

THAMES GATEWAY BRIDGE
PUBLIC INQUIRY

STATEMENT OF CASE

LONDON BOROUGH OF GREENWICH

Planning Inspectorate ref: APP/E5330/V/05/1174147
GOL ref: LRP 13/B5330/0/51
GONE refs: DN5002/55/12M/1 ; DN5002/55/7/1 ; DN5002/60/1/03
Greenwich LBC ref.: 04/1800/F
Newham LBC ref.: P/04/1170

Town and Country Planning Act 1990, Section 77
Town and Country Planning (Inquiries Procedure) (England) Rules 2000
Town and Country Planning (General Development Procedure) Order 1995
*APPLICATIONS BY TRANSPORT FOR LONDON FOR PLANNING
PERMISSION MADE FOR A THAMES GATEWAY BRIDGE LINKING THE
A13/A406 IN BECKTON TO THE A2016 EASTERN WAY THAMESMEAD AND
FOR ASSOCIATED WORKS AND BUILDINGS

The Compulsory Purchase by Non-Ministerial Acquiring Authorities (Inquiries
Procedure) Rules 1990
The Highways (Inquiries Procedure) Rules 1994
THE A2012 GLA ROAD (THAMES GATEWAY BRIDGE) –
(i) SPECIAL ROADS AND BRIDGE SCHEME 2004
(ii) (SIDE ROADS) ORDER 2004
(iii) COMPULSORY PURCHASE ORDER 2004
(iv) TOLL ORDER 2004

STATEMENT OF CASE OF THE LONDON BOROUGH OF GREENWICH

1. This Statement of Case is made by the London Borough of Greenwich (“LBG”), the planning authority for an area that includes (1) approximately the southern half of the proposed bridge and (2) the site of all associated works and building to the south of the River Thames. LBG is also in respect of its area a local highway authority and an authority having powers and duties in respect of certain environmental matters including air quality and noise.
2. LBG supports the construction of the Thames Gateway Bridge subject to the Conditions and to the execution of a legal agreement that accords with the decision of its Planning Board of 14th December 2004. The gist of its case is that set forth in the report to this meeting subject to the amendments shown in the record of planning decisions for the meeting. The case will be updated to reflect the progress of the emerging Greenwich Unitary Development Plan and other developments with respect to relevant policy. LBG reserves the right to supplement the issues in the light of the cases and evidence of and other information from other participants in the Inquiry.
3. LBG will describe: (1) the site and its environs and history; (2) relevant planning policies, including site-specific policies, general policies, adopted policies and emerging policies. In accordance with section 38(6) of the Planning and Compulsory Purchase Act 2004, LBG will consider both the development plan and other material considerations. LBG will refer to the adopted and emerging policies listed in the report to its Planning Board of 14th December 2004, to the London Plan and to the central-government planning policy in the documents listed at the end of this Statement of Case.
4. LBG will adduce evidence to demonstrate that, provided Transport for London (“TfL”) is prepared to enter into an appropriate agreement, the

balance of material considerations justifies the granting of planning permission subject to appropriate Conditions.

Documents

LBG anticipates referring to the following documents. It reserves the right to produce such further documents as may be appropriate to deal with issues raised by other participants in the inquiry.

**Transport for London*

All the relevant Orders for the Bridge scheme
Sustainability Report by Scott Wilson – September 2004
Public Transport Statement – November 2004
Correspondence with TfL
The Borough Liaison Minutes of meetings between TfL and five London boroughs.

**Newham*

Jacobs Babtie - Final Reports on Traffic and Transport Report Review, Review of Public Transport Model Validation Report, & Review of Public Transport Options, all dated 23/11/2004.

Greenwich

The adopted London Borough of Greenwich Unitary Development Plan (25th November 1994)
The emerging Greenwich Unitary Development Plan Second Deposit Draft
Pre-Inquiry Changes to the Greenwich Unitary Development Plan Second Deposit Draft
*LBG's Cabinet Committee Reports of 11/8/2003 , 28/9/2004 & 11/1/2005, with minutes or decisions record),.
The Report to the Planning Board of 14/12/2004, with the record of planning decisions for that meeting
Responses to Consultation
Interim Local Implementation Plan 2001
*Consultation Draft for Local Implementation Plan 2005 (when issued)
The Application for Planning Permission by TfL
The Environmental Statement by TfL

London and the South East

The London Plan
The Mayor's Transport Strategy
Cleaning London's Air: The Mayor's Air Quality Strategy (GLA September 2002)
Sunder City: The Mayor's Ambient Noise Strategy (GLA March 2004)
Success through Diversity: London's Economic Development Strategy (GLA July 2001)
Green Light to Clean Power: The Mayor's Energy Strategy (GLA February 2004)
Connecting with London's Nature: The Mayor's Biodiversity Strategy (GLA July 2002)
RPG9, RPG9A
Correspondence with the Greater London Authority
Correspondence with the Government Office for London
Correspondence with the Government Office for the North East

England

PPS1, PPG4, PPG9, PPG10, PPG13, PPG16, PPS23, PPG24, PPG25.

Development Plan Policies

LBG anticipates that it will refer to the following policies in its adopted Unitary Development Plan while reserving the right to refer to other policies should it become apparent that these are material.

Part One

- C2 Planning obligations will be sought where they are relevant to the development.
- J3 Attract new economic activities in suitable locations which offer appropriate types of jobs.
- J7 Regenerate derelict areas.
- 02 Safeguard and improve public open spaces.
- 03 Promote access to open space and the riverside.
- E1 To improve and protect all elements of the environment.
- E2 To control development to limit pollution.
- D1 To improve all areas of poor quality environment.
- D2 To preserve or enhance areas of recognised character.
- D3 Ensure all developments provide safe environments with easy access for all users.
- D5 To ensure the incorporation of ecological considerations in the development process.
- D6 To preserve and enhance historic landscapes and listed buildings and their settings.
- D7 Encourage new development to fit into an overall urban design framework.
- M1 Promote and accommodate improvements to public transport.
- M3 To effectively link major transport generators.
- M5 To safeguard the environment through traffic management measures.
- M9 Safeguard changes to the strategic public transport and road network to include an East London River Crossing.
- M12 Take account of accessibility to and from public transport.
- ACE1 Promote new Arts, culture and Entertainment facilities.
- W1 Facilitate the development of redundant land in the Waterfront bringing about the regeneration of the whole area.

Part Two

- C8 Seek planning obligations to meet local demand for health, education and other community needs.
- H4 Provide a high quality of environment. .
- H19 Noise attenuation in new residential developments. .
- 012 Public open space deficiency. .
- 015 Provision of appropriate park facilities.
- 020 Promote new water related activities.
- 021 Protection of existing footpaths and creation of new footpaths.
- 022 Improve the riverside footpath and promote Thames Path.
- 023 Provide leisure cycleways by river.
- O25 Encourage improvements of environmental quality of open space.
- 026 Protect sites of nature conservation importance.

- 027 Protect and improve ecological and wildlife value of the river.
- 028 Secure provision of managed wildlife habitats.
- 031 Encourage the use of wildlife sites to provide ecological awareness.
- E6 Protection of amenities of adjacent occupiers/users.
- E11 Noise attenuation measures to be included in development adjacent to permanent significant noise/vibration sources.
- E20 Encourage energy conservation.
- E21 Encourage use of public transport, cycling and walking to reduce traffic pollution.
- E22 Encourage environmental factors including use of sustainable materials in new building proposals.
- E25 Avoid contamination of land where contamination has occurred, and restore land to beneficial use.
- E42 Control of development to ensure surface or ground water (aquifer) is not polluted.
- E46 Protection of tidal defences.
- E47 Protection and improvement of access to the river in conjunction with the Environment Agency.
- D8 New development to be of high design capacity.
- D11 Development designed to improve personal safety.
- D12 Access for those with disabilities.
- D13 Encourage new tree planting.
- D27B Archaeology.
- M10 Seek extension of public transport throughout the waterfront.
- M12 Accessibility to and from public transport.
- M38 Promote cycling and needs of cyclists.
- M39 High standards of pedestrian safety.
- W2 The Council will seek to ensure that development on the Waterfront preserves and enhances local character and historical and ecological heritage.

These documents can be viewed at the Planning Office, First Floor, Peggy Middleton House, 50 Woolwich New Road, Woolwich, London SE18 6HQ between the hours of 09.30am and 16.00pm Monday to Friday (excluding bank and public holidays).