
Greenwich Peninsula 3 Planning Brief

Consultation Statement

October 2017

1. Introduction

Pursuant to Section 12.A of the Town and Country Planning (Local Planning) (England) (as Amended) Regulations 2012 and in accordance with Royal Borough of Greenwich's (RBG) Statement of Community Involvement (December, 2012), this statement provides an overview of the consultation undertaken during the production of the Greenwich Peninsula 3 (GP3) Planning Brief.

The consultation has sought to gather the views of the stakeholders, statutory consultees and the local community to understand the aspirations and any concerns regarding the future development of the site. The consultation has consisted of workshops with RBG officers, meetings with stakeholders and statutory consultees, and a four week public consultation period from the 19th of June to the 17th of July 2017 which included a drop-in exhibition.

Section 2 provides an overview of the GP3 Planning Brief Consultation process; and Section 3 provides a table highlighting the key themes and the proposed responses to the consultation. The responses to the consultation are also included in full at Section 4 of this report.

2. GP3 Planning Brief Consultation Overview

I. GP3 Planning Brief Royal Borough of Greenwich Officers' Workshop Consultation

The initial stage of the GP3 Planning Brief consultation process consisted of a workshop with officers from the Royal Borough of Greenwich, held on the 2nd of March 2017. The workshop discussed the context of Greenwich Peninsula, opportunities for the GP3 site, and site specific topics, including land uses, heritage, transport, activity areas and massing.

II. Stakeholder Discussions

The next stage in the consultation consisted of discussions held with key stakeholders who have a direct interest in the masterplan, such as a land holding. The key stakeholders were sent tailored letters dated 20/12/16 introducing the masterplan process and providing contact details for further information or comment. Following this individual discussions were held with key stakeholders to consider individual aspirations, and opportunities and constraints. The stakeholders engaged through this process included:

- Transport for London
- The Horniman Museum
- Knight Dragon
- Lidoka Estates Limited (LEL)
- SGN
- O'Keefe Construction

III. Statutory Consultation on Draft Planning Brief

A public consultation on the draft Planning Brief took place from the 19th of June to the 17th of July 2017. During this period a draft was made available on RBG's website, where respondents were encouraged to review the document and provide their comments via an online questionnaire or send letters directly to RBG. A public exhibition was also held during the consultation period.

The consultation including the exhibition was advertised on the RBG website and in the local press: Greenwich Info and Greenwich Weekender. Direct consultation invites were also sent to approximately 300 stakeholders, local businesses and interest groups and 170 local residents.

The Royal Borough of Greenwich received 35 responses in writing and there were 44 responses to the online questionnaire. The responses have been analysed and key consultation themes are identified in Section 3. Section 4 details all consultation comments and RBG responses.

Exhibition – Wednesday 5th of July 2017

A public exhibition was held on Wednesday the 5th of July 2017, at St. Mary Magdalene C of E School, and was attended by approximately 15 people. The consultation boards provided an overview of the Planning Brief, and invited people to comment on the proposals. Officers were available to answer any questions.

3. Key Consultation Themes and Council Responses

KEY MESSAGE	COUNCIL RESPONSES AND PROPOSED CHANGES
<p>1. View that the structures of heritage significance, in particular the gas holder, should be retained.</p> <p>Popular view amongst respondents, including the Victorian Society and local conservation groups that redevelopment should seek to protect the heritage of the gas holder, through its complete or partial retention, or reflection in design. There was particular emphasis on the opportunity to incorporate the gas holder into open spaces or its conversion into a building.</p> <p>Respondents viewed the gasholder as a significant visual asset, which is a reminder of the Peninsula's industrial heritage, and should not be lost.</p> <p>View that consideration should be given for the preservation of the London School Board Dreadnought Building, currently used as storage by the Horniman Museum.</p>	<p>The Royal Borough recognises the value of the historic environment and attributes great value to the role of heritage assets in adding to the quality of the environment and character.</p> <p>In response to the consultation an additional page has been inserted in section 2 Context, recognising the heritage value of the gas holder and the School Board Dreadnought Building. The key messages from this section are summarised in an updated opportunities section.</p> <p>Development principle 4.5.2 has also been added to the Planning Brief, to ensure future development responds to and benefits from the site's heritage value:</p> <p><i>“Proposals should reflect and respond to the industrial character of the area as a means of relating new development to the local context. In particular, development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area. This could be achieved through a variety of means. For example, the retention of all or part of the structure within a public open space or building, or reinterpretation of the structure and its industrial history through the design of building façade details, public realm/landscaping or the layout of the development. Prior to any work to the gasholder, heritage and structure surveys are required.”</i></p> <p>Development principle 4.5.9 has also been added to the Planning Brief to protect the heritage value of the London School Board Dreadnought Building:</p> <p><i>“Development should seek to protect the heritage value of the former London School Board Dreadnought School, now in use as the Horniman Museum Study Collections Centre. Any refurbishment of the School should seek to retain and enhance it's</i></p>

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	<p><i>historic value.”</i></p> <p>Wording at paragraphs 1.1.4 and 2.3.3 has also been amended to acknowledge the gasholder has been decommissioned.</p>
<p>2. Support for pedestrian and cycle routes and facilities.</p> <p>A number of respondents expressed support for radical improvement to pedestrian movement and cycle routes on the Peninsula, stating the lack of connectivity for non-motorists. Respondents expressed appreciation of the proposed increase in permeability within and around the site, and improvements to the streetscape and public realm.</p> <p>A number of respondents, including TfL, stated they would like to see further detail on the pedestrian and cycle proposals, such as street widths.</p>	<p>The Planning Brief identifies a vision and set of development principles for the site to guide future development. The brief does not provide detailed information on the design of streets, which is anticipated to be undertaken through the development of proposals through the planning application process.</p>
<p>3. Concerns raised over the levels of air and noise pollution, and traffic within the immediate environs of the site.</p> <p>Several respondents raised concerns over the levels of pollution and traffic within the immediate vicinity of the site, with some citing concerns over increases to congestion in the light of the planned Silvertown Tunnel.</p> <p>Some respondents also raised concern for the potential impact that the proposed Silvertown Tunnel might have on proposed residential uses.</p> <p>It was also noted that any development should demonstrate consultation with TfL in order to ensure that the capacity of the site is optimised.</p>	<p>The Planning Brief has been informed by a robust evidence base, including an assessment of existing and future air quality and noise. These assessments help to shape the development principles, which seek to mitigate against any potential adverse air quality or noise impacts, including principles 4.4.5 and 4.5.2.</p> <p>Future planning applications will be subject to further detailed assessments, through Air Quality or Noise Impact Assessments, and/or Environmental Impact Assessments.</p>
<p>4. Support for the preservation of views of Canary Wharf.</p> <p>A number of respondents expressed support for the preservation of views of Canary Wharf from both within the site and its immediate environs. Some</p>	<p>The Planning Brief proposes a townscape strategy, which seeks to maximise views towards Canary Wharf, whilst addressing the air quality and noise constraints from</p>

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<p>expressed opposition to the presence of tall buildings on the grounds that they would block views north towards Canary Wharf.</p>	<p>the A102, including a gradual transition in heights from west to east. This approach is proposed through the scale and massing principles on page 19, and in particular 4.4.5 and 4.4.6.</p>
<p>5. Support for green open space, parks and sports facilities to be incorporated into development.</p> <p>Some respondents were of the view that Greenwich Peninsula is currently lacking in green open space and that the proposed increase in residential uses would intensify this demand.</p> <p>Respondents stated that the redevelopment of the site should include well connected open spaces with recreational uses, such as tennis courts and football pitches.</p>	<p>The Planning Brief sets out development principles to guide the future delivery of open space across the site on page 20. Specifically, principle 4.3.1 seeks to “<i>provide a series of public open spaces varied in character to form the ‘heart’ of the development, and encourage a range of activities including play space and formal and informal seating.</i>”</p> <p>Additional information on landscape and open space has been included in the diagram on page 20.</p> <p>The detailed design of the public open spaces will be developed through the future planning application process.</p>
<p>6. Concerns raised over the inclusion of the Thames Water Pumping Station and Estate Services Centre within the boundaries of the site.</p> <p>Concerns raised over the inclusion of a Thames Water pumping station within the area outlined for residential development. A view was expressed that it would be impractical for the pumping station to be moved and that any redevelopment plans should leave it in situ (Knight Dragon).</p> <p>Additionally, the ESC already has planning permission for use by the development at Greenwich Peninsula Masterplan (KD), therefore an ESC for any proposed residential development would need to be allocated elsewhere.</p>	<p>The Planning Brief sets the framework for the long-term development of the site, over the period of the Royal Borough’s plan period to 2028. As such the plan adopts an aspirational view of the land uses across the site, identifying the existing Thames Water Pumping Station and the Estate Services Centre land, as suitable for future residential development. Although, as potential longer term phase of development.</p> <p>To acknowledge the Pumping Station and the ECS as constraints, the following constraints have been added to section 2.6.5 of the Planning Brief:</p> <p><i>“The Estates Services Centre at Boord Street (16/2309/F) and the Thames Water Pumping Station to the south-east of Site GP3 act as land constraints, whilst the</i></p>

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	<p><i>proposed Silvertown Tunnel ventilation shaft and control building are likely to occupy the northern part of the site creating a further land constraint. If the proposed Silvertown crossing is not constructed, the land at the north-west tip of the GP3 site will become available for development. Development proposed here should follow the development principles for the remainder of the site.”</i></p> <p>To address the above constraints the following development principles have been added to section 4.1.5 Land Uses:</p> <p><i>“Future development will need to explore the potential to integrate the ECS within a mixed use block, or alternatively provide a replacement ECS facility. Similarly, development should explore the potential to relocate the Thames Water Pumping Station, or integrate this essential piece of infrastructure into the development, subject to feasibility.</i></p>
<p>7. Concerns that the COMAH zones shown do not represent the most up to date HSE consultation zones.</p> <p>Respondents stated that HSE consultation zones associated with Brenntag do not represent the definitive HSE consultation zones updated in June 2017. This therefore should be reflected in the impacts on the density, massing and scale of buildings.</p>	<p>Following HSE's assessment of the risks associated with the granting of Hazardous Substances Consent at Brenntag UK Ltd (Ref: 12/1247/H), the Consultation Zones have been reduced. The revised zones are shown on Figure 2.4.</p>
<p>8. Queries regarding clarity on the status of the planning brief</p> <p>Some respondents raised concerns of whether the Planning Brief will be considered as a material consideration in planning terms and how the brief relates to the Greenwich Peninsula West Masterplan SPD 2012, and the Royal Greenwich Local Plan (July, 2014).</p>	<p>The Planning Brief explores the future potential of the site and identifies a series of development principles to create high quality development. The Planning Brief does not form part of the Royal Borough's Local Plan but will inform the emerging Site Allocations Local Plan and any future updates to the Greenwich Peninsula West SPD.</p> <p>The Planning Brief has been subject to full public consultation and cabinet approval</p>

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	and will form a material consideration in the determination of planning applications.
<p>9. View that Scenario 3 is the most likely future scenario</p> <p>Some respondents raised concerns for Scenario 1 being presented as the most likely future scenario. The Brenntag Ltd Consultation Zone was stated as a constraint to the densities of residential development proposed.</p> <p>Respondents believed that scenario 3 would be the most likely future scenario with the development of the Silvertown Tunnel and the Brenntag HSE Consultation Zone revoked or amended.</p>	<p>The indicative scenarios were used to test the site's transport capacity and viability and inform the design guidance. The scenarios have been removed from the Planning Brief to allow the document to focus on the development principles and guidance. Following amendments to the HSE Consultation Zone for Brenntag UK Ltd, Scenario 1 became redundant.</p>

4. Section 4 - Full Written Responses

This section provides a list of formal comments received during the consultation period.

ID	ORGANISATION	COMMENTS	RESPONSE
GP1	Association for Industrial Archaeology	<p>The Association for Industrial Archaeology notes in the “Consultation Draft Planning Brief” of June 2017 in respect of Greenwich Peninsula Site GP3 that the above gasholder is potentially to be decommissioned and that in consequence there will be more intensive use made of that area paragraph 1.1.4). However, it is also noted that limited gas infrastructure will need to remain (paragraph 2.5.8 of the Consultation Draft Planning Brief).</p> <p>The Association would wish to point out the area was one where the uses were predominantly industrial and that the gasholder which is at the centre of the site is one of the few visible surviving reminders of the former use of the area and as such is an important piece of its history.</p> <p>This gas holder was designed by George and Frank Livesey in 1886-9. It is a larger version of Old Kent Road No 1. As a consequence it set another world record for capacity. It was the first with four lifts and this reduced the depth of the tank. The design is distinguished by double sets of diagonal braces, sloped at 1:1 and 1:2. It was part of the South Metropolitan Gas Company's huge East Greenwich gas works and now is the only representative of this otherwise cleared site. The gas holder is a prominent feature from the riverside. The Association notes that other authors have referred to it as “a very important testimonial of remarkable merit and pioneer work of London’s gas engineers” and that “the Livesey’s guide framing in East Greenwich” should “be treated as a jewel”.</p> <p>The Association considers that an effort should be made to include</p>	<ul style="list-style-type: none"> An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area.

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		<p>the holder framework as part of the redesign and regeneration of this area. It would be a reminder of the area's former industrial importance. That it is considered not unattractive is perhaps evidenced by the fact that it even featured in Royal Academy Summer Exhibition 2015 - Art work – 983 East Thames by Cuan-Hawke, and in the previous year it featured in an architectural scheme for its reuse. However, if it is not to be retained then it is essential that the site is recorded appropriately.</p>	
GP2	Greenwich Society	<p>The Greenwich Society is grateful for the opportunity to comment on the draft planning brief for this important site.</p> <p>We recognise the potentially significant contribution that this site could make to meeting housing need, especially for affordable housing. We are also mindful of the serious constraints imposed upon any redevelopment here by environmental and health and safety concerns and by current and prospective land use on or close to the site.</p> <p>Uncertainties about:</p> <ol style="list-style-type: none"> 1. the future of the Brenntag Chemical Works to the west of the site and the associated COMAH Zone; 2. the Silvertown Tunnel which would lie immediately north; 3. and the timing of the release of the land currently occupied by SGN's gas holder and revocation of its associated COMAH Zone <p>lead us to question whether a meaningful planning brief can be produced at this time.</p> <p>The consultants have sought to deal with these uncertainties by positing 3 different scenarios, as follows:</p> <ul style="list-style-type: none"> • Scenario 1 - the Brenntag COMAH Zone remaining in place and the development of the proposed Silvertown Tunnel. • Scenario 2 – the Brenntag COMAH Zone remaining in place and Silvertown Tunnel not proceeding • Scenario 3 - the Brenntag COMAH Zone revoked and the Silvertown Tunnel approved 	<ul style="list-style-type: none"> • Following amendments to the HSE Consultation Zone for Brenntag UK Ltd, Scenario 3 is now considered the most likely future scenario. The Planning Brief has been updated to reflect the reduced HSE Consultation Zones. Scenarios were included in the Draft Planning Brief as an indication of viability and development capacity of the site. They informed the Development Principles, and have been omitted from the final Planning Brief. • An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area. • The Planning Brief is built on a robust evidence base, and the Draft document presented 3 scenarios testing the capacity and viability for the future development of the Site GP3. In turn, these scenarios informed the Development Principles for the site. • The Planning Brief has been updated to reflect both the Thames Water Pumping Station and ESC, part of the Knight Dragon

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		<p>Scenario 1 would provide 2.8 ha. of developable land and envisages, 800 dwellings, 8,800 m2 of office and mixed use space and 5000m2 of green space. Scenario 2 would provide 3.07 ha. of land and 1075 dwellings, 17,500 m2 office and mixed use development and 6900 m2 of green space. Scenario 3 would provide 4.43 ha. land, 1540 dwellings, 14,300 m2 mixed use space and just 900 m2 of green space.</p> <p>Whilst most of the document concentrates on elaborating Scenario 1, it is the intention that the brief should apply equally if scenarios 2 or 3 were to be realised. We question this “one size fits all approach”. Scenario 3 envisages nearly twice as many dwellings as Scenario 1. The very substantial impact of this on the site can be seen in the indicative massing diagrams in the Appendix. One consequence is a massive reduction in green space – from 5000m2 to 900m2 – for a population which would be twice as large.</p> <p>We suggest that this brief should either be withdrawn until it is clearer how much developable land will be available and a brief produced for that situation or the present brief should be amended so that it covers only Scenario 1. At present it risks giving a green light to over-development on the lines of Scenarios 2 and 3 without adequate examination.</p> <p>We have a number of more specific comments on the draft planning brief, as follows:</p> <ol style="list-style-type: none"> 1. The proposed vision and objectives are very general. They could apply to almost any site and their operational utility is questionable. 2. The discussion of the planning context and the elaboration of the brief do not take adequate account of the Knight Dragon masterplan to the east covering future development at Meridian Quays, Brickfields North and Brickfields South. There is only a passing nod to it in objective 2 and in the reference to the density limits set in it (but see 4). In particular the massing diagrams in the Appendix need to be 	<p>Masterplan.</p> <ul style="list-style-type: none"> • The Planning Brief sets out development principles to guide the future delivery of open space across the site on page 20. Specifically, principle 4.3.1 seeks to “provide a series of public open spaces varied in character to form the ‘heart’ of the development, and encourage a range of activities including play space and formal and informal seating.” • Additional information on landscape and open space has been included in the diagram on page 20. • With regards to a landmark building, section 4.4.3 has been updated to the following: “The north-east corner of the site should form a visual landmark that invites people into the site and creates a positive first impression. This may not necessarily be a taller building but could be achieved through a high quality building which makes an architectural statement.” • The Planning Brief has been informed by a robust evidence base, including an assessment of existing and future air quality and noise. These assessments help to shape the development principles, which seek to mitigate against any potential adverse air quality or noise impacts, including principles 4.4.5 and 4.5.3.

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		<p>related to the comparable material in the Knight Dragon masterplan and justified in that context.</p> <ol style="list-style-type: none"> <li data-bbox="517 357 1211 528">3. We object to the proposed landmark structure at the north-east corner of the site. There is already a signature feature in the form of the Conrad Shawcross cladding of the flues of the low carbon energy centre; and there would be a conflict with the residential towers in the Meridian Quay element of the 2015 Knight Dragon masterplan. <li data-bbox="517 536 1200 619">4. We welcome the restatement of the Core Strategy target of 35% provision of affordable housing and urge that in the case of GP3 it should be realised. <li data-bbox="517 627 1216 943">5. We are concerned about the very high density of 350 units/hectare proposed for this site. This far exceeds the London Plan range for urban sites of 35-260 u/ha. As noted above, the only justification offered is the Knight Dragon masterplan. In fact it exceeds the upper limit densities set for the two Brickfield sites. The very significant environmental problems associated with GP3, especially from the approach road to the Blackwell Tunnel and potentially from a Silvertown Tunnel suggest that the residential density here should be modest and that commercial development might be more appropriate to the north and west of the site. <li data-bbox="517 951 1205 1034">6. Scenario 3 raises particular concern about the exposure of residents to noise and pollution along the west and northern sides of the site. <li data-bbox="517 1042 1216 1241">7. The draft notes that this area is an open space deficiency area in the core strategy. Scenario 1 envisages 5000 m2 of green space but does not spell out how this would translate into public open space provision. The green space would be mainly along the western side of the site which is heavily exposed to traffic noise and fumes so its suitability is perhaps questionable. <li data-bbox="517 1249 1211 1358">8. There is a heritage case for the retention of the historic gas holder. We are not taking a position on this at this stage but think that the planning brief ought to recognise that there is an issue here. 	

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GP3	Knight Dragon	<p>Principle of development</p> <p>Knight Dragon generally supports the principle of redevelopment of this site which has lain largely underused for many years. However whilst I firmly believe that the site has the potential to significantly enhance the regeneration benefits which the Peninsula is currently experiencing we are unable to support the Planning Brief for the reasons set out below.</p> <p>The existing site constraints and land ownership</p> <p>As you are aware the GP3 site boundary includes an area of the land at the junction of Boord Street and Millennium Way and you will be aware that KD have secure detailed planning permission (your reference:16/23-9/F) for an Estate Service Centre (ESC). In short the ESC will serve the Greenwich Peninsula Masterplan in terms of estate management and waste collection and disposal services. I attach a location plan which shows extent of the site and can confirm that the site has already been cleared with the ESC is due to commence on site late this year with a completion date in 2018. In essence therefore, a replacement ESC facility will be required as part of any GP3 planning brief if this particular element remains earmarked for residential development within the brief.</p> <p>In addition to the above and immediately to the west of the ESC site is a Thames Water Pumping Station. This Pumping station provides an essential piece of infrastructure for the Peninsular in that it pumps surface water from the central area of Greenwich Peninsular into the River Thames. Bearing in mind that the pumping station will need to be retained and will also be subject of a servicing and maintenance regime, I do not believe that there is any real possibility that this parcel of land can be redeveloped for residential use. I further believe it must remain in situ given the likely significant infrastructure costs</p>	<ul style="list-style-type: none"> The Planning Brief has been updated to reflect both the Thames Water Pumping Station and ESC. Development Principle 4.1.5 now states the following: <ul style="list-style-type: none"> <i>“Future development will need to explore the potential to integrate the ESC within a mixed use block, or alternatively provide a replacement ESC facility. Similarly, development should explore the potential to relocate the Thames Water Pumping Station, or integrate this essential piece of infrastructure into the development, subject to feasibility.”</i> Following amendments to the HSE Consultation Zone for Brenntag UK Ltd, Scenario 3 is now considered the most likely future scenario. The Planning Brief has been updated to reflect the reduced HSE Consultation Zones. Scenarios were included in the Draft Planning Brief as an indication of viability and development capacity of the site. They informed the Development Principles, and have been omitted from the final Planning Brief. Noted, the planning brief has been updated to reflect the potential commercial uses along the western boundary of the site. The green space buffer is viewed as an important mitigation measure for air quality and noise, and has therefore been extended in response to the environmental elements. The Planning Brief has been updated at sections 1.1.4 and 2.3.3 to acknowledge the decommissioning of the gas holder. Noted, section 1.2 has now been updated to show the electricity substation to the south-east of the site. The planning permission date has also been updated to December 2015.

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		<p>involved with any replacement facility.</p> <p>I therefore request that the Brief is amended accordingly to reflect the above.</p> <p>Turning now to the three potential Indicative Scenarios I can make the following comments:</p> <p>Scenario 1</p> <p>I note that the Brief considers this to be the most likely scenario however KD do not take the same view for the reasons set out below.</p> <p>Whilst we believe that the Silvertown Tunnel will receive consent in October 2017 (and believe that construction will commence as early as Q1 2019) we do not consider that the illustrative development shown in this Scenario can proceed with the Brenntag COMAH Zone remaining as they are at present.</p> <p>Illustrative Scenario 1 proposed both high density residential use (quoted as 350 dwelling per hectare); high density (4 storey) mixed use and office uses together with several areas of large outdoor public spaces (up to 5000 sq m) all falling within the existing COMAH Outer Zone with a large proportion of the site falling within the Middle Zone. It is my understanding that the Health and Safety Executive (HSE) will have no alternative but to Advise Against (AA) the emerging development proposals as per the guidance contained in Table 2.1 of the brief 'Padhi Development Type Sensitivity Matrix'. This is because the proposals are for high density residential development (above 40 dwelling per hectare) and hence classed as Level 3 development. When considering the guidance which states (at paragraph 26 of the HSE's Land Use Planning Methodology) that 'if any individual Development Type receives an Advise Against decision then HSE's response, then HSE's response for the whole project will be 'Advise</p>	<ul style="list-style-type: none"> • Victoria Deep Water Terminal has been added as a source of noise within the Constraints section of the Planning Brief. • Following HSE's assessment of the risks associated with the granting of Hazardous Substances Consent at Brenntag UK Ltd (Ref: 12/1247/H), the Consultation Zones have been reduced. The revised zones are shown on Figure 2.4. • Timescales for adoption of the planning Brief has been addressed in section 1.3 Consultation and Final Planning Brief.

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		<p>Against'.</p> <p>In light of the above it is my view that the only potential for high density residential led development arises from the alteration of the existing Brenntag COMAH Zones. In terms of resolving this constraint I believe that this is entirely possible and within the gift of the Royal Borough, through the determination of the current planning application for Brenntag's Hazardous Substance Application which has been with your authority since February 2012. I also believe that if the application is approved with appropriate planning conditions then not only will the COMAG Zones will be significantly reduced in which will enable redevelopment opportunities for this site to be possible whilst still enabling Brenntag to operate without any real changes to their existing regime.</p> <p>I am aware from the consultation event that you have had discussions with the HSE and I would be grateful if you could send through the advice you have received in relation to this point as it would inform all parties of the current position.</p> <p>In light of the above and until the HSE has given written confirmation that the AA would not apply KD have no alternative by the object to this scenario being the most likely scenario.</p> <p>Scenario 2</p> <p>In terms of Scenario 2 I note that as the Brenntag COMAH Zone remains unchanged from the current position (ie the majority if the site within the Middle and remainder in the Outer Zone) and as per the above comments I believe that the HSE would Advise Against development and hence this scenario is unlikely to proceed.</p> <p>In light of the above KD objects to the Scenario being the second most likely scenario.</p>	

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		<p>Scenario 3</p> <p>As Scenario 3 shows the Brenntag Zone revoked (or amended as per the comments above in relation to the current planning application) and Silvertown Tunnel constructed, I believe this is the most likely scenario as the AA representations from the HSE would no longer apply.</p> <p>Turning therefore to the development proposals as shown on the Indicative use plan I am able to make the following comments.</p> <p>As per the paragraph above the land to the south western side of Boord Street is earmarked by KD for an Estate Service Centre and is also occupied by the Thames Water Pumping Station and hence the proposed residential use if unlikely unless the ESC is satisfactorily relocated. I do not consider it would be viable to relocate the Thames Water asset within the site and therefore the indicative quantum of residential development will need to re-examined.</p> <p>Turning now to the remainder of the indicative Scenario I note that there are two parcels of land highlighted as areas suitable for mixed use development. I believe that if these uses were to be designed in a strop along the western boundary of the site they could potentially act as a 'buffer' to the proposed residential uses thereby potentially reducing the noise and air quality impacts from the Blackwall Tunnel Approach Road and the proposed Silvertown Tunnel. Furthermore the mixed use category should be expanded to include an Estate Service Centre (should the proposed residential use remain within the Brief).</p> <p>In addition I consider that the green area is likely to be better located in the centre of the site rather than its proposed location for similar environmental reasons.</p> <p>I also consider that other potential uses for the site could include a</p>	

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		<p>coach park as the size of the proposed coach park as illustrated in the 2015 Masterplan is unable to be developed due to the Silvertown Tunnel portal buildings being relocated as per TFL's Silvertown Tunnel DCO application.</p> <p>Turning now to the proposed car parking levels I note that the car parking ratio for residential is approximately 0.37 and compared to the Greenwich Peninsular masterplan provision of 0.25 is relatively high. In addition I note that the parking provision for the mixed use element would appear not to comply with London Plan standards and hence I would request that this level of provision is re-examined.</p> <p>In summary and for the reasons outlined above, KD have no other option but to raise objection in relation to all 3 Potential Future Scenarios until the necessary amendments have been made to the brief and confirmation has been received in relation to the COMAH Zones from the HSE.</p> <p>Other points and general comments on the brief.</p> <p>In relation to paragraph '1.2 The Site' I believe it is important to also acknowledge that a major substation building is constructed off Old School Close and has the benefit of planning permission your reference 14/3601/F. in addition the KD masterplan was granted on the 8th December 2015 and not 15th April 2011.</p> <p>Turning to section 2 Local Context, I believe that it also important to acknowledge the existence of the Victoria Deep Water Terminal as a potential constraint on any development proposals due to noise and air quality impacts albeit this is noted in the constraints section.</p> <p>Turning to SGN Gasholder we are aware that this structure has been decommissioned and I attach a plan dated 17th August 2011 confirming the associated pipework being abandoned which</p>	

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		<p>previously connected the gasholder. In light of this evidence it is clear that the gas holder was in actual fact decommissioned over 6 year ago and therefore paragraphs 1.14 and 2.3.3 of the brief should be reworded to reflect the current status. Furthermore the Council needs to submit an application to revoke the Hazardous Substance Consent which would subsequently delete the associated COMAH zones. Finally the Figure 2.4 and 2.8 incorrectly show the extent of the COMAH Zones and hence needs to be revised to reflect the actual areas covered and I attach a copy of the relevant plans plotted on OS Maps.</p> <p>Turning now to the timescales for adoption I note in Section 5.0 Next Steps that the Draft Brief is to be formally adopted in July 2017. Given that the consultation period expired on 17th July I fail to see how revisions can be taken into account and formal adoptions still proceed. At the consultation event you said that the brief is now likely to be presented to Cabinet in September and I would be grateful if you could confirm the position in relation to timescale leading to adoption and its status in relation to the other Supplementary Planning Documents and the Core Strategy.</p> <p>I trust the reasons behind the current objections are clear however should you wish to discuss this matter further please do not hesitate to contact me.</p>	
GP4	Woolwich & District Antiquarian Society	<p>Two development areas in the Royal Borough are in a pre-planning stage: The Spray Street Quarter in Woolwich and the Greenwich Peninsula Site GP3.</p> <p>In neither instance is there a consideration of the heritage assets already on these sites.</p>	<ul style="list-style-type: none"> As this is a Consultation Statement for Site GP3, it is not appropriate to comment on the Spray Street Quarter. An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial

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		<p>The NPPF section 12 puts forward the case for retaining, and enhancing, heritage assets. In particular paragraph 126 says: 126. Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. In developing this strategy, local planning authorities should take into account:</p> <ul style="list-style-type: none"> # the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; # the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; # the desirability of new development making a positive contribution to local character and distinctiveness; and # opportunities to draw on the contribution made by the historic environment to the character of a place. <p>With reference to the Spray Street quarter this is covered by the Woolwich Masterplan, which states: "An assessment of important historic buildings on the site should be undertaken and a fine grain approach promoted. This will be a very prominent site, located opposite the Crossrail station, forming a first impression of the town."</p> <p>The Royal Borough of Greenwich has policy of encouraging tourism and for providing a cultural milieu for its citizens, for which its heritage assets need to be retained. The historical aspects of a place add interest both for tourists (many with a family background in the area) and for residents.</p> <p>Spray Street Quarter</p>	<p>character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area.</p> <ul style="list-style-type: none"> • Development Principle 4.5.9 has been added to the Planning Brief to ensure development responds to the heritage value of the Dreadnought School: <p><i>"Development should seek to protect the heritage value of the former London School Board Dreadnought School, now in use as the Horniman Museum Study Collections Centre. Any refurbishment of the School should seek to retain and enhance its historic value."</i></p>

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		<p>The latest plans proposed by Notting Hill Housing and St Modwen show total demolition of the buildings currently on the site, presumably in accordance with the brief given them by the RGB Planning Department.</p> <p>When a development brief was first proposed in 2014 one heritage asset, the Covered Market was mentioned. Another, which should have been mentioned, is No.2 Plumstead Road which is on the List of Buildings of Local Architectural or Historic Interest.</p> <p>However there are several more notable buildings in Woolwich New Road and along the Plumstead Road, and indeed in Spray Street itself. Among the replies to the consultation at the time was one from English Heritage (now Heritage England) by Richard Parish drawing attention to the need for the planning brief to include an “analysis of the historical assets across the site and their contribution to the wider significance of the area.” Another reply from the Woolwich & District Antiquarian Society outlined which buildings they felt should be retained. These replies were incorporated in the council records, and are still valid.</p> <p>Greenwich Peninsula Site GP3</p> <p>Here again the draft proposal shows total demolition of the buildings currently on the site: this notwithstanding one major industrial heritage asset on the Peninsula – the Gas Holder.</p> <p>The Gas Holder is of great industrial significance, both in its architectural design and in the history not just of the Peninsula or of the Borough but a swathe of South London.</p> <p>This should be retained and the developer encouraged to make it a community asset.</p> <p>We are always pleased when developers and their architects stage</p>	

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		<p>pre-application displays of their intentions. When they do, we find they are usually receptive of information on local issues. One wonders why it is that they seem not to have heard of them from the Council.</p>	
GP5	The Victorian Society	<p>Thank you for notifying the Victorian Society of this public consultation.</p> <p>The East Greenwich No 1 Gasholder was constructed between 1886 and 1888 by Frank Livesey. At the time it was the largest gasholder in the world, and the first to be equipped with four lifts. Earlier this year the East Greenwich No 1 Gasholder was assessed for statutory designation. While it was not ultimately deemed to satisfy the very strict selection criteria for inclusion on the National Heritage List, Historic England nonetheless described the Gasholder as being “a <i>monumental industrial landmark in this part of London, a clear marker on the skyline</i>”. In light of the fact that it is a non-designated heritage of exceptional prominence, striking appearance and notable historic interest – one which both local and national policies seek to protect – it is disappointing that the Consultation Draft Planning Brief provides no real assessment of its importance and fails to consider any options for the retention and imaginative reuse of this inimitably dramatic structure. Given the high local significance of the No 1 Gasholder, the Victorian Society advocates its preservation.</p> <p>Also included on the site is a former stock and red-brick Board School. It too must be considered a heritage asset, and we would welcome further information on its history and interest.</p>	<ul style="list-style-type: none"> • An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area. • Development Principle 4.5.9 has been added to the Planning Brief to ensure development responds to the heritage value of the Dreadnought School: <p><i>“Development should seek to protect the heritage value of the former London School Board Dreadnought School, now in use as the Horniman Museum Study Collections Centre. Any refurbishment of the School should seek to retain and enhance its historic value.”</i></p>
GP6	Greenwich Conservation	We fully support the Council’s aspiration of promoting development on	<ul style="list-style-type: none"> • The Planning Brief has been updated to reflect both the Thames

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	Group	<p>this very challenging site through the preparation of a planning brief to inform future developers but we have some reservations about the approach currently being taken.</p> <p>We consider that the draft documentation, in its current form, is in certain respects too vague to achieve the ambitions espoused by the Royal Borough in that there needs to be much more certainty about some of the assumptions made in the draft document.</p> <p>The section on site constraints 1.2 and the accompanying Figure 1.3 is incomplete in that no reference is made to existing structures on the site such as the Thames Water pumping station in the south-east corner of the site accessed from Boord Street. Similarly, there is reference in the text to the Estates Services Buildings to service developments in the adjacent 2015 Knight Dragon Masterplan area.</p> <p>We believe that, irrespective of any future decision on the Silvertown Tunnel, it is irresponsible not to indicate, in this section of the draft brief, the location of above-ground infrastructures and buildings associated with this project.</p> <p>We also regret that, although recognition is given to the existing gas holder on the site, nowhere in the documentation is there a recognition that this historic structure might be retained and adapted for alternative uses. By the same token, we regret that no consideration has been given to the retention and adaptation for alternative use of former London School Board Dreadnought School building currently used as a storage facility for the Horniman Museum.</p> <p>In Section 3.1 (as well as on the accompanying Figure 3.1 and subsequent Figure 4.4) there is reference to a landmark structure in</p>	<p>Water Pumping Station and ESC. Development Principle 4.1.5 now states the following:</p> <p><i>“Future development will need to explore the potential to integrate the ESC within a mixed use block, or alternatively provide a replacement ESC facility. Similarly, development should explore the potential to relocate the Thames Water Pumping Station, or integrate this essential piece of infrastructure into the development, subject to feasibility.”</i></p> <ul style="list-style-type: none"> • The Planning Brief has been updated to indicate potential future Silvertown Tunnel Infrastructure at section 4.2. • An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area. • Development Principle 4.5.9 has been added to the Planning Brief to ensure development responds to the heritage value of the Dreadnought School: <p><i>“Development should seek to protect the heritage value of the former London School Board Dreadnought School, now in use as the Horniman Museum Study Collections Centre. Any refurbishment of the School should seek to retain and enhance its historic value.”</i></p>

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		<p>the north-eastern section of the site. We consider that there is no place on the site for a further statement building in such close proximity to the now well-established signature feature of the Conrad Shawcross cladding of the flues of the low carbon energy centre. Also, any statement building in the north-east part of the site will, in time, be dominated by the residential towers in the Meridian Quays element of the 2015 Knight Dragon Masterplan.</p> <p>It is noticeable that, nowhere in the draft document, is there any recognition of the scale, height and massing of future development in the Meridian Quays, Brickfields North and Brickfields South elements of the Knight Dragon Masterplan approvals. The omission of such key information against which to assess the current draft brief is alarming and must be rectified.</p> <p>We note that, in the three development scenarios included at Appendix A, a density of 350 u/ha is stated in all three cases. This figure exceeds the 218 u/ha upper limit set for the Brickfields South element of the Knight Dragon development and of the 300 u/ha upper limit set for the adjacent Brickfields North element. We can see no justification for exceeding either of these density figures particularly as the location of the south-eastern sector of the GP3 site is even further distant from the major transport interchange at North Greenwich than is the Brickfields South element.</p> <p>We also note that, in the three scenarios, while the density remains constant, the number of residential units changes from 800 in scenario 1, to 1,075 in scenario 2 and to 1,540 in scenario 3 set against developable areas of 2.28 ha, 3.07 ha and 4.43 ha respectively. We consider that the open space allocation should increase proportionately from 5,000 m² in scenario 1, to 6,750 m² in</p>	<ul style="list-style-type: none"> With regards to a landmark building, section 4.4.3 has been updated to the following: <p><i>“The north-east corner of the site should form a visual landmark that invites people into the site and creates a positive first impression. This may not necessarily be a taller building but could be achieved through a high quality building which makes an architectural statement.”</i></p> Residential density levels have been updated in the Planning Brief to 600- 1200 units, to reflect the range of potential future development. The Planning Brief sets out development principles to guide the future delivery of open space across the site on page 20. Specifically, principle 4.3.1 seeks to <i>“provide a series of public open spaces varied in character to form the ‘heart’ of the development, and encourage a range of activities including play space and formal and informal seating.”</i> <p>The detailed design of the public open spaces will be developed through the future planning application process.</p> The Planning Brief has been updated to reflect the correct date of the Knight Dragon Masterplan approval in December 2015.

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		<p>scenario 2 and to 9,600 m2 in scenario 3. The figure of 900 m2 for scenario 3 given in the draft brief has to be seriously questioned.</p> <p>For any development on this site to be realistic, we believe it is essential that much more certainty is required on the status of the present gas holder and its immediately adjacent site. The process of decommissioning must be negotiated with SGN and time frames for the removal of the Health and Safety Executive safety zone constraint must also be established.</p> <p>We consider that, as matters currently stand, any adoption of this draft planning brief would be premature. We urge that more thought needs to be given to incorporating some of the points of criticism we have indicated in this response not least the requirement to give consideration to the retention of the historic buildings on the site - the gasholder and the former school building. We also urge that the indicative massing diagrams for all three scenarios in Appendix A are, at present, of little value as each needs to be read in relation to massing studies in the 2015 Knight Dragon Masterplan - refer to the Design and Access Statement submitted in conjunction with application 15/0716/O - for the Brickfields South, Brickfields North and Meridian Quays elements of that approved development.</p> <p>In this respect, at Para 1.2.4, please amend the date of approval to read "8 December 2015" rather than "15 April 2011".</p>	
GP7	O'Keefe Construction	<p>We have reviewed this [Planning Brief] in the context of the current restrictions in place from the HSE on the COMAH Zones for the Gas Holder and the chemical storage facility. We believe that the land uses and the design have been predicated on the Scenario that these will remain in place. From our investigations, which are included as</p>	<ul style="list-style-type: none"> Following HSE's assessment of the risks associated with the granting of Hazardous Substances Consent at Brenntag UK Ltd (Ref: 12/1247/H), the Consultation Zones have been reduced. The revised zones are shown on Figure 2.4.

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		<p>part of this representation, we believe that the influence of the Brenntag facility is lower than assumed in the Brief and therefore it would allow for different development scenarios to come forward.</p> <p>We would ask that further investigation with the HSE is carried out on this important aspect before the Planning Brief is formally adopted. We have also commented that a Hotel use would be suitable in this area and that the O'Keefe Site lends itself to incorporating a landmark building for such a use.</p>	
GP8	U and I Group PLC (Freehold owners & long lease at Morden Wharf)	<p>Representations Extract: HSE Boundaries The HSE consultation zones associated with Brenntag Ltd (as detailed in section 2.5) do not represent the definitive HSE consultation zones that were revised in June 2017 following an up-to-date assessment of the 1999 consent position (appended to this letter for ease of reference). The definitive consultation zones map illustrates that a much smaller part of the GP3 site falls within the HSE's consultation zone (with the boundary being the same for all three zones), with only a small strip of land along the western boundary of the site falling within the definitive zone. The final Planning Brief should therefore be updated accordingly and the lesser implications should be reflected in revised scale, massing, activity and illustrative massing diagrams.</p> <p>Building Heights, Massing and Density As a consequence of updating the HSE consultation zones, the site has potential to support much more built development. Applying the updated consultation zones, there is an opportunity to extend the 'main activity' zone (illustrated at diagram 4.1) and thereafter increase scale and massing across the site (figure 4.4) to show greater activity and potential for medium/taller scale buildings towards the western boundary of the site. Such modifications could allow for a similar</p>	<ul style="list-style-type: none"> • Following HSE's assessment of the risks associated with the granting of Hazardous Substances Consent at Brenntag UK Ltd (Ref: 12/1247/H), the Consultation Zones have been reduced. The revised zones are shown on Figure 2.4. • Residential density levels have been updated in the Planning Brief to 600- 1200 units, to reflect the range of the site's capacity for potential future development. • The Planning Brief has been updated to reflect changes to the HSE Consultation Zones. As such the connectivity and circulation across the site has also been updated at section 4.2 Access, Movement Servicing and Parking.

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		<p>massing as illustrated in Scenario 3. This would allow for appropriate optimisation of the site and more sympathetic townscape links with the taller building heights of Enderby Wharf and The Telegraph Works, both to the south of GP3 and further from North Greenwich station.</p> <p>The Planning Brief acknowledges the higher densities at the adjacent Knight Dragon development and states that all scenarios are based on a density of 350 units per hectare. Given the close proximity to North Greenwich station, the highly sustainable location of the site and need to maximise the potential of the site and wider Opportunity Area, densities should be applied more flexibly. 350 dwellings per hectare should not limit higher density development if it can be justified through high quality design.</p> <p>Connectivity</p> <p>GP3 forms a crucial link joining Morden Wharf, Enderby and Lovell's Wharves (to the south) and protected industrial land (to the west) with the rest of the Greenwich Peninsula, including North Greenwich transport node. With the future decommissioning of the existing gas holder on the site, GP3 has clear potential to deliver a high quality residential-led mixed use scheme that knits together adjacent sites and acts as a real place shaper and catalyst for future development at Peninsula West, including Morden Wharf. Tunnel Avenue is a significant barrier to east-west movement. The acknowledgement that links through the site to the proposed new Silvertown Tunnel overbridge is welcome (paras 4.2.3 and 4.3.7). This will assist in connecting Morden Wharf, Enderby and Lovell's Wharves with the wider area and providing improved access to the River Thames and Thames Path for future residents living at GP3. The definition of east-west and north-south 'primary' routes (Figure 4.2) is also welcome but the Planning Brief should go further to ensure that the detailed design of GP3 will deliver maximum diagonal connectivity through the site</p>	

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		between the overbridge and the North Greenwich centre.	
GP9	GLA Land & Property	<p>Further to your publication of the above document this letter sets out the views of GLA Land & Property Limited ("GLAP"). As you may be aware, GLAP is a separate entity to the Greater London Authority which performs a statutory planning function and this letter should be read as such.</p> <p>GLAP has significant land holdings on Greenwich Peninsula and has long been involved in the areas regeneration and development. GLAP's role can be traced back via its predecessors (the Homes and Communities Agency and English Partnerships) to the regeneration master plan following the closure of the Millennium Dome. We therefore have a long term understanding of the area. Following changes to the redevelopment of the Peninsula we are working closely with the Council, Knight Dragon, AEG and others to continue the process of regeneration of the area into a new community for London. Central to this vision is a commitment to high quality residential built around strong transport links, high quality public realm, a mix of housing tenures and types and links to the hugely successful 02 complex.</p> <p>With regard to the specific proposals set out in the above document we would comment as follows:</p> <ul style="list-style-type: none"> - GLAP has land holdings in the area covered by the document and is supportive of the principle of residential redevelopment subject to it fitting with the wider regeneration master plan for the Peninsula. - Any redevelopment of the site should be seen in the context of the Mayor's policy on affordable housing and viability, as set out in "Homes for Londoners - Draft Affordable Housing and Viability SPG" published in November 2016. Development proposals for the site should also consider the potential impact of the London Plan revision. 	<ul style="list-style-type: none"> • Noted, the Planning Brief has considered the Affordable Housing and Viability SPG adopted August 2017. • Following the reduction of HSE Consultation Zones on the GP3 site, the indicative residential uses have been extended. Any future development must take the appropriate measures to mitigate, minimise or remove the constraint of the zone surrounding Brenntag UK Ltd. • Noted, any future development would be encouraged to seek TfL consultation at the planning application stage.

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		<ul style="list-style-type: none"> - The document clearly shows the impact of the Brenntag COMAH zone and the significant potential reduction in housing it could cause. Options to mitigate, minimise or remove the constraint of the COMAH zone should be considered as part of any detailed design proposal. - The document shows how the site could be impacted by the Silvertown Tunnel, the Development Consent Order for which is expected to be determined by the Secretary of State later this year. GLAP is aware of the work that TfL have done with Knight Dragon to enable development within close and safe proximity to the tunnel route elsewhere on the Peninsula and so would encourage an early dialogue with TfL by any potential developer of the site to ensure that the capacity of the site is maximised. 	
GP10	Greater London Industrial Archaeological Society	<p>Extract of recommendations:</p> <p>Until now, East Greenwich No.1 Gasholder has been of great importance in the riverside landscape, so it is inexcusable that it is virtually unmentioned in the draft planning brief and its total elimination is implicitly assumed. Yet No.1 and the former No.2 Gasholders have considerable potential in place-making for the new development. To their visual and technical interest and history may be added the distinctive circular forms in plan.</p> <p>The indicative plans within the Consultation Draft are remarkably lacking in vision. A more imaginative approach is called for that would tie the development in with the past and provide the means for No. 1 Gasholder to be prominently commemorated. We are not suggesting it would be practicable to retain this large gasholder intact, but the development could be themed around it.</p> <ul style="list-style-type: none"> • The outlines of the former gasholders should be taken as the starting point for the plan layout. • An open space could incorporate a portion of the top of the gasholder tank, that is the circular, formerly water-filled pit into which the telescopic sections of the gasholder "bell" descended as it deflated. • Portions of the guide framing could be salvaged during demolition and re-erected against the face of a new building for support. The 	<ul style="list-style-type: none"> • An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area.

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		<p>distinctive form of the multiple diagonal bracing, standards and ties could thus be displayed.</p> <ul style="list-style-type: none"> Some of the wheeled “carriages” that guided the “bell”, together with sections of the vertical rails on the guide frame that they ran against, could be salvaged and incorporated in a piece of public art. The design would need to be respectful of the engineering. Associated with this would be ample illustrative display boards, signage and other interpretative material, which needs to be technically informed and informative. <p>We urge you to modify the brief so as to incorporate these ideas.</p>	
GP11	Southern Gas Network	<p>Following receipt of the draft Greenwich Peninsula Site GP3 Planning Brief, I now set out below comments on the document which we believe should be incorporated prior to any formal consultation:</p> <ul style="list-style-type: none"> The document is well written, simple and cohesive and establishes a clear approach to future development. The document is a material consideration which should carry significant weight in any future planning decision by the Royal Borough of Greenwich. This should be explicitly set out within the document at paragraph 1.2.5. Paragraph 4.1.2 should be revised to include the text “subject to viability” after “Policy H3” to ensure that the text complies with the Development Plan and NPPF. The document cannot stipulate a blanket affordable provision of 35% affordable housing. Within Section 4.1 it would be useful to explain that the suggested “Data Centre” and up to “10,500m² of business and office space” is an indicative use which reflects the spatial requirements of the site and the limitations arising from the Brenntag HSC. There is no empirical data supporting the bespoke delivery of a Data Centre at this site, or up to 10,500m² of business and office space. Figure 4.4 appears to be missing a southern viewing “eye” towards Historic Greenwich. This is identified in Figure 2.7 as an opportunity. 	<ul style="list-style-type: none"> The Planning Brief explores the future potential of the site and identifies a series of development principles to create high quality development. The Planning Brief does not form part of the Royal Borough’s Local Plan but will inform the emerging Site Allocations Local Plan and any future updates to the Greenwich Peninsula West SPD. The Planning Brief has been subject to full public consultation and cabinet approval and will form a material consideration in the determination of planning applications. Section 4.1 of the Planning Brief is identified as an example of potential land uses for Site GP3 and is therefore as you suggest only indicative. Noted, the view towards Historic Greenwich has been added to section 4.4. The purpose of the Planning Brief is to guide future development of Site GP3. It is therefore considered appropriate to include the future potential planning application deliverables,

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		<ul style="list-style-type: none"> • Within Section 4.4 we believe that it is necessary to include a sentence which confirms that tall buildings are a building typology required to deliver expected density levels. The text could read “To maximise development opportunities at this site, and achieve appropriate living conditions it is considered that tall buildings would be acceptable in this location”. • Paragraph 5.2.1 makes an assumption regarding future planning applications for Site GP3. We don't think it is necessary to make this assumption. • I trust that you find these observations useful and acceptable and will appreciate your confirmation that they will be incorporated in the document prior to the formal consultation. 	
GP12	Lidoka Estates Limited (LEL), Landowners	<p>LEL own land within the GP3 site. The plan provided as Appendix 1 to this letter shows the extent of LEL's land ownership. The land is located to the south-east of the gasholder and is bounded by Millennium Way to the north-east; Boord Street to the south-east and Dreadnought Street to the south-west. The main access to the site is from Millennium Way but there is a second access from Dreadnought Street.</p> <p>The site is currently leased to the Royal Borough of Greenwich (RBG) who in turn lease it to The London Evening Standard (TLES) who use the site as a Distribution Centre from where they distribute papers all over London. TLES sub-leases small parts of the site to two other businesses.</p> <p>LEL have been in discussion with Transport for London (TfL) and have made representations to the Planning Inspectorate (PINS) in respect of the proposals for the Silvertown Tunnel which is an important consideration when considering development options for the GP3 site. LEL are also aware of the planning application that is yet to</p>	<ul style="list-style-type: none"> • The Planning Brief explores the future potential of the site and identifies a series of development principles to create high quality development. The Planning Brief does not form part of the Royal Borough's Local Plan and is intended to inform the emerging local plan and future updates to the Greenwich Peninsula West SPD. The Planning Brief is subject to a full public and statutory consultation and cabinet approval, and forms a material consideration in the determination of future planning applications. • Timescales for adoption of the planning Brief has been addressed in section 1.3 Consultation and Final Planning Brief. • Following the reduction of HSE Consultation Zones on the GP3 site, the indicative residential uses have been extended. Any future development must take the appropriate measures to mitigate, minimise or remove the constraint of the zone surrounding Brenntag UK Ltd.

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		<p>be decided for reinstatement of Studio 338 following the fire last year (RBG application reference 16/3945/F). Studio 338 is located immediately at the south-west corner of the LEL site. LEL have objected to planning permission being granted for reinstatement of the nightclub on a number of grounds.</p> <p>The Principle of Redevelopment at Site GP3</p> <p>LEL are generally supportive of the principle of redeveloping Site GP3 and for this to comprise a residentially-led, mixed-use scheme. It is fully acknowledged that the site is affected by a number of constraints and that there are a number of landowners probably with different aspirations for the site's future. Achieving a collective vision for the site's future alongside the known constraints will be challenging. However, and in light of the successful redevelopment of other parts of the Greenwich Peninsula by Knight Dragon Developments Limited (KDDL) and others, LEL hope that the full development potential for the GP3 site can be realised.</p> <p>LEL are keen to work with RBG and its team of appointed consultants, together with other interested parties to promote the vision for Site GP3 and look forward to being consulted on the next steps going forward.</p> <p>Specific Comments on the draft Planning Brief for Site GP3</p> <p>LEL wish to raise some specific comments on the draft Planning Brief which we think should be considered and/or addressed prior to final adoption of the document by RBG. These are set out below under various headings:</p> <p><i>Status of the Planning Brief</i></p> <p>The draft Brief explains that once adopted, it will be used by RBG to manage development proposals for the site. It would be helpful if RBG could confirm the exact status of the Brief once it has been adopted</p>	<ul style="list-style-type: none"> • Land Uses have been guided by a robust evidence base and the scenario testing. Section 4.1 is therefore set out as an indicative guide of land uses. • Noted, the Planning Brief has been informed by a robust evidence base, including an assessment of existing and future air quality and noise. These assessments help to shape the development principles, which seek to mitigate against any potential adverse air quality or noise impacts, including principles 4.4.5 and 4.5.3. Further noise assessments would be a requirement of any future planning applications.

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		<p>and the weight that is to be attached to it in future plan-making and decision taking. For example, will the Development Brief be formally adopted as part of RBG's Local Plan Framework? If so, will it be a material consideration in the determination of planning applications coming forward on the site? It would also be helpful if RBG could confirm if the GP3 site will be formally allocated as a housing/mixed-use site as part of the Local Plan Framework and how residential development on this site will contribute to meeting the Borough's housing targets.</p> <p><i>Relationship with the Peninsula West Masterplan Supplementary Planning Document (SPD)</i> (April 2012)</p> <p>The GP3 site is only part of a wider site that was included in the Peninsula West SPD 2012. The proposal to bring forward residential-led mixed use development on Site GP3 currently contradicts the land uses proposed for LEL's land in the 2012 SPD. We support the proposals in the draft GP3 Site Planning Brief, but consider it is essential for RBG to confirm how the Brief will sit alongside the 2012 SPD within the Council's Local Plan Framework and the planning weight to be afforded to each document. It is understood that the 2012 SPD will not be formally withdrawn. We note that Policy EA3 of the Greenwich Core Strategy (2012) states that the 2012 SPD will be updated. It is important this should be done to reflect the aspirations for the GP3 site as set out in the draft Planning Brief. RBG also need to explain how the different land uses currently proposed for the GP3 Site in the 2012 SPD and the draft Planning Brief will be reconciled.</p> <p><i>Land Ownership</i></p> <p>The GP3 Site is owned by a number of landowners and it is unclear as to what discussions have taken place with them and other</p>	

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		<p>interested parties and how differing views will be reconciled.</p> <p><i>Timescales for adopting the Site GP3 Planning Brief</i> Paragraph 5.1.3 states that the Brief will be formally adopted by RBG in July 2017. This seems a little ambitious if the closing date for comments on the draft is 17th July. It would be helpful to get an update on timescales for adoption and the process for adoption i.e. does the Brief need to be approved at Committee level? If so, which Committee will consider it?</p> <p><i>Timescale for Project Delivery</i> The Brief makes no reference to when the redevelopment could take place and the programme constraints that could affect delivery. This is an omission which should be corrected.</p> <p><i>Alignment of the new Planning Brief with existing Royal Greenwich Core Strategy (2012)</i> Policy EA3 (Greenwich Peninsula West) envisages a new urban quarter at Greenwich Peninsula West (which includes the GP3 site) to include a range of uses including residential and commercial uses but with a need for sufficient “buffering” from the retained Strategic Industrial Location (SIL) land and the safeguarded Victoria Deep Water Terminal and Tunnel Wharves to minimise conflicts of use and interference to new residents. We support the approach recommended in the draft Brief which promotes buildings of at least four storeys high along the boundary of the site with the A102 Blackwall Tunnel Southern Approach to block noise and pollution away from the site. However, it is not clear from any of the options included in the Appendix to the draft Planning Brief how this is promoted as those options promote open space and/or low-level/low activity immediately adjacent to the A102. As indicated above, we</p>	

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		<p>support a residential-led mixed use development on Site GP3. However, Policy EA4 (Strategic Industrial Locations) allocates Greenwich Peninsula West as a SIL and the policy protects it for continued industrial use (part Industrial Business Park; part Preferred Industrial Location). RBG will need to explain how the proposed development will fit in with this policy requirement.</p> <p><i>Site Constraints</i> There are numerous constraints affecting the GP3 site and these are well documented in the draft Planning Brief. The Brief should set out clearly the 'tests' that RBG would expect interested parties to satisfy to demonstrate acceptable forms of development. The GP3 site has known flooding, noise, air quality, HSE and land contamination constraints. This is not dissimilar to the constraints that equally applied to land to the north and east of the GP3 site which has the benefit of planning permission for residential-led, mixed use development and which has been partly developed for these uses, so the expectation is that developers would be similarly able to satisfy the tests in relation to this site. It would be helpful if the Stage 1 Baseline Report (paragraph 1.3.2) could be made available and if all the site constraints could be recorded in the Planning Brief in one place with the Council's criteria for satisfying these in planning terms.</p> <p><i>Development Principles</i> Section 4.1 of the draft Planning Brief lists the proposed land uses deemed acceptable in principle when considering redevelopment of the GP3 Site. The Brief needs to explain how this list can be reconciled with, or supersedes, the SIL allocation that applies to the site and the RBG/GLA policy drive to promote the Greenwich Peninsula as a leisure and tourism destination. Leisure and hotel uses</p>	

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		<p>should also be promoted.</p> <p><i>Land Uses</i> We consider that the Planning Brief should promote development potential with the widest and most flexible array of “other uses” provided they can be accommodated within the known site constraints. This should include Food and Drink, Retail, Assembly and Leisure and Community and Education Uses. The density of residential development being proposed (350 units per hectare) is below the upper ranges of the London Plan residential density guidelines for the Greenwich Peninsula location (405 units per hectare). On this basis, a greater density of development could be sustained on the site to ensure the most efficient use of land (subject to all other matters being satisfied).</p> <p><i>Silvertown Tunnel</i> A decision on the Silvertown Tunnel Development Consent Order (DCO) application is due in October 2017. Whilst we do not wish to delay publication of this Planning Brief, it may be prudent to publish it after that decision is announced to give potential developers more certainty in terms of development options. As the delay would only be a few weeks, the extra time involved would not be significant.</p> <p><i>Studio 338</i> We note that Studio 338’s planning application to rebuild and relaunch itself as a 23-hour night club is still awaiting a decision and is shown on the RBG Planning Portal as “open for comment.” As such, we consider it important that the proposals in this draft Planning Brief are taken into account in arriving at a decision on this planning application. Consistent with the representations submitted by LEL to the Studio 338 planning application, there are concerns that any</p>	

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		<p>permission for Studio 338 to reinstate itself would have a very negative effect on any new residential development not only on the GP3 site but on the Greenwich Peninsula as a whole due to the consequential loss of residential amenity. In our view, any continuation of Studio 338 would be completely at odds with the Vision, Objectives and Development Principles of the draft Brief for a residential-led mixed use development.</p> <p><i>Control of Major Accidents Hazards (COMAH) zones</i> It would be useful to understand the process involved in decommissioning the gas holder and the associated timescales for completion of this process. It would also be helpful to understand what effects the various phases of decommissioning will have in terms of realising the vision for Site GP3 especially mindful of the Control of Major Accidents Hazards (COMAH). Additional detail needs to be provided in the Planning Brief preferably following detailed discussions with the Health and Safety Executive (HSE). This would provide greater certainty to potential developers in terms of the timescales for development delivery.</p> <p>Similarly, it would be useful to understand if discussions have taken place with Brenntag as to whether there are firm proposals to alter/revoke the COMAH Zone around their chemical facility and if so, what effects this will have in terms of the development potential of Site GP3.</p> <p><i>Scale and Massing, Design Quality and Character- Appendix A : Scenarios</i> As indicated above, we agree that it is important to mitigate against the known air quality and noise constraints through design. The draft Brief suggests in Sections 2.3 and 4.4.5 that this could be done by locating buildings of a least four storeys along the site boundaries.</p>	

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		<p>However, we note that Scenarios 1 and 2 appear to allow large gaps between the buildings. We appreciate that these scenarios are merely indicative, but we suggest that it would be helpful to revise the illustrations to show greater massing, height and density to ensure the most efficient use of land. In 4.4.5, the draft Brief refers to “locating sensitive uses in podium development set back from the building line.” Can the Brief further clarify exactly what is envisaged by this?</p> <p><i>Consultation with Statutory Consultees</i></p> <p>The draft Brief fails to confirm whether it has been prepared in discussion with statutory consultees including the Environment Agency and the Health and Safety Executive. This should be confirmed and details of their responses should be provided to assist potential developers.</p> <p><i>Conclusion</i></p> <p>LEL are very keen to engage with RBG in respect of the draft Planning Brief for Site GP3. The principle for redeveloping this site for residential-led, mixed-use development is supported. The draft Planning Brief proposes sensible options for how this development can be progressed in recognition of the site constraints. Further clarification from RBG on the matters highlighted in this letter will provide greater certainty for potential developers and this would be welcomed.</p>	
GP13	GLA, Development, Enterprise and Environment	<p>Strategic</p> <p>The site is within the Greenwich Peninsula Opportunity Area which is targeted for at least 13,500 new homes and 7000 additional jobs. The site itself is currently used for a range of generally low intensity land uses, notably including a gasholder.</p>	<ul style="list-style-type: none"> • Following the reduction of HSE Consultation Zones on the GP3 site, the indicative residential uses have been extended. Any future development must take the appropriate measures to mitigate, minimise or remove the constraint of the zone surrounding Brenntag UK Ltd. • Timescales for adoption of the planning Brief has been addressed

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		<p>The site is not within a Strategic Industrial Land designation, however it has been in industrial uses. The loss of industrial land will need to be carefully justified as there is emerging evidence from London Industrial Land Demand Study 2017 that industrial floorspace capacity needs to be retained within London and Greenwich. If existing businesses/industrial activities are affected by the proposed land use changes it will be important to ensure that appropriate relocation arrangements are put in place for those businesses.</p> <p>The principle of the planning brief presenting three options for future development is welcomed given that there are two important strategic issues that will affect the extent and nature of developable land. The two strategic issues are firstly the proposed Silvertown Crossing route and land associated with that and secondly the extent of the COMAH zones.</p> <p>The Silvertown Tunnel DCO Examination ended in April 2017, the Planning Inspectorate has since passed its recommendations to the Secretary of State, who is due to make a decision by the 11th October 2017. In view of this imminent deadline, the Council should be in a position to conclude on one of the major issues affecting the site prior to the finalising of the Planning Brief.</p> <p>Clearly the Mayor and TfL support the Silvertown Tunnel project and therefore expect that the land will be required for the road alignment and for construction activities related to it. Further detail is given in the attached appendix containing detailed comments from TfL.</p> <p>The principle of relatively dense residential development to the east of the site, with a buffering form of less sensitive development along the</p>	<p>in section 1.3 Consultation and Final Planning Brief.</p> <ul style="list-style-type: none"> • The Planning Brief has been updated at section 4.1 Land Uses to reflect the potential re-provision of some light industrial and commercial uses along the western edge of the GP3 site. • Section 4.3 Open Space and Streetscape has been updated to extend the landscape buffer along the western edge and to include a buffer along the proposed Silvertown Tunnel access route.

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		<p>A102 frontage is supported.</p> <p>The inclusion of a range of public, private and semi public open spaces within the development is supported as there is generally a lack of open and natural spaces on Greenwich Peninsula.</p> <p>While it is acknowledged that the gas holder is not currently operational and that SGN intends to decommission the structure, the hazardous substances consent remains in place and therefore this remains a material planning consideration until such a time that the Council revokes the consent.</p> <p>Scenarios</p> <p>Scenarios 1 and 3, which both envisage that the Silvertown Crossing will be built, do not appear to offer any guidance as to what should happen with the somewhat fragmented land parcels to the north of the Silvertown Crossing route. Whilst these areas of land are relatively small, it would still be appropriate to consider whether there are any viable land uses or whether they should be designated as open spaces.</p> <p>In these scenarios, it is not clear that there is very much buffering of the development to the north of the site alongside the new Silvertown Crossing route.</p> <p>Scenarios 1 and 2 indicate that a form of less sensitive development, up to around 4 storeys would be built alongside the A102, this is welcomed in principle as offering a degree of mitigation to the noisy, polluting and hostile environment of that road. The indicative massing appears to allow for some significant breaks in that built format, which</p>	

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		<p>is likely to undermine this buffering role. Furthermore, the massing of the residential elements to the east of the site indicates a horseshoe format facing westwards, such a format would be likely to trap or even amplify any noise.</p>	
GP14	Transport for London	<p>Whilst there are some good aspects of the brief, which seeks to improve pedestrian permeability and connectivity across the site and that barriers to access to the site are addressed, we feel there are other considerations, such as constraints on available public transport capacity that should be noted. Furthermore, we feel that the planning brief could be more ambitious with it's response to encouraging Healthy Streets and Liveable Neighbourhoods, which in turn will provide greater encouragement for people to travel by sustainable, active modes.</p> <p>Pre-preparation engagement TfL met with BDP who were commissioned to develop the planning brief, prior to the release of the consultation draft. A meeting was held in March 2017 to discuss potential site constraints and aspirations for the brief. Furthermore, members of TfL's Silvertown Tunnel team were also consulted in separate meetings.</p> <p>Testing and Assessment of Development Proposals It has not been made clear what the potential impact of this scale of development will have on the strategic public transport and highways networks and whether there is sufficient capacity on these networks to cater for the increased demand that will result from the proposals. There is also limited detail on the potential impacts of the increase in homes and jobs in this location and there is no detail on whether any potential additional transport capacity will be required. We would</p>	<ul style="list-style-type: none"> • The Planning Brief has been updated to reflect changes to the HSE Consultation Zones. As such the connectivity and circulation across the site has also been updated at section 4.2 Access, Movement Servicing and Parking. • Street layout will be assessed and considered when planning applications come forward for the site. • Healthy Streets for London has been acknowledged in section 4.2 alongside the requirement for pedestrian wayfinding.

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		<p>welcome further discussions with RBG regarding how they expect to determine whether there is sufficient capacity on public transport or highway networks to cater for the additional demand.</p> <p>There is significant congestion experienced on the Jubilee line at North Greenwich station during peak periods, and as such there is a requirement for alternative modes of transport to be encouraged including walking, cycling and buses.</p> <p>Urban Design Throughout the planning brief there is no mention of Healthy Streets and given the Mayoral focus on these themes and the recently published Healthy Streets for London vision document (February 2017) and the draft Mayor's Transport Strategy (June 2017) it would be good to integrate the Healthy Streets Principles within the brief and provide some commitment to meeting them.</p> <p>It would be beneficial to relate the proposed street layout with the hierarchy of routes set out in the Street Types for London.</p> <p>The shared-surface routes proposed throughout the site suggest these routes are for pedestrians, cyclists and general traffic to share equally. With the significant levels of parking that are provided, and the likely traffic generation from the development on site, we would have expected more detail and consideration included into what these streets would look like i.e. it would be useful to see what the footway widths are expected to be, and what cycling provision will be provided.</p> <p>Walking The brief appears to be positive in promoting walking and pedestrian routes through the area. Despite this, pedestrian wayfinding is not</p>	

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		<p>mentioned anywhere in the document and this could be a key component to linking this site with the Peninsula masterplan area and public transport hubs at North Greenwich. TfL would therefore request that wayfinding is noted (specifically with reference to Legible London), and this should go into detail about the need to develop a strategy that considers wayfinding requirements of the entire area. We are happy to be involved in further discussions around how RBG would go about undertaking this.</p> <p>Cycling As stated earlier in this response, the document needs to reflect TfL's current policy focus on Healthy Streets for London. Overall, it would be beneficial to include a stronger vision about how the brief will ensure that the development will prioritise walking, cycling and public transport. More specifically, considering the proximity of the area to other major attractors and the lack of discussions to improve public transport, the brief could take the opportunity to reinforce the potential and advantages of promoting cycling as an alternative mode of transport across the area. Walking and cycling are the easiest and most affordable ways of travel, that have a wide range of benefits, from increasing physical activity levels, reducing air and noise pollution, to easing congestion, helping combat social isolation, increasing safety and economic benefits to businesses.</p> <p>There is lack of discussion over the potential layout of street types and it would be useful if dedicated cycling facilities are included in the proposals. For example, the brief indicates that there are cycling facilities on Millennium Way, however there is a lack of discussion over whether these are fit for purpose and will be able to satisfy the potential demand from the development envisaged from this development site.</p>	

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		<p>It would helpful in the context of creating better streets and balancing users' needs, that good design for cycling is considered in the design of street environments. Therefore, we would recommend that advice and guidance provided in the London Cycling Design Standards (LCDS) is considered in the design of streets across the area, and this is committed to in the brief.</p> <p>The brief includes an access plan showing the proposed local routes through the site, however the brief could have been improved by showing plans indicating the strategic and secondary cycle routes across the wider area and how the development site would make connections to these. Considering the need to promote cycling, a diagram such as this could demonstrate how the proposed site network will connect to existing and planned cycle infrastructure (such as Cycle Superhighway 4 further to the south) and its impacts on those travelling to/from and through the site.</p> <p><i>Cycle Parking</i></p> <p>The brief includes references to the need for planning and designing high quality parking facilities for all cycle users. Provision of fit-for-purpose, secure, well-located cycle parking is essential for supporting the development of cycling as a practical transport choice. A lack of appropriate cycle parking facilities is often cited as a barrier to cycling and cycle ownership use, and could be a constraint on the future growth of cycling. Based on experience in supporting increased cycling in London, TfL recommends that the brief reflects good practice for cycle parking as set out in the relevant chapter of the London Cycle Design Network Guidance.</p> <p><i>Cycle Superhighway 4 (CS4)</i></p>	

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		<p>The brief should include references to Cycle Superhighway 4, which will be key to delivering a lot of benefits for cycling in the wider area. The phase of Cycle Superhighway 4 that is closest to the site is still in a feasibility design stage, however when this phase comes forward in future, TfL are willing to work in partnership with RBG to develop options.</p> <p>Buses Considering the issues highlighted above regarding the congestion experienced on the Jubilee line at North Greenwich station, the brief should focus on the accessibility and connectivity provided by the bus network to the rest of the borough.</p> <p>The brief could also make reference to the emerging North Greenwich to Slade Green Transit study which is currently being undertaken by TfL in a close working relationship with RBG and which will be looking into a transit corridor which is likely to use the existing busway through the peninsula.</p> <p>Use of the River <i>Thames Path and Access to the River</i> Although there are some references to the Thames Path and access to the river they could be made stronger. The brief should encourage access to, and use of the river, for passenger and freight activities.</p> <p><i>Use of the River for Construction, Servicing and Deliveries</i> It could be useful for the brief to outline the support for any future development to maximise use of the river during construction and for servicing and deliveries to the area. TfL are keen to work with the PLA and RBG to encourage the use of the river on the peninsula and work with developers in these areas. There are a couple of protected</p>	

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		<p>wharves (Victoria Deep Water Terminal and Tunnel Wharf) highlighted in the document which could be used for these activities.</p> <p>Taxi and Private Hire There are a number of discussions occurring between developers and TfL regarding the provision for taxi and private hire ranks and infrastructure across the peninsula. As the specific commercial uses have yet to be determined, it would be beneficial for RBG to ensure that developers interesting in bringing forward development on the brief areas discuss with us the potential to include set-down areas and taxi ranks within their schemes.</p> <p>Strategic Highways Our comments regarding the highways focus mainly on the potential impact of these proposals and the possible effects that could be experienced on the A102.</p> <p>Any proposals that are deemed to have a significant impact on the distribution of traffic along the A102 or roads leading into it will require full strategic modelling, capturing all known schemes such as Silvertown Tunnel and Greenwich Peninsula masterplan.</p> <p>Silvertown Tunnel It is pleasing to see that the brief properly recognises the proposed Silvertown Tunnel, which is the subject of a Safeguarding Direction and a DCO application, awaiting determination by the Secretary of State for Transport. In particular it is important that the improvements to overall accessibility have been acknowledged. TfL would however like to comment on the adverse effect of the COMAH zones for the existing hazardous substances consent (HSC) at Brenntag Ltd, as they have a similar adverse constraint on the Silvertown Tunnel</p>	

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		<p>development as they do the residential-led proposals for the brief site. In light of this TfL would urge RBG to consider either modifying the existing deemed HSC or determining the outstanding 2012 HSC application such that the extents of the COMAH zones are reduced and more accurately reflect the nature of Brenntag's operation and use of their site.</p> <p>TfL Land Ownership TfL wishes to highlight that we own two small parcels of land within the GP3 site boundary, these are located north and south of Dreadnought St, where the eastern side of the crossing bridge descends from crossing the A102. To ensure that the vision of a high quality residential-led mixed use neighbourhood is met, and that development potential is maximised, TfL strongly support engagement with adjacent landowners and the development on an illustrative masterplan for the entire site (Section 5.2.3).</p>	
GP15	Thames Water	<p>I refer to the above mentioned consultation. Thames Water Utilities Ltd (Thames Water) Property Services function is now being delivered by Savills (UK) Limited as Thames Water's appointed supplier. Savills are therefore pleased to respond to the above consultation on behalf of Thames Water.</p> <p>Thames Water seek to ensure that any necessary upgrades to water and wastewater infrastructure are delivered alongside development and encourage developers to engage with them at the earliest opportunity. Thames Water are already working closely with Knight Dragon in relation to the delivery of infrastructure for development coming forward at Greenwich Peninsula.</p>	<ul style="list-style-type: none"> Noted. The Planning Brief has been updated to reflect the location of the Thames Water Pumping station.
GP16	Health and Safety Executive	<p>Thank you very much for sight of the Consultation, in principle, from the Health and Safety Executives (HSE) Land Use Planning (LUP) perspective which is concerned with public safety, this is quite good</p>	<ul style="list-style-type: none"> Noted, Section 1.14 has now been updated to the following: "The gas holder structure on Site GP3 was decommissioned in 2011,

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		<p>as a draft planning brief as it clearly recognises HSE consultation zones as constraints and it identifies 3 scenarios taking into account the possible changes to those constraints (objective 5). However some of the detail is not quite correct and I would offer the following non-exhaustive observations and comments based only from HSE's LUP methodology (methodology) perspective http://www.hse.gov.uk/landuseplanning/methodology.htm.</p> <ol style="list-style-type: none"> 1) Paragraph 1.14 includes the comment 'With the potential decommissioning of the gas holder structure', but paragraph 2.3.3 includes the comment 'As the intentions of SGN are to decommission the remaining gas holder structure and revoke the COMAH Zone licence, the related COMAH Zones have not been considered as an environmental constraint.' a) Firstly it should be noted that there is no COMAH zone license or COMAH zones; the zones are in relation to the Hazardous Substances Consent that runs with land as long as the consent exists, these are known as consultation zones/distances, and; b) Reading the two paragraphs 1.14 and 2.33 it is not clear what is SGN 's position regarding their consent; furthermore if the position is that of paragraph 2.3.3 if the gasholder zones are not to be a constraint then they do not need to appear in figure 2.8. 2) Paragraph 2.3.2 is correct but table 2.1 has some errors; using the methodology: <ol style="list-style-type: none"> a) For DT2.1 to be AA in both the inner and middle zones and a DAA in the outer zone it would be a level 3 development; in the methodology this is classified as DT2.1 x2 or DT1x3 (Larger developments for more than 30 dwelling units and any developments (for more than 2 dwelling units) at a density of more than 40 dwelling units per hectare respectively), and; b) For DT2.4 to be AA in the inner zone and a DAA in both the middle and outer zones it would be a level 2 development; in the methodology this is classified as Developments for use by the general public where total floor space (of all floors) is from 250 m² up to 5000 m² if the floor space is larger that 	<p><i>however the Hazardous Substances Consent remains in place. With the potential future removal of this licence, Site GP3 can accommodate more intensive uses. This Planning Brief has been developed to take into account these changing circumstances and to realise the future potential of the site."</i></p> <ul style="list-style-type: none"> • Section 2.3.3 has been amended to the following: <i>"The existing gasholder structure on Site GP3 was decommissioned in 2011 and is no longer in use. It is understood that SGN intend to revoke the Hazardous Substances Consent surrounding the gasholder which remains in place. As such, the related HSE Consultation Zones have not been considered as an environmental constraint."</i> • The HSE methodology table was not considered a necessary element for the level of detail of the Planning Brief and has therefore been removed. • Noted. Following HSE's assessment of the risks associated with the granting of Hazardous Substances Consent at Brenntag UK Ltd (Ref: 12/1247/H), the Consultation Zones have been reduced. The revised zones are shown on Figure 2.4. • Noted. Section 4.1.3 provides an example of safety measures and therefore does not propose an exhaustive list of considerations. This approach is considered appropriate for the level of detail for the Planning Brief. • The indicative scenarios were used to test the site's transport capacity and viability and inform the design guidance. The scenarios have been removed from the Planning Brief to allow the document to focus on the development principles and guidance. Following amendments to the HSE Consultation Zone for Brenntag UK Ltd, Scenario 1 became redundant.

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		<p>this in the methodology this is classified as D2.4x2 <i>Development with more than 5000 m² total floor space (of all floors).</i></p> <p>3) Figures 2.4 and 2.8 appear to illustrate the Brenntag hazardous substance consent zones from a 2012 application that HSE assessed but has not yet determined by the Council; rather than the 1999 deemed consent (pre-June 2017 update).</p> <p>4) Paragraph 2.5.8, there may be other constraints arising from the presence of gas distribution pipework; SGN should be able to advise the Council.</p> <p>5) Paragraph 4.1.3, it would appear the brief is taking LUP methodology into consideration though the paragraph is somewhat confusing because it mixes up a number of safety and other constraints alongside the proposed mitigation action to be taken e.g. <i>no habitable rooms permitted on the ground floor, would appear to be flood risk mitigation whilstand less sensitive uses such as leisure/sports use, an archive centre or a data centre to the west, providing a buffer from the A102 and industrial uses to the west, would appear to be a public safety mitigation.</i></p> <p>6) Appendix A scenarios 1 and 2 need correcting as they are based on the faulty table 2.1. In addition constraints on commercial development arising from the distinction between sensitivity levels 1 and 2 need to be identified.</p> <p>7) If the recently updated Brenntag consultation zone (1999 deemed consent) was used in the brief instead of the as yet undetermined 2012 application it is possible that HSE would not advise against the proposal. I would direct your consultants the HSE's advisory Web-App service at https://pa.hsl.gov.uk/ where they would need to register and there then would be a charge to use the service; alternatively as the development is large scale, and a potentially complex development that may need more bespoke advice, they may wish to consult direct (again with a charge) to the LUP team at lupenquiries@hsl.gsi.gov.uk .</p> <p>I hope this is of some assistance but please do not hesitate to contact me if the Council require clarification of these points; advice on development configuration should be directed to the advisory service</p>	

ID	ORGANISATION	COMMENTS	RESPONSE
		where there will be a charge to your consultants.	
GP17	Individual	<p>The Peninsula generally - much of what has been developed on the Peninsula consists of blocks of flats. They are all jammed up close together and some of very dubious quality. Amenities and community facilities described in many master plans have frequently never been provided and in some cases the sites used for more flats. (ie Peartree Way!)</p> <p>It is not reasonable to keep building more and more housing with nothing else and no amenities - anyone who has studied the history of housing developments will be aware that this is how the 19th century slums were created.</p> <p>Greenwich needs to do something better.</p> <p>The site has a number of features which could be used for a prestigious scheme which would get development in Greenwich noticed. Ideally the site would be amenity space but housing could easily be included, hopefully with a bit of imagination instead of what is being put up all around.</p> <p>The gas holder (I am happy to give details of why it is an important structure and some of its history). All round the world local authorities are adapting holders for housing and amenity space. There are flats in smaller holders at Kings Cross, Dublin and elsewhere. Holders elsewhere are used for sports arenas, or venues built inside their space. Just the other side of the river in Bromley by Bow and Poplar, holders which much less merit than ours are being developed as features in parkland developments. Why do we always have to take the least imaginative and most retrograde option?</p> <p>The tank - next to the holder is the tank of what was the larger holder demolished in 1986. It should have some use.</p>	<ul style="list-style-type: none"> • The Planning Brief has taken a comprehensive and holistic view of potential future development across the site which the Draft document tested for viability and capacity in a set of three scenarios. These scenarios subsequently informed the Development Principles and indicative uses and densities for Site GP3. • An additional page has been inserted into the Planning Brief recognising the heritage value of Site GP3 and Greenwich Peninsula's industrial history. • An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area.

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		<p>The school - the Horniman Museum store is not discussed and it would be interesting to know what discussions have taken place with Horniman and what their plans for this building are. The school dates from 1893 and in many areas such London School Board buildings are routinely listed. They are robust well planned buildings and if Horniman no longer want it then it should absolutely remain in other use.</p> <p>Basically Greenwich needs to think about this site and think about the lack of amenities throughout the peninsula. But if we want it to be an exciting place that adds value to the Borough and to the riverside we need to produce something a LOT better than this boring and routine scheme - and to link it to some of the better developments being produced by Knight Dragon and whatever U&I are planning on Morden Wharf. Hopefully discussions with them are ongoing about this.</p>	
GP18	Individual	<p>I would be very sad to see the Gasholder go it fascinated me when younger watching the levels of the sides rise up and down to the need of gas over the winters. I would like to see it developed into apartments like the Gasholder in Dublin .The roundness of the building would add great contrast to the squareness of most apartments.</p>	<ul style="list-style-type: none"> An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area.
GP19	Individual	<p>Please preserve the gas holder at Greenwich as it is an historic landmark & my dad who has passed away reported it when a bomb was left there.</p>	<ul style="list-style-type: none"> An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area.

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GP20	Individual	<p>I wish to object to the demolition of the above on the grounds of its historical and architectural importance. It could still be made into flats for the community. There is already dense housing in the area and the retention of this iconic building would improve the aesthetic value of the environment for residents and visitors. A beautiful and daring architectural scheme combining old and new would be wonderful and add to the many landmarks in the Royal Borough.</p>	<ul style="list-style-type: none"> An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area.
GP21	Individual	<p>I am writing to give my views on the next redevelopment stage for the Greenwich Peninsula, the area termed GP3. Firstly, as I understand that there is a campaign to save the structure of the Greenwich Gasworks Gasholder, I would wholeheartedly support a move to include this in the regeneration plans as a protected structure. I have seen pictures of others of these which have been repurposed as flats, or community spaces - with a renowned design school on the doorstep, it must surely be possible to invite ideas for its regeneration as an existing structure, rather than removal and replacement. The expressed intention of the eco-friendly aspect of the area - encouraging walking and cycling, the ecology park, etc - would be better served by a show of renewal and reuse. Also, I feel that a nod to the industrial heritage of the area would give character that you risk losing by stripping the site completely, and you often find something far more interesting, design wise, when constrained by existing parameters. A historical example being the building of the Royal Naval College; Wren wanted to clear the site completely, but was required to work around the Queens House, and to protect the views to the river, which means that to this day we have an uninterrupted view from the top of the park to the river.</p> <p>My other concern is relating to the 338 Studio club, which burned down, and is apparently still awaiting permission to repair and reopen.</p>	<ul style="list-style-type: none"> An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area. An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area. Noted, the Planning Brief has been informed by a robust evidence base, including an assessment of existing and future air quality and noise. These assessments help to shape the development principles, which seek to mitigate against any potential adverse air quality or noise impacts, including principles 4.4.5 and 4.5.3. Further noise assessments would be a requirement of any future planning applications.

ID	ORGANISATION	COMMENTS	RESPONSE
		<p>I note in the proposals that it is stated that if this permission were to be granted, the club would become a source of noise (by inference, noise pollution) to the homes likely to be built nearby. Having seen this happen a number of times, with live music venues, race tracks, pubs etc, where residents move adjacent to an existing noise source then campaign to shut it down, I can see the possible conflict here, but do not see the answer as being to remove all sources of entertainment. An Ibiza-style superclub is not my idea of a fun night out, but it obviously is to many, and I would defend their right to enjoy it. Given the proximity of the O2 and the Blackwall Tunnel approach, it would seem reasonable to ensure developers fitted appropriate soundproofing, and made prospective purchasers aware that moving to a vibrant, buzzy area is inconsistent with then expecting to hear no sounds of life.</p> <p>Returning to my first point, my suggestion for the use of the gasholder would be to retain the outer structure, and build within it, possibly a boutique hotel as a friend of mine suggested, or proper social housing in the manner of the Boundary Estate in Shoreditch. A live music venue would presumably come into conflict of interest with the O2, but a well soundproofed club to replace the existing Studio 338, especially if it could also be used as a performance/modern art space would tap into the area's growing arts/music reputation. The proposal also mentions films studios being built in the area, which I would say could maybe be another use for the gasholder, though whilst I understand it is the biggest in the country, I have no idea how much space would be available. I do feel that the structure would lend a cachet to any business housed within a sympathetic redevelopment of the gasholder, and that we shouldn't erase the entire past of the area in the pursuit of the future.</p>	

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GP22	Individual	<p>Please do not demolish this gasholder!! It is historic, and iconic, and flats inside it would work much better than some block of ugly flats on the site.</p> <p>Thank you for considering my plea.</p>	<ul style="list-style-type: none"> An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area.
GP23	Individual	<p>I am writing in connection with views in the potential future use of the Gasholder at Greenwich (public consultation).</p> <p>I understand that according to your website the consultation ended yesterday however according to The Greenwich Visitor newspaper (July 2017 No. 81) it states it would be ending tomorrow.</p> <p>In any case if there is still time to comment could I just say that I am of the view that the gasholder should be retained. In my view it should be converted into a massive green house to educate people of environmental matters.</p> <p>This historic landmark should never be demolished.</p>	<ul style="list-style-type: none"> An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area.
GP24	Individual	<p>Good to see that there will be more emphasis on sustainability and including open spaces and cycle routes. Please can we protect the gas works which is iconic and could be repurposed with a bit of imagination. It maintains the industrial heritage.</p> <p>We should also resist the temptation to allow development to erode our music venues and spaces and some emphasis should be placed on protecting these when new residents move in. As such Studio 338 could be protected, enlarged and made into a more attractive music venue proposition.</p>	<ul style="list-style-type: none"> An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area. Noted, the Planning Brief is based on the information available for Studio 338 at the time of preparation. Further noise assessments and viability would be a requirement of any future planning

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GP25	Individual	<p>I have just read an article in the Greenwich Visitor regarding the proposed demolition of the iconic gasholder outer structure on Greenwich Marsh.</p> <p>I understand that local residents and those with an interest in retaining the history of the borough were invited to write in with their thoughts about the destruction of this landmark and proposal to build even more high rise accommodation on the Marsh, and even though the very small amount of time allocated for people to do so has run out, as a published author who has written several books detailing the fantastic history of the borough, I feel must add my name to the list of those making their thoughts known about the proposed tearing down of such an historic landmark.</p> <p>I hope that the planning department reconsider the wanton destruction of the gasholder and look at other ways to retain this for future generations to appreciate.</p>	<p>applications.</p> <ul style="list-style-type: none"> An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area.
GP26	Individual	<p>I wanted to write to express my concern that there is talk the gasholder might be bulldozed - please add my name to the list of dissenting voices hoping to keep this unique piece of our history and reimagine it as part of our community.</p>	<ul style="list-style-type: none"> An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area.
GP27	Individual	<p>After reading the article about the Greenwich Gasholder, in the Mercury and Greenwich Visitor, I feel it would be a lost opportunity to demolish this historic structure.</p> <p>I would like to put forward a new purpose (multi or singular) use of this structure, something which has been easily achieved with other gasholders.</p>	<ul style="list-style-type: none"> An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and

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		<p>Please see the following suggestions:</p> <p>Could this not be converted into a 'Mini' Crystal Palace style structure and incorporate the amenities. There are many new apartments being built in the area with very few amenities for the people living in them.</p> <ol style="list-style-type: none"> 1. Greenwich SE10 does not have a large indoor swimming pools center, Eltham and Woolwich do. 2. A viewing platform from the top of the structure. 3. A decent play area for children. 4. perhaps some trees around the outside between the A2 road and the Structure to help prevent pollution. 	<p>distinctiveness of the area.</p>
GP28	Individual	<p>Please don't demolish the old gas works in the millennium village area of Greenwich. Use it instead. Develop it. Don't flatten it to make more tower blocks. Use your imagination. It's a lovely, historical building and like the Greenwich Visitor paper has stated, other countries throughout the world have used these gasworks without flattening them.</p>	<ul style="list-style-type: none"> • An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area.
GP29	Individual	<p>I would like to add my comments on why the Gasholder at Greenwich should be preserved and not demolished.</p> <p>The gasholder and the O2 structure, close by, are very similar in nature. Domes held together with spider like pylons. They compliment and contrast each other. One is representative of the 19th century, the other of the 21st century (opened in the year 2000). They represent the engineering of their times. The gasholder being the biggest in Europe and the Dome being unique of its type. There being so close together must be unique in Britain, probably in Europe and possibly the world. What a coup and asset for the Royal Borough.</p> <p>If the gasholder must be used, then keep its structure and build inside it. Take a look at what has been done to the gasholder just off the</p>	<ul style="list-style-type: none"> • An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area.

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		Regents Canal at Kings Cross.	
GP30	Individual	<p>As an engineer looking out every day onto the gas holder on the peninsula, I am always impressed by Victorian engineers and it is a piece of history I value.</p> <p>As such ideas to get rid of the gas holder are repugnant to me.</p> <p>In Kings Cross they have retained our heritage and still managed to build new housing which I realise we need. Can Greenwich not be as enlightened?</p>	<ul style="list-style-type: none"> An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area.
GP31	Individual	<p>I would like to see the Gas Holder protected. It's a structure of historical significance and should remain in place in such an industrial setting.</p> <p>I would not like to see another high rise apartment block take its place.</p>	<ul style="list-style-type: none"> An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area.
GP32	Individual	<p>I saw the recent article in 'The Greenwich Visitor' about Livesey's East Greenwich Gas Holder.</p> <p>I live in the borough and walk along the river to Greenwich regularly. The Gas Holder is a landmark feature of my river walk view which speaks of the history of this area, already with many historical features that document its wonderful history. Once these historical features are lost, they are lost for ever.</p> <p>I would ask that Greenwich give serious consideration to developing the site including the steel structure in a useful and functional way. I have seen some of the structures at Kings Cross that have incorporated the gas towers in their design and they are a wonderful amalgamation of the old and the new and bring innovative features to the landscape.</p> <p>I do think just building for profit at the expense of creative and interesting ways of preserving our historical heritage within the design</p>	<ul style="list-style-type: none"> An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area.

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		will result in a poorer cultural environment and one that reduces us all to mere numbers on a spreadsheet.	
GP33	Individual	<p>Your 'planners' have already obliterated almost any remnant of the Peninsula's historic heritage with gross overdevelopment with blocks of flats packed together leaving ever diminishing green space. Its resembling a housing ghetto with no thought of urban planning to keep a low skyline and make buildings enhance the environment. The gas holder is a dramatic icon of the former gasworks and should not be demolished. Surely you do not intend to demolish this magnificent historic structure for yet another block of flats?</p>	<ul style="list-style-type: none"> An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area.
GP34	Individual	<p>I have to say, that I am really worried about what is going on in Greater London - the origin of a very important part of engineering history.</p> <p>The very first gasholder for public gas-lighting was erected at the gasworks of Westminster.</p> <p>The increasing demand of gas led to build high rising structures - as a new architectural type that became an important part of the cityscape. British engineers did pioneer's work on designing and developing the gasholder.</p> <p>The guide-framing became the most evident part of the gasholder, because the water tank and the lifts - that had far reaching construction history as well - were not that constantly visible as the framing.</p> <p>With the arrive of natural gas the decay of gas industry began and thus led to the abandonment of the gasworks and the gasholders. The lifts - the never-stopping indicator of the actual amount of gas - did not move anymore and became invisible by resting in the ground of the tank (latter was mostly invisible because of its underground position).</p> <p>Thus the guide framing nowadays is the only evident testimonial of</p>	<ul style="list-style-type: none"> An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area.

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		<p>the former progress of the 19th century</p> <p>In the construction history of the guide framing shows an impressive development in the course of the 19th century.</p> <p>The early engineers invented, improved, enlarged the early, small one-lift gasholders to high-rising multi-lift examples and showed the progress of iron-technology and building technique.</p> <p>Sir George T. Livesey - and his brother Frank - played a remarkable note in the history of gasholder building. It was the merit of George Livesey to invent the so called „shell-principle“ that enforced the structure of the guide framing and facilitated very tall gasholders with a large storage capacity.</p> <p>The first „Livesey Pattern Gasholder“ was built in Old Kent Rd in 1880 and showed its innovative structure with bracings of two Andrew Crosses each framing camp.</p> <p>With the example of East Greenwich, Livesey crowned this sublime structure with a very „eyeable“ pattern, that added a third cross. Thus the tall, six-tiered guide-framing has an very filigrane and elegant appearance and is an important landmark. Though being tall it permits a transparency and is well fitted in the cityscape.</p> <p>I hope that I could make it clear, that in my point of view - and in many others - the Livesey`s guide framing in East Greenwich is a very important testimonial of remarkable merit and pioneer work of Londons gas engineers and has to be treated as a jewel - like one existing example in Fulham, that represents the very beginning with a small, single-lift gasholder and CI-tripods.</p> <p>Thus Fulham stands for the beginning of the guide-framing in 1830 and the Livesey`s design represents the result of modern gas engineering of the end of the 19th century.</p> <p>Alpha & Omega.</p>	

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GP35 (5136 716)	Individual	<p>Happy to see its not more waste of land like giant retail parks.</p> <p>I disagree with any question that ties in with Silvertown Tunnel plans. It needs to be cancelled. Pedestrian and cycle paths need radical improvement all over the Peninsula, both within the area and connecting to Odeon, future Ikea, Charlton retail parks and east Greenwich around and under Blackwall Tunnel and approaches.</p> <p>It will not work if Silvertown Tunnel is approved and built.</p>	<ul style="list-style-type: none"> • The Planning Brief has been updated to reflect changes to the HSE Consultation Zones. As such the connectivity and circulation across the site has also been updated at section 4.2 Access, Movement Servicing and Parking. • The Silvertown Tunnel application is based on a separate evidence base, which the Planning Brief has taken account of. With no decision yet issued on its approval, the Planning Brief must consider the available information.
GP36 (5136 725)	Individual	<p>I would very much want to see the gas holder retained and used imaginatively. This is a piece of our industrial heritage and should not merely be swept away. Other gasholders have been re-used in really interesting ways, as at King's Cross. Please don't just go for the cheap, nasty, bland option.</p> <p>My comments re. the gasholder remain. Much, however, rests on the badly-flawed Silvertown tunnel proposal. If that goes ahead the traffic will be so bad it won't really matter what happens to this sliver of land.</p> <p>I'm back on that gas holder again. Very little of our history remains in the area. Please consider putting it to use, instead of just creating bland nothingness.</p>	<ul style="list-style-type: none"> • An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area.

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GP37 (5136 778)	Individual	<p>I think the proposal is lazy, short sighted and driven by money without thought for the interesting opportunity that the unique gas holder could present. The gas holder should be part of a redevelopment as has happened in other parts of the UK. The holder itself is a part of our heritage which is sometimes all too easy to sweep away in the name of progress but impossible to replace when gone. I urge a rethink, look into the exciting possibilities its redevelopment could bring. Take a chance, be ambitious, leave the bland behind and be remembered as the council/developers who produced something exciting and breath-taking.</p> <p>2 - Re my earlier comments. I don't think it has to "respond and compliment" at the expense of being visually inspiring and exciting - something lacking from existing buildings on the site. 3 - Pragmatism has its place. Fortune favours the bold. Be bold, be visionary. Show me something that incorporates the holder rather than obliterating it from history and I will applaud you.</p> <p>Don't let me down. Surprise me!</p>	<ul style="list-style-type: none"> An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area.
GP38 (5136 819)	Individual	<p>Already overpopulated. Another area that will need policing.</p> <p>What is shown on the Planning "map" never looks the same when being built and it is then too late to do anything.</p> <p>MIDDLE OF BAD POLLUTION which will only get worse when the Cruise Liner arrives and another tunnel.</p> <p>Turn it in to Sports Arena and somewhere for young adults to go.</p>	<ul style="list-style-type: none"> The Planning Brief has been informed by a robust evidence base, including an assessment of existing and future air quality and noise. These assessments help to shape the development principles, which seek to mitigate against any potential adverse air quality or noise impacts, including principles 4.4.5 and 4.5.3.

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GP39 (5136 874)	Individual	<p>I reject all scenarios that propose the demolition of the Gas Holder's cylindrical steel lattice and all scenarios where the space inside it is not public open space. Do what you like with the rest of the GP3 site.</p> <p>I reject all scenarios that propose the demolition of the Gas Holder's cylindrical steel lattice and all scenarios where the space inside it is not public open space. Do what you like with the rest of the GP3 site.</p> <p>I reject all scenarios that propose the demolition of the Gas Holder's cylindrical steel lattice and all scenarios where the space inside it is not public open space. Do what you like with the rest of the GP3 site. Combine and locate the proposed social space and central square within the circle of the existing (and retained) gas holder). Then start Draft #2.</p> <p>I reject all scenarios that propose the demolition of the Gas Holder's cylindrical steel lattice and all scenarios where the space inside it is not public open space. Do what you like with the rest of the GP3 site. Combine and locate the proposed social space and central square within the circle of the existing (and retained) gas holder). As we approach local elections next year I will (can can) organise the local community, residents in around borough and other passionate interested parties further afield in order to have the gasholder retained and integrated in the site as public space and to ensure public promises are made by councillors for the same outcome.</p>	<ul style="list-style-type: none"> An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area.

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GP40 (5136 890)	Individual	<p>I want the gas holder listed and to remain.</p> <p>Greenwich Peninsula is going to be over developed. The gas holder a historic monument and a work of art. It is a welcome bit of space which contrasts with the high-concentration development of the rest of the peninsula development.</p> <p>Land use - gas holder should remain. The surrounding area should be a park.</p> <p>Greenwich Peninsula is going to be over developed. The gas holder a historic monument and a work of art. It is a welcome bit of space which contrasts with the high-concentration development of the rest of the peninsula development.</p>	<ul style="list-style-type: none"> An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area.
GP41 (5136 981)	Individual Individual	<p>It's very ugly, wouldn't be a loss and seems a waste of space in a developing area! Though it would be tragic to block the view of Canary Wharf with a big new building.</p> <p>Just nothing tall to be replaced - such a great view of Canary Wharf (Through the gas holder).</p> <p>NOTHING TALL!!! Please keep Canary Wharf view. Another park would be lovely ha ha! Tennis Courts? Football Pitch? Anything for fitness really, I see kids hanging outside shops with nothing to do.</p>	<ul style="list-style-type: none"> The Planning Brief proposes a townscape strategy, which seeks to maximise views towards Canary Wharf, whilst addressing the air quality and noise constraints from the A102, including a gradual transition in heights from west to east. The scale and massing principles on page 21, and section 4.4.5 and 4.4.6 reflect this.
GP42 (5137 026)	Individual	<p>Please ensure retention of the gas holder frame. It is an enormous visual asset that is also a strong reminder or monument to the area's industrial past. It is said that when new in the 1880s it was the largest structure of its kind in the world.</p> <p>These are unexceptionable objectives put as they are, but do not address my concern, that is retention of the gas holder frame for the reasons already stated.</p> <p>Delighted to see in vision, albeit at end of final paragraph,</p>	<ul style="list-style-type: none"> An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area.

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GP43 (5137 057)	Individual	<p>'encouraging walking and cycling, and the use of public transport'. Going to Peninsula developments now is v unpleasant experience for non-car users - it would be great to see this stage take account of walking behaviour. We don't use buses to get short distances - but the routes are noisy, dirty, exposed - all in keeping with having to walk through car parks to get to destinations.</p> <p>On objective four - I'd prefer the emphasis to be reversed i.e.- Prioritise pedestrian and sustainable travel and limit the use of the [private vehicle, while Creating a high quality movement network which connects to existing areas of activity and transport hubs to ensure the site is an integral part of the Peninsula. That's because the focus on pedestrian and sustainable travel (essential for a truly equal & diverse environment) can just fall off the end of an objective, in practice.</p> <p>This could be land use or open space & streetscape - where will be residents be able have allotments/space to grow their own veg/plants?</p> <p>It would be good to see the gasholder retained in some way. So much of the peninsular's new development seems without character (tramping the pavements with my shopping/on way to cinema/walking by river, lost on way from Nrth Greenwich having given up on the bus - I see a lot of it!). Keeping that industrial history in view could help give the place some soul.</p>	<ul style="list-style-type: none"> The Planning Brief identifies a vision and set of development principles for the site to guide future development. The brief does not provide detailed information on the design of streets, which is anticipated to be undertaken through the development of proposals though the planning application process. Noted, objective 4 has now been changed to the following: <i>"Prioritise pedestrian and sustainable travel and limit the use of the private vehicle while creating a high quality movement network which connects to existing areas of activity and transport hubs to ensure the site is an integral part of the Peninsula."</i> The Planning Brief sets out development principles to guide the future delivery of open space across the site on page 20. Specifically, principle 4.3.1 seeks to <i>"provide a series of public open spaces varied in character to form the 'heart' of the development, and encourage a range of activities including play space and formal and informal seating."</i>
GP44 (5137 080)	Individual	<p>Why decommission the Gas holder, it is an iconic landmark and could be even more iconic if it was redeveloped in a similar way to other gas holders in London, across the rest of the country and across Europe.</p>	<ul style="list-style-type: none"> An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial

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			<p>character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area.</p>
GP45 (5137 419)	Individual	<p>Too much of the local history has been lost through overdevelopment of the area already. It would be a shame to eliminate yet another landmark from the rich history of industrial Greenwich. The gas holder should be kept and incorporated into any redevelopment like it has already been done in other parts of London (e.g.King's Cross). This would set the site apart from the faceless and dull designs that are crowding the peninsula at the moment.</p> <p>In general the air quality of the area is bad already, the connection to Greenwich town centre is terrible for cyclists and pedestrians, the focus should be on them rather than on cars - also there should be more open green spaces to ensure quality of life for residents rather than crowding in more housing for maximising profits for developers.</p> <p>Lack of open green spaces</p> <p>The gas holder should be retained and incorporated into the redevelopment</p>	<ul style="list-style-type: none"> • An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area. • Development Principle 4.5.9 has been added to the Planning Brief, which seeks to ensure that proposals protect the heritage value of the former London School Board Dreadnought School. • The Planning Brief has been informed by a robust evidence base, including an assessment of existing and future air quality and noise. These assessments help to shape the development principles, which seek to mitigate against any potential adverse air quality or noise impacts, including principles 4.4.5 and 4.5.3. • The Planning Brief sets out development principles to guide the future delivery of open space across the site on page 20. Specifically, principle 4.3.1 seeks to “provide a series of public open spaces varied in character to form the ‘heart’ of the development, and encourage a range of activities including play space and formal and informal seating.”
GP46 (5137)	Individual	Contaminated land: Neighbour buildings should be protected from contaminated air dust from the works. As many ground studies in the	<ul style="list-style-type: none"> • The Planning Brief has been informed by a robust evidence base, including an assessment of existing and future air quality and

ID	ORGANISATION	COMMENTS	RESPONSE
644)		area suggest, the land is still heavily contaminated in some places even after the remediation works done 15y ago for the whole site.	noise. These assessments help to shape the development principles, which seek to mitigate against any potential adverse air quality or noise impacts, including principles 4.4.5 and 4.5.3.
GP47 (5137 815)	Individual	<p>The vision shows the loss of the major industrial heritage asset - the Gas Holder. This could be converted into a community building.</p> <p>Objective 2 should override Objective 7. The Gas Holder is a Borough wide asset, a remaining part of its Industrial history. It could be used to boost Objective 3 in respect of community benefit. It should not be hidden by surrounding buildings.</p> <p>4.1 - The Gas Holder could incorporate the Data Centre and Storage/Archive Centre - with space left over for other functions. 4.4 - the Gas Holder should be the focus, with no taller buildings to the north, and none taller than it is.</p> <p>The previous industrial usage of the Peninsula (and the marsh before that) should be championed, not obliterated. Culture encompasses much more than what is provided by the O2.</p>	<ul style="list-style-type: none"> • An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area. • Noted, section 4.4.6 of Scale and Massing addresses building heights and retention of views towards Canary Wharf.
GP48 (5137 823)	Individual	<p>Excellent proposals</p> <p>I think all new developments in the area need to be well lit and well served by public transport. The new developments will greatly enhance the area around the Greenwich Peninsula.</p>	<ul style="list-style-type: none"> • Noted, lighting proposals and public transport capacity will be further assessed when future planning applications come forward.

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GP49 (5137 836)	Individual	<p>Keep the gas holder and use it, as has been done with other gas holders, in an imaginative way so that this old and wonderful landmark can be kept and improved and not lost but can still include housing. It could be wonderful instead of another batch of boring flats.</p> <p>Use (not lose) the gas holder - make it something special</p> <p>Use the gas holder - it has been done so well with many other gas holders - Greenwich Peninsula and all the building of new flats along the river in Greenwich is changing Greenwich in a bad way - but this could be different and wonderful if done differently</p> <p>Please keep the gas holder and make something good</p>	<ul style="list-style-type: none"> An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area.

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GP50 (5137 837)	Individual	<p>I think the gas holder should not be demolished. It is a valued reminder of the industrial past of the area, part of its heritage. It's a stunning structure which would lend itself to many imaginative developments, for housing, or recreation. There are examples of similar developments of gas holders to refer to, and it would make a great architectural competition. There are far too many unimaginative high rise buildings in Greenwich now.</p> <p>Vitally important - if a lot more housing, there needs to be efficient transport system, clean air, open space, trees, communal gardens, as well as services for the community such as meeting places for children, the elderly, the vulnerable. Will there be surgeries for doctors, dentists, in the area? As well as schools? Greenwich is fast losing its sense of community, and its skies. Too many close-built high-rise developments.</p> <p>I fervently hope there is a sensitive over-view of the whole development which includes all the points from 4.1 - 4.5. Recent developments in Greenwich in my opinion show little design quality and character, are too closely massed, too high. Our streets and roads are becoming canyons and wind tunnels. We need open space and well designed small public gardens. Pedestrians need to be considered, as well as drivers and cyclists. The needs of communities need to be put before profit of developers, however important the latter are to the UK economy.</p> <p>Does the Royal Borough have independent architects and artists on the consultation panel? To bring a different viewpoint to Planning occasionally? Not to make artwork or design a building for the site, but to discuss the overall plan through all stages?</p>	<ul style="list-style-type: none"> • An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area. • The Planning Brief sets out development principles to guide the future delivery of open space across the site on page 20. Specifically, principle 4.3.1 seeks to “provide a series of public open spaces varied in character to form the ‘heart’ of the development, and encourage a range of activities including play space and formal and informal seating.” • The Planning Brief identifies a vision and set of development principles for the site to guide future development. The brief does not provide detailed information on the design of streets, which is anticipated to be undertaken through the development of proposals through the planning application process. • Noted, the Planning Brief has taken a comprehensive and holistic view of potential future development across the site in order to arrive at Development Principles for high quality design, and the purpose of the consultation process is to understand and take account of the public’s responses. • The Planning Brief is built on a robust evidence base and prepared by an external design consultant team.

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GP51 (5137 902)	Individual	<p>The gas holder must be protected.</p> <p>Retention of gas holder is key.</p>	<ul style="list-style-type: none"> An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area.
GP52 (5137 986)	Individual	<p>Yes, we will be submitting written representation on this brief.</p>	<ul style="list-style-type: none"> Noted
GP53 (5137 987)	Individual	<p>I am strongly in favour of retaining the gasholder structure because of its historical interest and distinctive character which would enhance the architectural quality of the development.</p> <p>Re Objective 6, the built quality would be enhanced by incorporating the gasholder into the new development, and not demolishing it.</p> <p>4.5 design quality - Retaining the historical gasholder structure as part of the development would be a good opportunity to include a special and unique feature in the built environment.</p> <p>I hope the historically and architecturally important gasholder will not be demolished, but incorporated into the new development.</p>	<ul style="list-style-type: none"> An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area. Noted, Objective 6 has been updated to reference the site's heritage assets.
GP54 (5137 999)	Individual	<p>The vision is admirable. The means is not. Please utilise the gas holder in the design, not demolish it. It is a significant historical and cultural structure which must be retained to allow future generations an understanding of and connection to theirs and the area's past. It is clearly the inspiration behind the primary school and sainsbury's building designs with their curved frontage. If previous planners and designers have recognised its importance then it is quite unbelievable that the current custodians of the borough do not. It should be retained as a matter of importance.</p>	<ul style="list-style-type: none"> An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area.

ID	ORGANISATION	COMMENTS	RESPONSE
GP55 (5138 004)	Individual	<p>The question whether we 'agree' with the vision for the GP3 site would appear to ask the wrong question. The vision statement is laudable, however, there is no indication as to HOW this vision will be achieved. It includes the statement that the vision will 'respond to the site context', however, this is an abstract statement. We argue that demolition of the gas holder goes against this vision, as the 'site context' in fact is that historically the peninsula was in large parts made up of gasworks.</p>	<ul style="list-style-type: none"> • Noted, the vision has been updated to reflect the need for development to include sensitive and well considered design which responds in particular to the site's heritage. • An additional page has been inserted into the Planning Brief recognising the heritage value of Site GP3.
GP56 (5138 010)	Individual	<p>The gas holder is really the only piece of architecture with any historical significance left on the peninsula. I was under the impression that the Core Strategy of the council was to protect such structures. With the blanket development of new apartment blocks, keeping the only reminder of the peninsula's industrial past should be of the utmost importance. A short search on the internet gives many ideas for the imaginative redevelopment of such a site. The gas holder and the pub with its little line of cottages are all that remain of the soul of the peninsula. I find the new buildings serviceable but soulless. If the gas holder is kept and redeveloped, rather than demolished, it would be an achievement that the council could be proud of in years to come.</p> <p>There is enough housing on the peninsula already. The transport system cannot cope with the present number of residents as it is. The gas holder site would make a wonderful park or open space. East Greenwich desperately needs open spaces for kids to play in.</p>	<ul style="list-style-type: none"> • An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area. • Noted, the Planning Brief is built on a robust evidence base and public transport capacity will be further assessed when future planning applications come forward.

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GP57 (5138 021)	Individual	<p>The plan takes no account of the important Industrial history of the site by including East Greenwich No 1 Gas holder.</p> <p>The plan is a series of lazy tick boxed identikit blocks of little architectural merit and which totally ignores the character and history of the area.</p> <p>The plan fails to rise to any of the challenges of sensitive planning in an already crowded area in an historically and environmentally sensitive location, simply piling further, almost certainly premium priced apartment blocks into the area. Greenwich is not Manhattan and should not be turned into a simulacrum of Manhattan. It is symptomatic of the failure of imagination that this plan represents that the one chance it has to acknowledge and reference the character of the site, by adapting imaginatively the important and iconic No 1 Gas Holder, is completely ignored.</p> <p>This plan should be returned with an instruction that the developer produces a genuinely imaginative, plan which serves the entire population of the borough and above all, turns into a centerpiece the preserved and adapted No 1 Gas Holder.</p>	<ul style="list-style-type: none"> An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area. Development Principle 4.5.9 has been added to the Planning Brief, which seeks to ensure that proposals protect the heritage value of the former London School Board Dreadnought School. The Planning Brief is built on a robust evidence base, and the Draft document presented 3 scenarios testing the viability for the future development of the Site GP3.

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GP58 (5138 094)	Individual	<p>The question whether we 'agree' with the vision for the GP3 site would appear to ask the wrong question. The vision statement is laudable, however, there is no indication as to HOW this vision will be achieved. The vision aims to 'respond to the site context', however, this is an abstract statement. The Draft Planning Brief includes options for development which are of excessive density (350 units / hectare) which far exceeds the London Plan, and only limited green space is proposed. Furthermore, this Brief refers to features which give an interesting insight into the area's evolution over time (para 2.1.5) and RBG's Core Strategy Policy DH1 Design seeks to "ensure that RBG's heritage assets and environment are conserved and enhanced. We therefore argue that demolition of the gas holder goes against the vision and the borough's own Core Strategy, as the gas holder will in fact be the only remaining structure which refers to the Peninsula's historic industrial use. The Master Plan for the Peninsula includes a large number of modern high-rise buildings, with limited green space and a minimal reference to the important industrial role that the area had in the past. Retention and sensitive redevelopment of the gas holder (which has been achieved in other parts of London and other cities) would add to the overall look and feel of what otherwise is in danger of becoming a sterile and unwelcoming environment. Future residents of the peninsula may welcome the retention of a historic structure. The East Greenwich Residents Association would urge the RBG to reconsider the demolition of the gas holder. Whilst great efforts are made to retain the history of West Greenwich, little is done to conserve the history of East Greenwich.</p> <p>Clearly these objectives are to be aimed for, however, the question is whether the Borough's suggested execution of the plans will achieve these objectives, some of which are subjective, and some of which are too abstract to comment on. The entire peninsula, in addition to</p>	<ul style="list-style-type: none"> • An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area. • Development Principle 4.5.9 has been added to the Planning Brief, which seeks to ensure that proposals protect the heritage value of the former London School Board Dreadnought School. • The Planning Brief sets out development principles to guide the future delivery of open space across the site on page 20. Specifically, principle 4.3.1 seeks to "provide a series of public open spaces varied in character to form the 'heart' of the development, and encourage a range of activities including play space and formal and informal seating." • The Planning Brief is built on a robust evidence base, and the Draft document presented 3 scenarios testing the capacity and viability for the future development of the Site GP3. In turn, these scenarios informed the Development Principles for the site.

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		<p>the areas west of the peninsula along the river, are being over-developed. Clearly the land needs to be used effectively for housing, however, account needs to be taken of the surrounding neighbourhoods, the existing and required future infrastructure, and the provision of adequate green space and play areas. There continues to be a lack of joined-up thinking about the entire neighbourhood, and the effect that all the developments have on the area and each other. We urge RBG to take a more holistic approach, and to retain historic feature of interest and integrate these sensitively into the new developments.</p> <p>RBG continues to suggest over-development of the peninsula. Too little green space is included. It is understood that Greenwich is seen as a Borough with a lot of green space, however, this is a long way removed from the Peninsula, where the Blackwall Tunnel (and possibly the Silvertown Tunnel) will have an enormous impact on the environment that people will live.</p> <p>We ask that the Borough re-considers demolishing the gas holder, and that the site is not over developed.</p>	

ID	ORGANISATION	COMMENTS	RESPONSE
GP59 (5138 099)	Individual	<p>The gas holder should be retained and used imaginatively. It's beautiful, of historic importance and an essential part of the site. Development is not synonymous with demolition.</p> <p>They are lofty ideals which I hope will be translated into action. The devil is in the detail. These questions are like asking us if we are against sin.</p> <p>The gas holder should be retained</p> <p>Green spaces should be increased. The Ecology Park is vital and much advertised by the developers. It should not be overshadowed</p>	<ul style="list-style-type: none"> • An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area. • The Planning Brief sets out development principles to guide the future delivery of open space across the site on page 20. Specifically, principle 4.3.1 seeks to <i>“provide a series of public open spaces varied in character to form the ‘heart’ of the development, and encourage a range of activities including play space and formal and informal seating.”</i>
GP60 (5138 114)	Individual	<p>The question whether I 'agree' with the vision for the GP3 site would appear to be the wrong question. The vision statement is laudable, however, there is no indication as to HOW this vision will be achieved. The vision aims to 'respond to the site context', however, this is an abstract statement. The Draft Planning Brief refers to features which give an interesting insight into the area's evolution over time (para 2.1.5) and RBG's Core Strategy Policy DH1 Design seeks to ensure that RBG's heritage assets and environment are conserved and enhanced. The demolition of the gas holder goes against the vision and the borough's own Core Strategy, as the gas holder will in fact be the only remaining structure which refers to the Peninsula's historic industrial use. The Master Plan for the Peninsula includes a large number of modern high-rise buildings, with limited green space and a minimal reference to the important industrial role it had in the past. Retention and sensitive redevelopment of the gas holder (which has been achieved in other parts of London and other cities) would add to the overall look and feel of what otherwise is in danger of becoming a</p>	<ul style="list-style-type: none"> • Noted, the vision has been updated to reflect the need for development to include sensitive and well considered design which responds in particular to the site's heritage. • An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area.

ID	ORGANISATION	COMMENTS	RESPONSE
		sterile and unwelcoming environment. I urge the RBG to reconsider the demolition of the gas holder. Whilst great efforts are made to retain the history of West Greenwich, little is done to conserve the history of East Greenwich.	
GP61 (5138 122)	Individual	<p>It is unimaginative and fails to take account of the historic environment, gas holder, gas holder tank and school - as well as site of church, etc etc etc. All of these could be respected at the same time as providing the housing and much needed amenity space</p> <p>All of these objectives are worthy - they are also all inadequate and unimaginative. None of them are ok on their own</p> <p>This all needs to be thought through properly. All of it is inadequate</p> <p>The extant gas holder could be a focus for an prestigious scheme. The adjacent tank of the demolished holder could also be useful. The future of the London School Board School is not clear. All of these should be listed. They could make up a scheme which could be respected internationally - without cutting the number of housing units - which should all be Council owned and managed</p>	<ul style="list-style-type: none"> • An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area. • Development Principle 4.5.9 has been added to the Planning Brief, which seeks to ensure that proposals protect the heritage value of the former London School Board Dreadnought School. • The Objectives reflect the Planning Brief's comprehensive and holistic approach to guiding future development. As such, they are intended as a set of Objectives which enable the Vision to be achieved.

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GP62 (5138 147)	Individual	<p>Plans seem to be unrealisable without the destruction of the gasholder, a key piece of local industrial heritage. In addition the environmental constraints of the site - by an extremely busy road, near industrial sites - seem to prohibit a 'high-quality' residential development.</p> <p>It is essential to retain the historic gasholder, an important local landmark and key part of local and national industrial heritage. It is an important reminder of the industrial history of the Greenwich Peninsula and the technical and aesthetic achievements of the Victorians. To demolish it would be sheer vandalism. The gasholder appears in photographs by the renowned photographers Berndt and Hilla Becher, and I have spoken about the link at Tate Modern. They set out in the 1960s to document the then-disappearing industrial heritage: most of what they photographed has now disappeared, so it would be a dereliction of our duty to lose even more. The planned density of residential properties on the peninsula is already very high, especially considering the continued presence of major roads, large car parks servicing the O2 and the ongoing dirty industry. There is no need to destroy heritage to fit in more. If development of the site does go ahead, a number of alternative uses could be found for the gasholder as found elsewhere in London and in Dublin, including a park, a theatre or flats built into the structure.</p>	<ul style="list-style-type: none"> • Following HSE's assessment of the risks associated with the granting of Hazardous Substances Consent at Brenntag UK Ltd (Ref: 12/1247/H), the Consultation Zones have been reduced. The revised zones are shown on Figure 2.4. • An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area.

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GP63 (5138 148)	Individual	<p>The gas holder is an iconic landmark in the borough and should be retained and incorporated into the design in some form, as happens in the rest of London. This planning document once again demonstrates RBG's lack of vision with regard to the historic character of the borough. I would also object to the application on grounds of the site being too compromised by the motorway network, existing and proposed. The plans flag the issues go ahead anyway. Have some regard for the health of those who will end up living there if this development proceeds!</p> <p>Given the existing motorway network and the proposed Silvertown tunnel and new road network I don't think this particular site is suitable for any form of residential development. I also feel that the gas holder is part of our industrial heritage and should be protected. If the development proceeds it sounds be incorporated into the plans. Check out what has been done in Paddington as an example of what good planning can achieve. As someone who has lived in East Greenwich for many years I dispare at the poor quality of the design and construction of most of the new developments.</p> <p>As I don't think this site is suited to the sort of development you propose I can't agree with any of the above.</p> <p>Keep the gas holder and design around it. And I don't feel that part of the peninsula is suitable for residential development due to the motorways and the Tunnel club probably being rebuilt.</p>	<ul style="list-style-type: none"> • An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area. • The Planning Brief is built on a robust evidence base, and the Draft document presented 3 scenarios testing the capacity and viability for the future development of the Site GP3. Further assessment of the transport capacity of the site will form part of any future planning applications.

ID	ORGANISATION	COMMENTS	RESPONSE
GP64 (5138 152)	Individual	<p>Will great benefit the area around the Greenwich Peninsula</p> <p>I agree with all 7 objectives.</p> <p>As stated in your objectives will need to be served well by public transport and have some open spaces and a good streetscape. The developments should also be well lit and bright.</p> <p>I think development of this site is a great for the Greenwich Peninsula, the surrounding areas and the Royal Borough of Greenwich. It is really great to see areas redeveloped and brought back in to use.</p>	<ul style="list-style-type: none"> Noted, lighting proposals and public transport capacity will be further assessed when future planning applications come forward.
GP65 (5138 158)	Individual	<p>The gas holder is an iconic part of the heritage of London and should be protected not destroyed! If you must develop this site at least retain the gas holder.</p> <p>Once again the site isn't suitable for residential development given the existing and proposed motorway networks.</p> <p>The plans as proposed show very little in the way of either quality or character. That seems to be a characteristic of development in the borough.</p> <p>If development goes ahead please keep the gas holder. Have a look at the developments around Paddington to see what is achievable with a bit of effort!</p>	<ul style="list-style-type: none"> An additional section has been inserted into the Planning Brief recognising the heritage value of the gas holder. Development Principle 4.5.2 has been added to the Planning Brief, which seeks to ensure that proposals reflect and respond to the industrial character of the area. Development should build on the heritage value of the gas holder to enhance the character and distinctiveness of the area. Development Principle 4.5.9 has been added to the Planning Brief, which seeks to ensure that proposals protect the heritage value of the former London School Board Dreadnought School.