celebrate and protect the cultural and heritage environment while encouraging new offers
22. To conserve and recognise the area's geodiversity and protect soils from development and over intensive use	- Promote the use of brownfield land? - Prevent further soil degradation or erosion? - Restore degraded soil? - Minimise the risk of health impacts through contamination? - Maximise the potential benefit of access to new employment and housing as a result of remediation?	The OAPF objectives set out a framework to guide development in the Thamesmead and Abbey Wood OA. Section 1.5 on the environment identifies that some sites may have soil contamination, and calls for land assessments and associated remedial strategies
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates	- Promote the principles of circular economy when aiming for waste reduction, reuse, re-manufacturing and recycling? - Maximise use of innovative waste management techniques including smart technology? - Help develop more efficient and sustainable freight transportation? - Minimise negative impacts of waste processing and disposal on vulnerable groups?	The OAPF objectives set out a framework to guide development in the Thamesmead and Abbey Wood OA. - Objective 4 seeks to improve ecological resilience and enhance access to and quality of natural assets, including seeking to reduce waste. - Objective 6 seeks to plan for efficient use of employment land and safeguard protected industrial capacity
24. To minimise noise and vibration levels and disruption to people and communities across the opportunity area and reduce inequalities in exposure	- Reduce the number of people exposed to high levels of noise with the potential to cause annoyance, sleep disturbance or physiological effects? - Help reduce actual noise levels and disturbances from noise? - Minimise and reduce road, rail and aviation noise and vibration levels and disruption? - Improve people's access to quiet/ tranquil spaces? - Reduce night time noise in residential areas?	The OAPF objectives set out a framework to guide development in the Thamesmead and Abbey Wood OA. Objective 4 seeks to improve ecological resilience and enhance access to and quality of natural assets, including access to open space.

IIA Objective	Likely effects
1. To make the area inclusive by reducing inequality and disadvantage and addressing the diverse needs of the population	

2. To ensure the OAPF area has socially integrated communities which are strong, resilient and free of prejudice	
3. To improve the mental and physical health and wellbeing of local residents and to reduce health inequalities across the area and between communities	
4. To contribute to safety and security and the perceptions of safety	
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand and the needs of the community	
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development?	
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing. Nurturing a sense of place and distinctiveness, reducing the need to travel by motorized transport	
8. To maximise accessibility for all in and around London	
9. To enhance and improve connectivity for all to, from, within and around the area and increase the proportion of journeys made by sustainable and active transport modes. Improve connectivity and access to opportunities within the OA and to areas of significant employment growth, such as the Royal Docks. Overcome severance and promote safe, accessible routes for active travel	
10. To maintain, strengthen and support the local economy, recognising the existing and historical economic base with regard to logistics, manufacturing and the Thames Estuary Production Corridor vision and building upon this as a priority. To enhance the existing economy by improving conditions for business to thrive. Plan for efficient use of employment land and safeguard protected industrial capacity	
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness	
12. To ensure the education and skills provision meets the needs of area's existing and future labour market and improves life chances for all	
13. To safeguard and enhance the area's cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen and build strong and inclusive communities In Thamesmead specifically, Celebrate and protect existing cultural and heritage destinations while encouraging new offers.	
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality, and reduce exposure	
15. To ensure that the area adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks through regeneration and development opportunities	
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050	
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system	
18. To protect and enhance the area's water resources by ensuring the highest levels of water efficiency and reuse, drainage and the sewerage system	
19. To manage the risk of flooding from all sources and improve the resilience of property and infrastructure to flooding and reduce its effects and impacts on the community.	
20. To protect, connect and enhance the area's natural capital (including important habitats, species and landscapes) and the services and benefits it provides linking it directly with the wider London green and blue network.	

21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.	
22. To conserve and recognise the area's geodiversity and protect soils from development and over intensive use	
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates	
24. To minimise noise and vibration levels and disruption to people and communities across the opportunity area and reduce inequalities in exposure	

Unlocking good growth with Transport

IIA objective	Assessment guide questions <i>Will the strategy...? SEA/SA, EQIA, HIA, HRA, CSIA</i>	Assessment of OAPF component
1. To make the area inclusive by reducing inequality and disadvantage and addressing the diverse needs of the population	• Reduce poverty and social exclusion? • Promote a culture of equality, fairness and respect for people and the environment? • Promote an inclusive design approach ensuring a barrier free environment for all, especially disabled people? • Provide opportunities for people to choose an active, fulfilling life? – • Provide opportunities for Londoners to actively participate in the city’s life, decision making and communities? • Provide opportunities for Londoners of every background to connect?	The transport chapter of the draft OAPF includes proposals which aim to improve the connectivity of the area by investing in transport solutions which are affordable, inclusive and accessible for existing and new communities. Both bus transit and DLR extension scenarios are likely to provide greater opportunities to access larger parts of London and the jobs and facilities provided in these locations improving inclusion and reducing inequality. Both proposals include accessible trains, buses and stops with real-time information provided at stops and stations which are likely to contribute to a barrier-free environment and improve opportunities to participate in London life. Those transport proposals are complemented by a number of measures aimed at improving the quality of local walking and cycling connections and therefore tackling severance at a local scale. In line with the Mayor’s Transport Strategy (MTS) and highlighted in the IIA of the draft MTS, there is a strong focus on accessibility and inclusivity resulting in increasing the transport options for all groups. This would be especially beneficial to older people, disabled people or those who have a long-term illness that are more likely to be socially isolated as well as some BAME groups
2. To ensure the OAPF area has socially integrated communities which are strong, resilient and free of prejudice		The transport proposals would improve the connectivity of the area significantly, making it easier and quicker for existing and future residents to travel to existing and proposed social infrastructure such as those located in Thamesmead town centre, Thamesmead Waterfront and Southmere Lake. This would contribute to making communities more integrated.
3. To improve the mental and physical health and wellbeing of local residents and to reduce health inequalities across the area and between communities	• Improve access and equity of access to health and social care services and facilities? • Reduce differentials in life expectancy and healthy life expectancy across London? • Promote increases in physical activity, particularly in areas of health and social deprivation? • Reduce inequalities in levels of physical activity? • Improve the physical and mental health and wellbeing of communities? • Reduce inequalities in physical and mental health and wellbeing? • Support the provision of quality, affordable and healthy food?	The transport chapter contains a number of proposals which would make public transport more attractive with better connections to walking and cycle routes. Existing and new residents would be encouraged to walk or cycle to their destinations or to their local bus stop/station. An increase in physical activity directly contributes to improving the mental and physical health of residents and well-being in general. Improving public transport connectivity in the area makes health and social care services and facilities more accessible such as the existing health centre in Thamesmead town centre and Southmere Lake and proposed facilities in Thamesmead Waterfront. This would be especially beneficial to older people, disabled people or those who have a long-term illness that are more likely to be socially isolated and some minority ethnic groups. Better and more integrated public transport benefits residents by making it more convenient to reach a greater array of shops within the OA (Thamesmead town centre) and beyond the OA (Beckton Riverside, Plumstead High Street, Woolwich town centre and Abbey Wood)
4. To contribute to safety and security and the perceptions of safety	• Reduce levels of crime? • Reduce the opportunity for crime and anti-social behaviour? • Create a travel environment that feels safe to all users during the day time and night time?	All scenarios outlined in the transport chapter include secure and safe transport improvements. The bus transit scenario would provide new stops which would be high quality ‘platform’ type stops with CCTV and real time information.

IIA objective	Assessment guide questions <i>Will the strategy...? SEA/SA, EQIA, HIA, HRA, CSIA</i>	Assessment of OAPF component
	• Increase security and resilience to major incidents? • Improve perceptions of safety and fear of crime to help remove barriers to activities leading to reduced social isolation?	The new DLR station would be functional and accessible for all, it would feel safe and secure to use and bring an identity to the area improving the perception of safety. Access to public transport at all times would create opportunities to increase night time activities and improve safety and perceptions of safety on the main roads. This could be especially beneficial for elderly and LGBT+ groups who have the greatest fear of crime and BAME groups that suffer from the greatest incidents of crime
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand and the needs of the community	• Help to facilitate the delivery of house building that meets the needs of Londoners? • Reduce homelessness and overcrowding? Increase the range and affordability of housing? • Promote accessible and adaptable homes, improving choice for people who require them? • Improve insulation and energy efficiency in housing to reduce fuel poverty and ill-health? • Provide housing that encourages a sense of community and enhances the amenity value of the community?	The measures proposed in the transport chapter directly support housing growth by providing high quality public transport in the OA. They would increase the transport options in existing areas which are currently less accessible by public transport. This would improve transport connectivity in the OA but also to neighbouring areas and across London enabling additional growth. The proposed DLR extension and proposed bus transit would considerably improve transport accessibility for developments around Thamesmead town centre, Thamesmead Waterfront and West Thamesmead. This would also enable higher development density around the new DLR station, supporting the viability of a new town centre and the delivery of housing in the area. As highlighted in the IAA of the draft MTS, encouraging people to use public transport, walk and cycle reduces car use and potentially frees up more space for housing when less space is used for parking. All transport options would support the additional provision of housing. The DLR and bus transit would support the highest housing growth. This should in turn support the greatest provision of affordable housing and specialist housing – benefiting young families, older people, disabled people, BAME groups. This option has the greatest potential to alleviate homelessness, which could benefit woman who are single parents or victims of domestic abuse and alleviate overcrowding which affects BAME families the most. Transport improvements can increase property values which could have a positive effect on those who already own their own homes but could increase costs for those wanting to buy or rent in the area. This would benefit older people who are most likely to own their own home but disadvantage young adults who are least likely to own their own home, but want to.
6. To make the best and most efficient use of land so as to support sustainable patterns and forms of development	• Make the best use of land through appropriate development on brownfield sites and use of existing transport network? • Ensure that higher densities development does not adversely impact on different groups of people? • Integrate land use and transport? • Promote regeneration and provide benefits for existing communities?	The transport options outlined in chapter 3 are fully integrated with the existing transport network to minimise cost and maximise the benefits generated by the transport improvements. Public transport is the most space efficient mode of transport and enables the release space for new infrastructure including new homes. Higher density developments would be enabled around the DLR station as well as the delivery of a new town centre. The DLR and bus transit would support the highest level growth, enabling the most efficient use of land and give the greatest support sustainable patterns and forms of development. In line with the MTS and highlighted in the IAA, the proposals are predicated on an integrated approach to land use planning and the provision of transport services based on the principle that new residential and commercial development should be as close as possible to high quality public transport. The proposed DLR station and the proposed bus transit route would serve areas where the majority of employment and housing growth is planned.

IIA objective	Assessment guide questions <i>Will the strategy...? SEA/SA, EQIA, HIA, HRA, CSIA</i>	Assessment of OAPF component
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing. Nurturing a sense of place and distinctiveness, reducing the need to travel by motorized transport	• Conserve and enhance the townscape/cityscape character? • Create and maintain a safe and attractive public realm which encourages people to walk and cycle? • Help to make people feel positive about the area they live in and promote social integration? • Encourage an inclusive design approach taking into account the needs of a variety of users • Help to improve the wider built environment and create a sense of place and ‘vibrancy’? • Promote high quality design and sustainable design and construction methods? • Improve legibility and ease of use of the built environment for people with sensory or cognitive impairments? • Retain the spatial diversity of communities?	The bus transit scheme would provide an opportunity to transform some of the main arterial roads through the OA and the surrounding public realm, supporting the creation of Healthy Streets by reallocating road space to pedestrians, cyclists and public transport users. High-quality public realm around the station would be designed to encourage people to spend time in the local area, and to walk, cycle or take public transport to their final destination. Stations and stops would be integrated with their surroundings giving the opportunity to create high quality public realm and reduce severance caused by the road network.
8. To maximise accessibility for all in and around London	• Improve accessibility to all public transport modes? • Increase equality of access to services and facilities ? • Improve links between areas, neighbourhoods and communities?	The transport chapter of the adoption draft OAPF includes proposals which aim to improve connectivity in the area and to surrounding neighbourhoods by investing in transport solutions which are affordable, inclusive and accessible for existing and new communities. Both proposals include secure and accessible trains, buses and stops with real-time information provided at stops and stations, improving sustainable travels options for those who are less mobile, such as people travelling with children and those with physical disabilities. This would also benefit young people who cannot drive. Those transport proposals are also complemented by a number of measures aimed at improving the quality of local walking and cycling connections and therefore tackling severance.
9. To enhance and improve connectivity for all to, from, within and around the area and increase the proportion of journeys made by sustainable and active transport modes. To improve connectivity and access to opportunities within the OA and to areas of significant employment growth, such as the Royal Docks. To overcome severance and promote safe, accessible routes for active travel	• Improve connectivity by public transport in outer London? • Improve connectivity across the River Thames by all modes of transport, particularly in east London? • Reduce traffic volumes and congestion on roads across all parts of London? • Reduce severance and consequent inequalities for those groups who are more greatly affected by severance (e.g. people on low incomes, disabled people, children and young people, older people and people dependent on walking and using public transport for travel)? • Encourage a modal shift to more sustainable forms of travel as well as encourage greater efficiency (e.g. through car-sharing)? • Reduce the overall need for people to travel by improving their access to the services, jobs, leisure and amenities in the place in which they live? • Encourage active travel by creating safe, attractive routes?	The proposals included in the transport chapter would enable the provision of high quality public transport with high frequency services. This would make travelling within the OA and beyond the OA quicker and easier and therefore significantly improve the connectivity of the area. As explained in the IIA of the draft MTS, greater bus connectivity improves access to employment opportunities including for areas which are further away from the rail network. It also improves access to employment opportunities for lower income groups which are more dependent on bus links. Improving sustainable travels options also benefits those who are less mobile such as people travelling with children and those with physical disabilities. It also benefits young people who cannot drive The DLR extension proposal would provide direct access across the river reducing severance caused by the river, making it quicker to access centres of employment such as the Royal Docks and Isle of Dogs. As part of a wider strategy to build a developer-led pier in east London, there is a potential to introduce a new pier at Thamesmead. There would be an opportunity to provide new cross-river connections to central London, to the west and Kent.
10. To maintain, strengthen and support the local economy, recognising the existing and	• Help maintain London as an internationally competitive city? • Increase London’s productivity?	The transport proposals for Thamesmead form part of the wider MTS proposal to increase transport capacity which would provide significant economic benefits to businesses as noted in the IIA of the draft MTS.

IIA objective	Assessment guide questions <i>Will the strategy...? SEA/SA, EQIA, HIA, HRA, CSIA</i>	Assessment of OAPF component
historical economic base with regard to logistics, manufacturing and the Thames Estuary Production Corridor vision and build upon this as a priority. To enhance the existing economy by improving conditions for business to thrive. To plan for efficient use of employment land and safeguard protected industrial capacity	- Facilitate the provision of the right type of employment land and floorspace in the right place to ensure that London remains economically competitive? - Help generate satisfying, secure and rewarding new jobs? - Create healthy, productive workplaces? - Help to provide employment opportunities in the most deprived areas, particularly to disadvantaged groups, and stimulate regeneration? - Minimise barriers to employment (e.g. transport, financial, childcare)? - Help reduce overall unemployment, particularly long-term and youth unemployment? - Improve the resilience of business and the economy? - Help to diversify the economy? - Encourage business start-ups and support the growth of businesses, particularly SMEs? - Enable people with physical and mental health conditions and disabilities to stay in employment? - Support social enterprise, voluntary and community sectors? - Support small, local retail offers? - Support working families?	The proposed bus transit and DLR extension would better connect local employment centres to neighbourhood centres creating new opportunities for businesses. This could also contribute to the creation of mixed-use developments in the OA providing employment opportunities to local residents including those in the most deprived areas. Traffic congestion has an adverse effect on the local economy and businesses and the transport proposals of chapter 3 promote a shift from car use to the most space-efficient modes of transport. This would contribute to reducing traffic congestion and help to provide a reliable and resilient network making bus journeys and freight trips quicker and more efficient.
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness	- Ensure that provision of environmental, social and physical infrastructure support economic competitiveness and housing delivery? - Unlock land that has capacity for housing development? - Provide accessible infrastructure to connect new housing developments to key services? - Ensure equity of access to environmental, social and physical infrastructure?	The public transport proposals in Thamesmead would deliver physical infrastructure which increases connectivity in the area. They would create an integrated public transport network giving greater access to key services and enabling growth in areas which are currently isolated.
12. To ensure the education and skills provision meets the needs of area's existing and future labour market and improves life chances for all	- Help to improve learning and the attainment of skills to the right employment opportunities? - Ensure provision of sufficient school places to meet growing needs across London? - Support transitions from education to work? - Support London's status as an international city of learning, research and development? - Support adult education to improve social mobility and life chances for all ages? - Support early years education and support, particularly in areas of deprivation? - Encourage education and training that meets the needs of business, including vocational training?	The transport proposals do not directly contribute to education provision but would provide better connectivity and accessibility to local amenities in the OA and beyond the OA. This includes, schools, adult education centre and education services in general, which would benefit young people.
13. To safeguard and enhance the area's cultural offer, infrastructure, heritage, natural	Improve accessibility for all to cultural venues?	The transport proposals do not directly contribute to the provision of cultural facilities but they would provide better connectivity and accessibility to local amenities in the OA and beyond the OA. This includes places offering cultural activities and cultural venues.

IIA objective	Assessment guide questions <i>Will the strategy...? SEA/SA, EQIA, HIA, HRA, CSIA</i>	Assessment of OAPF component
environment and talent to benefit all Londoners while delivering new activities that strengthen and build strong and inclusive communities. In Thamesmead specifically, to celebrate and protect existing cultural and heritage destinations while encouraging new offers.	• Improve participation by all in cultural activities and support cultural activities that promote social integration? • Help to maintain and increase appropriate cultural facilities, both for consumption and production to sustain and strengthen a growing sector • Enable Londoners to develop skill and take up careers in the creative industries • Provide access to affordable cultural activities in areas of deprivation?	Transport improvements could provide the opportunity to provide a cultural facility in an accessible location.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality, and reduce exposure	• Reduce NO_x, PM₁₀ and PM_{2.5} emissions? • Reduce inequalities in terms of access to clean air across London, particularly for those: • who live in deprived areas? • who live, learn or work near busy roads or construction sites? • who are more vulnerable because of their age or existing medical condition? • Reduce the number of people exposed to particulates and NO₂ concentrations, particularly vulnerable people? • Improve air quality around areas which may have high concentrations of vulnerable people such as schools, outdoor play areas, care homes and hospitals? • Help to achieve national and international standards for air quality? • Reduce costs to the economy resulting from premature deaths due to poor air quality?	The transport proposals encourage existing and new residents to use sustainable modes which reduce reliance on cars. This could lead to a decrease in the number of cars on the local network, a reduction in traffic congestion and a reduction in harmful air pollution which impacts human health and the environment. As highlighted in the IIA of the draft MTS and the London Plan, because the most vulnerable tend to be the most exposed, reduced air pollution would also reduce health inequalities in general.
15. To ensure that the area adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks through regeneration and development opportunities	• Protect London from climate change impacts? • Improve the microclimate and ameliorate the impact of the heat island effect on Londoners? • Help London to function during a flood event, heavy rainfall or tidal surge? • Help London to function during periods of drought? • Reduce impacts on groups more vulnerable to the effects of climate change e.g. older people are more vulnerable to excess heat?	The transport proposals do not directly contribute to ensuring that the area becomes more resilient to the impacts of climate change.
16. To help tackle climate change through reducing greenhouse gas emissions and moving	• Help to reduce London's CO₂ emission targets by 60% by 2025? • Reduce transport's contribution to CO₂ emissions? • Reduce the built environment's contribution to CO₂ emissions?	The transport proposals encourage existing and new residents to use sustainable modes which reduce reliance on cars. This could lead to a decrease in the number of cars on the local network, a reduction in traffic congestion and a reduction in CO₂ emissions.

IIA objective	Assessment guide questions <i>Will the strategy...? SEA/SA, EQIA, HIA, HRA, CSIA</i>	Assessment of OAPF component
towards a zero carbon London by 2050	- Facilitate investment in green technologies, equipment and infrastructure that reduce GHG emissions? - Promote the transition to a low carbon economy? - Reduce carbon emissions by shifting to more sustainable modes of transport?	
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system	- Increase the proportion of energy both purchased and generated from renewable and sustainable resources? - Contribute to the provision of smart and affordable energy system for all? - Reduce the demand and need for energy? - Promote generation of energy locally? - Ensure that any supply shortages are addressed? - Promote and improve energy efficiency? - Reduce impacts of fuel poverty, particularly for vulnerable groups? - Promote the transition to a low carbon economy?	The transport proposals included in chapter 3 of the OAPF provide greater public transport connectivity and accessibility. This could result in fewer cars on the network reducing the level of energy required for travelling.
18. To protect and enhance the area's water resources by ensuring the highest levels of water efficiency and reuse, drainage and the sewerage system	- Improve the quality of the water environment, helping to meet the objectives of the Water Framework Directive? - Reduce discharges to surface and ground waters? - Support necessary improvements to the water systems infrastructure (water supply/sewerage)? - Reduce abstraction from surface and ground water sources? - Reduce water consumption through the promotion of demand management? - Protect and enhance the character and use of London's riverscapes and waterways?	The transport proposals do not directly contribute to protecting and enhancing the area's water resources.
19. To manage the risk of flooding from all sources and improve the resilience of property and infrastructure to flooding and reduce its effects and impacts on the community.	- Minimise the risk of flooding from all sources of flooding to people, property, infrastructure ? - Manage residual flood risks appropriately and avoid new flood risks? - Seek to minimise new development in areas prone to flood risk or mitigate the potential for such risk? - Promote the integration of sustainable urban drainage systems? - Ensure that sites in areas of high tidal flood risk include provision for the creation or improvement of flood defences? - Ensure that no development prejudices the Environment Agency's ability to improve flood defences in line with its strategic plans?	The transport proposals do not directly contribute to managing the risk of flooding.
20. To protect, connect and enhance the area's natural capital (including important habitats,	- Protect and enhance the character of local greenspaces? - Bring nature closer to people, particularly in most urbanised parts of the city and improve access to areas of biodiversity interest?	The proposed transport improvements do not directly contribute to enhancing the natural capital of the area. However, the proposed bus transit route would bring residents closer to the area's natural capital including Southmere and Birchmere Lakes by making those places better integrated with the surrounding neighbourhoods and by providing a high level of service along those places.

IIA objective	Assessment guide questions <i>Will the strategy...? SEA/SA, EQIA, HIA, HRA, CSIA</i>	Assessment of OAPF component
species and landscapes) and the services and benefits it provides linking it directly with the wider London green and blue network.	• Help to acknowledge monetary value to natural capital of London? • Conserve, enhance or create natural and semi-natural habitats of recognised ecological value and/or the green corridors that link them enhancing the ecological function and carrying capacity of the greenspace network? • Avoid damage to sites, protected species and habitats, especially where there is a designation of international, national, regional or local importance? • Promote, educate and raise awareness of the enjoyment and benefits of the natural environment to all? • Promote and support the function of the Blue Ribbon Network? • Specifically address deficiencies in access to open space? • Create green spaces that are safe and accessible to all? • Promote sensory environments and play spaces? • Support the protection of the priority species identified in the Greenwich and Bexley BAP? • Improve access to, and the connectivity of, the Green Chain?	The transport proposals encourage existing and new residents to use sustainable modes which reduce reliance on cars. This could lead to a decrease in the number of cars on the local network, a reduction in traffic congestion and a reduction in CO2 emissions. This could improve biodiversity and enhance the experience of open space.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.	• Conserve and/or enhance heritage assets, their setting and the wider historic environment? • Contribute to the better management of heritage assets and tackle heritage at risk? • Improve the quality and condition of the historic environment? • Respect, maintain and strengthen local character and distinctiveness? • Increase the social benefit (e.g. education, participation, citizenship, health and well-being) derived from the historic environment? • Engage communities in identifying culturally important features and areas? • Provide for increased access to and enjoyment of the historic environment? • Provide for increased understanding and interpretation of the historic environment?	The proposed transport improvements do not directly contribute to enhancing the historic environment but they would provide better connections and could help residents to access places with heritage assets more quickly and more conveniently. Reduced traffic can enhance the experience of heritage assets. The delivery section recommends an Archaeological study to be undertaken and led by Historic England.
22. To conserve and recognise the area's geodiversity and protect soils from development and over intensive use	• Promote the use of brownfield land? • Prevent further soil degradation or erosion? • Restore degraded soil? • Minimise the risk of health impacts through contamination? • Maximise the potential benefit of access to new employment and housing as a result of remediation?	The transport proposals do not directly contribute to conserving the area's geodiversity.
23. To keep materials at their highest value and use for as long	• Promote the principles of circular economy when aiming for waste reduction, reuse, re-manufacturing and recycling?	The transport proposals do not directly contribute to keeping materials at their highest value,

IIA objective	Assessment guide questions <i>Will the strategy...? SEA/SA, EQIA, HIA, HRA, CSIA</i>	Assessment of OAPF component
as possible. To significantly reduce waste generated and achieve high reuse and recycling rates	• Maximise use of innovative waste management techniques including smart technology? • Help develop more efficient and sustainable freight transportation? • Minimise negative impacts of waste processing and disposal on vulnerable groups?	
24. To minimise noise and vibration levels and disruption to people and communities across the opportunity area and reduce inequalities in exposure	• Reduce the number of people exposed to high levels of noise with the potential to cause annoyance, sleep disturbance or physiological effects? • Help reduce actual noise levels and disturbances from noise? • Minimise and reduce road, rail and aviation noise and vibration levels and disruption? • Improve people's access to quiet/ tranquil spaces? • Reduce night time noise in residential areas?	The measures outlined in the transport chapter encourage the use of sustainable modes which would reduce reliance on private modes of transport. This would reduce levels of congestion in the longer term and is therefore likely to reduce the level of noise people are exposed to from road traffic.

IIA Objective	Likely effects
1. To make the area inclusive by reducing inequality and disadvantage and addressing the diverse needs of the population	
2. To ensure the OAPF area has socially integrated communities which are strong, resilient and free of prejudice	
3. To improve the mental and physical health and wellbeing of local residents and to reduce health inequalities across the area and between communities	
4. To contribute to safety and security and the perceptions of safety	
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand and the needs of the community	
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development?	
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing. Nurturing a sense of place and distinctiveness, reducing the need to travel by motorized transport	
8. To maximise accessibility for all in and around London	
9. To enhance and improve connectivity for all to, from, within and around the area and increase the proportion of journeys made by sustainable and active transport modes. Improve connectivity and access to opportunities within the OA and to areas of significant employment growth, such as the Royal Docks. Overcome severance and promote safe, accessible routes for active travel	
10. To maintain, strengthen and support the local economy, recognising the existing and historical economic base with regard to logistics, manufacturing and the Thames Estuary Production Corridor vision and building upon this as a priority. To enhance the existing economy by improving conditions for business to thrive. Plan for efficient use of employment land and safeguard protected industrial capacity	
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness	
12. To ensure the education and skills provision meets the needs of area's existing and future labour market and improves life chances for all	
13. To safeguard and enhance the area's cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen and build strong and inclusive communities In Thamesmead specifically, Celebrate and protect existing cultural and heritage destinations while encouraging new offers.	
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality, and reduce exposure	
15. To ensure that the area adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks through regeneration and development opportunities	
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050	
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system	
18. To protect and enhance the area's water resources by ensuring the highest levels of water efficiency and reuse, drainage and the sewerage system	
19. To manage the risk of flooding from all sources and improve the resilience of property and infrastructure to flooding and reduce its effects and impacts on the community.	

20. To protect, connect and enhance the area's natural capital (including important habitats, species and landscapes) and the services and benefits it provides linking it directly with the wider London green and blue network.	
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.	
22. To conserve and recognise the area's geodiversity and protect soils from development and over intensive use	
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates	
24. To minimise noise and vibration levels and disruption to people and communities across the opportunity area and reduce inequalities in exposure	

Spatial Strategies

IIA objective	Assessment guide questions <i>Will the strategy...? SEA/SA, EQIA, HIA, HRA, CSIA</i>	Assessment of OAPF component
1. To make the area inclusive by reducing inequality and disadvantage and addressing the diverse needs of the population	• Reduce poverty and social exclusion? • Promote a culture of equality, fairness and respect for people and the environment? • Promote an inclusive design approach ensuring a barrier free environment for all, especially disabled people? • Provide opportunities for people to choose an active, fulfilling life? – • Provide opportunities for Londoners to actively participate in the city's life, decision making and communities? • Provide opportunities for Londoners of every background to connect?	The Spatial Strategy section sets out a number of initiatives that could lead to reduced inequality and disadvantage: ○ It promotes town and district centres to better serve the needs of the local communities and seeks a new neighbourhood centre at Southmere which would bring facilities closer to the community. Local facilities are especially beneficial to older people and disabled people who are less able to travel longer distances and as well as pregnant women and those with small children. London's high streets provide important places for people to gather, particularly for young people not in education, employment or training, and for older people, as they support social interaction and exchange that might not be available elsewhere. High streets also provide flexible job opportunities for younger and older people such as Saturday jobs for young adults and students and part-time work for older Londoners². Successful high streets also benefit BAME groups and women who are more likely to work in the retail sector. ○ It sets out how the Moorings social club and under-road arches are providing flexible spaces for local businesses. By providing business space where existing provision is lacking, it could create start-up opportunities for lower-income communities, women and BAME groups. ○ The West Thamesmead SIL section identifies the poor pedestrian environment around Plumstead gyratory, and seeks to improve the public realm, and the walking and cycling environment in this area. Improved public realm would help those who are less mobile such as disabled people and elderly people, pregnant women and those with small children. Improved public realm can also help those with visual impairments navigate their environment more easily.
2. To ensure the OAPF area has socially integrated communities which are strong, resilient and free of prejudice		• The Spatial Strategy section sets out a proposal to encourage low cost space for local SMEs which could help enable a broader range of local employment opportunities to accommodate a wider range of groups. By providing business space where existing provision is lacking, it could create start-up opportunities for lower-income communities, women and BAME groups. • It seeks to protect and/or replace community centres which have potential benefits for faith groups, older people, women with young children and children who tend to have meetings, coffee mornings and play groups in these spaces, encouraging social interaction.
3. To improve the mental and physical health and wellbeing of local residents and to reduce health inequalities across the area and between communities	• Improve access and equity of access to health and social care services and facilities? • Reduce differentials in life expectancy and healthy life expectancy across London? • Promote increases in physical activity, particularly in areas of health and social deprivation? • Reduce inequalities in levels of physical activity? • Improve the physical and mental health and wellbeing of communities?	• The Spatial Strategy section sets out a number of initiatives that could improve health and well-being: ○ It promotes access to facilities in local centres. Local centres are especially beneficial to older people and disabled people who are less able to travel longer distances and as well as pregnant women and those with small children. London's high streets provide important places for people to gather, particularly for young people not in education, employment or training, and for older people, as they support social interaction and exchange that might not be available elsewhere. High streets also provide flexible job

² High Streets for All, GLA, September 2017

IIA objective	Assessment guide questions <i>Will the strategy...? SEA/SA, EQIA, HIA, HRA, CSIA</i>	Assessment of OAPF component
	• Reduce inequalities in physical and mental health and wellbeing? • Support the provision of quality, affordable and healthy food?	opportunities for younger and older people such as Saturday jobs for young adults and students and part-time work for older Londoners³. Successful high streets also benefit BAME groups and women who are more likely to work in the retail sector. ○ It seeks to provide integrated health facilities and the expansion of existing healthcare centres at Gallions Reach and Lakeside to accommodate growth. This could especially benefit older people, disabled people, those with a long-term illness, or those undergoing gender reassignment as they could be treated for a wider range of conditions in one location reducing the need to travel. ○ It proposes enhanced links with green spaces and Thames Path to increase opportunities for walking, cycling and running ○ It proposes new and expanded leisure facilities, which would contribute significantly to wider health improvements by promoting increased physical activities.
4. To contribute to safety and security and the perceptions of safety	• Reduce levels of crime? • Reduce the opportunity for crime and anti-social behaviour? • Create a travel environment that feels safe to all users during the day time and night time? • Increase security and resilience to major incidents? • Improve perceptions of safety and fear of crime to help remove barriers to activities leading to reduced social isolation?	The spatial strategy section sets out a number of initiatives that would contribute to safety and security: • It encourages safe and walkable public realm network linking major centres • Under green infrastructure, it encourages new public spaces and routes that are well-lit and feel safe These measures are likely to represent positive impacts for older people who have a greater fear of crimes and disabled people, people who have undergone gender reassignment, BAME groups and members of religious groups who all experience a higher incidence of crime.⁴
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand and the needs of the community	• Help to facilitate the delivery of house building that meets the needs of Londoners? • Reduce homelessness and overcrowding? Increase the range and affordability of housing? • Promote accessible and adaptable homes, improving choice for people who require them? • Improve insulation and energy efficiency in housing to reduce fuel poverty and ill-health? • Provide housing that encourages a sense of community and enhances the amenity value of the community?	West Thamesmead could provide new affordable homes through consolidation of SIL Section 4.3 Energy sets out how new development is expected to optimise energy efficiency Plumstead bus garage is identified as a potential location for delivering housing as part of a co-location of land uses The increased delivery of housing would result in additional affordable housing. The delivery of affordable housing, including intermediate housing would be particularly beneficial for young people who are more likely to experience difficulties with housing costs.⁵. The average age for shared ownership properties is 32⁶. The delivery of additional affordable housing is also likely to have a positive effect for BAME Londoners who are more likely to live in households with an average annual income below £20,000 (43 per cent BAME, compared with 32 per cent White) and are twice as likely to rent privately than White British people⁷. In addition, women are more likely to be economically inactive⁸, low paid⁹, and/ or subject to the poverty that affects single parent families¹⁰. Thus, women

³ High Streets for All, GLA, September 2017

⁴ EHRC (2016 update) Crime and disabled people: Measures of disability-related harassment

See assessment of the GLA impact on trans-equality https://www.london.gov.uk/sites/default/files/assessment_of_the_gla_impact_on_trans_e_quality.pdf.)

EHRC 2016. Is England Fairer? The state of equality and human rights 2016

⁵ In a London First survey of London employees, 70 per cent of respondents in the 25-39 age group said that they found the cost of living and working in London difficult and 41 per cent of these said that they would consider leaving London to work elsewhere

⁶ 2016/17 CORE Data

⁷ Office of National Statistics – 2011 Census

⁸ New Policy Institute. London's Poverty Profile 2015

⁹ 58 per cent of low paid jobs in London are carried out by women. Moreover, the biggest group among the low paid in London is female part-time employees, who account for 31 per cent of all low paid Londoners. Ibid

¹⁰ 53 per cent of all London's single parent families live in poverty, and 97 per cent of those parents are female. Ibid

IIA objective	Assessment guide questions <i>Will the strategy...? SEA/SA, EQIA, HIA, HRA, CSIA</i>	Assessment of OAPF component
		may benefit from efforts to increase the supply of homes and particularly of genuinely affordable homes. The provision of new housing would also result in the provision of specialist housing such as wheelchair and adaptable housing which would benefit disabled people and the elderly. Colocation could potentially result in poor environmental quality for residents but there are wider policies in this OAPF and the London Plan to mitigate impacts from noise, vibrations and other nuisances.
6. To make the best and most efficient use of land so as to support sustainable patterns and forms of development	• Make the best use of land through appropriate development on brownfield sites and use of existing transport network? • Ensure that higher densities development does not adversely impact on different groups of people? • Integrate land use and transport? • Promote regeneration and provide benefits for existing communities?	• The industrial strategy seeks to intensify uses, making better use of land including providing residential development. The provision of residential development could limit the attractiveness of industrial floorspace provided in mixed-use schemes, although policies in the London Plan are designed to mitigate this risk. • The potential for new development at West Thamesmead is linked to its proximity to Plumstead station, which would encourage use of existing public transport network • The options for West Thamesmead and Veridion Park would encourage additional industrial development, including affordable workspace. This could enable a broader range of local employment opportunities to accommodate a wider range of groups. The retention and intensification of industrial uses would limit the amount of land for residential development. However, the London Plan evidence shows a need for industrial land and the jobs they provide which can have a particular benefit for men¹¹ and BAME Londoners¹². • The strategy encourages the provision of Integrated health facilities This could especially benefit older people, disabled people, those with a long-term illness, or those undergoing gender reassignment as they could be treated for a wider range of conditions in one location reducing the need to travel.
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing. Nurturing a sense of place and distinctiveness, reducing the need to travel by motorized transport	• Conserve and enhance the townscape/cityscape character? • Create and maintain a safe and attractive public realm which encourages people to walk and cycle? • Help to make people feel positive about the area they live in and promote social integration? • Encourage an inclusive design approach taking into account the needs of a variety of users • Help to improve the wider built environment and create a sense of place and ‘vibrancy’? • Promote high quality design and sustainable design and construction methods? • Improve legibility and ease of use of the built environment for people with sensory or cognitive impairments? • Retain the spatial diversity of communities?	• The strategy identifies the opportunity to strengthen the identity and sense of place of Thamesmead town centre. Further detail is provided in the Places section. • The strategy encourages more diverse land-uses in local centres that can serve the needs of the local community

¹¹ GLA Economics (2016) Economic Evidence Base 2016

¹² Current Issues Note 36: Patterns of low pay, GLA Economics, July 2012

IIA objective	Assessment guide questions <i>Will the strategy...? SEA/SA, EQIA, HIA, HRA, CSIA</i>	Assessment of OAPF component
8. To maximise accessibility for all in and around London	• Improve accessibility to all public transport modes? • Increase equality of access to services and facilities ? • Improve links between areas, neighbourhoods and communities?	• The spatial strategy encourages a greater diversity of uses in town centres to serve the needs of the local community • It encourages safe and walkable public realm networks to link centres • The strategy identifies a lack of connections and poor accessibility in Thamesmead town centre and promotes place-making improvements to strengthen its identity and sense of place • The strategy encourages development in the most accessible locations, for example close to Plumstead station
9. To enhance and improve connectivity for all to, from, within and around the area and increase the proportion of journeys made by sustainable and active transport modes. To improve connectivity and access to opportunities within the OA and to areas of significant employment growth, such as the Royal Docks. To overcome severance and promote safe, accessible routes for active travel	• Improve connectivity by public transport in outer London? • Improve connectivity across the River Thames by all modes of transport, particularly in east London? • Reduce traffic volumes and congestion on roads across all parts of London? • Reduce severance and consequent inequalities for those groups who are more greatly affected by severance (e.g. people on low incomes, disabled people, children and young people, older people and people dependent on walking and using public transport for travel)? • Encourage a modal shift to more sustainable forms of travel as well as encourage greater efficiency (e.g. through car-sharing)? • Reduce the overall need for people to travel by improving their access to the services, jobs, leisure and amenities in the place in which they live? • Encourage active travel by creating safe, attractive routes?	• The strategy promotes local employment opportunities in town centres and at industrial locations which could reduce the need to travel • West Thamesmead Options 2 and 3 encourage new development close to Plumstead station • The strategy sets out proposals to minimise conflict with pedestrian movement • The Healthy Streets Approach supports the delivery of high quality, inclusive spaces that should prevent and remove barriers for disabled people, and encourage many disabled Londoners to increase their use of the city's streets by making them more appealing and accessible to people with a range of impairments, for example by reducing traffic volumes and speeds, making it easier to cross roads, ensuring footways are even and wide, providing lighting and resting points, and allowing inclusive and step-free access to bus stops and Tube stations.
10. To maintain, strengthen and support the local economy, recognising the existing and historical economic base with regard to logistics, manufacturing and the Thames Estuary Production Corridor vision and build upon this as a priority. To enhance the existing economy by improving conditions for business to thrive. To plan for efficient use of	• Help maintain London as an internationally competitive city? • Increase London's productivity? • Facilitate the provision of the right type of employment land and floorspace in the right place to ensure that London remains economically competitive? • Help generate satisfying, secure and rewarding new jobs? • Create healthy, productive workplaces? • Help to provide employment opportunities in the most deprived areas, particularly to disadvantaged groups, and stimulate regeneration? • Minimise barriers to employment (e.g. transport, financial, childcare)? • Help reduce overall unemployment, particularly long-term and youth unemployment? • Improve the resilience of business and the economy? • Help to diversify the economy?	• The strategy facilitates employment by promoting the intensification of SIL to provide more floorspace and local jobs. • The Good Growth Fund investment at the Moorings Hub will provide new flexible spaces for local SMEs which could help enable a broader range of local employment opportunities to accommodate a wider range of group. By providing business space where existing provision is lacking, it could create start-up opportunities for lower-income communities, women and BAME groups • The strategy promotes new town centre uses, which would provide more job opportunities in the local area • The strategy recognises that industrial land provides low-cost business space for micro, small and medium-sized businesses. • The retention of sufficient industrial capacity within London will particularly benefit men and BAME Londoners. There are significant disparities in rates of low pay between BAME and White workers in specific sectors, with BAME workers more likely to experience low pay in the wholesale and retail sector and the primary utilities and manufacturing sector¹³. Apart from most retail premises, these sectors are often accommodated in industrial locations. While the retention of industrial capacity

¹³ Current Issues Note 36: Patterns of low pay, GLA Economics, July 2012

IIA objective	Assessment guide questions <i>Will the strategy...? SEA/SA, EQIA, HIA, HRA, CSIA</i>	Assessment of OAPF component
employment land and safeguard protected industrial capacity	- Encourage business start-ups and support the growth of businesses, particularly SMEs? - Enable people with physical and mental health conditions and disabilities to stay in employment? - Support social enterprise, voluntary and community sectors? - Support small, local retail offers? - Support working families?	would be unlikely to directly address pay disparities, these policies may have a positive impact through helping to ensure that businesses that employ low-paid BAME workers can continue to operate within London. - The proportion of men working in skilled trades occupations or working as process, plant and machine operatives is significantly higher than the proportion of women in these roles¹⁴. These roles are more likely to be located in industrial locations, and therefore these policies may have a greater beneficial effect for men than women. - Younger people are less likely to be employed and are likely to face less secure and stable employment¹⁵ so a strong economy can provide greater opportunities for young people.
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness	- Ensure that provision of environmental, social and physical infrastructure support economic competitiveness and housing delivery? - Unlock land that has capacity for housing development? - Provide accessible infrastructure to connect new housing developments to key services? - Ensure equity of access to environmental, social and physical infrastructure?	- West Thamesmead would unlock additional residential development. The increased delivery of housing would result in additional affordable housing. The delivery of affordable housing, including intermediate housing would be particularly beneficial for young people who are more likely to experience difficulties with housing costs.¹⁶ The average age for shared ownership properties 32¹⁷. The delivery of additional affordable housing is also likely to have a positive effect for BAME Londoners who are more likely to live in households with an average annual income below £20,000 (43 per cent BAME, compared with 32 per cent White) and are twice as likely to rent privately than White British people¹⁸. In addition, women are more likely to be economically inactive¹⁹, low paid²⁰, and/ or subject to the poverty that affects single parent families²¹. Thus, women may benefit from efforts to increase the supply of homes and particularly of genuinely affordable homes. The provision of new housing would also result in the provision of specialist housing such as wheelchair and adaptable housing which would benefit disabled people and the elderly. Colocation could potentially result in poor environmental quality for residents but there are wider policies in this OAPF and the London Plan that aim to mitigate impacts from noise, vibrations and other nuisances. - The strategy proposes public realm improvements as part of SIL intensification development - The Social and Community Infrastructure section presents an assessment of uses that support each growth scenario. It sets out detailed requirements for specific infrastructure – including schools, leisure and energy. This would support a greater choice of schools and educational opportunities for all, which is particularly important for low-income communities, ethnic minority groups, disabled residents or those with existing health conditions, and Gypsy and Traveller communities - The Digital Connectivity section encourages full fibre connectivity as a key infrastructure need for new development
12. To ensure the education and skills provision meets the needs of area's existing and future	- Help to improve learning and the attainment of skills to the right employment opportunities? - Ensure provision of sufficient school places to meet growing needs across London?	The strategy proposes for Veridion Park option 1 a new construction-related further education facility. This would help provide education and training that meets the needs of business. This is

¹⁴ GLA Economics (2016) Economic Evidence Base 2016

¹⁵ EHRC (2016) 'Is England Fair: The State of Equality and Human Rights 2016

¹⁶ In a London First survey of London employees, 70 per cent of respondents in the 25-39 age group said that they found the cost of living and working in London difficult and 41 per cent of these said that they would consider leaving London to work elsewhere

¹⁷ 2016/17 CORE Data

¹⁸ Office of National Statistics – 2011 Census

¹⁹ New Policy Institute. London's Poverty Profile 2015

²⁰ 58 per cent of low paid jobs in London are carried out by women. Moreover, the biggest group among the low paid in London is female part-time employees, who account for 31 per cent of all low paid Londoners. Ibid

²¹ 53 per cent of all London's single parent families live in poverty, and 97 per cent of those parents are female. Ibid

IIA objective	Assessment guide questions <i>Will the strategy...? SEA/SA, EQIA, HIA, HRA, CSIA</i>	Assessment of OAPF component
labour market and improves life chances for all	• Support transitions from education to work? • Support London's status as an international city of learning, research and development? • Support adult education to improve social mobility and life chances for all ages? • Support early years education and support, particularly in areas of deprivation? • Encourage education and training that meets the needs of business, including vocational training?	likely to benefit young people, the unemployed and lower income communities in particular, who may have more limited access to education and employment opportunities • The Social and Community Infrastructure section includes an estimated requirement for new facilities linked to the two growth options, and identifies broad locations, and expansion of existing schools. It also references the need for early years provision to be provided as part of mixed-use development. This would support a greater choice of schools and educational opportunities for all, which is particularly important for low-income communities, ethnic minority groups, disabled residents or those with existing health conditions, and Gypsy and Traveller communities • These proposals would have a positive impact on this objective and particularly for young people who are most likely to benefit from education and training that will help them into the workforce.
13. To safeguard and enhance the area's cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen and build strong and inclusive communities In Thamesmead specifically, Celebrate and protect existing cultural and heritage destinations while encouraging new offers.	• Improve accessibility for all to cultural venues? • Improve participation by all in cultural activities and support cultural activities that promote social integration? • Help to maintain and increase appropriate cultural facilities, both for consumption and production to sustain and strengthen a growing sector • Enable Londoners to develop skill and take up careers in the creative industries • Provide access to affordable cultural activities in areas of deprivation?	• The Spatial strategy identifies the potential for Thamesmead town centre to provide cultural and social uses that serve the local community which would have potential benefits for faith groups, older people, women with young children and children who all tend to have meetings, coffee mornings and play groups in these centres, encouraging social interaction
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality, and reduce exposure	• Reduce NO_x, PM₁₀ and PM_{2.5} emissions? • Reduce inequalities in terms of access to clean air across London, particularly for those: • who live in deprived areas? • who live, learn or work near busy roads or construction sites? • who are more vulnerable because of their age or existing medical condition? • Reduce the number of people exposed to particulates and NO₂ concentrations, particularly vulnerable people?	• The spatial strategy encourages a greater range of uses in town centres which would reduce the need to travel • The section on Air Quality identifies Air Quality Focus Areas, and Air Quality Management Areas, and sets out proposals for encouraging large developments to achieve an Air Quality Positive approach which would benefit those with respiratory conditions and other long term illnesses. • Age is an important factor in relation to susceptibility to the health effects of air pollution. Poor air quality can have particular impacts on children and older people²² and during pregnancy affecting both mother and baby resulting in babies with low birth weights²³. In addition, BAME groups can be more likely to be exposed to above EU-limit concentrations of Nitrogen Dioxide (NO₂)²⁴.

²² Updated Analysis of Air Pollution in London, Aether, February 2017

²³ BMJ, 2017, Impact of London's road traffic air and noise pollution on birth weight: retrospective population based cohort study

²⁴ Updated Analysis of Air Pollution in London, Aether, February 2017

IIA objective	Assessment guide questions <i>Will the strategy...? SEA/SA, EQIA, HIA, HRA, CSIA</i>	Assessment of OAPF component
	- Improve air quality around areas which may have high concentrations of vulnerable people such as schools, outdoor play areas, care homes and hospitals? - Help to achieve national and international standards for air quality? - Reduce costs to the economy resulting from premature deaths due to poor air quality?	
15. To ensure that the area adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks through regeneration and development opportunities	- Protect London from climate change impacts - Improve the microclimate and ameliorate the impact of the heat island effect on Londoners? - Help London to function during a flood event, heavy rainfall or tidal surge? - Help London to function during periods of drought? - Reduce impacts on groups more vulnerable to the effects of climate change e.g. older people are more vulnerable to excess heat?	- The Spatial Strategy includes a section on managing flood risk. The entire OA is in Flood Zone 2-3 and sits within the Thames Estuary 2100 action zone. The flood risk sections advises that land may have to be set aside for future flood defenses. This may reduce the amount of land available for development. - An Integrated Water Management Strategy has been prepared with recommendations for addressing constraints in the area - The section on Green Infrastructure identifies the contribution that the area's green spaces and water bodies can make to mitigating climate change. It also encourages greening the public realm to create shade and natural cooling.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050	- Help to reduce London's CO₂ emission targets by 60% by 2025? - Reduce transport's contribution to CO₂ emissions? - Reduce the built environment's contribution to CO₂ emissions? - Facilitate investment in green technologies, equipment and infrastructure that reduce GHG emissions? - Promote the transition to a low carbon economy? - Reduce carbon emissions by shifting to more sustainable modes of transport?	- The inclusion of the objective and aim to coordinate delivery of district heating is more likely to result in the delivery of such a network and reduce carbon dioxide emissions. The mixed used nature of development is more likely to enable the use of waste heat from industrial and waste processes, reducing the need for gas heating. - The spatial strategy encourages a greater range of uses in local centres which would reduce the need to travel - West Thamesmead options 2 and 3 locate new housing close to Plumstead station
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system	- Increase the proportion of energy both purchased and generated from renewable and sustainable resources? - Contribute to the provision of smart and affordable energy system for all? - Reduce the demand and need for energy? - Promote generation of energy locally? - Ensure that any supply shortages are addressed? - Promote and improve energy efficiency? - Reduce impacts of fuel poverty, particularly for vulnerable groups? - Promote the transition to a low carbon economy?	- The spatial strategy recognises the need for utilities to be provided in a timely manner, and states that discussions have taken place with utility providers to estimate requirements for the OA - It proposes delivery coordination to minimise disruption and mitigate impacts of future growth - The strategy references work being done on energy masterplanning with Bexley to create a heat network, using the Riverside Resource Recovery facility. This could also tackle fuel poverty which affects people in older, poorer housing stock. 10 per cent of households in London are fuel poor and national evidence demonstrates that there is greater proportion of BAME households in fuel poverty and a significant proportion of households that are fuel poor include children²⁵ - Whilst short term energy supply has been secured, the Development Infrastructure Funding Study identified a shortfall in capacity in the long term, and the upgrades required to meet capacity - The energy section encourages new developments to adopt energy efficient designs and be net zero carbon

²⁵ 106 www.gov.uk/government/collections/fuel-poverty-statistics

IIA objective	Assessment guide questions <i>Will the strategy...? SEA/SA, EQIA, HIA, HRA, CSIA</i>	Assessment of OAPF component
18. To protect and enhance the area's water resources by ensuring the highest levels of water efficiency and reuse, drainage and the sewerage system	• Improve the quality of the water environment, helping to meet the objectives of the Water Framework Directive? • Reduce discharges to surface and ground waters? • Support necessary improvements to the water systems infrastructure (water supply/sewerage)? • Reduce abstraction from surface and ground water sources? • Reduce water consumption through the promotion of demand management? • Protect and enhance the character and use of London's riverscapes and waterways?	• The spatial strategy Water and Waste Water section seeks all development to be constructed to maximum achievable standards in water efficiency, and to identify alternative sources of water supply (e.g. rainwater, greywater or wastewater recycling)
19. To manage the risk of flooding from all sources and improve the resilience of property and infrastructure to flooding and reduce its effects and impacts on the community.	• Minimise the risk of flooding from all sources of flooding to people, property, infrastructure ? • Manage residual flood risks appropriately and avoid new flood risks? • Seek to minimise new development in areas prone to flood risk or mitigate the potential for such risk? • Promote the integration of sustainable urban drainage systems? • Ensure that sites in areas of high tidal flood risk include provision for the creation or improvement of flood defences? • Ensure that no development prejudices the Environment Agency's ability to improve flood defences in line with its strategic plans? •	• The Spatial Strategy section on flood risk identifies that the area is in zone 2-3, and that the Thames Estuary 2100 Plan sets out an action plan for tidal flood risk management. • The strategy promotes the production of a Riverside Strategy that could set out requirements for updating flood defences and promotes use of SUDS
20. To protect, connect and enhance the area's natural capital (including important habitats, species and landscapes) and the services and benefits it provides linking it directly with the wider London green and blue network.	• Protect and enhance the character of local greenspaces? • Bring nature closer to people, particularly in most urbanised parts of the city and improve access to areas of biodiversity interest? • Help to acknowledge monetary value to natural capital of London? • Conserve, enhance or create natural and semi-natural habitats of recognised ecological value and/or the green corridors that link them enhancing the ecological function and carrying capacity of the greenspace network? • Avoid damage to sites, protected species and habitats, especially where there is a designation of international, national, regional or local importance? • Promote, educate and raise awareness of the enjoyment and benefits of the natural environment to all? • Promote and support the function of the Blue Ribbon Network? • Specifically address deficiencies in access to open space? • Create green spaces that are safe and accessible to all? • Promote sensory environments and play spaces?	• The section on Veridion Park SIL identifies environmental considerations and adjacencies with the allocated SINC. Development would need to be carefully managed to protect the SINC. • Southmere lake is identified as an opportunity to provide water play areas for childfree. The section on Green Infrastructure notes that Thamesmead has extensive areas of green space and water bodies. It seeks to protect and enhance these existing assets and sets out a set of principles for development. The map identifies areas of existing assets, improvements to green routes, SINC's and Open Space, as well as potential for urban greening which would have a positive effect on this objective. • The strategy seeks to strengthen and enhance SINC's and the natural habitat. This could have a positive effect as development and the loss of vacant land has the potential to displace existing biodiversity.

IIA objective	Assessment guide questions <i>Will the strategy...? SEA/SA, EQIA, HIA, HRA, CSIA</i>	Assessment of OAPF component
	- Support the protection of the priority species identified in the Greenwich and Bexley BAP? - Improve access to, and the connectivity of, the Green Chain?	
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.	- Conserve and/or enhance heritage assets, their setting and the wider historic environment? - Contribute to the better management of heritage assets and tackle heritage at risk? - Improve the quality and condition of the historic environment? - Respect, maintain and strengthen local character and distinctiveness? - Increase the social benefit (e.g. education, participation, citizenship, health and well-being) derived from the historic environment? - Engage communities in identifying culturally important features and areas? - Provide for increased access to and enjoyment of the historic environment? - Provide for increased understanding and interpretation of the historic environment?	The Spatial Strategy will not impact on, and could potentially, enhance the historic environment
22. To conserve and recognise the area's geodiversity and protect soils from development and over intensive use	- Promote the use of brownfield land? - Prevent further soil degradation or erosion? - Restore degraded soil? - Minimise the risk of health impacts through contamination? - Maximise the potential benefit of access to new employment and housing as a result of remediation?	The Industrial strategy seeks to intensify uses, making better use of land including providing residential development
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates	- Promote the principles of circular economy when aiming for waste reduction, reuse, re-manufacturing and recycling? - Maximise use of innovative waste management techniques including smart technology? - Help develop more efficient and sustainable freight transportation? - Minimise negative impacts of waste processing and disposal on vulnerable groups?	- The spatial strategy identifies the designated waste sites in the area, and as SIL-compliant uses include waste, it is beneficial that industrial land is being retained. - The strategy encourages circular economy principles in the design and development of proposals. Large-scale developments are encouraged to produce a Circular Economy Statement
24. To minimise noise and vibration levels and disruption to people and communities across the opportunity area and reduce inequalities in exposure	- Reduce the number of people exposed to high levels of noise with the potential to cause annoyance, sleep disturbance or physiological effects? - Help reduce actual noise levels and disturbances from noise? - Minimise and reduce road, rail and aviation noise and vibration levels and disruption? - Improve people's access to quiet/ tranquil spaces? - Reduce night time noise in residential areas?	- Options assessment for the industrial sites considers edge conditions and adjacent uses - Access to open space would improve access to quiet/tranquil places having a positive effect on this objective. - New development has the potential to provide better living conditions for residents by having better design and including better sound insulation and by providing a buffer to existing noise sensitive development

IIA Objective	Likely effects
1. To make the area inclusive by reducing inequality and disadvantage and addressing the diverse needs of the population	
2. To ensure the OAPF area has socially integrated communities which are strong, resilient and free of prejudice	
3. To improve the mental and physical health and wellbeing of local residents and to reduce health inequalities across the area and between communities	
4. To contribute to safety and security and the perceptions of safety	
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand and the needs of the community	
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development?	
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing. Nurturing a sense of place and distinctiveness, reducing the need to travel by motorized transport	
8. To maximise accessibility for all in and around London	
9. To enhance and improve connectivity for all to, from, within and around the area and increase the proportion of journeys made by sustainable and active transport modes. Improve connectivity and access to opportunities within the OA and to areas of significant employment growth, such as the Royal Docks. Overcome severance and promote safe, accessible routes for active travel	
10. To maintain, strengthen and support the local economy, recognising the existing and historical economic base with regard to logistics, manufacturing and the Thames Estuary Production Corridor vision and building upon this as a priority. To enhance the existing economy by improving conditions for business to thrive. Plan for efficient use of employment land and safeguard protected industrial capacity	
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness	
12. To ensure the education and skills provision meets the needs of area's existing and future labour market and improves life chances for all	
13. To safeguard and enhance the area's cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen and build strong and inclusive communities In Thamesmead specifically, Celebrate and protect existing cultural and heritage destinations while encouraging new offers.	
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality, and reduce exposure	
15. To ensure that the area adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks through regeneration and development opportunities	
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050	
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system	
18. To protect and enhance the area's water resources by ensuring the highest levels of water efficiency and reuse, drainage and the sewerage system	

19. To manage the risk of flooding from all sources and improve the resilience of property and infrastructure to flooding and reduce its effects and impacts on the community.	
20. To protect, connect and enhance the area's natural capital (including important habitats, species and landscapes) and the services and benefits it provides linking it directly with the wider London green and blue network.	
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.	
22. To conserve and recognise the area's geodiversity and protect soils from development and over intensive use	
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates	
24. To minimise noise and vibration levels and disruption to people and communities across the opportunity area and reduce inequalities in exposure	

Places

IIA objective	Assessment guide questions <i>Will the strategy...? SEA/SA, EQIA, HIA, HRA, CSIA</i>	Assessment of OAPF component
1. To make the area inclusive by reducing inequality and disadvantage and addressing the diverse needs of the population	• Reduce poverty and social exclusion? • Promote a culture of equality, fairness and respect for people and the environment? • Promote an inclusive design approach ensuring a barrier free environment for all, especially disabled people?	• The Places section does not directly impact on poverty and social exclusion. However, opportunities for new development that integrates with existing communities, improving access to jobs and homes, are identified. Opportunities for new or improved local and strategic connections and areas of public realm are also identified, with a view to creating a more inclusive Thamesmead and Abbey Wood.
2. To ensure the OAPF area has socially integrated communities which are strong, resilient and free of prejudice	• Provide opportunities for people to choose an active, fulfilling life? – • Provide opportunities for Londoners to actively participate in the city's life, decision making and communities? • Provide opportunities for Londoners of every background to connect?	• The Places section does not directly impact on socially integrated communities. However, emphasis is placed on new development acknowledging the importance of local cultural and historic assets, as well as incorporating resilience principles. The section sets out potential local connections for each area, which would improve access to local facilities. Local facilities are especially beneficial to older people and disabled people who are less able to travel longer distances and as well as pregnant women and those with small children.
3. To improve the mental and physical health and wellbeing of local residents and to reduce health inequalities across the area and between communities	• Improve access and equity of access to health and social care services and facilities? • Reduce differentials in life expectancy and healthy life expectancy across London? • Promote increases in physical activity, particularly in areas of health and social deprivation? • Reduce inequalities in levels of physical activity? • Improve the physical and mental health and wellbeing of communities? • Reduce inequalities in physical and mental health and wellbeing? • Support the provision of quality, affordable and healthy food?	• The Places section emphasises the importance of integrating the Healthy Streets approach into future change. This includes promoting cycling, walking and public transport, and implementing projects that improve environmental quality. The Healthy Streets approach aims to contribute to improved physical and mental health and reduce health inequalities. • New sports and leisure facilities are proposed at Thamesmead town centre and Waterfront , and North Thamesmead and The Moorings, which would contribute significantly to wider health improvements by promoting increased physical activities.
4. To contribute to safety and security and the perceptions of safety	• Reduce levels of crime? • Reduce the opportunity for crime and anti-social behaviour? • Create a travel environment that feels safe to all users during the day time and night time? • Increase security and resilience to major incidents? • Improve perceptions of safety and fear of crime to help remove barriers to activities leading to reduced social isolation?	• The environmental and connectivity improvements contained within the Places section have the potential to improve perceptions of safety and security in Thamesmead and Abbey Wood. They promote development that fosters passive surveillance of public spaces, well-lit walking and cycling routes, and more active and animated places.
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand and the needs of the community	• Help to facilitate the delivery of house building that meets the needs of Londoners? • Reduce homelessness and overcrowding? Increase the range and affordability of housing? • Promote accessible and adaptable homes, improving choice for people who require them? • Improve insulation and energy efficiency in housing to reduce fuel poverty and ill-health? • Provide housing that encourages a sense of community and enhances the amenity value of the community?	• The Places section does not directly impact on the quantum, type, quality and tenure of housing. However, the importance of new development integrating with existing communities is emphasised. Combined with identifying potential new and improved connections, and other environmental improvements, the Places section could help encourage a sense of community and enhance the amenity value of the community

IIA objective	Assessment guide questions <i>Will the strategy...? SEA/SA, EQIA, HIA, HRA, CSIA</i>	Assessment of OAPF component
6. To make the best and most efficient use of land so as to support sustainable patterns and forms of development	• Make the best use of land through appropriate development on brownfield sites and use of existing transport network? • Ensure that higher densities development does not adversely impact on different groups of people? • Integrate land use and transport? • Promote regeneration and provide benefits for existing communities?	• The Places section is clear about the potential opportunities for integrating new development with existing and potential transport infrastructure. This includes intensifying land use around transport nodes, and realising opportunities for wider environmental improvements. The importance of new development integrating with existing communities is also emphasised, ensuring that higher density development does not adversely impact on different groups of people.
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing. Nurturing a sense of place and distinctiveness, reducing the need to travel by motorized transport	• Conserve and enhance the townscape/cityscape character? • Create and maintain a safe and attractive public realm which encourages people to walk and cycle? • Help to make people feel positive about the area they live in and promote social integration? • Encourage an inclusive design approach taking into account the needs of a variety of users • Help to improve the wider built environment and create a sense of place and ‘vibrancy’? • Promote high quality design and sustainable design and construction methods? • Improve legibility and ease of use of the built environment for people with sensory or cognitive impairments? • Retain the spatial diversity of communities?	• The Places section is clear about the potential opportunities for integrating new development with existing and potential transport infrastructure. This includes intensifying land use around transport nodes, and realising opportunities for wider environmental improvements. The importance of new development integrating with existing communities is also emphasised, ensuring that higher density development does not adversely impact on different groups of people. Emphasis is also placed on new development acknowledging the importance of local cultural and historic assets, as well as incorporating resilience principles. • Furthermore, The Places section emphasises the importance of integrating the Healthy Streets approach into future change. This includes promoting cycling, walking and public transport, and implementing projects that improve environmental quality. The Healthy Streets approach aims to contribute to improved physical and mental health and reduce health inequalities. The Healthy Streets Approach supports the delivery of high quality, inclusive spaces that should prevent and remove barriers for disabled people, and encourage many disabled Londoners to increase their use of the city’s streets by making them more appealing and accessible to people with a range of impairments, for example by reducing traffic volumes and speeds, making it easier to cross roads, ensuring footways are even and wide, providing lighting and resting points, and allowing inclusive and step-free access to bus stops and Tube stations.
8. To maximise accessibility for all in and around London	• Improve accessibility to all public transport modes? • Increase equality of access to services and facilities ? • Improve links between areas, neighbourhoods and communities?	• The Places section emphasises the importance of integrating the Healthy Streets approach into future change. This includes promoting cycling, walking and public transport, and implementing projects that improve environmental quality. The Healthy Streets approach aims to contribute to improved physical and mental health and reduce health inequalities. Potential local and strategic connections and improvements are identified, resolving historic severances caused by infrastructure and poor urban design.
9. To enhance and improve connectivity for all to, from, within and around the area and increase the proportion of journeys made by sustainable and active transport modes. To improve connectivity and access to opportunities within the OA and to areas of significant employment growth, such as the	• Improve connectivity by public transport in outer London? • Improve connectivity across the River Thames by all modes of transport, particularly in east London? • Reduce traffic volumes and congestion on roads across all parts of London? • Reduce severance and consequent inequalities for those groups who are more greatly affected by severance (e.g. people on low incomes, disabled people, children and young people, older people and people dependent on walking and using public transport for travel)? • Encourage a modal shift to more sustainable forms of travel as well as encourage greater efficiency (e.g. through car-sharing)?	• The Places section emphasises the importance of integrating the Healthy Streets approach into future change. This includes promoting cycling, walking and public transport, and implementing projects that improve environmental quality. The Healthy Streets approach aims to contribute to improved physical and mental health and reduce health inequalities. Potential local and strategic connections and improvements are identified, resolving historic severances caused by infrastructure and poor urban design. The Places section also adds weight to the future public transport scenarios detailed in the Transport section, by identifying opportunities for new local connections to strategic public transport connections like a new DLR extension to the Royal Docks via Beckton Riverside.

IIA objective	Assessment guide questions <i>Will the strategy...? SEA/SA, EQIA, HIA, HRA, CSIA</i>	Assessment of OAPF component
Royal Docks. To overcome severance and promote safe, accessible routes for active travel	• Reduce the overall need for people to travel by improving their access to the services, jobs, leisure and amenities in the place in which they live? • Encourage active travel by creating safe, attractive routes?	
10. To maintain, strengthen and support the local economy, recognising the existing and historical economic base with regard to logistics, manufacturing and the Thames Estuary Production Corridor vision and build upon this as a priority. To enhance the existing economy by improving conditions for business to thrive. To plan for efficient use of employment land and safeguard protected industrial capacity	• Help maintain London as an internationally competitive city? • Increase London's productivity? • Facilitate the provision of the right type of employment land and floorspace in the right place to ensure that London remains economically competitive? • Help generate satisfying, secure and rewarding new jobs? • Create healthy, productive workplaces? • Help to provide employment opportunities in the most deprived areas, particularly to disadvantaged groups, and stimulate regeneration? • Minimise barriers to employment (e.g. transport, financial, childcare)? • Help reduce overall unemployment, particularly long-term and youth unemployment? • Improve the resilience of business and the economy? • Help to diversify the economy? • Encourage business start-ups and support the growth of businesses, particularly SMEs? • Enable people with physical and mental health conditions and disabilities to stay in employment? • Support social enterprise, voluntary and community sectors? • Support small, local retail offers? • Support working families?	• The Places section proposes visions for the future of five places in the OA area. Some of these emphasise the importance of retaining existing industrial floorspace in accordance with draft London Plan policy. Potential new local connections and environmental improvements would also make it easier for existing and future residents to access local job opportunities. • The potential for industrial intensification is identified in West Thamesmead and Plumstead.
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness	• Ensure that provision of environmental, social and physical infrastructure support economic competitiveness and housing delivery? • Unlock land that has capacity for housing development? • Provide accessible infrastructure to connect new housing developments to key services? • Ensure equity of access to environmental, social and physical infrastructure?	• The Places section emphasises the importance of integrating the Healthy Streets approach into future change. This includes promoting cycling, walking and public transport, and implementing projects that improve environmental quality. The Healthy Streets approach aims to contribute to improved physical and mental health and reduce health inequalities. Potential local and strategic connections and improvements are identified, resolving historic severances caused by infrastructure and poor urban design.
12. To ensure the education and skills provision meets the needs of area's existing and future	• Help to improve learning and the attainment of skills to the right employment opportunities? • Ensure provision of sufficient school places to meet growing needs across London? • Support transitions from education to work?	• The Places section includes proposals for a potential new school at North Thamesmead and the Waterfront, and a construction-related further education facility at Veridion Park. This would support a greater choice of schools and educational opportunities for all, which is particularly important for low-income communities, ethnic minority groups, disabled residents or those with existing health conditions, and Gypsy and Traveller communities.

IIA objective	Assessment guide questions <i>Will the strategy...? SEA/SA, EQIA, HIA, HRA, CSIA</i>	Assessment of OAPF component
labour market and improves life chances for all	- Support London’s status as an international city of learning, research and development? - Support adult education to improve social mobility and life chances for all ages? - Support early years education and support, particularly in areas of deprivation? - Encourage education and training that meets the needs of business, including vocational training?	
13. To safeguard and enhance the area’s cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen and build strong and inclusive communities In Thamesmead specifically, to celebrate and protect existing cultural and heritage destinations while encouraging new offers.	- Improve accessibility for all to cultural venues? - Improve participation by all in cultural activities and support cultural activities that promote social integration? - Help to maintain and increase appropriate cultural facilities, both for consumption and production to sustain and strengthen a growing sector - Enable Londoners to develop skill and take up careers in the creative industries - Provide access to affordable cultural activities in areas of deprivation?	The potential improvements to local and strategic connections identified in the Places section could improve access to culture. The importance of heritage assets is also acknowledged.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality, and reduce exposure	- Reduce NO_x, PM₁₀ and PM_{2.5} emissions? - Reduce inequalities in terms of access to clean air across London, particularly for those: - who live in deprived areas? - who live, learn or work near busy roads or construction sites? - who are more vulnerable because of their age or existing medical condition? - Reduce the number of people exposed to particulates and NO₂ concentrations, particularly vulnerable people? - Improve air quality around areas which may have high concentrations of vulnerable people such as schools, outdoor play areas, care homes and hospitals? - Help to achieve national and international standards for air quality? - Reduce costs to the economy resulting from premature deaths due to poor air quality?	By promoting the Healthy Streets approach, the Places section could contribute towards a modal shift towards sustainable transport and a corresponding improvement in local air quality.
15. To ensure that the area adapts and becomes more resilient to the impacts of climate change and extreme weather events	- Protect London from climate change impacts? - Improve the microclimate and ameliorate the impact of the heat island effect on Londoners? - Help London to function during a flood event, heavy rainfall or tidal surge?	The Places section will not impact directly on climate change mitigation

IIA objective	Assessment guide questions <i>Will the strategy...? SEA/SA, EQIA, HIA, HRA, CSIA</i>	Assessment of OAPF component
such as flood, drought and heat risks through regeneration and development opportunities	- Help London to function during periods of drought? - Reduce impacts on groups more vulnerable to the effects of climate change e.g. older people are more vulnerable to excess heat?	
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050	- Help to reduce London's CO₂ emission targets by 60% by 2025? - Reduce transport's contribution to CO₂ emissions? - Reduce the built environment's contribution to CO₂ emissions? - Facilitate investment in green technologies, equipment and infrastructure that reduce GHG emissions? - Promote the transition to a low carbon economy? - Reduce carbon emissions by shifting to more sustainable modes of transport?	By promoting the Healthy Streets approach, the Places section could contribute towards a modal shift towards sustainable transport and a corresponding improvement in local air quality.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system	- Increase the proportion of energy both purchased and generated from renewable and sustainable resources? - Contribute to the provision of smart and affordable energy system for all? - Reduce the demand and need for energy? - Promote generation of energy locally? - Ensure that any supply shortages are addressed? - Promote and improve energy efficiency? - Reduce impacts of fuel poverty, particularly for vulnerable groups? - Promote the transition to a low carbon economy?	By promoting the Healthy Streets approach, the Places section could contribute towards a modal shift towards sustainable transport and a corresponding improvement in local air quality.
18. To protect and enhance the area's water resources by ensuring the highest levels of water efficiency and reuse, drainage and the sewerage system	- Improve the quality of the water environment, helping to meet the objectives of the Water Framework Directive? - Reduce discharges to surface and ground waters? - Support necessary improvements to the water systems infrastructure (water supply/sewerage)? - Reduce abstraction from surface and ground water sources? - Reduce water consumption through the promotion of demand management? - Protect and enhance the character and use of London's riverscapes and waterways?	The Places section will not impact on water management.
19. To manage the risk of flooding from all sources and improve the resilience of property and infrastructure to flooding and	- Minimise the risk of flooding from all sources of flooding to people, property, infrastructure ? - Manage residual flood risks appropriately and avoid new flood risks? - Seek to minimise new development in areas prone to flood risk or mitigate the potential for such risk?	The section on North Thamesmead and the Moorings notes that natural flood management methods can contribute to increasing flood storage and creating recreational areas and habitat.

IIA objective	Assessment guide questions <i>Will the strategy...? SEA/SA, EQIA, HIA, HRA, CSIA</i>	Assessment of OAPF component
reduce its effects and impacts on the community.	- Promote the integration of sustainable urban drainage systems? - Ensure that sites in areas of high tidal flood risk include provision for the creation or improvement of flood defences? - Ensure that no development prejudices the Environment Agency's ability to improve flood defences in line with its strategic plans?	
20. To protect, connect and enhance the area's natural capital (including important habitats, species and landscapes) and the services and benefits it provides linking it directly with the wider London green and blue network.	- Protect and enhance the character of local greenspaces? - Bring nature closer to people, particularly in most urbanised parts of the city and improve access to areas of biodiversity interest? - Help to acknowledge monetary value to natural capital of London? - Conserve, enhance or create natural and semi-natural habitats of recognised ecological value and/or the green corridors that link them enhancing the ecological function and carrying capacity of the greenspace network? - Avoid damage to sites, protected species and habitats, especially where there is a designation of international, national, regional or local importance? - Promote, educate and raise awareness of the enjoyment and benefits of the natural environment to all? - Promote and support the function of the Blue Ribbon Network? - Specifically address deficiencies in access to open space? - Create green spaces that are safe and accessible to all? - Promote sensory environments and play spaces? - Support the protection of the priority species identified in the Greenwich and Bexley BAP? - Improve access to, and the connectivity of, the Green Chain?	- By promoting the Healthy Streets approach, and identifying opportunities for improved local and strategic connections, the Places section would improve access to local green spaces, support the creation of new spaces, and attract investment into local natural capital. - The section on North Thamesmead and the Moorings identifies potential ecological improvements and a new publicly-accessible nature reserve at Crossway, and West Thamesmead and Plumstead identifies potential ecological improvements and wetlands at Broadwater Dock.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.	- Conserve and/or enhance heritage assets, their setting and the wider historic environment? - Contribute to the better management of heritage assets and tackle heritage at risk? - Improve the quality and condition of the historic environment? - Respect, maintain and strengthen local character and distinctiveness? - Increase the social benefit (e.g. education, participation, citizenship, health and well-being) derived from the historic environment? - Engage communities in identifying culturally important features and areas? - Provide for increased access to and enjoyment of the historic environment?	The Places section acknowledges the importance of statutorily and locally designated heritage assets to the successful evolution of the OA.

IIA objective	Assessment guide questions <i>Will the strategy...? SEA/SA, EQIA, HIA, HRA, CSIA</i>	Assessment of OAPF component
	Provide for increased understanding and interpretation of the historic environment?	
22. To conserve and recognise the area's geodiversity and protect soils from development and over intensive use	- Promote the use of brownfield land? - Prevent further soil degradation or erosion? - Restore degraded soil? - Minimise the risk of health impacts through contamination? - Maximise the potential benefit of access to new employment and housing as a result of remediation?	The Places section will not impact on the area's geodiversity.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates	- Promote the principles of circular economy when aiming for waste reduction, reuse, re-manufacturing and recycling? - Maximise use of innovative waste management techniques including smart technology? - Help develop more efficient and sustainable freight transportation? - Minimise negative impacts of waste processing and disposal on vulnerable groups?	The Places section will not impact on local reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across the opportunity area and reduce inequalities in exposure	- Reduce the number of people exposed to high levels of noise with the potential to cause annoyance, sleep disturbance or physiological effects? - Help reduce actual noise levels and disturbances from noise? - Minimise and reduce road, rail and aviation noise and vibration levels and disruption? - Improve people's access to quiet/ tranquil spaces? - Reduce night time noise in residential areas?	The Places section will not impact on the minimisation of noise and vibration.

IIA Objective	Likely effects
1. To make the area inclusive by reducing inequality and disadvantage and addressing the diverse needs of the population	
2. To ensure the OAPF area has socially integrated communities which are strong, resilient and free of prejudice	
3. To improve the mental and physical health and wellbeing of local residents and to reduce health inequalities across the area and between communities	
4. To contribute to safety and security and the perceptions of safety	
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand and the needs of the community	
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development?	

7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing. Nurturing a sense of place and distinctiveness, reducing the need to travel by motorized transport	
8. To maximise accessibility for all in and around London	
9. To enhance and improve connectivity for all to, from, within and around the area and increase the proportion of journeys made by sustainable and active transport modes. Improve connectivity and access to opportunities within the OA and to areas of significant employment growth, such as the Royal Docks. Overcome severance and promote safe, accessible routes for active travel	
10. To maintain, strengthen and support the local economy, recognising the existing and historical economic base with regard to logistics, manufacturing and the Thames Estuary Production Corridor vision and building upon this as a priority. To enhance the existing economy by improving conditions for business to thrive. Plan for efficient use of employment land and safeguard protected industrial capacity	
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness	
12. To ensure the education and skills provision meets the needs of area's existing and future labour market and improves life chances for all	
13. To safeguard and enhance the area's cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen and build strong and inclusive communities In Thamesmead specifically, Celebrate and protect existing cultural and heritage destinations while encouraging new offers.	
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality, and reduce exposure	
15. To ensure that the area adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks through regeneration and development opportunities	
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050	
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system	
18. To protect and enhance the area's water resources by ensuring the highest levels of water efficiency and reuse, drainage and the sewerage system	
19. To manage the risk of flooding from all sources and improve the resilience of property and infrastructure to flooding and reduce its effects and impacts on the community.	
20. To protect, connect and enhance the area's natural capital (including important habitats, species and landscapes) and the services and benefits it provides linking it directly with the wider London green and blue network.	
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, rchaeological and cultural value in relation to their significance and their settings.	
22. To conserve and recognise the area's geodiversity and protect soils from development and over intensive use	
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates	
24. To minimise noise and vibration levels and disruption to people and communities across the opportunity area and reduce inequalities in exposure	

Conclusion

This report presents the final appraisal for the Thamesmead and Abbey Wood Opportunity Area Planning Framework (OAPF). The primary purpose of the IIA has been to assess whether and to what extent the OAPF is consistent with the GLA's environmental, equality, health and community safety objectives.

Overall, the OAPF is considered to have a generally positive impact in relation to the objectives, when compared to the alternative of not preparing an OAPF. There are some neutral effects, however no negative effects were identified through the assessment at this stage.

The OAPF has been assessed as performing strongly against the objectives for housing supply, quality, choice and affordability, sustainable land use, design, accessibility, connectivity and economic competitiveness and employment.

The draft IIA report was open for consultation alongside the draft Thamesmead and Abbey Wood OAPF December 2019 -March 2020 .

Appendix D

Habitats Regulations Assessment Screening Report Thamesmead and Abbey Wood OAPF December 2019

Introduction

This report responds to requirements of the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) which implements the requirements of the European Commission's Habitats Directive 92/43/EEC. Consideration is given as to whether or not the OAPF is likely to have significant effects on the integrity of sites designated of European level biodiversity interest, either alone, or in combination with other plans or projects.

The draft London Plan was published in December 2017 and following the Examination in Public the Intend to Publish version was published in December 2019. An HRA was undertaken for the Draft London Plan and an updated report was published in July 2018 (AECOM 2018). This assessment considered the implications for European sites of proposed policies and proposals at London-level, including Policy SD1 on Opportunity Areas. This assessment stated that:

For the most part the opportunity areas are relatively remote from European sites and the overall focus on the role of the London Plan (and Mayor's agencies) in these opportunity areas is on improvement/delivery of sustainable public transport, which will be positive for air quality.

It did not specifically identify any issues with the Thamesmead and Abbey Wood Opportunity Area. The focus of this screening report is to specifically consider the implications of the Thamesmead and Abbey Wood OAPF on European sites.

Need for Plan assessment

Article 6 of the European Habitats Directive (92/43/EEC) provides the means by which the European Union meets its obligations in relation to natural habitats, flora and fauna under the Bern Convention. The main provision of the Directive relevant to this report is concerned with the assessment and review of plans and projects which have the potential to affect Natura 2000 sites. Natura 2000 sites include: Special Protection Areas established in accordance with the requirements of the Birds Directive (2009/147/EC as amended) and Special Areas of Conservation established in accordance with the requirements of the Habitats Directive.

Articles 6(3) and 6(4) of the Habitats Directive state:

6 (3) Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.

6 (4) If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature, the Member State shall take all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted.

Where the site concerned hosts a priority natural habitat type and/or a priority species, the only considerations which may be raised are those relating to human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest.

The Conservation of Habitats and Species Regulations 2017 (as amended) (Habitats Regulations) transpose into domestic legislation obligations associated with both the European Birds Directive and the Habitats Directive. Regulation 102 of the Habitats Regulations is the most pertinent in relation to this report. Regulation 102(1) states:

*Where a land use plan —
is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and
is not directly connected with or necessary to the management of the site,
the plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site's conservation objectives.*

The term 'Habitats Regulations Assessment' is used to cover the whole process of assessing the effects of a land use plan on European sites and Ramsar sites. An Appropriate Assessment is only one stage within the whole process of HRA (see methodology section for further details).

The European site network comprises sites of nature conservation value that benefit from statutory protection at the European level. These sites include: Special Areas of Conservation (SACs) and candidate Special Areas of Conservation (cSACs) [designated under the EC Habitats Directive]; Special Protection Areas (SPAs) and potential Special Protection Areas (pSPAs) [classified under the EC Birds Directive 1979, 79/409/EEC]. The Government also expects candidate SACs (cSACs), potential SPAs (pSPAs), and Ramsar sites [designated under the Ramsar Convention 1976] to be included within the HRA process. For the purposes of this report European sites are considered to include SACs, cSACs, SPAs, pSPAs and Ramsar sites.

Purpose of this report

This report presents the HRA screening for the emerging Thamesmead and Abbey Wood OAPF. It sets out the methodology for the HRA, determines the European sites that require consideration with regards to potential effects arising from the OAPF, and then goes through the assessment process, assessing likely significant effects on relevant European sites and presents its conclusions.

Consultation

Consultation on this HRA screening report is taking place alongside consultation on the draft OAPF. In their role as SEA Consultation Body, Natural England were consulted on the IIA Scoping Report, and submitted a response. They were informally consulted on the results of this report and agreed with the conclusion that there are no likely significant effects.

Methodology

There is no formal central Government guidance on HRA, although general EC guidance on HRA does exist ¹. The Department for Communities and Local Government (DCLG) released a

¹ European Commission (2001): Assessment of plans and projects significantly affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Article 6(3) and 6(4) of the Habitats Directive.

consultation paper on the Appropriate Assessment of Plan in 2006². As yet, no further formal guidance has emerged. However, Natural England has produced its own internal guidance³ as has the RSPB⁴.

The list below outlines the stages of HRA according to current draft DCLG guidance. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations, and any relevant changes to the plan until no significant adverse impacts remain.

- Evidence Gathering – collecting information on relevant European sites, their conservation objectives and characteristics and other plans or projects.
- HRA Task 1: Likely significant effects ('screening') –identifying whether a plan is 'likely to have a significant effect' on a European site
- HRA Task 2: Ascertaining the effect on site integrity – assessing the effects of the plan on the conservation objectives of any European sites 'screened in' during HRA Task 1
- HRA Task 3: Mitigation measures and alternative solutions – where adverse effects are identified at HRA Task 2, the plan should be altered until adverse effects are cancelled out fully

The first task, screening for HRA, will determine if planning policy and guidance documents are likely to have a significant effect on the conservation objectives of the European sites. This will determine whether stages 2 and 3 of the HRA are required.

² CLG (2006) Planning for the Protection of European Sites, Consultation Paper

³ ⁴Natural England (1997) Habitats regulations guidance note 1.

http://www.ukmpas.org/pdf/practical_guidance/HRGN1.pdf

⁴ Dodd A.M., Cleary B.E., Dawkins J.S., Byron H.J., Palframan L.J. and Williams G.M. (2007)

The Appropriate Assessment of Spatial Plans in England: a guide to why, when and how to do it. The RSPB, Sandy.

The Thamesmead and Abbey Wood Opportunity Area Planning Framework

The OAPF is being prepared as a long-term planning framework to support and guide emerging development in the Thamesmead and Abbey Wood Opportunity Area. It responds directly to the requirements in Policy 2.13 – Opportunity Areas and Intensification Areas of the current London Plan (2016) and Policy SD1 of the draft London Plan (2019). The draft London Plan states that:

Housing Zone status and investment by Peabody in estate renewal in the area will improve the quality of the environment and bring new housing opportunities. To deliver wider regeneration benefits to Thamesmead, other interventions to support the growth of the Opportunity Area are needed. These include: the redevelopment and intensification of employment sites to enable a range of new activities and workspaces to be created in parallel with new housing development; a review of open space provision in the area to create better quality, publicly accessible open spaces; the creation of a new local centre around Abbey Wood station, the revitalisation of Thamesmead town centre and Plumstead High Street; and improved local transit connections. The Planning Framework should ensure that there is no net loss of industrial floorspace capacity.

Alongside the opening of the Elizabeth Line, major investments in transport infrastructure such as the proposed DLR extension from Gallions Reach are also needed to support high density development and provide access to areas of significant employment growth, such as the Royal Docks for existing and new residents of Thamesmead. To accommodate the expected growth in the area, utility infrastructure –in particular water and electricity supply, broadband and a local heat network –should be upgraded and/or planned for accordingly. In view of the low-lying nature of parts of the area, particular attention should also be given to flood risk management.

OAPF preparation process

The OAPF is being prepared by the Mayor of London (the GLA), Transport for London, the Royal Borough of Greenwich and the London Borough of Bexley. During the summer of 2019 the GLA undertook early engagement with local communities and key stakeholders to understand key priorities and challenges in the area. This work is summarised in the draft OAPF and has been used to inform proposals. The draft OAPF is subject to a 12-week consultation. A draft IIA scoping report was submitted to the SEA consultation bodies in October 2019 and is available alongside this report.

Form and content of the OAPF

The OAPF comprises the following linked sections:

Part 1 Introduction (what is an OAPF, evidence, engagement, context, analysis)

The introduction chapter of the OAPF describes the scope of this planning framework and its relation to other planning documents such as the London Plan and other national and local level policies. It provides context on London's growing population and explains what this means for the Thamesmead and Abbey Wood Opportunity Area.

Engagement with local communities has played an important role in compiling this consultation draft OAPF. Details of the public engagement programme and the feedback received can be found in Part 1.3 Engagement and Consultation. Key findings from the baseline analysis and evidence-base can be found in Part 1.5.

Part 2 Vision, Principles and Objectives

The OAPF sets out a long-term vision and objectives for the OA. The vision and objectives for Thamesmead and Abbey Wood have been informed by earlier engagement with stakeholders and feedback from local communities. They have also been guided by the following six Good Growth objectives that are set out in the draft London Plan.

Part 3 Unlocking Good Growth with Transport

This chapter sets out two transport and growth scenarios that have been explored through the OAPF. These scenarios consider change over the next 20 years: intermediate growth with a bus transit, and higher growth with bus transit and an extension to the Docklands Light Railway (DLR).

Part 4 Spatial Strategies

This chapter reviews the social, community and environmental infrastructure requirements that are needed to support growth in the OAPF.

Part 5 Places

Ideas for the future of individual places within the Thamesmead and Abbey Wood Opportunity Area are contained in Part 5 Places. These visions for the future are set within a high-level Urban Design Framework, and build on our baseline analysis, public engagement and growth scenarios to show how strategic opportunities for new homes, jobs and infrastructure could combine at a local scale to embody Good Growth, and create places which people choose to live and work in.

Part 6 Delivery

Part 6 Delivery sets out how the strategic vision for the Thamesmead and Abbey Wood Opportunity Area contained within this OAPF could be delivered. This would involve a variety of projects and initiatives in the short, medium and long term.

Identification of relevant sites

Using the HRA of the London Plan and the MAGIC website ⁵ the GLA identified those European sites within a 15km zone extending from the boundary of the Opportunity Area. European sites were scoped into the study if they were either wholly or partially within this geographical area. Three sites are partially within 15km of the Thamesmead and Abbey Wood OA

European site	Approximate distance from OAPF area	Qualifying Features
Epping Forest SAC	9km	Atlantic acidophilus beech forests, Northern Atlantic wet heaths with <i>Erica tetralix</i> , and European dry heaths. Stag beetle (<i>Lucanus cervus</i>)
Lee Valley SPA	12km	Internationally important populations of northern shoveler (<i>Anas clypeata</i>), gadwall (<i>Anas strepera</i>), and bittern (<i>Botaurus stellaris</i>)
Lee Valley Ramsar	12km	Nationally scarce plant species (whorled water-milfoil) <i>Myriophyllum verticillatum</i> and the rare or vulnerable invertebrate (<i>Micronecta minutissima</i>). Species/populations occurring at levels of international importance: Northern Shoveler, and Gadwall.

:

⁵ <https://magic.defra.gov.uk/>

In order to assess whether the Thamesmead and Abbey Wood OAPF will have a significant effect on European Sites, the HRA of the London Plan was reviewed for the three particular sites identified.

The London Plan HRA identified the various ways in which land use plans can impact on internationally designated sites by following the pathways along which development can be connected with those sites. Pathways are routes by which a change in activity associated with a development can lead to an effect upon an internationally designated site. Four impact pathways were identified, and were discussed in relation to each European site:

- Impacts from urbanisation and recreational activities (including disturbance and abrasion)
- Atmospheric pollution
- Water Abstraction
- Water Quality

Epping Forest SAC (From London Plan updated HRA 2018)

Introduction

70% of this 1,600 hectare site consists of broadleaved deciduous woodland, and it is one of only a few remaining large-scale examples of ancient wood-pasture in lowland Britain. Epping Forest supports a nationally outstanding assemblage of invertebrates, a major amphibian interest and an exceptional breeding bird community.

Reasons for Designation⁶

Epping Forest qualifies as a SAC for both habitats and species. The site contains Annex I habitats of:

- Beech forests on acid soils with *Ilex* and sometime *Taxus* in the shrub layer.
- Wet heathland with cross-leaved heath; and
- Dry heath

The site contains Annex II species:

- Stag beetle *Lucanus cervus*.

Current Pressures⁷

- Air pollution
- Public disturbance
- Inappropriate water levels
- Water pollution

Conservation Objectives

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site

Assessment

Epping Forest SAC receives a great many visits per year (estimated at over 4 million) and discussions with the Corporation of London (who manage Epping Forest) have identified long-standing concerns about increasing recreational use of the forest resulting in damage to its interest features. A programme of detailed visitor surveys have been undertaken in recent years. A core catchment, within which 75% of visitors derive, has been defined as 6.2km where net new

⁶ JNCC (2015) Natura 2000 Standard Data Form: Epping Forest SAC

⁷ Natural England (2016). Site Improvement Plan: Epping Forest SAC

housing will need to be mitigated in some form. Within London the major points of visitor origin are Waltham Forest and Redbridge, with a small proportion from Newham.

Thamesmead and Abbey Wood OA falls outside this core catchment, and is 9km from the SAC at its closest boundary. The OA is well-served by open space. It is also the case that Epping Forest SAC is located north of the River Thames, and it is considered unlikely that residents of T&AW will travel north through central London to reach the SAC. The OAPF sets out proposals to retain and enhance open space, encouraging greater public access. It is considered that the OAPF will not have any likely significant effects on the Epping Forest SAC.

Air Quality

Epping Forest SAC is known to be adversely affected by relatively poor local air quality alongside the roads that traverse the SAC and this has been demonstrated to have negatively affected the epiphytic lichen communities of the woodland as well as other features. The nature of the road network around Epping Forest is such that journeys between a number of key settlements around the Forest by car, van or bus effectively necessitate traversing the SAC.

Journey to work census data from 2011 indicate that the London boroughs most likely to contribute to NOx concentrations and nitrogen deposition within Epping Forest SAC, arising from road traffic, are Waltham Forest, Redbridge and possibly Enfield.

Natural England advised Runnymede Borough Council on air pollution in July 2006. An excerpt of the letter follows:

The air pollution associated with developments that could arise from the LDF CS is primarily a result of predicted increases in traffic and construction activities. Pollutants can act locally or be transported far from the source in long range transport to act nationally or even internationally. The LDF CS can only be concerned with locally emitted and short range locally acting pollutants¹. In terms of pollution from vehicular emissions the concentrations decline exponentially from the road edge.

Though it varies with a range of factors and from pollutant to pollutant, the concentrations of pollutant from roads can be said to have localised impacts up to 200m from the road side. Therefore, for the LDF CS effects of vehicular atmospheric emissions should be considered if the roads on which the vehicles travel are closer than 200m from the Natura 2000 site

(English Nature, 2006).

Given there are no European sites within 200m of any roads in the OA it is considered that the OAPF will not have a significant effect in relation to air quality. The potential impacts of London's overall growth on Epping Forest was considered through the HRA of the draft new London Plan and recommendations were made and incorporated into the London Plan including the text at paragraph 4.1.13 which states:

As identified in the Habitats Regulation Assessment, a mitigation strategy for Epping Forest Special Area of Conservation (SAC) is being produced to respond to the impact of additional recreational pressure and air pollution from nearby authorities, including some London boroughs. Should monitoring and evidence demonstrate adverse impacts on the SAC associated with development from

London and following the implementation of the mitigation strategy, this will be considered as part of assessing whether a review of the London Plan is required. The GLA will engage with the relevant stakeholders on the formulation and delivery of the mitigation strategy.

It unlikely that any additional growth identified in this OA and its associated traffic and construction activities will impact Epping Forest SAC especially as the SAC is north of the river Thames and there are no direct vehicles routes to it.

Lee Valley SPA and RAMSAR

Introduction

The Lee Valley is a series of wetlands and reservoirs located in the north east of London within the Lee Valley Regional Park. The site occupies approximately 24 km of the valley and comprises embanked water supply reservoirs, sewage treatment lagoons and former gravel pits that support a range of man-made, semi-natural and valley bottom habitats that support wintering wildfowl.

Reasons for Designation

Lee Valley qualifies as a SPA for its Annex I species⁸:

Wintering:

- Bittern *Botaurus stellaris*

Migratory:

- Gadwall *Anas strepera*
- Shoveler *Anas clypeata*

Lee Valley qualifies as a Ramsar site under the following criterion⁹:

- Criterion 2: The site supports the nationally scarce plant species whorled water-milfoil *Myriophyllum verticillatum* and the rare or vulnerable invertebrate *Micronecta minutissima* (a water-boatman); and,
- Criterion 6: species/populations occurring at levels of international importance. Qualifying Species/populations (as identified at designation):
- Species with peak counts in spring/autumn: Northern shoveler *Anas clypeata*
- Species with peak counts in spring/autumn: Gadwall *Anas strepera*

Current Pressures¹⁰

- Water pollution
- Hydrological changes
- Recreational disturbance including angling
- Atmospheric pollution

Conservation Objectives¹¹

With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:

- The extent and distribution of the habitats of the qualifying features

⁸ JNCC (2015). Natura 2000 Standard Data Form: Lee Valley SPA

⁹ JNCC (2008). Information Sheet on Ramsar Wetlands: Lee Valley Ramsar site.

¹⁰ Natural England (2014) Site Improvement Plan: Lee Valley

¹¹ Natural England (2014) Conservation Objectives: Lee Valley

- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site

Recreational activity

Within the past five to ten years landowners/managers within the SPA (RSPB, the local Wildlife Trust, the Regional Park Authority and Thames Water) have undertaken initiatives both to facilitate and to promote greater public access to the SPA for recreation. Changing public access is fundamentally linked with increasing visitor numbers given that one of the primary reasons for changing the access is to attract more visitors. Most recently, Thames Water's flagship Walthamstow Wetlands project, which opened in October 2017, aims to substantially increase public access to, and use of, Walthamstow Reservoirs, which were little used for recreation and had only been accessible by prior arrangement. Clearly, the various owners and managers of the SPA components would not have embarked on these initiatives (or have been permitted to do it by competent authorities) if it was expected that by providing and promoting greater public access at this location they would risk an adverse effect on the SPA. There is therefore no current evidence that recreational disturbance of the wintering gadwall and shoveler using Walthamstow Reservoirs in international numbers will be incompatible with growth in London over the period 2019-2029 and no *a priori* reason to assume any mitigation will be needed. This is particularly the case since both species are known to be able to habituate to human activity and the peak of human recreational use of the Walthamstow Wetlands is likely to be in summer when numbers of gadwall and shoveler are at their lowest.

Notwithstanding this promotion of the site, it is unlikely residents of the OA would cross the river and travel through Central London to reach the SPA. The OAPF also promotes greater access to the River, which could provide an alternative water-based recreation activity to the SPA.

Water Resources

Walthamstow Reservoirs SSSI is a series of sealed reservoirs that are part of the water supply infrastructure for London. As such, water levels are directly controllable by the site manager (Thames Water) and they have been largely responsible for creating the circumstances that have led to the site being of international importance for gadwall and shoveler. Moreover, Thames Water has invested significantly in water supply infrastructure to ensure that London's water supply is as resilient as possible. This includes the construction of an operational desalination plant at Beckton in north-east London.

It is unlikely the OA will rely on the water supply from this reservoir.

Water Quality

Any increase in wastewater resulting from proposals in the OAPF are not likely to affect the SPA/Ramsar, as wastewater is treated at the Crossness Treatment Plant and discharged into the Thames.

It is considered unlikely that development associated with the OAPF will adversely affect the Lee Valley SPA/Ramsar as the OA has its own waste water treatment facility at Crossness which is being upgraded to treat 44% more sewage.

Other Plans

The Royal Borough of Greenwich has recently published the Site Allocations DPD, which has relied upon the HRA screening assessment for the Core Strategy¹².

That assessment concluded that there would not be any likely significant effects on any European Site.

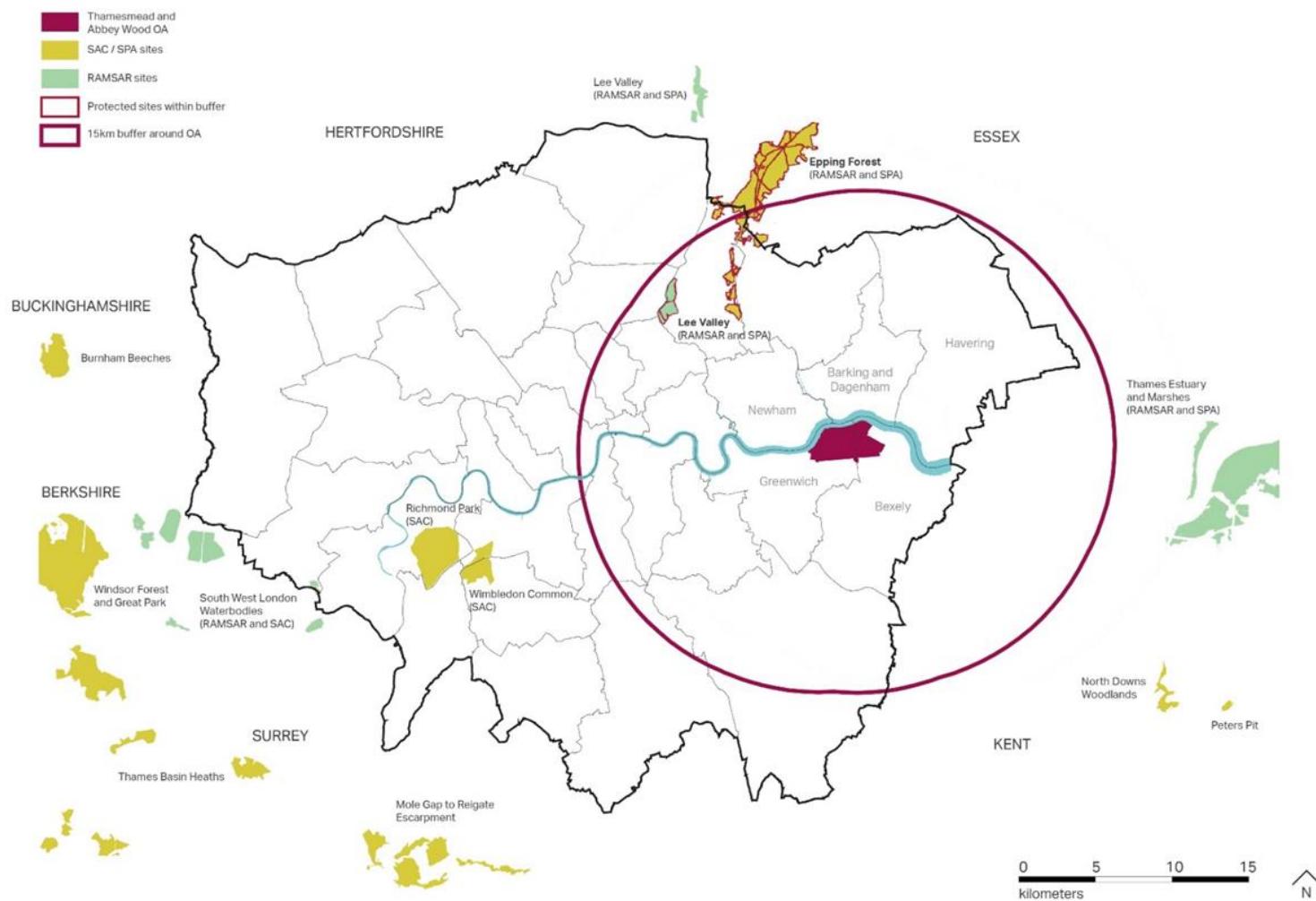
¹² Habitat Screening Assessment on Core Strategy Proposed Submission Version RBG 2013

Conclusion

This report has identified those European sites within 15km of the OA boundary. These sites are Epping Forest SAC and the Lee Valley SPA/Ramsar. The assessment reviewed the reasons for site designations and key vulnerabilities. In brief it is considered that: the distance between the OA and the sites (9km and 12km respectively), their position north of the river and beyond central London, and the amount of open space within and close to the OA all lead to an assessment that the Thamesmead and Abbey Wood OAPF will not have a likely significant effect on any European Site.

In addition, individual schemes within the OA will be subject to wider London Plan and more specific policies set out in the OAPF on air quality, water management, sustainable transport and open space enhancements that aim to minimise adverse effects of development.

Map of Thamesmead and Abbey Wood OAPF and protected sites



Appendix E

Historic England - Archaeological Framework Thamesmead and Abbey Wood OAPF

Introduction

1. Purpose

This Archaeological Framework has been prepared by Historic England for the Thamesmead and Abbey Wood Opportunity Area.

The driver for the proposed archaeological approach is to permit appropriate consideration and understanding of its significance and protection. Working within the context of NPPF 2019, the Archaeology Framework will enable site specific applications to build upon the buried landscape assessment to refine their planning approach and possible archaeology condition mitigation.

The proposed approach ensures an economy of scale by permitting the true significance of the recovered geo/archaeological data to be correctly identified at the landscape level while enabling archaeology conditions to be deemed satisfied at the earliest opportunity. The approach draws upon the planning work undertaken within the Battersea, Nine Elms and Vauxhall area and that within the Greenwich Peninsula in addition to examples from across the country.

2. Context

Historically the Thamesmead and Abbey Wood area has been raised to reclaim the marsh for development. The historic and ancient landscape therefore lies buried but has the potential to contain a rich archaeological legacy of societies' inhabitation of this special environment.

Archaeological evidence is a fragile and non-renewable resource and so the Framework is to inform development with an understanding of significance at the landscape level. The Framework will address and interpret the archaeological potential of the Thamesmead and Abbey Wood OAPF area and for this understanding to be updated through a cycle of revision and refinement of potential.

3. Historic England's Recommended Framework

❖ The Board

To oversee the Archaeology Framework, a Board could consist of the Royal Borough of Greenwich Local Planning Authority, Borough of Bexley Local Planning Authority and Historic England.

The aim of The Board will be the:

- preparation of the *Archaeology Framework Brief* (drafted by Historic England)
- amendment of planning permission *Condition Wording* to include reference to the Archaeology Framework
- appointment of a *Consultant* to undertake an assessment of potential by overseeing the landscape level consideration

Archaeology Framework Brief

The Brief will provide the detail regarding what is required of the consultant as well as the approach to be followed at the site specific planning application level. The Brief will build upon best practice and national professional guidance as well as planning guidance.

Condition Wording

The model for this is taken from the amended condition wording employed by Lambeth and Wandsworth Borough Council Local Planning Authorities in respect of planning application sites that fell within the Battersea Channel Project area to which the project brief applied.

Appointment of a Consultant

The employment of a consultant will enable the OAPF area wide archaeological considerations to be appropriately addressed. The resourcing for this retained consultant could be recovered through s106 planning agreements, CIL contributions or other mechanism. It is further recommended that the identified resource required could be funded 65:35 between the two planning authorities.

❖ **Landscape Wide**

It is recommended that the appointed consultant be charged with the preparation and submission of a Method Statement that details how they fulfil the requirements as detailed within the OAPF *Archaeology Framework Brief*. In summary, the consultant should be charged with the requirement to produce an area-wide archaeological desk-based assessment, including combining existing buried archaeological deposit mapping to provide an up to date and accurate mapping for the area. Upon to this model the consultant should map the graded areas of geo/archaeological potential. This approach echoes the current program to update the borough Archaeological Priority Areas using the Tier model of graded potential.

Having undertaken the preparation of a detailed desk-based assessment, the consultant should be required to follow a five-year cycle of combining the results of that periods' archaeological site work into a single synthesis and publish while also ensuring that the area mapping model is updated plus any changes to potential. It should also be the responsibility of the consultant to provide the Greater London Historic Environment Record with required data.

As part of the remit of the consultation, full consideration should be given to public benefit and engagement.

❖ **Site Specific**

NPPF 2019 continues to apply in respect of the process of assessment and understanding archaeological potential at the pre/application stage to inform the nature and scope of any on-going archaeological interest in respect of all planning application sites that fall within the OA. This consideration does not exclude the potential for pre-determination site-work to inform the planning process, nor possible preservation *in situ* of identified specifically significant archaeological assets.

The developer appointed archaeological practice should therefore be expected to undertake an assessment of their client's application site by drawing upon the area wide dataset and defined areas of potential. The archaeological practice should add new evidence to this model by using geotechnical and other data that may have been generated to aid the planning application.

The archaeological practice should consider if there is sufficient data to permit a clear statement regarding whether there is on-going archaeological potential with the site. If the conclusion is that there is not enough data to provide certainty, then the expectation should be that limited site work will be necessary so that a clear statement of potential can be made. As per current approach, any site work, pre-or post-determination should require a specification to be submitted and approved prior to its implementation.

The key departure for the site specific applicant and their appointed archaeological practice will be that in most cases their planning conditioned requirement will conclude sooner than otherwise by the submission and approval of a Summary Statement. This document should include detail of the site work undertaken and its results, assessment derived from any recovered cores and any required full analysis results as part of the conditioned work, plus consideration as to the significance of the results and confirmed data transfer to OA consultant and deposition of the archive to Museum of London or other appropriate repository as defined and agreed in the archaeological practice site work specification.

4. Conclusion

The proposed approach ensures an economy of scale by permitting the true significance of the recovered geo/archaeological data to be correctly identified at the landscape level while enabling archaeology conditions to be deemed satisfied at the earliest opportunity. The approach draws upon the planning work undertaken within the Battersea, Nine Elms and Vauxhall area and that within the Greenwich Peninsula in addition to examples from across the country.

5. References

National deposit modelling examples are provided within the volume, *Deposit Modelling and Archaeology*, 2019, Brighton University, <https://www.brighton.ac.uk/research-and-enterprise/groups/past-human-and-environment-dynamics/deposit-modelling-and-archaeology.aspx> and the national guidance *Deposit Modelling and Archaeology: guidance for mapping buried deposits*, January 2020, Historic England, <https://historicengland.org.uk/images-books/publications/deposit-modelling-and-archaeology/heag272-deposit-modelling-and-archaeology/>

Appendix F

Sustainability Statement

Thamesmead and Abbey Wood OAPF

Sustainability Statement

1. Introduction

- 1.1 This Sustainability Statement, also known as a post adoption statement for the purposes of the Environmental Assessment of Plans and Programmes (EAPP) Regulations 2004, confirms that the Thamesmead and Abbey Wood Opportunity Area Planning Framework (T&AW OAPF)) has been published on [insert publication date] along with this Sustainability Statement and can be found on the Greater London Authority's web-site www.london.gov.uk.
- 1.2 In accordance with the requirements of Article 9(1) of the European Directive 2001/42/EC1 (known as the Directive on Strategic Environmental Assessment (SEA), the EAPP Regulations 2004 and Government guidance on sustainability appraisal this statement outlines the sustainability considerations that have been integrated into the T&AW OAPF prior to their publication, the reasons for choosing the preferred policies and measures for monitoring the T&AW OAPF . Appendix 1 sets out the specific environmental aspects considered during the development of the T&AW OAPF, as required by the European Directive on SEA and EAPP Regulations 2004. Appendix 2 sets out the specific considerations in relation to equalities to demonstrate the Mayor and the GLA have met their requirements under the GLA Act 1999, as amended and the Equality Act 2010.
- 1.3 The following information reflects the outcomes of the Integrated Impact Assessment (IIA) including the sustainability appraisal that was undertaken, and comprises the final step of the assessment process as part of the implementation, monitoring and formal publication process of the T&AW OAPF.
- 1.4 The IIA was prepared in-house and was produced in an integrated way to meet the requirements of strategic environmental assessment, health impact assessment, equalities and community safety legislation. The result was an Integrated Impact Assessment Report, which enabled the Mayor both to meet the requirements of the European Directive on Strategic Environmental Assessment, and to meet his duties under the Greater London Authority (GLA) Acts 1999 and 2007, equalities and other legislation to take account of a range of matters including:
- Economic development and wealth creation;
 - Social development;
 - Improvement of the environment;
 - Community safety;
 - Health inequality and promoting Londoners' health; and
 - Equality of opportunity, elimination of discrimination and the promotion of good community relations.
- 1.5 This integrated approach reflects the Greater London Authority's agreed methodology for impact assessment of strategies and policies, and has been used consistently in assessing the draft London Plan.

2. Thamesmead and Abbey Wood OAPF

- 2.1 The T&AW OA is designated in Table A1.1 of the current London Plan (2016) as an Opportunity Area (OA) with an indicative capacity of 3,000 new homes and 4,000 jobs. The T&AW OA designation states that:
- 2.2 *“The residential environment and capacity of Thamesmead should be enhanced through estate renewal integrated with strategic opportunity sites for new housing, social and recreation facilities together with improved open space and Metropolitan Open Land. Access to the riverside and adjacent spaces in Tripcock Park should be enhanced, together with measures to secure better use of landscape assets such as the Ridgeway and improved local connections through the South East London Green Chain. In view of the low-lying nature of parts of the Area, particular attention should be given to flood risk management. There is scope to enhance employment capacity in the White Hart Triangle and other industrial sites, including waste management and logistics provision.”*
- 2.3 The current London Plan sets out public transport schemes and improvements to increase the capacity of public transport in London (Table 6.1). This includes work towards potential extension of the DLR east of Gallions Reach post-2022.
- 2.4 The Intend to Publish London Plan (2019) identifies an opportunity for T&AW OA to accommodate 8,000 new homes up to 2041 (Table 2.1). This is an uplift of 5,000 new homes from the current London Plan. The T&AW OA designation states that alongside the opening of the Elizabeth line at Abbey Wood, major investments in transport infrastructure such as the proposed DLR extension from Gallions Reach are needed to support high density development and provide access to areas of significant employment growth, such as the Royal Docks.
- 2.5 Paragraph 2.1.4 of the Intend to Publish London Plan sets out that OAPFs can represent the first stage in a plan-led approach to providing significant quantities of additional jobs and homes, improvements to transport and other infrastructure, and better access to local services. The Mayor recognises that there are different models for taking these forward depending on the circumstances and development needs of each OA, and for translating these frameworks into policy in Development Plan documents and Supplementary Planning Documents. Whatever model is used, the Intend to Publish London Plan sets out that frameworks must be prepared in a collaborative way with local communities and stakeholders.

3. Integrated Impact Assessment

- 3.1 The EAPP Regulations 2004 require this Sustainability Statement to set out how the environmental considerations have been integrated into the T&AW OAPF. The IIA not only considered the environmental aspects of the proposals but also the Mayor's other duties as outlined below.
- 3.2 The Mayor has legal duties to consider the following:
- Economic development and wealth creation (GLA Act 1999, as amended);
 - Social development (GLA Act 1999, as amended);
 - Protection and improvement of the environment (European Directive 201/42/EC on SEA, The Environmental Assessment of Plans and Programmes Regulations 2004, GLA Act 1999, as amended);
 - Health inequality and promoting Londoners' health (GLA Act 1999, as amended);
 - Community safety (Crime and Disorder Act 1998, Police and Justice Act 2006); and
 - Equality of opportunity, elimination of discrimination and the promotion of good community relations (GLA Act 1999, as amended, Equality Act 2010).
- 3.3 The GLA adopts an integrated approach to demonstrate how these duties have been considered in the form of an Integrated Impact Assessment. This enables any common themes to be considered together.

Habitats Regulation Assessment

- 3.5 Regulation 102 of the Conservation of Habitats and Species Regulations 2010, which implements Article 6(3) of the Habitats Directive (92/43/EEC) requires an appropriate assessment also known as a Habitats Regulation Assessment (HRA) to be undertaken in respect of any plan or project which is likely to have a significant effect on a European site of nature conservation, either individually or in combination with other plans or projects.
- 3.6 A separate Habitats Regulation Assessment screening report was prepared to support the T&AW OAPF. It concluded the distance between the OA and the sites (9km and 12km respectively), their position north of the river and beyond central London, and the amount of open space within and close to the OA all lead to an assessment that the Thamesmead and Abbey Wood OAPF will not have a likely significant effect on any European Site. In addition, individual schemes within the OA will be subject to wider London Plan and more specific policies set out in the OAPF on air quality, water management, sustainable transport and open space enhancements that aim to minimise adverse effects of development.

IIA Scoping report

- 3.7 The role of the scoping report is to set the framework for the IIA by identifying the sustainability objectives and framework as well as providing background to and identifying trends in the themes and geography of the proposals. The T&AW OAPF IIA Scoping Report was prepared in-house and was developed with a range of input across the GLA, including the GLA Diversity and Social Policy Team, the Housing Team, Transport for London (TfL) and the Demography and Policy Analysis team.

Statutory Engagement

- 3.8 As required by the Regulations, the statutory consultees (Natural England, the Environment Agency, English Heritage, Highways Agency, and Historic England) were invited to comment on the Scoping Report prior to the formal consultation of the IIA, alongside the draft T&AW OAPF. A draft Scoping Report was published between 29 October 2019 – 3 December 2019 for a 5-week consultation period.

- 3.9 The Environment Agency responded, stating that:

'We generally support the approach proposed for this IIA. There are some areas, which we recommend could be developed further, or some additional points included. We feel that, environmental net-gain and the Thames Estuary 2100 Plan, could be two mechanisms to enable good growth in this opportunity area and offer a response and help adapt to the impacts of a changing climate. These should be strongly represented in the IIA and the forthcoming OAPF, with a focus on implementation.'

- 3.10 The Environment Agency also recommended that the Scoping Report and forthcoming OAPF include additional programmes and strategies as detailed in their response table (incl. Riverside Strategies and Thames Estuary 2100). This included reference to the principle of 'net gain' in line with the draft London plan and 25 year Environment Strategy. It also suggested a link between environment and health in the key issues of the baseline.

- 3.11 Highways England responded, stating that:

'Having examined the Thamesmead and Abbeywood OAPF IIA Scoping Report, we are satisfied that its policies will not materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT C2/13 para 10 and DCLG NPPF para 32) as this document generally sets out the background data, together guidance and recommendations for the area's enhancement. Accordingly, Highways England does not offer any comments on the consultation at this time.'

- 3.12 Natural England responded, stating that it *'does not consider that this Scoping report highlights any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation.'*

- 3.13 Historic England recommended that the Scoping Report identified:

- Crossness Conservation Area
- Heritage at Risk assets

- the need for an area-wide framework to assess and evaluate the significance of archaeology in the OA

- 3.16 Following the receipt of these comments additional text was included in the IIA Scoping Report to take account of comments received. In particular, reference was added on the principle of 'net gain' and the Thames Estuary 2100 plan. In addition, text was added to the Historic Environment section noting the need for policies that seek to protect and enhance local historic assets, and for an archaeological framework assess and evaluate the significance of archaeology in the OA.

The Integrated Impact Assessment

The Integrated Impact Assessment findings

- 3.17 A full IIA report was prepared and used the assessment to also prepare an Equalities Impact Assessment, Health and Well-being Impact Assessment and Community Safety Impact Assessment. The Sustainability Appraisal assessed the preferred proposed OAPF components against the sustainability objectives. These objectives included environmental considerations such as biodiversity, air quality and climate change as well as equalities considerations plus health and well-being and accessibility and mobility. Following are the key findings from the IIA Report on the main proposals.

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

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

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

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

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

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

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

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

The public transport proposals in Thamesmead would deliver physical infrastructure which increases connectivity in the area. They would create an integrated public transport network giving greater access to key services and enabling growth in areas which are currently isolated.

The Places section further emphasises the importance of integrating the Healthy Streets approach into future change. This includes promoting cycling, walking and public transport, and implementing projects that improve environmental quality. The Healthy Streets approach aims to contribute to improved physical and mental health and reduce health inequalities. Potential local and strategic connections and improvements are identified, resolving historic severances caused by infrastructure and poor urban design.

Ensure the education and skills provision meets the needs of the area's existing and future labour market and improves life chances for all

The Social and Community Infrastructure section includes an estimated requirement for new facilities linked to the two growth options, and identifies broad locations, and expansion of existing schools. It also references the need for early years provision to be provided as part of mixed-use development. This would support a greater choice of schools and educational opportunities for all, which is particularly important for low-income communities, ethnic minority groups, disabled residents or those with existing health conditions, and Gypsy and Traveller communities

The transport proposals do not directly contribute to education provision but would provide better connectivity and accessibility to local amenities in the OA and beyond the OA. This includes, schools, adult education centre and education services in general, which would benefit young people.

Safeguard and enhance the area's cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen and build strong and inclusive communities in Thamesmead

The Spatial strategy identifies the potential for Thamesmead town centre to provide cultural and social uses that serve the local community which would have potential benefits for faith groups, older people, women with young children and children who all tend to have meetings, coffee mornings and play groups in these centres, encouraging social interaction

Ensure that the area adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks through regeneration and development opportunities

The Spatial Strategy includes a section on managing flood risk. The entire OA is in Flood Zone 2-3 and sits within the Thames Estuary 2100 action zone. The flood risk sections advises that land may have to be set aside for future flood defenses. This may reduce the amount of land available for development. An Integrated Water Management Strategy has been prepared with recommendations for addressing constraints in the area. The section on Green Infrastructure identifies the contribution that the area's green spaces and water bodies can make to mitigating climate change. It also encourages greening the public realm to create shade and natural cooling.

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

The inclusion of the objective and aim to coordinate delivery of district heating is more likely to result in the delivery of such a network and reduce carbon dioxide emissions. The mixed used nature of development is more likely to enable the use of waste heat from industrial and waste processes, reducing the need for gas heating. The spatial

strategy encourages a greater range of uses in local centres which would reduce the need to travel

The transport proposals encourage existing and new residents to use sustainable modes which reduce reliance on cars. This could lead to a decrease in the number of cars on the local network, a reduction in traffic congestion and a reduction in CO2 emissions.

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

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

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

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

To protect, connect and enhance the area's natural capital (including important habitats species and landscapes) and the services and benefits it provides linking it directly with the wider London green and blue network

The section on Veridion Park SIL identifies environmental considerations and adjacencies with the allocated SINCC. Development would need to be carefully managed to protect the SINCC. Southmere lake is identified as an opportunity to provide water play areas for children. The section on Green Infrastructure notes that Thamesmead has extensive areas of green space and water bodies. It seeks to protect and enhance these existing assets

and sets out a set of principles for development. The map identifies areas of existing assets, improvements to green routes, SINCs and Open Space, as well as potential for urban greening which would have a positive effect on this objective. The strategy seeks to strengthen and enhance SINCs and the natural habitat. This could have a positive effect as development and the loss of vacant land has the potential to displace existing biodiversity.

Reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality, and reduce exposure

The transport proposals encourage existing and new residents to use sustainable modes which reduce reliance on cars. This could lead to a decrease in the number of cars on the local network, a reduction in traffic congestion and a reduction in harmful air pollution which impacts human health and the environment. As highlighted in the IIA of the draft MTS and the London Plan, because the most vulnerable tend to be the most exposed, reduced air pollution would also reduce health inequalities in general. By promoting the Healthy Streets approach, the Places section could contribute towards a modal shift towards sustainable transport and a corresponding improvement in local air quality.

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

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

4. Influence of the IIA and consultation responses

- 4.1 One of the purposes of IIA is to promote sustainable development through the better integration of economic, social and environmental considerations into the preparation, adoption and monitoring of plans. The work on the T&AW OAPF and its associated IIA has ensured that all relevant sustainability and equality considerations have been addressed in the development of policies, including through a Sustainability Appraisal that considered alternative proposal options.

- 4.2 Statutory consultation has ensured that this work has been carried out robustly. Following the formal public consultation, small alterations to the draft T&AW OAPF were recommended by GLA officers in response to comments received.

Consultation responses to the T&AW OAPF

- 4.3 There are statutory requirements to consult on the proposals as well as the IIA that informed the proposals. The draft T&AW OAPF was open for consultation for 12 weeks from December 2019. The EAPP Regulations 2004 require this Sustainability Statement to set out how any opinions received have been taken into account.

Consultation responses

- 4.8 Following is a short summary of the wider responses relevant to the IIA considerations received during the consultation of the T&AW OAPF. All the comments received during the T&AW OAPF consultation are published on the GLA web-site.
- 4.9 Approximately 28 responses from a range of boroughs, developers, amenity groups, public bodies and other stakeholders were received on the draft T&AW OAPF. In addition, a T&AW OAPF specific consultation website was set up which attracted over 3,100 unique visitors and 417 contributions from local people (over 1,670 unique comments). Most comments were supportive of the Mayor's objectives for the Thamesmead and Abbey Wood OA.

The general comments on the draft T&AW OAPF include:

- Transport and Growth – General support for the transport and local connections package proposed. 68% of respondents on the consultation website felt 'positive' or 'somewhat positive' about the proposed transport options. 18% felt neutral and the remaining 14% felt 'somewhat negative' or 'negative'. Safety at night, and better walking and cycling were highlighted as key concerns. Multiple stakeholders, including developer and landowner groups, were supportive of the higher growth scenario (DLR and bus transit). The commercial case for development coming forward as part of the intermediate bus transit scenario was queried. Responses also requested that the OAPF make clearer that new development will need to be of a higher density than the existing context.
GLA comment: The intermediate and high growth scenarios were relabelled to provide a clearer narrative that the OAPF plans for the DLR extension, and that in the interim a bus transit could provide improved public transport particularly in North and West Thamesmead and for those that are far from train stations. The delivery of bus transit could have the potential to kick-start some investment and development in the OA. Additional precedents and design guidance were added in the OAPF to demonstrate the level of development envisaged in the OA and to guide future development.

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

5. Monitoring

- 5.1 The European Directive 2001/42/EC on SEA requires monitoring of the significant environmental effects of implementing the Plan. The monitoring of the T&AW OAPF will be an integral aspect of a more comprehensive approach to the monitoring and implementation of the London Plan which will bring together monitoring the delivery of each plan policy through the publication of an Annual Monitoring Report and a regularly updated Implementation Report.

- 5.2 Being guidance to the London Plan the indicators for T&AW OAPF follow those set out in Chapter 8 of the London Plan. For further information see the most recent London Plan Annual Monitoring Report (AMR) which is available on the GLA website¹.
- 5.4 In addition, there are other actions undertaken to monitor the effectiveness of the T&AW OAPF on an annual basis. For example, the London Development Database collects information on planning applications in London and can provide a number of statistics regarding new development. Other agencies such as the Department of Environment, Food and Rural Affairs and the Environment Agency as well as the London boroughs collect data on flooding, noise, air pollution and water quality.

5. Conclusion

- 5.1 The T&AW OAPF seeks to support the sustainable development of London. The proposals in the T&AW OAPF have been assessed by the IIA process to be a sustainable response to some of the pressures facing London, whilst making the best use of available resources. The IIA Report concludes that:

‘The assessment of the draft T&AW OAPF has found the framework to be broadly positive when considered against the IIA sustainability objectives and when compared to the alternative of not preparing an OAPF. The OAPF has been assessed as performing strongly against the objectives for housing supply, quality, choice and affordability, sustainable land use, design, accessibility, connectivity. and economic competitiveness and employment. While there are some neutral effects, such as those in relation to air quality, greenhouse gas emissions and water resources, no negative effects were identified through the assessment.’

¹ <http://www.london.gov.uk/priorities/planning/research-reports/monitoring-london-plan>

Appendix 1 – Environmental considerations in the development of the T&AW OAPF

The European Directive 2001/42/EC1 on Strategic Environmental Assessment requires plans and programmes that are considered to have significant effects on the environment to be assessed for their environmental impact. The SEA Directive has been transposed into UK law through the Environmental Assessment of Plans and Programmes Regulations 2004.

This Sustainability Statement or post-adoption statement is prepared in accordance with s16 of the Environmental Assessment (IIA) of Plans and Programmes Regulations 2004. This Appendix to the overall sustainability statement specifically addresses the requirements of s16(4) of the Regulations.

(a) how environmental considerations have been integrated into the plan or programme;

Environmental considerations were considered through the development of the Integrated Impact Assessment for the T&AW OAPF, which includes a Strategic Environmental Assessment, as part of the Sustainability Appraisal element of the IIA.

The Sustainability Appraisal assessed the potential impacts of the proposals on the Sustainability Objectives. The Sustainability Objectives specific to the environment included biodiversity, flood risk and climate change adaptation, climate change mitigation and energy, water quality and water resources, waste, air quality. Where the proposals related to the sustainable use of land the objective relating to regeneration and land-use is also relevant.

See the full IIA Scoping Report for full details on the Key Sustainability Objectives and the Sustainability Appraisals.

(b) how the environmental report has been taken into account;

Many of the proposals in the OAPF will have a potential direct or indirect effect on the environment. The IIA appraisal was considered in total in the further development of the policies. For example, further cross references were included between policies to ensure development, especially in areas likely to experience higher densities considered the lifetime neighbourhoods policies to create liveable and diverse communities.

The IIA findings included:

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

The proposal in the OAPF are likely to be beneficial on several effects. The Places section is clear about the potential opportunities for integrating new development with existing and potential transport infrastructure. This includes intensifying land use around transport nodes and realising opportunities for wider environmental improvements. The importance of new development integrating with existing communities is also emphasised, ensuring that higher density development does not adversely impact on different groups of people. Emphasis is also placed on new development acknowledging the importance of local cultural and historic assets, as well as incorporating resilience principles. In addition, the industrial strategy seeks to intensify uses, making better use of land including

providing residential development. The provision of residential development could limit the attractiveness of industrial floorspace provided in mixed-use schemes, although policies in the London Plan are designed to mitigate this risk.

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

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

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

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

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

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

The public transport proposals in Thamesmead would deliver physical infrastructure which increases connectivity in the area. They would create an integrated public transport network giving greater access to key services and enabling growth in areas which are currently isolated.

The Places section further emphasises the importance of integrating the Healthy Streets approach into future change. This includes promoting cycling, walking and public transport, and implementing projects that improve environmental quality. The Healthy Streets approach aims to contribute to improved physical and mental health and reduce health inequalities. Potential local and strategic connections and improvements are identified, resolving historic severances caused by infrastructure and poor urban design.

Ensure the education and skills provision meets the needs of the area's existing and future labour market and improves life chances for all

The Social and Community Infrastructure section includes an estimated requirement for new facilities linked to the two growth options, and identifies broad locations, and expansion of existing schools. It also references the need for early years provision to be provided as part of mixed-use development. This would support a greater choice of schools and educational opportunities for all, which is particularly important for low-income communities, ethnic minority groups, disabled residents or those with existing health conditions, and Gypsy and Traveller communities

The transport proposals do not directly contribute to education provision but would provide better connectivity and accessibility to local amenities in the OA and beyond the OA. This includes, schools, adult education centre and education services in general, which would benefit young people.

Safeguard and enhance the area's cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen and build strong and inclusive communities in Thamesmead

The Spatial strategy identifies the potential for Thamesmead town centre to provide cultural and social uses that serve the local community which would have potential benefits for faith groups, older people, women with young children and children who all tend to have meetings, coffee mornings and play groups in these centres, encouraging social interaction

Ensure that the area adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks through regeneration and development opportunities

The Spatial Strategy includes a section on managing flood risk. The entire OA is in Flood Zone 2-3 and sits within the Thames Estuary 2100 action zone. The flood risk sections advises that land may have to be set aside for future flood defenses. This may reduce the amount

of land available for development. An Integrated Water Management Strategy has been prepared with recommendations for addressing constraints in the area. The section on Green Infrastructure identifies the contribution that the area's green spaces and water bodies can make to mitigating climate change. It also encourages greening the public realm to create shade and natural cooling.

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

The inclusion of the objective and aim to coordinate delivery of district heating is more likely to result in the delivery of such a network and reduce carbon dioxide emissions. The mixed used nature of development is more likely to enable the use of waste heat from industrial and waste processes, reducing the need for gas heating. The spatial strategy encourages a greater range of uses in local centres which would reduce the need to travel

The transport proposals encourage existing and new residents to use sustainable modes which reduce reliance on cars. This could lead to a decrease in the number of cars on the local network, a reduction in traffic congestion and a reduction in CO2 emissions.

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

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

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

The Places and Spatial Strategy has a positive effect on managing the risk of flooding. The Spatial Strategy section on flood risk identifies that the area is in zone 2-3, and that the Thames Estuary 2100 Plan sets out an action plan for tidal flood risk management. This is

further emphasised in the Places section. The strategy promotes the production of a Riverside Strategy that could set out requirements for updating flood defences and promotes use of SUDS.

To protect, connect and enhance the area's natural capital (including important habitats species and landscapes) and the services and benefits it provides linking it directly with the wider London green and blue network

The section on Veridion Park SIL identifies environmental considerations and adjacencies with the allocated SINC. Development would need to be carefully managed to protect the SINC. Southmere lake is identified as an opportunity to provide water play areas for childfree. The section on Green Infrastructure notes that Thamesmead has extensive areas of green space and water bodies. It seeks to protect and enhance these existing assets and sets out a set of principles for development. The map identifies areas of existing assets, improvements to green routes, SINC's and Open Space, as well as potential for urban greening which would have a positive effect on this objective. The strategy seeks to strengthen and enhance SINC's and the natural habitat. This could have a positive effect as development and the loss of vacant land has the potential to displace existing biodiversity.

Reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality, and reduce exposure

The transport proposals encourage existing and new residents to use sustainable modes which reduce reliance on cars. This could lead to a decrease in the number of cars on the local network, a reduction in traffic congestion and a reduction in harmful air pollution which impacts human health and the environment. As highlighted in the IIA of the draft MTS and the London Plan, because the most vulnerable tend to be the most exposed, reduced air pollution would also reduce health inequalities in general. By promoting the Healthy Streets approach, the Places section could contribute towards a modal shift towards sustainable transport and a corresponding improvement in local air quality.

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

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

- (c) **how opinions expressed in response to—**
- (i) **the invitation referred to in regulation 13(2)(d);**
 - (ii) **action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;**

Section 3 and 4 of this statement summarises the relevant consultation responses in relation to the OAPF, the IIA and the Mayor's and the GLA's duties. Section 4 sets out how the consultation responses influenced the OAPF.

With regards to the IIA Scoping Report, the Environment Agency, stated it was generally supportive of the approach proposed for this IIA. However, there were some areas, which could be developed further, or some additional points included (e.g. those in relation to environmental net-gain and the Thames Estuary 2100 Plan).

proposed policy changes to accommodate growth had the potential to impact the environment. In line with its comments additional consideration was included in the IIA Scoping Report on the baseline information, potential mitigation measures and the cumulative effects. In line with its comments additional consideration was included in the IIA Scoping Report on the baseline information and the cumulative effects.

Highways England responded that it was satisfied that its policies will not materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT C2/13 para 10 and DCLG NPPF para 32) as this document generally sets out the background data, together guidance and recommendations for the area's enhancement.

Natural England responded did not consider that the Scoping report highlights any likely risk or opportunity in relation to our statutory purpose.

Historic England recommended that the Scoping Report identified the Crossness Conservation Area, Heritage at Risk assets and the need for an area-wide framework to assess and evaluate the significance of archaeology in the OA.

Following the receipt of these comments additional text was included in the IIA Scoping Report to take account of comments received. In particular, reference was added on the principle of 'net gain' and the Thames Estuary 2100 plan. In addition, text was added to the Historic Environment section noting the need for policies that seek to protect and enhance local historic assets, and for an archaeological framework assess and evaluate the significance of archaeology in the OA.

- (d) how the results of any consultations entered into under regulation 14(4) have been taken into account;**

n/a

- (e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with;**

The Sustainability Appraisal appraised the preferred options and alternative options for the proposed policies. The chosen policies were those that were appraised to have a likely overall positive effect against the sustainability objectives.

- (f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.**

The monitoring of the T&AW OAPF will be an integral aspect of a more comprehensive approach to the monitoring and implementation of the London Plan which will bring together monitoring the delivery of each plan policy through the publication of an Annual Monitoring Report and a regularly updated Implementation Report.

Being guidance to the London Plan the indicators for T&AW OAPF follow those set out in Chapter 8 of the London Plan. For further information see the most recent London Plan Annual Monitoring Report (AMR) which is available on the GLA website .

In addition, there are other actions undertaken to monitor the effectiveness of the T&AW OAPF on an annual basis. For example, the London Development Database collects information on planning applications in London and can provide a number of statistics regarding new development. Other agencies such as the Department of Environment, Food and Rural Affairs and the Environment Agency as well as the London boroughs collect data on flooding, noise, air pollution and water quality

Appendix 2 – Equalities considerations in the development of the T&AW OAPF

The Mayor and GLA have “general public sector duties” under equality and wider legislation. As set out in paragraph 1.2 and 1.3 of this Sustainability Statement, the IIA process included an Equalities Impact Assessment of the T&AW OAPF.

The public sector equality duty under Equality Act 2010 covers age, being or becoming a transsexual person, being married or in a civil partnership, being pregnant or having a child, disability, race including colour, nationality, ethnic or national origin, religion, belief or lack of religion/belief, sex, sexual orientation. These are the grounds upon which discrimination is unlawful and are referred to as ‘protected characteristics.’ The Duty requires the Mayor when exercising his functions to have ‘due regard’ to the need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act; advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

An Equalities Impact Assessment was carried out as part of the wider IIA of the T&AW OAPF. *Equalities* was one of the key sustainability objectives that all the proposed alterations and their alternative options were appraised against. *Health and well-being* and *access and mobility* are key sustainability objectives linked to equalities. The appraisal of the proposed policies against these objectives was integrated into the outputs of the full IIA report.

The Assessment of Equalities Effect (Para XX to the IIA of T&AW OAPF) concludes that most of the proposals in the OAPF will overall have a generally positive effect on the GLA’s identified equality objectives. Neutral effects have been identified in relation to two equality objectives that is i) Materials and waste – The OAPF has a neutral effect in keeping materials at their highest value for as long as possible and reducing waste generated; ii) Noise and vibration –The OAPF is regarded as having a neutral effect on minimising noise and vibration levels and disruption to people and communities across the OA.

Equalities responses to the draft FALP

- The greatest impact on equalities is likely to come from the social and community infrastructure strategy in the OAPF, which sets out a strategic estimation of the social infrastructure required to support a growing population. Transport and walking/cycling proposals in the OAPF would improve connectivity of the area significantly, making it easier and quicker for existing and future residents to travel to existing and proposed social infrastructure, such as in Thamesmead Town Centre, Waterfront and Southmere Lake. By providing sufficient infrastructure, such as sports and community facilities, and access to facilities that provide multiple services, this could promote social inclusion by providing areas for people to meet and interact. It is also noted that the location of these facilities has potential to cause an uneven impact on different groups depending on proximity to services.
- The housing uplift proposed is also likely to impact on equalities. All transport options would support the additional provision of housing. The DLR and bus transit would support the

highest housing growth. This should in turn support the greatest provision of affordable housing and specialist housing – benefiting young families, older people, disabled people, BAME groups. This option has the greatest potential to alleviate homelessness, which could benefit women who are single parents or victims of domestic abuse and alleviate overcrowding which affects BAME families the most. Transport improvements can increase property values which could have a positive effect on those who already own their own homes but could increase costs for those wanting to buy or rent in the area. This would benefit older people who are most likely to own their own home but disadvantage young adults who are least likely to own their own home, but want to.

- There is the potential for differential impacts to occur on vulnerable groups, in particular:
 - Whilst the accessibility improvements promoted through the transport and movement strategy and linked local connections plan within the OAPF would improve connectivity for all residents within the OA, the planned improvements to public realm and the integration of stations with their surroundings would be of particular benefit to disabled people in terms of improving step free access;
 - An identified Gypsy and Traveller site is located within the OA. The OAPF refers to protecting the existing provision and encourages early engagement and inclusion in development proposals in its proximity with the Gypsy and Traveller community in order to provide opportunities for the community to actively participate and be involved in decision making; and,
 - The focus within the social and community infrastructure section of the OAPF on providing sufficient school places to meet rising demand would be of particular benefit to young people. This could minimise the need for young people resident within the OA to travel beyond the locality to attend school, which could have wider equalities benefits in terms of minimising travel costs.