

Royal Borough of Greenwich

Local Plan



**Site Allocations Preferred Approach
Regulation 18 Consultation**

August 2019

How to Respond

Site Allocations Local Plan

Preferred Approach

From **16 August 2019 to 11 October 2019**, we are inviting comments on the Site Allocations Preferred Approach. Responses can be submitted as follows:

- **Online survey:** www.royalgreenwich.gov.uk/haveyoursay
- **By email:** planning.policy@royalgreenwich.gov.uk
- **By post:** Royal Borough of Greenwich, Planning Policy Team, 5th Floor, The Woolwich Centre, 35 Wellington Street, Woolwich, London, SE18 6HQ

We are keen to hear your views on proposed allocations. Respondents can submit their views via the online survey (link above) or by submitting written responses.

This document is available to view at all of Royal Greenwich's libraries and through the reception area at The Woolwich Centre, 35 Wellington Street.

We will take all views into account and a summary of the comments received will be made public. If you'd like to be kept informed of the process please provide your contact details and you'll be added to the Planning Policy Consultation Database.

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I Introduction

- I.1 The Site Allocations Development Plan Document (DPD) provides specific policy for key sites in order to ensure that the vision and objectives of the Local Plan's strategic policies (as set out in the Core Strategy) are implemented. It supports a strategic and proactive approach to development and change, by ensuring that the most suitable sites are brought forward and that the most appropriate combination of uses and scale of development is promoted on each site.
- I.2 The Site Allocations focuses on sites that will deliver a significant amount of development and sites that support the delivery of specific Local Plan objectives. It includes sites to meet the development needs identified in the Core Strategy (and the London Plan) and secure specific land uses, including for housing, jobs and the infrastructure required to support growth.
- I.3 Only those sites that are considered central to delivering the policies and objectives of the Core Strategy, and likely to come forward during the lifetime of the Local Plan are included in the Site Allocations DPD. The additional certainty about the nature and location of future development provided by the Site Allocations also supports more effective infrastructure planning. The individual allocations incorporate an appropriate degree of flexibility, in recognition of the changing context within which development proposals will be brought forward in the long term.

The Preferred Approach Document

- I.4 The Site Allocations Preferred Approach is the second document in the preparation of Royal Greenwich's Site Allocations Local Plan. As set out in the Local Development Scheme (LDS), the Preferred Approach is a second round of consultation carried out in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, whereby the Local Planning Authority consults on the Local Plan in preparation.
- I.5 The Preferred Approach document has been informed by the previous consultation on the Site Allocations Issues and Options document, which was carried out for six weeks from 15 February to 29 March 2016. This consultation also included a formal 'call for sites' which invited landowners, developers and others to put forward sites for consideration for inclusion in the Site Allocations. The views expressed during the previous round of consultation have been considered and reflected in this Preferred Approach document.
- I.6 The Preferred Approach Document has also been informed by the evidence base for the Local Plan (both existing and new/updated studies; refer to Appendix D for a full list of the evidence base) and appraisal of the emerging allocations for their sustainability, health and equalities implications via the Integrated Impact Assessment (IIA) process. The Royal Borough is also undertaking an ongoing process of engagement with the statutory bodies, including neighbouring local authorities, as part of the Duty to Cooperate.

Policy Context

- 1.7 The Site Allocations Local Plan complements the Core Strategy with Detailed Policies (adopted July 2014) which sets the overarching vision for the Royal Borough as well as guiding decisions on planning applications. The Mayor produces a spatial development strategy for London, known as the London Plan. The Royal Borough's Local Plan together with the London Plan 2016 forms the statutory Development Plan for the borough.
- 1.8 The London Plan must be consistent with national policies, and the Local Plan must be consistent with both national policies and the London Plan. See Figure 1 for the relationship between the different levels of planning policy.



Figure 1 Royal Borough of Greenwich planning framework

National Policy

- 1.9 The overarching purpose of the planning system is to contribute to sustainable development, and the National Planning Policy Framework (NPPF) sets out the principles of sustainable development. Importantly, it states that Local Plans should be based on the principle of the 'presumption in favour of sustainable development'. Because site allocations proactively seek opportunities for the effective use of land to meet the identified development needs of the local area, they play a key role in establishing which types of development are sustainable in which locations and support the approval of development proposals in accordance with the Development Plan.

- I.10 The new National Planning Policy Framework (NPPF) was published in July 2018 and updated in February 2019. It states that sufficient sites should be allocated to deliver the strategic priorities for the area, except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non-strategic policies. As set out above, the Site Allocations Local Plan is not the sole means for delivering the strategic priorities for the Royal Borough, and there are a number of strategic and detailed policies already in place that contribute to meeting the development needs of the borough.
- I.11 The NPPF also introduces a requirement that land should be identified through the development plan and brownfield registers to accommodate at least 10% of the borough housing requirement on sites no larger than one hectare. However, if it can be shown that the plan preparation process that there are strong reasons why the 10% target cannot be achieved the requirement will not apply. Because the NPPF also recognises the role that larger scale development plays in the supply of large numbers of new homes, this new requirement is therefore not considered to require a reconsideration of the general approach to Site Allocations. RBGs Brownfield Land Register s updated annually in December and published on the website: https://www.royalgreenwich.gov.uk/info/200191/planning_policy_and_strategy/1955/brownfield_land_register
- I.12 The Site Allocations Preferred Approach has had particular regard to the support within the NPPF for the allocation of sites to support sustainable economic development, the delivery of high quality new homes, the vitality and viability of town centres, and the role of good design in making places better for people. The Preferred Approach is also explicit regarding those sites where development potential is dependent on the delivery of physical and/or social infrastructure.

Regional Policy

- I.13 General conformity with the London Plan is also a legislative requirement. As the preparation of the Site Allocations is taking place at the same time as preparation of the new London Plan, it is necessary to consider conformity with the current as well as the emerging London Plan. The minor suggested changes to the draft Plan (published July 2018) remove the requirement to allocate small sites to meet housing need, however the identification of small sites (less than 0.25ha) via Local Plans is still encouraged.
- I.14 It is not considered desirable or practicable to seek to identify small sites of less than 0.25ha in the Site Allocations that have not already been considered during early stages of plan preparation, particularly as sites under 0.25ha are excluded from the London Strategic Housing Land Availability Assessment (SHLAA). Such sites are better managed and promoted through the development of area-wide design codes for small housing developments (an approach also recommended by the draft London Plan).
- I.15 The London Plan sets out indicative guidelines for new homes and new jobs in opportunity areas across London, and advises that where appropriate boroughs should seek to exceed these indicative guidelines. Development capacity in opportunity areas is linked to existing (for example Crossrail) or potential (for

example, DLR extension to Thamesmead) improvements in public transport connectivity and improvement, and the timeframes for delivery in opportunity areas often extends over 20 years or more (beyond the 15 year timeframe of Local Plans).

Integrated Impact Assessment

- I.16 All Development Plan Documents (DPDs) are required to undergo Sustainability Appraisal. A Sustainability Appraisal (SA) is a systematic, iterative process that must be carried out in parallel with the preparation of a Local Plan. It assesses the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. SAs incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the Strategic Environmental Assessment Regulations).
- I.17 The first stage of the SA process (Stage A – the Sustainability Appraisal Scoping Report) was published alongside the Issues and Options document. The Scoping Report set out the SA framework against which the Site Allocations would be assessed. When the Scoping Report was consulted on, it was titled as a ‘Sustainability Appraisal Scoping Report’. However the draft Scoping Report was explicit that equalities and health had been considered and were incorporated into the draft framework. Therefore the final Scoping Report and subsequent stages of the process are referred to correctly as an Integrated Impact Assessment (IIA).
- I.18 The next stage of the SA process (Stage B – developing and refining alternatives and assessing effects) was carried out alongside the development of the Preferred Approach, and an Interim IIA Report is published alongside the Preferred Approach document. The findings of the IIA process to date have informed the drafting of the Preferred Approach document.
- I.19 It is important to notes that the IIA focuses on the impacts that are likely to be significant, and it does not need to be done in any more detail than is considered to be appropriate for the content and level of detail in the Local Plan. The Core Strategy with Detailed Policies sets out the spatial strategy for the borough, and identifies Strategic Development Locations where a significant amount of growth will occur.
- I.20 The Core Strategy was subject to an SA, HIA and EqIA and it is not the purpose of the Site Allocations SA to reassess the spatial strategy. Rather, the IIA of the Site Allocations considers the impacts of the individual allocations as compared to the alternative of not allocating the site.

Consultation

- I.21 The consultation on the Site Allocations Preferred Approach is in line with Royal Greenwich's Statement of Community Involvement (SCI) and runs for 8 weeks from **16 August 2019 to 11 October 2019**.
- I.22 During the consultation period the Preferred Approach document, the Consultation Statement and the Interim IIA Report will be available:
- Online at www.royalgreenwich.gov.uk/haveyoursay
 - For reference in all of Royal Greenwich's libraries
<https://www.royalgreenwich.gov.uk/directory/26/libraries>
- I.23 All comments should be sent to the Planning Policy Team:
- Via online survey: www.royalgreenwich.gov.uk/haveyoursay
 - By email to planning.policy@royalgreenwich.gov.uk
 - By post to Royal Borough of Greenwich, Planning Policy Team, The Woolwich Centre, 35 Wellington Street, London SE18 6HQ
- I.24 Any comments must be submitted by **11 October 2019**. All comments will be made publically available. For further information please contact the Planning Policy Team via email at planning.policy@royalgreenwich.gov.uk
- I.25 Following consultation on the Preferred Approach document, the Royal Borough will take all responses into account and will produce a full draft of the Site Allocations Local Plan (the 'Publication' version). This will be subject to public consultation in Spring/Summer 2019 in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

2 The Sites

- 2.1 The Town and Country Planning (Local Planning) (England) Regulations 2012 specifies that a site allocation policy is one which allocates ‘sites for a particular type of development or use’, and that site allocations policies are intended to guide the determination of applications for planning permission.
- 2.2 The Site Allocations Local Plan is not an exhaustive list of every potential development site in the borough. Only those sites that are considered central to delivering the objectives and policies of the Core Strategy, and likely to come forward during the lifetime of the Local Plan, are included.
- 2.3 While a large proportion of the development in the Royal Borough occurs on smaller sites that when taken together make an important contribution to achieving the vision for Royal Greenwich, the borough-wide development policies are considered sufficient to guide planning decisions on these small sites individually.
- 2.4 The site allocations set out a preferred use or mix of uses for a site and help to safeguard this, and additionally identify further policy context, criteria and guidance for development to support appropriate proposals coming forward. This approach provides certainty about what type of development is likely to take place and where, as well as providing additional clarity to potential applicants regarding the Royal Borough’s expectations for key sites.

Royal Greenwich’s Spatial Strategy

- 2.5 As set out in the Core Strategy, there will be significant change in Royal Greenwich over the 15 year life of the plan, which presents a number of opportunities and challenges. The overarching strategy to manage this growth is to guide future development in a way that ensures everyone who lives in, works in, learns in or visits Royal Greenwich benefits from future planning decisions.
- 2.6 The Core Strategy sets out broad locations for delivering sustainable development and enhancement, including new housing and other important strategic development needs such as employment, retail, leisure, community uses, public services and transport. The spatial strategy is based on accommodating significant levels of growth in six Strategic Development Locations (SDLs), areas of brownfield land that reflect the Opportunity Areas and Intensification Area set out in the London Plan.
- 2.7 The Strategic Development Locations are:
 - Charlton Riverside (Opportunity Area). The new Charlton Riverside SPD was adopted in 2017, and sets a long term (20+ years) vision for the entirety of the Charlton Riverside area. The most potential for change within the plan period, and for housing growth, is concentrated within the central part of the area (Phase I in the SPD). A key component of delivering change in the area is increasing business growth alongside the introduction of residential, and sustainable growth is dependent on the timely delivery the range of physical and social infrastructure required to support new residents.

- Deptford Creek/Greenwich Riverside (Opportunity Area, partly in London Borough of Lewisham). A significant amount of new development has already been delivered in the Creekside area, and the ability of the area to support further development is now more limited.
 - Greenwich Peninsula/Greenwich Peninsula West (Opportunity Area). The majority of development over the plan period is focused on the Peninsula, with outline permission granted for 15,000 new homes on the GLA/Knight Dragon site and several other significant development sites under construction on the western side of the Peninsula. Further opportunities have been identified with the decommissioning of the gasholder and the potential relocation of the Tunnel Glucose safeguarded wharf.
 - Kidbrooke (Area for Intensification). As with the Creekside area, redevelopment in Kidbrooke is well underway. The focus for the remaining sites is ensuring that they complement Kidbrooke Village as well as providing adequate social infrastructure provision to support new their residents.
 - Themamead and Abbey Wood (Opportunity Area, partly in London Borough of Bexley). An OAPF for the area is currently being prepared in partnership with the Greater London Authority, Transport for London and the London Borough of Bexley. Once adopted, this will replace the 2009 Thamesmead and Abbey Wood SPD. The focus is on unlocking the significant growth potential in Thamesmead town centre and waterfront area through a step-change in public transport provision. This long term potential is complemented by short/medium term opportunities in Abbey Wood arising from the opening of Crossrail.
 - Woolwich (Opportunity Area). The strategy for the town centre is to capitalise on its strengths, including its heritage, riverside location and excellent transport links.
- 2.8 Otherwise, the Royal Borough's designated town centres at Eltham (Major), Greenwich (District), East Greenwich (District) and Plumstead (District) are the focus for more localised growth. A number of sites have been identified in/around both Eltham and Plumstead town centres. These focus on increasing the residential population alongside enhancing the town centre environment and supporting a mix of uses that will sustain the viability and vitality of the centres over the longer term.
- 2.9 The site allocations are therefore focused on identifying sites that are important to delivering the policies and objectives of the Local Plan, both in terms of the identified strategic development needs (set out in paragraph 2.6 above), and in terms of the identified pattern for growth based on the Strategic Development Locations.

Evidence Base Update

- 2.10 The Core Strategy with Detailed Policies was adopted in 2014. Since that time, a number of new evidence base studies have been produced, both by the Royal Borough and the Mayor of London (as part of the full review of the London Plan), which have informed the Site Allocations Preferred Approach. Refer to Appendix D for a full list of the evidence base that has informed the Preferred Approach document.

London Strategic Housing Land Availability Assessment (SHLAA) and London SHMA (2017)

- 2.11 The London-wide SHMA identified a need for 66,000 additional homes per year. The draft London Plan is explicit that, because of London's ability to plan strategically, boroughs are not required to carry out their own housing needs assessments and must plan for the housing targets in the London Plan. The draft London Plan sets a 10-year housing target based on the 2017 SHLAA. For Greenwich the annualised requirement is 3,204 homes per year. This new target applies from the date of adopted of the new London Plan (likely to be early 2020).
- 2.12 All of the sites included in the 2017 SHLAA have been assessed for inclusion in the Preferred Approach document. As referenced in paragraph 1.14, small sites of less than 0.25ha are better managed and promoted through the development of area-wide design codes for small housing developments (an approach also recommended by the draft London Plan).

London Industrial Land Demand Study (2017)

- 2.13 The 2017 London Industrial Land Demand Study assesses the amount of industrial land London needs to maintain to ensure it continues to function as a successful and sustainable city. The study assessed demand for land for general industrial uses, logistics activity and wider uses of industrial land such as transport and waste. It produced forecasts of industrial land demand by borough and industrial property market area.
- 2.14 Based on the study, the draft London Plan identifies Greenwich as a 'retain capacity' borough for the purposes of industrial land management. Previously Greenwich was identified as a 'managed release' borough, with an indicative benchmark for release of industrial land of 50ha between 2011 and 2031. As a retain capacity borough, Greenwich should now seek to intensify industrial capacity following the general principle of no net loss across designated Strategic Industrial Land (SIL) and Locally Significant Industrial Sites (LSIS).
- 2.15 The implication for the Site Allocations is that no designated SIL should be identified for release, and that where there are existing industrial uses in non-designated locations any redevelopment of these sites should retain and intensify industrial uses. This has implications for one of the four Housing Zones sites in Thamesmead which is partially located within SIL. While the Issues and Options suggested that this site could be released from SIL, this approach is not supported by the current evidence base.

London Office Policy Review (2017)

- 2.16 The 2017 London Office Policy Review analyses trends in the London office market and assesses future demand for office floorspace at borough level. The Review notes that office development is unviable throughout most of London beyond the Central Activities Zone (CAZ), and concludes that promoting large-scale office development in most centres outside the CAZ (other than Chiswick, Croydon and Stratford) would be counter to structural changes. However, this conclusion is subject to the proviso that supply of stock suitable for small and medium enterprises (SMEs) should be sought in most centres.

Mayor of London Safeguarded Wharves Review (2018)

- 2.17 There is a network of wharves along the Thames that are protected for use as a wharf by a safeguarding Direction issued by the Secretary of State for Housing, Communities and Local Government. The current safeguarded network dates from 2005. The Mayor has undertaken a review of safeguarding Directions and is recommending some changes to the network. There are no wharves proposed for removal from safeguarding in Greenwich.
- 2.18 However, the GLA is proposing the relocation of the safeguarding Direction from Tunnel Glucose Wharf to Tunnel Wharf. In line with the Core Strategy, this is supported and the relevant site allocation reflects the potential relocation of the safeguarding. The implementation of the recommendations in the Review will depend on sign off from the Secretary of State.

RBG Gypsy and Traveller Accommodation Assessment (2016)

- 2.19 The Gypsy and Traveller Accommodation Assessment (GTAA) was undertaken in 2016. The National Planning Policy for Traveller Sites (PPTS), which requires a GTAA to be carried out, was revised in August 2015. This amended the definition of 'traveller' so that those who have ceased to travel permanently are no longer considered to be travellers for the purposes of the assessment.
- 2.20 The GTAA identified issues with overcrowding on both the public site at Thistlebrook and the unauthorised site at Horn Link Way. However, the study found that the travellers within Greenwich have ceased to travel permanently and therefore no longer fall under the definition of traveller. As a result, the GTAA concluded that no additional pitch provision was needed to 2031.
- 2.21 The draft London Plan proposes a different definition of Gypsies and Travellers than the national definition, and states that boroughs that have not undertaken a needs assessment since 2008 should update this based on the new London Plan definition as part of their Local Plan review process. As a GTAA was carried out in 2016 in accordance with national policy, the requirement to carry out an updated needs assessment will be reviewed depending on the outcome of the London Plan examination, likely as part of the Local Plan review.

Towards a Greener Royal Greenwich – Green Infrastructure Study (2017)

- 2.22 The Green Infrastructure Study assessed all forms of green infrastructure in a single, comprehensive study – collating and analysing information on parks and open space, urban greening features (trees, living roofs), Sites of Importance for Nature Conservation (SINCs) and Metropolitan Open Land (MOL).
- 2.23 The study recommends a proposed standard for quantity of open space provision of 2.69ha per 1000 people, and accessibility and play provision standards consistent with the London Plan. The standards recommended by the study highlight where investment in existing spaces to enhance their role, or the provision of new spaces, should be focused. There is a deficiency in access to certain types of open space within certain parts of the Borough including northern Woolwich and Thamesmead, Greenwich peninsula, Kidbrooke, and the very south of the Borough.

- 2.24 There are currently 1177.8ha of land designated as MOL within the Royal Borough. Of this, the Study found that 1.8ha could be considered for exclusion. A further 10.9ha could be considered as meeting the criteria for MOL set out in London Plan Policy 7.17D, and could therefore be considered for inclusion. The Study recommends that the Royal Borough considers these potential amendments on a case by case basis.
- 2.25 While the Core Strategy (para 4.5.11) states that the boundaries of MOL will be reviewed as part of the preparation of the Site Allocations, based on the results of the Green Infrastructure Study it is not considered appropriate to propose revisions to MOL boundaries as part of the Site Allocations. As set out in the London Plan and NPPF, established MOL boundaries should only be altered where exceptional circumstances are fully evidenced and justified.
- 2.26 Having considered the potential amendments proposed by the Study, at this point in time there are not exceptional circumstances that would justify alteration to established MOL boundaries. The development needs identified in the Core Strategy and London Plan can be met by directing development to suitable brownfield sites and underutilised land. Similarly, as the Study proposes a standard for quantity of open space provision that is below that currently set in the Core Strategy, it is not considered appropriate to review Community Open Space designations as part of the Site Allocations review.

Charlton Riverside Employment and Heritage Study (2017)

- 2.27 The 2017 Charlton Riverside Employment and Heritage Study contains a number of recommendations specific to the nature of employment uses and type of employment space that should be promoted to support the economy of the area. For example a third of businesses in the area occupy premises of 2,500sqft or less. The area's current employment profile indicates a range of employment activities that are compatible with mixed-use redevelopment – both in terms of sectors and workspace typologies. Heritage assets, particularly along the eastern edge of the area, should be flagship sites for employment.

South East London Joint Waste Technical Paper (2017)

- 2.28 The South East London Joint Waste Technical Paper was updated in December 2017. It demonstrates that across the sub-region, sufficient waste sites have been safeguarded which, when pooled, collectively meet the London Plan (2016) waste capacity apportionment requirements of the region. In addition to this, surplus capacity exists to allow the sub-region to respond to any uplift in give additional security in the future.

RBG Strategic Flood Risk Assessment (SFRA), Level 1 (2017) and Level 2 (2018)

- 2.29 As set out in the Core Strategy, the spatial strategy for the borough is reliant on developing areas at risk of flooding. A SFRA was previously completed in 2011, and it informed the Core Strategy with Detailed Policies. This SFRA that informed the core strategy was considered robust at the examination of the plan, and Core Strategy policies E2 and E3 ensure that development does not exacerbate flood risk in an unacceptable way.

- 2.30 The SFRA has been reviewed to take account of the significant changes in the legislative framework for flood risk management (Flood Risk Regulations 2009 and Flood and Water Management Act 2010) and the introduction of the NPPF and PPG. Additionally, the Environment Agency has refined breach models relating to tidal flood risk from the Thames and updated climate change projections.
- 2.31 A Level 2 SFRA is prepared when land outside flood risk areas cannot accommodate the necessary development and therefore the Exception Test needs to be applied. The purpose of the Exception Test is to ensure that, where it may be necessary to locate development in areas at risk of flooding, new development is only permitted in Flood Zone 2 and Flood Zone 3 where the flood risk is clearly outweighed by other sustainability factors and where the development will be safe during its lifetime, considering climate change.
- 2.32 The Level 2 SFRA therefore provides further flood risk information for each site included in the Issues and Options and sites put forward during the Call for Sites to facilitate an assessment of the likelihood of sites being able to satisfy the requirements of the Exception Test, and therefore support the allocation of the site. Even when a site is allocated for development, any developer coming forward with a proposal in an area of flood risk will need to, at the time of making an application, demonstrate through a site-specific flood risk assessment that the Exception Test can be passed.

RBG Retail and Leisure Study (2018)

- 2.33 The 2018 Retail and Leisure Study (RLS) assesses the quantitative need for additional retail floorspace in the borough in 5-year periods for the next 20 years (up to 2038). It illustrates that based on projected population growth, there is a small amount of need for convenience retail floorspace over the plan period and no need for additional comparison retail floorspace within the first 15 years.
- 2.34 This lack of need for retail floorspace is due to a number of factors from changes in the way people shop, changes in store formats, the continued increase in internet shopping, the large amount of retail floorspace recently provided in the borough, and the floorspace in the pipeline – including the recent expansion of out of town centre retail park at Charlton and the outlet village at Greenwich Peninsula.
- 2.35 The Study also concluded that the vision set out in the Core Strategy for Woolwich to become a Metropolitan Town Centre is likely to be too ambitious in the short/medium term given the current retail trends for out of town centre shopping and Woolwich's current under performance as a Major Centre. The amount of floorspace in Woolwich Town Centre would need to increase dramatically and there would need to be a step change in the quality of the offer in order to become a Metropolitan Centre.
- 2.36 Otherwise, the comprehensive town centre health check indicated that the borough's designated town centres are generally performing well and fulfilling their role, although East Greenwich and Plumstead would benefit from improvements to the quality of the retail offer and general town centre environment. The Issues and Options document suggested that the Site Allocations would review the designated town centre

boundaries and propose changes as appropriate. Based on the outcomes of the town centre health checks, boundary changes are not considered necessary.

- 2.37 As the RLS found there to be very little capacity for additional retail floorspace over the plan period and virtually no need within the first five years, there is no need to identify and allocate specific sites for future retail floorspace. Rather, allocations within the borough's town centres focus on encouraging a viable mix of commercial and leisure uses as well as retail to broaden the offer of town centres. This is a notable change from the Issues and Options document, which suggested (based on the 2008 Retail Capacity Study) that it was necessary to identify sites within Woolwich to enable a growth in comparison retail.

Education and Healthcare Planning

- 2.38 For primary school place planning purposes the borough is divided into six planning areas reflecting the pattern of applications for places and groups of schools serving the neighbourhood. Current projections indicate that most areas of the borough will have sufficient places to meet need over the next five years, with localised pressures in the North and North West of the borough.
- 2.39 There continues to be pressure for primary school places in Greenwich Peninsula, Blackheath Westcombe, Greenwich West, Charlton and Woolwich Riverside areas where it is currently anticipated that an additional 3.5FE will be required between 2019/20 and 2022/23. A proposed new free school has been approved that would meet this demand but has yet to secure a suitable site. In the medium to long term new provision will be required in areas of significant development, particularly Charlton Riverside and Thamesmead areas.
- 2.40 The expectation is that secondary school aged pupils may travel to school independently. Therefore the need for places is assessed on a borough wide basis, rather than concentrating on specific areas of development. In addition to this, it is accepted that there is significant cross-borough movement of pupils which may fluctuate according to parental preferences and the availability of places. There is a growing need for secondary schools in the borough, and the planned provision to meet this need has now secured suitable sites.
- 2.41 Special Educational Needs and Disability (SEND) provision is currently under pressure, especially in regards to provision for children with an Autistic Spectrum Disorder. There are a number of projects in the pipeline to provide specialist provision to help meet future demand. The Council submitted a bid for a new special school under the free school programme, but was unsuccessful. An alternative solution is currently under consideration.
- 2.42 Current and planned provision of sixth form places within the borough is sufficient to meet demand for the medium to long term. New sixth form provision will become available in 2020 through St Mary Magdalene CE School and moving on, sixth form provision are planned to open at Greenwich Free School, International Academy of Greenwich and Leigh Academy Blackheath. These developments will ensure that there is sufficient provision to meet rising demand beyond 2020.

- 2.43 In regards to healthcare provision, the Greenwich Commissioning Strategy 2018 to 2022, published by the Greenwich Clinical Commissioning Group (CCG), established four strategic priorities: to prevent illness and help people to live well throughout their lives; strengthen support for people with mental illness; better meet the needs of frail, older people with care closer to homes and improve presentation, detection and treatment of cancers. Investment in primary care and community-based care services has been identified as one of the two key enablers to support transformation and improvement.
- 2.44 For general practice, working at a larger scale through new GP-led Primary Care Networks (PCNs) will help deliver the strategy and improve sustainability of, and access to, primary care. For the strategic period of 2018-22, it is considered by the CCG that there is capacity in existing buildings to house the required number of GPs, practice nurses and increasingly, pharmacists, social prescribers, physiotherapists and other primary care team members.
- 2.45 The CCG is committed to making more efficient use of the existing estate and in supporting PCNs and their practices to use the CCGs existing larger, purpose-built health facilities where possible. However, the CCG also recognises that in the medium-long term (post 2022), the scale of development potential in the borough is likely to require the development of new health facilities in areas of significant development to meet the growing population in these areas.

Site Selection Process

- 2.46 During preparation of the Site Allocations Local Plan, over 200 sites were considered for inclusion in the Preferred Approach document. Potential sites were drawn from a variety of sources including:
- The evidence base for the Local Plan, including the Housing Trajectory, the 2017 Strategic Housing Land Availability Assessment (SHLAA) and the 2012 Employment Land Review (ELR). Refer to Appendix A for key evidence base documents.
 - Site identified in adopted/emerging area-based masterplan SPDs, site specific SPDs and Opportunity Area Planning Frameworks (OAPFs).
 - The Royal Borough's property disposals strategy, including the Local Authority New Build (LANB) programme.
 - The saved UDP Site Proposals Schedule (addendum to the Core Strategy).
 - Sites with known development interest (sites with planning permission or in the planning pipeline).
 - On-going engagement with landowners and developers.
 - Sites put forward during the Call for Sites that was carried out during the Issues and Options consultation.

- 2.47 All sites within the Issues and Options document along with sites from the above sources have been reassessed against national, London and local policy to determine if they should be carried forward in the Preferred Approach, having regard to the main purpose of the Site Allocations. This reassessment included further research in addition to the existing evidence base, site visits, liaison with landowners/stakeholders as appropriate, and consideration of the responses received to the Issues and Options consultation.
- 2.48 A complete list of the sites considered for inclusion, but not taken forward in the Preferred Approach, is included in Appendices A to C. The criteria for site selection excluded sites for one or a combination of the following reasons:
- No clear link to the delivery of Core Strategy objectives/policies
 - The size of the site is insufficient (generally less than 0.25ha) to make a significant contribution to the delivery of the Core Strategy.
 - The principle of the proposed use has been previously established on the site.
 - The site has planning permission for the proposed use and a significant proportion of the permitted development has been delivered.
 - The existing use(s) on the site are protected by the Development Plan.
 - The proposed use is contrary to the Core Strategy, London Plan, and/or existing policy designations.
 - The indicative delivery timeframe is beyond the plan period, as determined by the London SHLAA.

Key changes from Issues and Options

- 2.49 Of the 81 sites included in the Issues and Options, 40 sites have been taken forward in the Preferred Approach. Note that some sites in the Issues and Options have been amalgamated in the Preferred Approach; where this is the case, this is highlighted in the 'notes' section of individual allocations. Refer to Appendix A for the sites not taken forward from the Issues and Options stage, and the reasons for their exclusion.
- 2.50 The adoption of the new Charlton Riverside SPD in 2017 clarified issues around phasing and infrastructure requirements in the Opportunity Area, with the result that the central area is considered the most likely to come forward during the current plan period.
- 2.51 Only one site that was included within the Issues and Options consultation for Greenwich Town Centre has been taken forward in the Preferred Approach. This is because a number of sites have been redeveloped/gained permission. Other sites have been removed as there is no realistic prospect of significant development on the site. Additionally, the area has been renamed 'Greenwich Creekside' as this aligns with the Core Strategy approach to this area.

- 2.52 The Plumstead sites in the Issues and Options document included all those sites identified in the 2016 Plumstead Urban Development Framework. However, Plumstead is not identified in the Core Strategy as a Strategic Development Location or an area where a significant amount of change is expected over the plan period. When considered against the site selection criteria for inclusion in the Preferred Approach, a number of sites included in the Plumstead UDF are not suitable for taking forward as site allocations.
- 2.53 An Opportunity Area Planning Framework (OAPF) is currently being developed for the Thamesmead and Abbey Wood area in partnership with the GLA, TfL and London Borough of Bexley. This will update the 2009 SPD for the area, and the priority objective for the OAPF will be delivering the significant transport improvements necessary to enable substantial residential growth in the waterfront area.
- 2.54 Although the Issues and Options did not include all of the sites/areas in the 2009 SPD, the development capacity modelling and other evidence base work informing the emerging OAPF has confirmed that Thamesmead Town Centre and the land within the Pettman Crescent gyratory should be included as development opportunities. Additionally, the Core Strategy identifies the remodelling of Thamesmead Town Central as a key objective.

Call for Sites Submissions

- 2.55 A total of 54 individual sites were submitted during the Call for sites. Sites were submitted by landowners, developers, local residents and community organisations. A mixture of uses was proposed for the additional sites put forward, with the majority proposed for residential or mixed uses. The assessment of these sites (refer to Appendix B) concluded that only two sites were suitable for inclusion in the Preferred Approach.

Social Infrastructure Provision

- 2.56 The Site Allocations Local Plan does not allocate standalone sites for the provision of new social infrastructure. The key infrastructure requirements to support the identified growth and their means of delivery are set out within the Infrastructure Delivery Plan (IDP); the IDP is currently being updated and it will be published alongside the Proposed Submission version of the Site Allocation Local Plan.
- 2.57 The Core Strategy and the London Plan 2016 contain borough-wide policies that protect and promote social infrastructure provision, and proposals that include appropriate social infrastructure provision on any of the sites included in this document will generally be supported.
- 2.58 Additionally, where sites are of a sufficient size to justify on-site provision of specific type(s) of social infrastructure this is included in the site allocation to ensure that the necessary infrastructure is delivered as part of development proposals, and at the right time. Depending on the nature of the infrastructure requirement, it may be necessary to unlock development of the site (e.g enabling infrastructure). Other infrastructure, however, does not necessarily need to be implemented in advance of any development being occupied, but will need to be operational either when a certain

number of residents are in occupation or by the time the development is fully occupied.

Planning Submission Requirements

- 2.59 The inclusion of a site within the Local Plan does not remove the requirement for planning permission nor guarantee planning permission. Proposals must be in accordance with the site specific policies as well as satisfying the policies within the Core Strategy, the London Plan and relevant material considerations including SPDs, SPGs and national policy/guidance.
- 2.60 The requirements identified for each site are not exhaustive. The site allocations highlight key objectives and requirements specific to the site, rather than repeating policies covered elsewhere. The guidance does not set out detailed prescriptions relating to development capacity, exact building heights or infrastructure requirements as these can only be considered once detailed proposals have been submitted through the planning application process. Timescales for delivery are indicative, based on available evidence of the five year time period in which a site is most likely to come forward.
- 2.61 Potential applicants should contact the Royal Borough at the earliest stage to discuss submission requirements and initiate the design process appropriately. A comprehensive pre-application service is available and should be used for all sites within this document. Reference should also be had at an early stage to relevant guidance produced by the Royal Borough, for example the Developer Guide for Flood Risk and Surface Water Management (Appendix B, SFRA Level 1, 2017).

The Site Allocations

- 2.62 For consistency, each site allocation is presented in a standard template, with the site boundary clearly identified and relevant contextual information presented. In addition to the allocation, site requirements and development guidelines are set out. The 'notes' field has been included in the Preferred Approach document as an informative to aid consultation, and will not be included in the adopted document.
- 2.63 For the purposes of the Site Allocations Local Plan, 'town centre uses' include the main town centre uses as defined in the glossary of the NPPF. This includes: Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities). The appropriate mix of town centre uses on a particular site will need to be determined with regard to relevant Core Strategy policies.
- 2.64 Residential use is also appropriate in town centres, but is not a town centre use as defined in the NPPF and therefore is not a town centre use for the purposes of the Site Allocations Local Plan. The site requirements and/or development guidelines therefore provide further guidance on the acceptable form of residential development where it is considered an appropriate use for the site.

- 2.65 Provision of outdoor amenity space is a key component of residential development, and every home should have access to suitable private and/or communal amenity space as set out in the Mayor's Housing SPG. The fundamental design considerations for amenity space relate to its quality and usability; in flatted schemes this will generally be achieved through provision of a consolidated area of communal amenity space in addition to generously sized balconies. For the purposes of the Site Allocations Local Plan, the requirement for children's play space to Mayoral standards is included within reference to communal amenity space.
- 2.66 Car-free development is defined as no parking provision on site and occupiers not being able to ability to obtain car parking permits, except for parking needed to meet the needs of disabled people.
- 2.67 The delivery of site allocations will be monitored on an annual basis through the Authorities' Monitoring Report to assess progress on implementation, which will in turn assist with the future review of the Local Plan and related documents. This will be carried out alongside the housing trajectory and the requirement to demonstrate an adequate supply of land for housing to meet the Royal Borough's target, as set out in the London Plan and the Core Strategy.
- 2.68 The full index of sites is presented in Figure 2.