

# **Royal Borough of Greenwich**

## **Local Plan**

### **Site Allocations**

#### **Proposed Submission Consultation Statement**

**November 2021**

## **I Purpose and Background**

- I.1 This statement has been prepared in accordance with Regulation 22(1)(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) which sets out the requirements for public participation and for preparing a consultation statement. It accompanies the Site Allocations Proposed Submission document, a draft Local Plan document prepared under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) that sets out site specific policy for the main sites where development or other change is expected.
- I.2 From 8<sup>th</sup> November to 20<sup>th</sup> December 2021, RBG are inviting representation on the Proposed Submission Site Allocations document. Regulation 19 requires a statement to be published setting out: which bodies and persons were invited to make representations under Regulation 18; how those bodies and persons were invited to make representations; and how those main issues raised have been addressed in the Local Plan.
- I.3 This is the third consultation exercise undertaken during the preparation of the Site Allocations Local Plan. Previous consultation has included:
  - Consultation on the Site Allocations Issues and Options document for six weeks from 15 February 2016 to 29 March 2016, to inform people about the Local Plan document the Royal Borough proposed to prepare and invite them to make representations on what the Site Allocations Local Plan ought to contain. This consultation formed the first stage in the preparation of the Site Allocations Local Plan and included a long list of 81 sites with options for future uses. A Call for Sites was carried out alongside this consultation, with 54 individual sites submitted.
  - Consultation on the Site Allocations Preferred Approach document for eight weeks from 16 August 2019 to 11 October 2019. This consultation was a second round of consultation carried out in accordance with Regulation 18 and the procedures set out in the Statement of Community Involvement (SCI) and included full draft allocations for 40 sites.
- I.4 Responses to these previous rounds of consultation have informed the Site Allocations Proposed Submission (Regulation 19) documents. This consultation statement sets out details of how the consultation on the Regulation 18 Preferred Approach Document has taken place, and how the responses have informed the Site Allocations Proposed Submission document. This satisfies the requirements of Regulation 19 regarding publication of a consultation statement.
- I.5 The previously published (February 2019) Site Allocations Issues and Options Consultation Statement sets out details of how the consultations on the Issues and Options Document informed the Preferred Approach document.
- I.6 A further consultation statement will be published detailing the number of representations made in response to the Regulation 19 consultation, and a summary of the main issues raised in those representations. This will be the final consultation statement submitted to the Secretary of State when the Site Allocations Local Plan is submitted for examination, as required under Regulation 22.

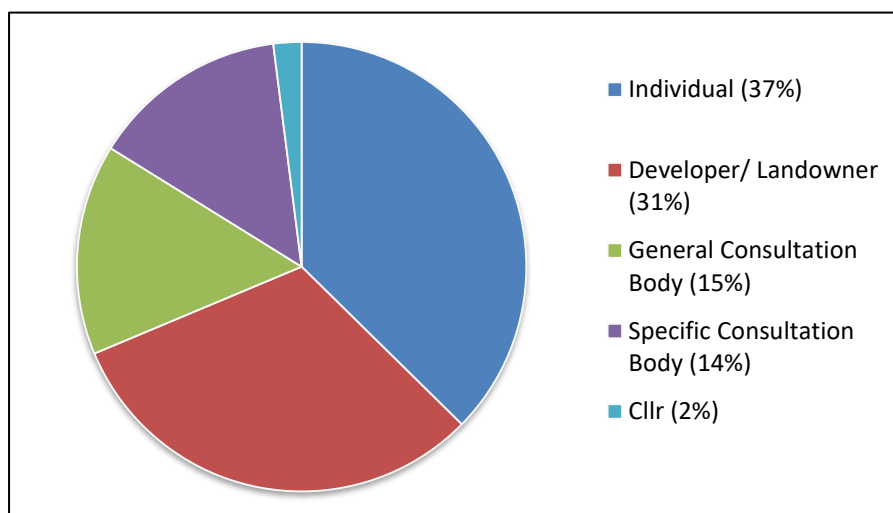
## 2 Consultation

- 2.1 The Regulation 19 consultation on the Site Allocations Preferred Approach document ran for a period of eight weeks between 16 August and 11 October 2019.
- 2.2 The following consultation activities were undertaken for the Site Allocations Preferred Approach, in accordance with the Regulations and the SCl:
- The document was published online, on the Royal Borough's website on its Consultation Portal at [www.royalgreenwich.gov.uk/haveyoursay](http://www.royalgreenwich.gov.uk/haveyoursay). Consultation responses could be submitted via an online survey, by email or by post.
  - Hard copies of the document were placed for reference in all of the libraries in the Borough.
  - Notifications were sent to all those on the Planning Policy Consultation Database (over 1000 entries including Specific Consultation Bodies (Statutory Consultees), General Consultation Bodies (Including Local Amenity Groups and Residents Associations), Developers, Landowners and interested local residents.
  - Advertisement by Statutory Notice, (published in The Greenwich Weekender: 14-08-2019 edition)
  - Advertisement on the Royal Borough's social media accounts.
- 2.3 Consultation literature is set out in Appendix A. Representations were invited on the Site Allocations Preferred Approach document as well as the Interim Integrated Impact Assessment (IIA) Report that was published alongside.

### 3 Analysis of Responses

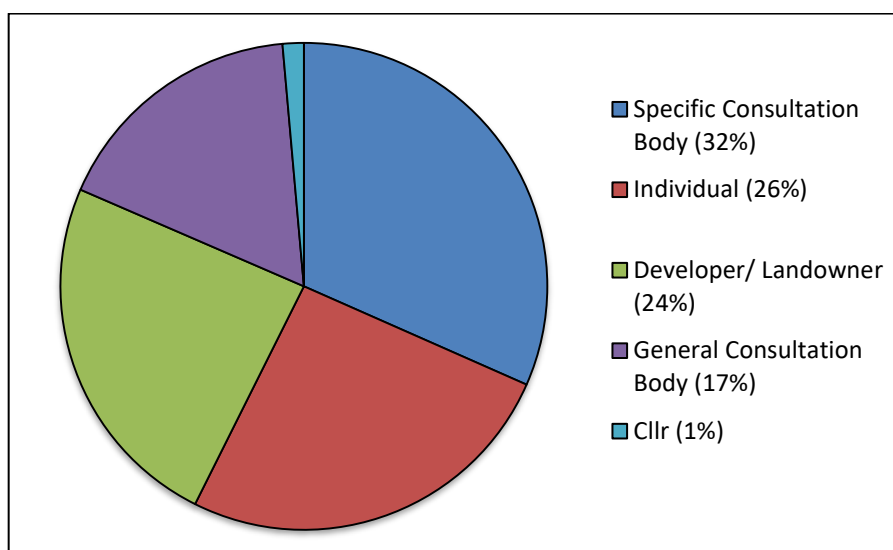
- 3.1 In total there were 432 comments made by 99 respondents. Responses have been broken down into individual comments, to ensure thorough analysis, so an individual respondent may have several comments registered to them if they commented on more than one issue/site. The full list of representations received and the council's response to these is included in Appendix B.
- 3.2 As can be seen in Figure 1, the majority of the 99 respondents were classified as individuals and developers / landowners.

*Figure 1 Responses (99 total) by respondent type*



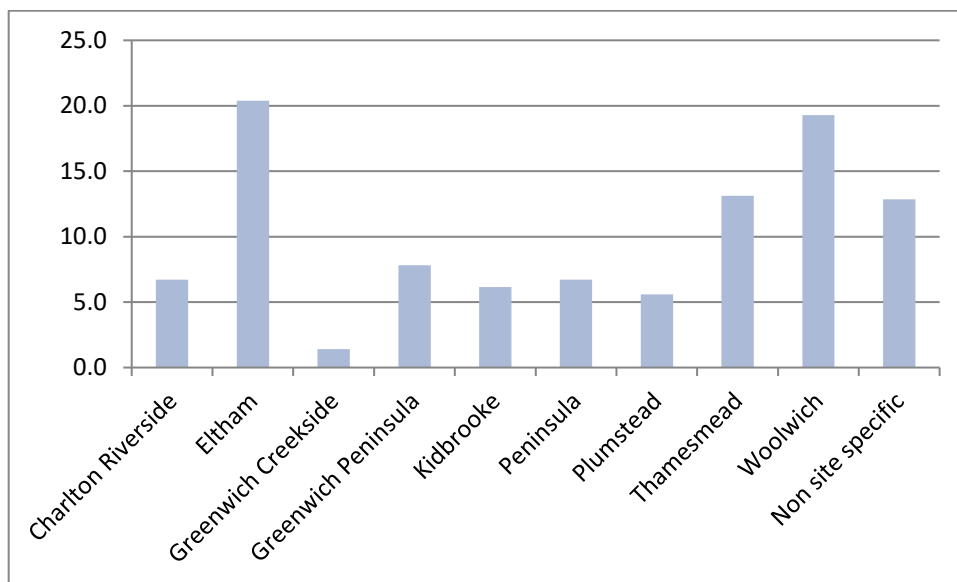
- 3.3 As set out in Figure 2, of the 432 comments received on the Preferred Approach document, the majority were made by specific consultation bodies, followed by individuals then developers/landowners. Approximately half of the comments made by general consultation bodies fell within the sub-category of local residents' groups.

*Figure 2 Comments (432 total) by respondent type*



- 3.4 Figure 3 below breaks down the responses in relation to each of the areas of the Borough within which the sites are located. The sites in Eltham had the most individual responses, most of which were from local residents. Table I sets the number of sites consulted on and the number of comments received within each location.

*Figure 3 Proportion (percentage) of individual comments by area*



*Table I Comments by area*

Area	Number of sites	Responses Received
Charlton Riverside	3	20
Eltham	3	61
Greenwich Creekside	1	7
Greenwich Peninsula	5	37
Kidbrooke	5	20
Plumstead	4	17
Thamesmead & Abbey Wood	7	38
Woolwich	12	56
<b>Total</b>	<b>40</b>	<b>256</b>

- 3.5 Eleven responses suggested new sites for inclusion, although the Preferred Approach consultation did not include a Call for Sites.

## 4 Summary of Responses

- 4.1 The schedule of all consultation responses received, together with the Council's detailed response, is provided in Appendix B. For each site, a summary of the responses received, and changes made to the Proposed Submission allocations are set out below.

### **Charlton Riverside**

#### *CR1 Angerstein Triangle*

- 4.2 There were five responses received concerning this site, which were generally supportive. Although the site is currently a key policing facility, the Metropolitan Police Service are satisfied that the wording of the allocation is sufficiently clear that alternative use of the site would only be acceptable if the site was no longer required by the MPS. Clarity was sought on the form/quantum of employment use, and some concern was raised about the loss of industrial use. The allocation has been updated to reflect the potential for co-location of industrial and residential uses, as set out in the new London Plan, and to clarify that office uses are not generally suitable on sites outside town centres.

#### *CR2 Charlton Riverside Central*

- 4.3 There were ten responses received to the inclusion of this allocation, which were generally supportive, particularly in terms of the identification of necessary physical / social infrastructure to support the introduction of residential use. TfL identified additional connectivity improvements required to support development, and the Environment Agency requested that the allocation acknowledge its Thames Barrier operational requirements. Wharf operators and the Port of London Authority (PLA) requested several amendments to the development guidelines to ensure that wharves are appropriately safeguarded. The GLA raised concern about the potential loss of industrial and waste uses, and clarity was sought from developer / landowners on the form/quantum of employment use and the approach to waste sites. The developers / landowners sought a less restrictive approach to design and clarity on the phased approach to developing the site.
- 4.4 Suggested amendments from wharf operators / PLA, TfL and the Environment Agency have been incorporated into the allocation. The allocation has been updated to reflect the potential for co-location of industrial and residential uses, as set out in the new London Plan, and to clarify that office uses are not generally suitable on sites outside town centres. Text regarding the approach to compensatory waste provision has also been clarified. The allocation does not preclude development coming forward in phases based on land ownership where proposals accord with the site requirements and development guidelines. The design guidelines have taken into account the surrounding built form, uses and character (including the likelihood of change of these factors) as well the capacity for growth, having regard to the area-wide capacity work that underlies the Charlton Riverside SPD.

#### *CR3 Former Siemens Brothers' Works*

- 4.5 There were five responses received to the inclusion of this allocation, which were generally supportive, subject to the allocation being amended to clarify the operational requirements of the Thames Barrier and the constraints this imposes on the site. Clarity was sought on the form/quantum of employment use, and concern was raised about the proximity of SIL. The developer considered that the allocation unduly emphasised the heritage significance of 37 Bowater Road over the conservation area as whole.

- 4.6 The development guidelines have been amended to reflect the full extent of the Thames Barrier operational requirements, including that Barrier Park is operational land and not suitable for use as public open space. The allocation has been updated to reflect the potential for co-location of industrial and residential uses, as set out in the new London Plan, and the Agent of Change principle. The allocation has also been updated to reflect the recent Grade II Listing of 37 Bowater Road.

## **Eltham**

### *E1 Mecca Bingo*

- 4.7 There were sixteen responses received which while generally supportive of the allocation, raised concerns about the loss of Mecca Bingo due to the role it plays in the community. Residents also raised concerns about the impact more residential development would have on parking in the surrounding area. The site is in active use and review against the site selection criteria demonstrated that existing policies provide sufficient guidance regarding future development of the site, therefore it has been removed from the Site Allocations document.

### *E2 Orangery Lane*

- 4.8 Nineteen responses were received. Although generally supportive, a number of concerns were raised around loss of parking and increased vehicle movement close to the school. The Marks and Spencer's car park has been removed from the allocation. The site requirements have been revised to seek to reduce vehicular movement and have regard to the primary school.
- 4.9 Concerns were also raised over the loss of the food bank, whilst the development guidelines are clear that the food bank must be re-provided or relocated, this has been clarified in the site requirements. Some residents were concerned over the scale and massing proposed; the current built form and low intensity use does not realise the full potential of the site and its town centre location. The proposed scale and massing balances this against the existing site context, and the development guidelines have been clarified that proposals must be sufficiently set back from the listed Orangery to preserve its setting.

### *E3 260 Eltham High Street*

- 4.10 There were 26 responses received which were supportive of the allocation, but particular concern was raised regarding the requirement for residential access via Woodcroft Road which is a private road. The allocation has been updated to reflect this and that proposals should consider the potential to use Woodcroft close; Woodcroft Close is the most appropriate residential access route from a transport point of view because the existing access point to the site already causes significant traffic issues and any increase in vehicular movement would exasperate this.
- 4.11 The developer will therefore need to work with local residents to investigate if an alternate access point is possible. Residents were also worried that new homes would further reduce the parking availability in the area. The proposal for car free development is appropriate for a town centre location and supported by London Plan policies to reduce car usage; no changes are therefore proposed in this regard.

## **Greenwich Creekside & Greenwich Peninsula**

### *GCI Brookmarsh Industrial Estate and Saxon Wharf*

- 4.12 Seven responses were received to the inclusion of this site which were generally supportive, particularly regarding the requirement to improve the environment of, and provide a public footway along, Deptford Creek. Some concern was raised about the proximity of the safeguarded wharf, the loss of existing industrial uses and the potential impact on the World Heritage Site. The allocation has been updated to reflect the potential for co-location of industrial and residential uses, to emphasise the Agent of Change principle and the need for early engagement with the PLA and wharf operator. Reference to the potential impact on WHS views from taller buildings has been added to the Development Guidelines.

### *GPI Enderby Place*

- 4.13 Eight responses were received to the inclusion of this site which were generally supportive, particularly regarding the removal of the cruise liner terminal from the allocation. Clarity was sought on the form/quantum of employment use, and some concern was raised about the proximity of the safeguarded wharves and SIL. The developer is seeking a less restrictive approach to design/tall buildings, whereas a local amenity group is seeking a less permissive approach. TfL requested that further detail be provided on opportunities for new river bus services and bus services.
- 4.14 The allocation has been clarified regarding the nature and scale of B-use employment space appropriate to the site, to emphasise the Agent of Change principle and the need for early engagement with the PLA and wharf operators. The requirement to retain pier provision for the Thames Clipper has been clarified, and reference to a potential contribution to bus standing infrastructure added to the Development Guidelines. No change regarding heights; the London Plan advises that the Development Plan should identify appropriate tall building heights within locations where tall buildings may be appropriate.

### *GP2 Morden Wharf*

- 4.15 Nine responses were received to the inclusion of this site which were generally supportive, Clarity was sought on the form/quantum of employment use, and some concern was raised about the proximity of the safeguarded wharves and SIL. The level of public transport accessibility and the responsibility for improving this was also raised. The developer/landowner considered that the site boundary should reflect the full extent of their ownership, including land within the SIL. The developer is seeking a less restrictive approach to design/tall buildings, whereas a local amenity group is seeking a less permissive approach. TfL requested that further detail be provided on opportunities for new river bus services and bus services.
- 4.16 The Allocation has been updated to reflect the potential for co-location of industrial and residential uses, as set out in the new London Plan, and to clarify that office uses are not generally suitable on sites outside town centres. Reference to Tunnel Glucose Wharf, as referred to in the Safeguarded Wharves Review, has been included. The requirement for the site to contribute to pier provision on GPI has been clarified, are reference to bus standing infrastructure added to the Development Guidelines. The relationship of PTAL to optimum development capacity has been clarified. No change regarding heights; the London Plan advises that the Development Plan should identify appropriate tall building heights within locations where tall buildings may be appropriate.



### *GP3 Site between A102 and Bugsby's Way*

- 4.17 Six responses were received to the inclusion of this site which were generally supportive. Clarity was sought on the form/quantum of employment use, including where employment uses are concentrated. Some concern was raised about the proximity of the safeguarded wharves and SIL. There was a view that meanwhile uses should be supported in advance of comprehensive redevelopment, and that a phased approach would be necessary. The developer is seeking a less restrictive approach to design/tall buildings, whereas a local amenity group is seeking a less permissive approach.
- 4.18 The allocation has been amended to reflect the agent of change principle and to address the issue of proximity to safeguarded wharves. A zoned approach to uses is necessary in response to noise/air quality issues associated with the A102, Silvertown Tunnel and SIL. The allocation has been informed by the adopted Planning Brief for the site, and does not preclude development coming forward in phases. Reference to support for appropriate meanwhile uses added to the Development Guidelines.

### *GP4 Knight Dragon*

- 4.19 Nine responses were received to the inclusion of this site which were generally supportive, but concern was raised that any increases in residential capacity beyond the 2015 permission be supported by additional social infrastructure, and that the allocation should be updated to reflect changes to uses/quantum associated with the 2019 permission. The developer is seeking a less restrictive approach to design/tall buildings, whereas a local amenity group is seeking a less permissive approach.
- 4.20 The development guidelines have been clarified to include consideration of play space and public open space when assessing the need for additional social infrastructure, and to identify the sports and recreation facilities required to support the new residential population. The allocation has been updated to reflect changes to land use and resultant changes to built form arising from the non-delivery of proposed film studios.

### *GP5 Phase 3, 4 & 5 Greenwich Millennium Village*

- 4.21 Five responses were received to the inclusion of this site which were generally supportive, but concerns were raised about the proximity of safeguarded wharves. Clarity was sought on the form/quantum of employment use, including where employment uses would be concentrated. The allocation has been updated to emphasise the Agent of Change principle and the need for early engagement with the PLA and wharf operators. The site requirement for workspace has been amended to enable flexibility in location or provision along Bugsby's Way.

### **Kidbrooke**

#### *K1 Huntsman*

- 4.22 Five responses were received to the inclusion of this site. The land owner objects to the level of affordable housing required. However, no change has been made to the allocation as the 50% affordable housing figure was established by the SPD and is in accordance with GLA guidance for greenfield sites.

### *K2 Kidbrooke Village*

- 4.23 Four responses were received to the inclusion of this site, which were generally supportive, although there was an objection to the heights proposed within the development. However, the tallest buildings within the site have already been granted permission and are nearing completion. The heights are broadly in accordance with the principles of the Kidbrooke SPD.

### *K3 Kidbrooke Station Square*

- 4.24 Five responses were received to the inclusion of this site, which were generally supportive, although the developer has requested some amendments to accord with their proposed scheme. There is a further objection to the proposed heights and the lack of car parking provision. Heights are broadly in accordance with the SPD principles and car parking levels are in accordance with the Development Plan. However, the allocation has been amended to add clarity in relation to the proposed scheme.

### *K4 Former Thomas Tallis School*

- 4.25 Four responses were received to the inclusion of this site, which were generally positive, requiring that the site has safe access to Kidbrooke Village Centre and station. Minor clarifications have been made the allocation. The site has been renamed 'Kidbrooke Park Road'.

### *K5 Homebase*

- 4.26 Two responses were received to the allocation, showing support for mixed-use development and the retention of the supermarket. However, the site was put forward by the previous occupiers, Homebase, and is now occupied by Aldi and B&M. The new London plan provides sufficient support for intensification of out-of-centre retail should redevelopment proposals be forthcoming and the site has therefore been removed from the Site Allocations document.

## **Plumstead**

### *P1 Plumstead Motor Services Site*

- 4.27 Three responses were received to the inclusion of this site. One was a supporting representation but there were concerns raised over the displacement of existing businesses from the site, and the lack of facilities generally for young people in Plumstead. The relocation of existing businesses is already addressed in the allocation. Since the consultation closed, the improved Plumstead Centre has opened which contains a 33 station gym, badminton court, fitness and dance studios, a soft play facility, cafe and meeting rooms for hire alongside the improved library.

### *P2 Car Wash Site 23-36 Plumstead High Street*

- 4.28 Three responses were received to the inclusion of this site. One was a supporting representation but there were concerns raised over the displacement of existing businesses from the site, and the lack of facilities generally for young people in Plumstead. The allocation enables existing businesses to return to the site post development if they desired. Since the consultation closed, the improved Plumstead Centre has opened.

### *P3 Former Power Station, White Hart Road*

- 4.29 Five responses were received to the inclusion of this site. One was a supporting representation but there were concerns raised over non-industrial uses in an area designated as Strategic Industrial Land, and the lack of facilities generally for young people in Plumstead. The allocation clearly states that the function and the character of the site should remain part of SIL. Since the consultation closed, the improved Plumstead Centre has opened.

*P4 Former Plumstead Leisure Centre, Speranza Street*

- 4.30 Six responses were received to the inclusion of this site. Two were supporting representations but there were concerns raised over the loss of the sports centre and the lack of facilities generally for young people in Plumstead. Clarification was also sought over the affordable housing requirements. Since the consultation closed, the improved Plumstead Centre has opened. The justification has been amended to detail this new community provision. The allocation has been clarified to state a minimum of 50% affordable housing should be provided.

**Thamesmead and Abbey Wood**

*T1 Broadwater Dock*

- 4.31 Seven responses were received to the inclusion of this site, which were generally of support in principle. The landowner queried the requirement for a primary school, and sought an overall site capacity figure and less restrictive height parameters. There was concern from the GLA over the loss of open space and the Environment Agency required reference to TE2100. Wording has been added to the Site Requirements concerning flood defences. The potential need for a primary school is based on the indicative capacity in the area (as determined in the draft OAPF) and the site is considered to be the most appropriate location should a new school be required. The open space is not currently publicly accessible and qualitative improvements will be required.

*T2 Pettman Crescent / Gyrotory*

- 4.32 Five responses were received to the inclusion of this site. This included a request to split the site into separate allocations according to land ownership, to include a reference to the Agent of Change principle and to improved permeability throughout the site. The existing site allocation boundaries have been retained and clarity added to the development guidelines reflecting land ownership. References to permeability and the agent of change principle have been added to the development guidelines section.

*T3 Thamesmead Waterfront*

- 4.33 Eight responses were received to the inclusion of this site, which were generally of support in principle. The land owner requested that site allocations T3, T4 and T5 be considered as one allocation and that the allocation allow for MOL reconfiguration. There was support from the GLA for MOL retention, but concern from Sport England over school playing field management. Other representations sought reference to TE2100, links to BRT stops and maintenance access to lighthouse.
- 4.34 The sites have been kept as separate allocations in reflection of their differing designations and constraints, as this does not preclude the developer from developing their own Masterplan across the 3 sites. Reference to links to BRT stops, maintenance access to lighthouse, TE2100

and school playing fields management have been added, as well as further detail on the level of supporting services, amenities and infrastructure required.

#### *T4 Thamesmead Town Centre*

- 4.35 Six responses were received to the inclusion of this site, which were generally of support in principle. The land owner requested that site allocations T3, T4 and T5 be considered as one allocation. Reference to a future river bus terminal was sought. The sites have been kept as separate allocations, as this does not preclude the developer from developing their own Masterplan across the 3 sites. Reference to potential provision of a future river bus terminal has been added.

#### *T5 Thamesmere Civic Centre*

- 4.36 Three responses were received to the inclusion of this site, which were generally of support in principle. There was a request that site allocations T3, T4 and T5 be considered as one allocation. Reference to links to BRT stops and an improved transport interchange were sought. The sites have been kept as separate allocations, as this does not preclude the developer from developing their own Masterplan across the 3 sites. Reference to links to BRT stops and an improved transport interchange have been added.

#### *T6 Cross Quarter and Lyndean Industrial Estate*

- 4.37 Seven responses were received to the inclusion of this site, which were generally of support in principle. However, there was a request to consider the expansion of the adjacent Travellers Site and a comment that the site is not an appropriate location for office development. The allocation has been amended to clarify that the site is not appropriate for office use. The land adjacent to the Thistlebrook travellers site already has planning permission so cannot be considered for expansion.

#### *T7 Abbey Wood Telephone Exchange*

- 4.38 Two responses were received in support of the inclusion of this site, with a request to reference the agent of change principle, which has been added.

### **Woolwich**

#### *W1 Montgramit Square*

- 4.39 Five responses were received to the inclusion of this site which were generally supportive; with support particularly for the retention of the existing character and non-designated historic buildings and the retention and enhancement of existing routes. The site allocation seeks to retain the valued elements of the character, including the low-rise character of Powis Street, and the designated heritage assets.

#### *W2 Waterfront Leisure Centre*

- 4.40 Eight responses were received to the inclusion of this site which were mostly supportive. There was support for improved connections to the river, and a request that the allocation should refer to the new leisure centre opening before the existing one closes. The site allocation has been updated to include enhanced accessibility to the waterfront, and has been linked to Site W9 to ensure that the provision of leisure facilities is maintained.

#### *W3 Bunton Street*

- 4.41 Two responses were received to the inclusion of this allocation, with support for housing and the retention of the existing Lidl. While the allocation cannot refer to specific shops, it does seek to retain the large format retail unit suitable for a supermarket.

#### *W4 Macbean Street*

- 4.42 Five responses were received to the inclusion of this allocation, which were generally supportive. The landowners/developers however, question the need for design guidance and the size of the site. However, the design guidance is based on the Woolwich Urban Design Strategy and the size of the site is based on the need to ensure a consistent approach to heights and massing in this sensitive location.

#### *W5 Calderwood Street and Monk Street Car Parks*

- 4.43 Five responses were received to the inclusion of this allocation, the majority of which were positive. While there was support for redevelopment and environmental enhancements, there was an objection to the loss of Council parking. The site allocation is in accordance with the spatial strategy for the Borough and for London, which support reduction in car parking.

#### *W6 Island Site*

- 4.44 Four responses were received to the inclusion of this allocation, there was support for the retention of historic buildings, although the developer is seeking revisions to reflect their proposed scheme. All designated heritage assets are to be retained, the allocation has been updated based on the approved scheme.

#### *W7 Love Lane*

- 4.45 Four responses were received to the inclusion of this allocation, there was support for family housing, although the developer objects to the design guidance within the Development Guidelines. No change has been made as the allocation is based on the principles of the Woolwich Urban Design Strategy.

#### *W8 Former post office*

- 4.46 Five responses were received to the inclusion of this allocation, there was desire to retain the existing green space, although the developer objects to the design guidance in the Development Guidelines, particularly the recommended heights. No change has been made as the allocation is based on the principles of the Woolwich Urban Design Strategy. There is no policy basis to retain the site as green space which is a result of a temporary landscaped area following demolition of the previous buildings on the site in preparation for redevelopment.

#### *W9 Viscount House and Tramshed*

- 4.47 Four responses were received to the inclusion of this allocation, which were generally supportive. There was concern that the public toilets should be re-provided and that residential uses should be located to avoid any conflict with the theatre. The allocation has been updated to avoid conflict between the residential use and theatre. Reprovision of the public toilet is already included.

#### *W10 DLR Station*

- 4.48 Four responses were received to the inclusion of this allocation, which were generally supportive. There was support for an enhanced station entrance, however the allocation does not include the station entrances, which are unlikely to come forward for redevelopment.

#### *W11 Spray Street Quarter*

- 4.49 Four responses were received to the inclusion of this allocation, which were generally positive. There was support for the retention of the covered market and the provision of a cinema. The developer objected to overly prescriptive wording in the Development Guidelines. The allocation has been updated to reflect the Woolwich Urban Design Strategy and to allow for sufficient flexibility.

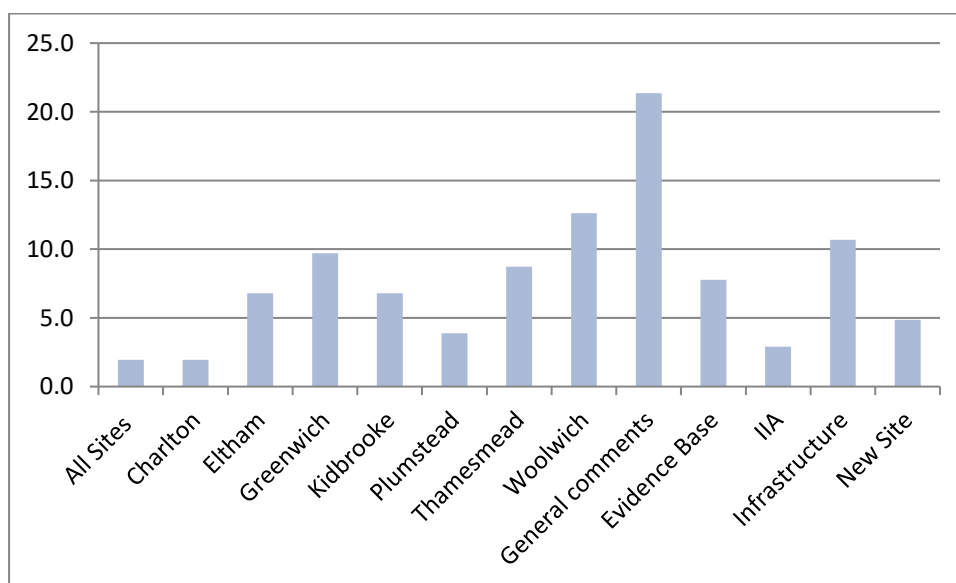
#### *W12 Arsenal Way Industrial Estate*

- 4.50 Six responses were received to this allocation. The landowners objected to the proposed LSIS designation and suggested that the site was suitable for mixed-use redevelopment. The site serves an important purpose in supporting the central activities zone and providing employment/business space in a highly accessible location. Most of the buildings are relatively new and are therefore not suitable for redevelopment.

#### **Non site-specific comments**

- 4.51 Some of the responses received did not relate to a specific site, although a number of these were making comments concerning a geographical area in general. Some representations were proposing new sites; however, this consultation did not include a call for sites. Other comments related to soundness, the Integrated Impact Assessment or to the SALP evidence base, particularly infrastructure. These are summarised in Figure 4 below.
- 4.52 The eleven sites suggested for allocation were assessed against the site selection criteria; none met the criteria and the reason for not including the sites is set out in Appendix B of the Proposed Submission document. An updated Infrastructure Delivery Plan is being prepared, and will be published alongside the submission documents.

*Figure 4 Non site-specific comments*



## **Summary**

- 4.53 The preparation of a Site Allocations Local Plan is generally supported. The majority of the representations sought further detail/minor clarifications on the allocations. These matters have been addressed both on a site by site basis and generally throughout the document, and an updated Infrastructure Delivery Plan has further refined the infrastructure requirements.

## Appendix A Notification and publicity material for Preferred Approach consultation

# WEEKENDER

August 14 2019  
www.weekender.co.uk

GREENWICH  
& LEWISHAM

Notice is hereby given that application(s) have been made to The Royal Borough of Greenwich in respect of the under mentioned premises/sites. You can see the submissions and any plans at <http://www.royalgreenwich.gov.uk/planning>.

If development proposals affect Conservation Areas and/or Statutorily Listed Buildings under the Planning (Listed Building and Conservation Areas) Act 1990 (As Amended) this will be shown within the item below.

### Publicity for Planning Applications.

**Applicant: Mr A. Bajwa** 19/1917/F  
Site Address: 18 Ramard Close, Woolwich, London, SE18 6QJ  
Development: Construction of a second floor comprising of a studio flat (Class C3)  
Conservation Area: Woolwich Conservation Area  
**Applicant: Mr N. Chaudhry** 19/2337/F  
Site Address: 361 Property Services, 11 The Village, Charlton, SE7  
Development: Demolition of existing rear studio flat and replacement with new 2 bed flat, second floor rear extension and reconfiguration of rear upper floors with new windows.  
Conservation Area: Woolwich Conservation Area  
**Applicant: PC Estates** 19/2284/F  
Site Address: 35 Ware Street, Woolwich, London, SE18 4NE  
Development: To add D1 use class to existing A1, A2 and B1 use class to allow flexible use. (ie the ground floor unit only).  
Conservation Area: Woolwich Conservation Area  
**Applicant: PA Housing** 19/2355/F  
Site Address: 1-10 Primrose Row, Blackheath, London.

Anyone who wishes to comment on these applications should be made in writing to Development Planning within 23 days of the date of this notice. Please quote the appropriate reference number.

Date: 14/08/2019

Victoria Geoghegan  
Assistant Director - Planning and Building Control

**Applicant: UTL Ltd** 19/2519/F  
Site Address: 28 Court Yard, Eltham, SE9 5QB  
Development: Retrospective change of use from 2 Decurs Surgery (Class D1) to a 17 bed HMO (See General) including the provision of refuse store.  
Conservation Area: Eltham Palace

**Applicant: Mr P Yiasoumi** 19/2546/HO  
Site Address: White Lodge, Westbrook Road, Kidbrooke, London, SE3 3LL  
Development: Excavation to create a basement including the creation of a lightwell, creation of an external staircase, demolition of existing single storey side extension and construction of a part one/just two part three storey side extension, replacement of two front roof lights and three rear roof lights, installation of a new rear roof light, replacement of rear ground floor window to create door and other external alterations.  
Conservation Area: Blackheath

**Applicant: Mrs Pittom** 19/2574/HO  
Site Address: 23 Hardy Road, Blackheath, London, SE3 7NS

### Planning and Compulsory Purchase Act 2004 Town and Country Planning (Local Planning) (England) Regulations 2012

The Royal Borough of Greenwich is inviting public representations on the Site Allocations Local Plan Preferred Approach (Regulation 18 Draft). This document will support the existing Core Strategy policies and provide additional detail on specific sites that will help to deliver the Core Strategy's priorities.

The consultation is open for 8 weeks from Friday 16th August 2019 to Friday 11th October 2019 and can be viewed:  
• on the Royal Borough's website at [www.royalgreenwich.gov.uk/consultation](http://www.royalgreenwich.gov.uk/consultation)  
• for reference in all of Royal Greenwich's libraries: <http://www.royalgreenwich.gov.uk/directory/26/libraries>

Comments should be made via the survey form at [www.royalgreenwich.gov.uk/consultation](http://www.royalgreenwich.gov.uk/consultation) or by email to [PlanningPolicy@royalgreenwich.gov.uk](mailto:PlanningPolicy@royalgreenwich.gov.uk) or by post to The Royal Borough of Greenwich, Planning Policy Team, 5th Floor, The Woolwich Centre, 35 Wellington Street, Woolwich, London SE18 4HQ by Friday 11th October 2019.


All representations will be taken into consideration and a summary of the comments received will be made public.



1. The Royal Borough of Greenwich makes this Order in exercise of powers under section 14(1) of the Road Traffic Regulation Act 1984. This is to facilitate works by Thames Water who need to carry out Water Main Repair.
2. The Order will come into operation on 19th August 2019 and would continue to be valid for 18 months. However the works are expected to take 3 days. The duration of the Order can be extended with the approval of the Secretary of State for Transport.
3. The effect of the Order would be to temporarily prohibit vehicles from entering, exiting, proceeding or waiting (including waiting for the purposes of loading or unloading) in Team Road outside number 44, as well as to prevent waiting (including waiting for the purposes of loading or unloading) between numbers 40 – 50 on both sides of the road and to remove the current one way prohibition and make this road two way for the duration of the works.
4. Whilst the Order is in operation traffic will be diverted via Plumstead Common Road and Erskine Terrace. Prohibitions remain in force, pedestrians are not affected and vehicle access will be maintained wherever possible.
5. Nothing in this Notice will apply to anything done with the permission or at the direction of a police constable in uniform or traffic warden, to emergency service vehicles, or to vehicles being used in connection with the works.
6. The restrictions described above will apply only during such times and to such extent as shall be indicated by traffic signs as prescribed by the Traffic Signs Regulations and General Directions 2016.
7. All enquiries concerning these works should be directed to the Royal Borough of Greenwich's Neighbourhood of Neighbourhood.




## Facebook

**Royal Borough of Greenwich**  
16 August 2019 · 🌐

As part of the overall planning policies for the borough, site allocations provide specific guidance and requirements for development on specific sites. These ensure that development meets the needs of the borough, and we are looking for your feedback on our preferred approach.

You can view the document and respond here: [royalgreenwich.gov.uk/haveyoursay](https://royalgreenwich.gov.uk/haveyoursay) or email [planning.policy@royalgreenwich.gov.uk](mailto:planning.policy@royalgreenwich.gov.uk).

  
ROYALGREENWICH.GOV.UK  
**Have your say | Royal Borough of Greenwich**  
Details of Royal Borough of Greenwich consultations...

## Twitter

**Royal Greenwich** ✓ · 20 Sep 2019

Planning Site Allocations provide guidance for developers, planners and residents regarding what should be built on specific sites to serve the overall needs of the borough. Have your say on our preferred approach here: [royalgreenwich.gov.uk/haveyoursay](https://royalgreenwich.gov.uk/haveyoursay)



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## Public Notice

### NOTICE OF CONSULTATION

#### SITE ALLOCATIONS LOCAL PLAN PREFERRED APPROACH (REGULATION 18 DRAFT)

**Planning and Compulsory Purchase Act 2004**

**Town and Country Planning (Local Planning) (England) Regulations 2012**

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The Royal Borough of Greenwich is inviting public representations on the Site Allocations Local Plan Preferred Approach (Regulation 18 Draft). This document will support the existing Core Strategy policies and provide additional detail on specific sites that will help to deliver the Core Strategy's priorities.

The consultation is open for 8 weeks from **Friday 16<sup>th</sup> August 2019** to **Friday 11<sup>th</sup> October 2019** and can be viewed:

- on the Royal Borough's website at [www.royalgreenwich.gov.uk/haveyoursay](http://www.royalgreenwich.gov.uk/haveyoursay)
- For reference in all of Royal Greenwich's libraries:  
<https://www.royalgreenwich.gov.uk/directory/26/libraries>

Comments should be made via the survey form at [www.royalgreenwich.gov.uk/haveyoursay](http://www.royalgreenwich.gov.uk/haveyoursay), by email to [Planning.Policy@royalgreenwich.gov.uk](mailto:Planning.Policy@royalgreenwich.gov.uk) or by post to The Royal Borough of Greenwich, Planning Policy Team, 5<sup>th</sup> Floor, The Woolwich Centre, 35 Wellington Street, Woolwich, London SE18 6HQ by **Friday 11<sup>th</sup> October 2019**.

All representations will be taken into consideration and a summary of the comments received will be made public.

## Appendix B Representations received and RBG response

Agent	Name	Category	Area	Site	Summary of Response	RBG response
	TfL	Specific consultation body	All	All	<p>The approach taken at individual sites should reflect the Healthy Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car, in order to achieve sustainable growth.</p> <p>New developments need to be planned around space-efficient modes of transport. Site requirements and development guidelines should prioritise walking, cycling and using public transport in the location and design of new development and associated public realm.</p> <p>A shift to sustainable modes, reductions in both road danger and environmental impacts, and growth in Greenwich all need to be supported by appropriate investment in public transport and active travel.</p>	The allocations have been drafted to incorporate the principles of the Mayor's Healthy Streets Approach and Vision Zero, and prioritise active transport and public transport and seek to reduce or eliminate reliance on private vehicles. Where relevant, the allocations have focused on increasing permeability and prioritising pedestrian and cycling connections to town centres and public transport nodes. The allocations also, where relevant, include the provision of essential public transport infrastructure.
	Thames Water	Specific Consultation Body	All		<p>It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to consider phasing.</p> <p>On the following sites the scale of development is likely to require upgrades of the water supply network infrastructure: CR1, CR2, CR3, E2, GC1, GP1, GP2, GP3, GP4, GP5, K1, K2, K3, K4, K5, T1, T2, T3, T4, T6, W1, W2, W3, W4, W6, W7, W9, W11</p> <p>We do not envisage concerns regarding water treatment capacity in relation to the following sites: E1, E3, P1, P2, P3, P4, T5, T7, W5, W10, W12</p>	The relevant allocations have been amended to reflect likely requirement for upgrades to the capacity of the water supply network to support the demand anticipated from the allocations, and the requirement to liaise with Thames Water when developing proposals.
	Thames Water	Specific Consultation Body	All		<p>The wastewater network capacity in this area is unlikely to be able to support the demand anticipated from the development of the following sites: CR2, GC1, GP1, GP2, GP3, GP4, GP5, K2, K3, K4, P3, T1, T2, T3, T4, T5, T6, W4, W11, W7, W12</p> <p>Strategic drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development.</p> <p>Where there is a wastewater network capacity constraint the developer should liaise with Thames Water and provide a detailed drainage strategy with the planning application, informing what infrastructure is required, where, when and how it will be delivered.</p> <p>We do not envisage infrastructure concerns regarding waste water infrastructure capacity in relation to the following sites: CR1, CR3, CR4, E1, E2, E3, K1, K5, P1, P2, P4, T7, W1, W2, W3, W5, W6, W8, W9, W10</p>	The relevant allocations have been amended to reflect likely requirement for upgrades to the capacity of the wastewater network to support the demand anticipated from the allocations, and the requirement to liaise with Thames Water when developing proposals.

Avison Young	UKI Charlton Limited	Developer/Landowner	Charlton Riverside	CRI	UKI Charlton Limited is a privately-owned real estate investor and is the sole freehold owner of the Site. The draft site allocation is supported in principle.	Ownership has been corrected.
Avison Young	UKI Charlton Limited	Developer/Landowner	Charlton Riverside	CRI	Reference to the existing land use and the Site becoming surplus to requirements should be removed to avoid the draft allocation precluding the future redevelopment of the Site and the delivery of the associated planning benefits.	MPS has confirmed that the site is a current in use as a key police facility which is essential to policing in London. As essential infrastructure supporting the emergency services, alternative use of the site is only appropriate should the MPS consider it surplus to requirements. The proposed allocation is sufficiently flexible to ensure that should the site become surplus to MPS requirements, it can be brought forward for alternative use without undue delay.
Avison Young	UKI Charlton Limited	Developer/Landowner	Charlton Riverside	CRI	The site allocation should be updated to provide residential-led, mixed use development including an element of BI to reflect the importance of delivering residential floorspace on this strategic Site and the limited suitability of the Site for intensive employment use. Since the ELR was published the Site's context has become significantly more residential in nature, through the comprehensive residential led redevelopment of the previous industrial warehouses to the north of the Site at Victoria Way. Given the Site's predominantly residential context and limitations in terms of access through residential streets a more appropriate use for the site would be mixed use residential including the provision of BI floorspace as proposed by the draft site allocation. It is important that any potential future redevelopment will be appropriate and not cause any potential conflicts with the neighbouring existing residential properties. As such, it is suggested that the proposed allocation should be updated to provide residential-led, mixed use development including an element of BI floorspace. This amendment would reflect the great importance that the NPPF attaches to significantly boosting the supply of new housing.	Local Plan and London Plan policies require that where there are employment/industrial uses on a site that the employment/industrial role of the site is retained as part of any redevelopment. The allocation has been updated to reflect the potential for co-location of industrial and residential uses, as set out in the new London Plan, and to clarify that E-class office uses are not generally suitable on sites outside town centres.
Avison Young	UKI Charlton Limited	Developer/Landowner	Charlton Riverside	CRI	The current, prescriptive design guidance should be amended to provide flexibility and to enable a comprehensive design led approach to be pursued focused on creating an integrated masterplan for the entire Site based on the provision of a mix of uses including new homes, employment floorspace and community focused accommodation together with high quality open space and public realm which is available to the existing community and new residents alike. It is not clear whether the Council has undertaken a design assessment in relation to the Site on which to base the proposed restrictions in terms of lower and mid-rise (4-6 storeys) buildings. The topography of the Site, which in some areas includes levels approximately 6 storeys below adjacent ridge heights, presents the opportunity to provide additional new homes and accommodation. Furthermore, the Site	The allocation has been updated to refer to the topography of the site. The London Plan requires a design-led approach to determining the optimum development capacity of sites that responds to a site's context and capacity for growth and encourages boroughs to set out acceptable building heights, scale massing and indicative layouts for allocated sites. As set out in Policy D2 of the London Plan, density should be linked to the provision of future planned levels of infrastructure and be proportionate to the site's connectivity. The design guidelines set out in the allocation in terms of use, scale and massing have taken into account the surrounding built form, uses and character (including the likelihood of change of these factors) as well the capacity for growth.

					benefits from generous separation distances from neighbouring residential uses created by the A102 to the west and the railway lines to the east. The Victoria Way development to the north of the Site has buildings of up to 10 storeys.	
Avison Young	UKI Charlton Limited	Developer/Landowner	Charlton Riverside	CRI	The draft site allocation also suggests that <i>“If residential is proposed, the layout should be orientated away from the A102 and designed to protect the amenity of new residents, ensuring sufficient privacy and adequate outlook”</i> . It is suggested that this wording is removed, as residential quality and amenity are both controlled through existing adopted planning policy. This includes Core Strategy policy H5, which sets a number of detailed requirements in relation to housing design and states that any new residential development will be expected to achieve a high quality of housing design and an integrated environment.	The western side of the site is exposed to severe noise levels from the adjacent A102, which also contributes to poor air quality issues. The constraints associated with the A102, and also with the railway which forms the boundary of the other two sites of the site, are most effectively addressed through a combination of layout and detailed mitigation measures.
Avison Young	UKI Charlton Limited	Developer/Landowner	Charlton Riverside	CRI	The requirement to locate employment and residential floorspace separately should be removed as this is contrary to the objectives of the draft London Plan and reduces the potential for the intensification of the Site to provide the maximum quantum of sustainable development. London Plan Draft Policy E7 sets a number of design mitigation measures that any mixed use developments are required to provide to ensure that no future conflicts between the proposed uses will arise. The draft allocation notes that the employment uses can be located adjacent to the A102 to provide a buffer between the road and any residential development. Any impacts of the A102 on future residential development are controlled by existing planning policies and will only be accepted by the Council where the relevant technical evidence is provided to demonstrate that the proposed use is appropriate.	The allocation has been updated to reflect the potential for co-location of industrial and residential uses, as set out in the new London Plan, and to clarify that E-class office uses are not generally suitable on sites outside town centres.
Avison Young	UKI Charlton Limited	Developer/Landowner	Charlton Riverside	CRI	The SINC located to the north of the Site should be included within the draft site allocation as any potential nature conservation benefit associated with the low quality SINC is limited and there is an opportunity to secure a package of ecological and environmental betterment as part of any potential future redevelopment of the site subject to future environmental assessments.	It is unclear how including the SINC within the site boundary would secure its enhancement.
Avison Young	UKI Charlton Limited	Developer/Landowner	Charlton Riverside	CRI	The delivery timescales should be updated to short/medium term to reflect the deliverability of the Site, whilst the ownership information	Ownership information has been corrected.

					should be updated to refer to UKI Charlton and Network Rail rather than the Metropolitan Police.	
Lam be rt Smith Hampt on	Metropolit an Police Service	General consultation body - regional	Charlton Riversid e	CR1	The site is a key police facility which is essential to policing in London. The site has been in use as a car pound for the Metropolitan Police Service (MPS) for a significant period of time and there is no intention to cease the use or relocate it. As part of the emerging Site Allocations Preferred Approach August 2019, the site is proposed to be allocated for residential and employment (B1) uses, subject to the car pound becoming a surplus requirement (as put forward on pages 25 to 27 of the SAPA) under site allocation ref. CR1 Angerstein Triangle. The MPS note that the policy is worded so as to make it clear that any alternative use of the site would only happen if MPS were to vacate the site. The policy is considered to be acceptable on the basis that this is made clear.	Support noted. The proposed allocation has been clarified that alternative use of the site is subject to the car pound becoming surplus to MPS requirements.
		Individual	Charlton Riversid e	CR1	Agree with the proposals. More housing that fits into the area would be nice and would also help to merge the divide across the borough. Aesthetics are key so integration of greenery, gardens are key to enhance more green.	Support noted.
	GLA	Specific Consultation Body	Charlton Riversid e	CR1	This site is industrial in nature. In line with draft London Plan E1, B1(a) offices should be directed to town centres. This is not a sustainable location for offices and the site allocation should clearly state B1(a) is not appropriate. Employment use on this site should be informed by local evidence. The Mayor's evidence suggests greatest demand for B8 capacity across London. If traffic movements are an issue, Greenwich should demonstrate where this industrial capacity will be re-provided in a suitable location elsewhere in the borough. In line with draft London Plan policy E7, the Mayor would support B1(c), B2, B8 co-location with residential use. The Mayor supports enhancements to the SINC.	The allocation has been updated to reflect the potential for co-location of industrial and residential uses, as set out in the new London Plan, and to clarify that E-class office uses are not generally suitable on sites outside town centres.
	TfL	Specific Consultation Body	Charlton Riversid e	CR1	We strongly support development guidelines to minimise car parking provision within the site and reference to promoting walking, cycling and public transport use. To improve the PTAL in the development site and enable sustainable travel, a new pedestrian and cycle link such as a bridge or subway could be developed at the northwest corner to improve access to Westcombe Park station.	Support noted. The indicative development capacity of the site is unlikely to be able to support a new pedestrian/cycle link over the A102 to Westcombe Park station.
Quod	Leopard Guernsey Anchor Propco Limited	Developer/ Landowner	Charlton Riversid e	CR2	Leopard support the principle of residential led mixed-use development at Charlton Riverside, in accordance with policy EA2 of the Royal Greenwich Local Plan. Leopard recognise that the principles for the regeneration of the area are set out in the Development Plan. There is significant consistency between the proposed draft and the Development Plan Policies but there are 3 areas on which Leopard	Neither the draft allocation or Policy EA2 of the Core Strategy are based on 'residential-led' development at Charlton Riverside.

					wish to make representations – areas where it is considered that the current draft departs from the strategic direction provided by the Development Plan and, consequently, is not sound.	
Quod	Leopard Guernsey Anchor Propco Limited	Developer/ Landowner	Charlton Riverside	CR2	<p>Consider that the London Plan opportunity area guidance and Local Plan Policy EA1 and EA2 provide the strategic policy direction, and that the emphasis is on residential-led development whilst shrinking the employment footprint, maintaining the number of jobs but changing the nature of employment. This emphasis is not apparent in the draft Site Allocations Local Plan which appears to place a greater emphasis on employment development, in particular:</p> <ul style="list-style-type: none"> <li>- elements of the draft create the impression that employment may be the predominant use, notwithstanding the terms of the London Plan and the Local Plan (paragraph 3.5 and page 29);</li> <li>- proposals are expected to provide as a minimum the equivalent amount of B-use floorspace, directly contrary to the Local Plan requirement that employment land will reduce to enable residential led regeneration (page 32/33);</li> <li>- the draft suggests that employment provision should not be restricted to ground floor uses with residential over because this may compromise the employment activity (page 32/33) – such an approach is directly at odds with the Local Plan requirement to consolidate employment uses, reduce their footprint and optimise residential development;</li> <li>- the draft requires s.106 obligations to provide relocation support (page 33) – notwithstanding the lack of any such requirement in the Local Plan and the indication in the Local Plan (at paragraph 4.2.6) that it is the Council which will support relocating businesses; and</li> <li>- the draft seeks to retain the current employment strengths of the area (page 33) - notwithstanding the clear expectation in the Local Plan that existing employment types should relocate to bring about a change in the type of employment (Local Plan paragraphs 4.2.5 and 4.2.8).</li> </ul> <p>In combination these requirements hold the potential to frustrate delivery of the strategic objectives of the Local Plan and London Plan</p>	<p>The strategic objectives for the Charlton Riverside area, as set out in the Core Strategy, are not based on 'residential-led' development. Since the adoption of the Core Strategy, new evidence base on the demand for employment/industrial floorspace has been published at the regional level (to inform the new London Plan) and at the local level (to inform the Charlton Riverside SPD, adopted in 2017). The evidence suggests the need for a range of industrial uses within the (former) B1(c), B2 and B8 use classes. The allocation has been updated to reflect the potential for co-location of industrial and residential uses, as set out in the new London Plan, and to clarify that E-class office uses are not generally suitable on sites outside town centres.</p>

Quod	Leopard Guernsey Anchor Propco Limited	Developer/ Landowner	Charlton Riverside	CR2	<p>Development Guidelines suggest that piecemeal development based on land ownerships will not be acceptable. In practice, however:</p> <ul style="list-style-type: none"> <li>- A number of land ownership parcels exist which are capable of individual development whilst respecting the vision for the regeneration of the wider area established in the strategic plan and the Local Plan; and</li> <li>- Given the long-standing designation of the Charlton Riverside Opportunity Area for regeneration, and the lack of progress made so far, there is an urgent need to facilitate rather than restrict development.</li> </ul> <p>Consider current drafting could hinder delivery and is not effective for soundness purposes. It would also be helpful if the draft Site Allocations Local Plan could clarify its relationship with the Charlton Riverside SPD which contains no comparable requirement.</p>	The allocation does not preclude development coming forward in phases. While land parcels within the allocation may come forward individually, to ensure that the optimum development capacity is achieved within the constraints of the site, the site must be planned in a comprehensive manner that does not prejudice the future of existing businesses and employment uses on the site. To ensure that earlier phases do not prejudice the delivery of later phases, all phases must be developed within the context of the site wide requirements and guidelines.
Quod	Leopard Guernsey Anchor Propco Limited	Developer/ Landowner	Charlton Riverside	CR2	<p>It is common ground that the east-west route from Anchor and Hope Lane is an important element of infrastructure necessary to unlock regeneration of the wider area. Leopard's proposals will help deliver the first phase of the east-west route.</p> <p>Detailed engagement with RBG and TfL has confirmed the suitability of Leopard's proposals for the east-west link, within a 24m corridor. It is not understood why the draft plan requires the safeguarding of a minimum corridor width of 35m which is unnecessary and the effect of which would be to sterilise important regeneration. This requirement is not justified or effective.</p>	The width of the street corridor referred to in the Development Guidelines has been changed to 25m.
Carter Jonas	London Homebuilding Partnership LLP (Hyde)	Developer/ Landowner	Charlton Riverside	CR2	<p>Comments are made in the context of Hyde's significant landholding within the Charlton Riverside Opportunity Area. In general terms Hyde strongly supports the proposed allocation for a mix of uses in the area and is pleased to continue its working relationship with RBG in order to facilitate new employment space and homes at this important strategic site. In particular, Hyde support the justification behind the allocation, which recognises that there is, "...significant potential to make more efficient use of the site, intensifying employment use and introducing a substantial amount of residential." However, it is important to focus on some specific issues set out below to ensure that deliverable and viable schemes can come forward on this strategically important site.</p>	Support noted.



Carter Jonas	London Homebuilding Partnership LLP (Hyde)	Developer/Landowner	Charlton Riverside	CR2	The twelfth bullet point in the Site Requirements section states explicitly that the development should be predominantly be mid-rise and makes reference to 3-8 storeys with taller elements identified at nodes of activity along the riverfront. Whilst guidance in terms of the suggested heights can be helpful, we do object to the specific reference of heights in the text of the document. There are a number of factors that should guide the appropriate height in these locations – not least, good design - and we consider that height should be explored in more detail as part of the detailed planning application process, which can consider proposals in their context and with site specific constraints in mind. We would contend that specific height restrictions and references should be avoided in this Site Allocations document.	The London Plan requires a design-led approach to determining the optimum development capacity of sites that responds to a site's context and capacity for growth and encourages boroughs to set out acceptable building heights, scale massing and indicative layouts for allocated sites. The allocations have been informed by a design led approach, including area wide capacity studies undertaken as part of the preparation of supplementary guidance for the Strategic Development Locations in the Core Strategy. As set out in Policy D2 of the London Plan, density should be linked to the provision of future planned levels of infrastructure and be proportionate to the site's connectivity. The design guidelines set out in the allocation in terms of use, scale and massing have taken into account the surrounding built form, uses and character (including the likelihood of change of these factors) as well the capacity for growth.
Carter Jonas	London Homebuilding Partnership LLP (Hyde)	Developer/Landowner	Charlton Riverside	CR2	The wording in the first two paragraphs of the Development Guidelines section appear to contradict each other. Hyde is supportive of an approach which ensures detailed consideration of the wider master plan area and this has been considered very carefully in their recent planning application submission. However, to state that <i>'piecemeal development based on land ownerships will not be acceptable'</i> is unduly restrictive and will damage the development potential and deliverability of proposals in this location and we would respectfully ask that this wording is removed. There is a need for some well-designed development to come forward to help act as a catalyst for development across the wider area.	The allocation does not preclude development coming forward in phases. While land parcels within the allocation may come forward individually, to ensure that the optimum development capacity is achieved within the constraints of the site, the site must be planned in a comprehensive manner that does not prejudice the future of existing businesses and employment uses on the site. To ensure that earlier phases do not prejudice the delivery of later phases, all phases must be developed within the context of the site wide requirements and guidelines.
Carter Jonas	London Homebuilding Partnership LLP (Hyde)	Developer/Landowner	Charlton Riverside	CR2	It is understood that the site is currently not connected as well as it could be and Hyde support the intention to carefully consider new public transport and walking and cycling infrastructure through the site.	Support noted.

Carter Jonas	London Homebuilding Partnership LLP (Hyde)	Developer/Landowner	Charlton Riverside	CR2	<p>The current wording relating to protected waste sites is confused. The London Plan refers to the release of waste sites as part of a plan-led process and as part of the Core Strategy RBG has specifically allocated this area under Policy EA2, which allocates the sites for designated alternative mixed use development. On the basis that RBG has identified four specific waste sites to meet its waste apportionment requirements and there is clearly a significant amount of capacity in the system to meet RBG's waste requirements over the Local Plan period, it would seem that the specific protection of 'windfall' waste sites with the need for compensatory provision elsewhere suggests a direct conflict with Policy EA2. The Council has not considered the protection of 'windfall' waste sites in the Charlton Riverside SPD (presumably because the capacity already exists with those sites that are specifically protected in the Core Strategy) and therefore it seems that the new draft London Plan which defines waste sites as all sites that have planning permission for waste uses or carry a waste licence, means that this has only been considered latterly. It would seem a good opportunity to remove this restriction as part of the Site Allocations process to provide one less barrier in the way of delivery for regeneration of this vitally important Opportunity Area site, particularly where there is plenty of existing waste and future capacity available in RBG.</p>	Development plan policies protect all sites in existing waste use. The allocation has been clarified regarding the need for compensatory provision to be secured and the options for delivering this.
Carter Jonas	London Homebuilding Partnership LLP (Hyde)	Developer/Landowner	Charlton Riverside	CR2	<p>Hyde also objects to the specific wording in the last paragraph on Page 32 of the document, where it is stated that proposals '<i>will be expected to provide, as a minimum, an equivalent amount of B-use floorspace that is appropriate for local demand in terms of type, specification, use and size.</i>' Whilst Hyde fully supports the continued promotion and importance of employment space in the area, there does need to be some flexibility within this wording to allow realistic and deliverable schemes to come forward. It is possible to design better/smaller spaces that create a higher employment yield and are fit for purpose for the local market, without providing like for like floorspace. Greater flexibility in this wording will allow for more balanced schemes to come forward and will also help RBG meet its housing targets through the efficient use of this brownfield site to maximise the delivery of new and truly affordable homes in the Royal Borough.</p>	In accordance with Local Plan and London Plan policies where there are employment/industrial uses on a site the employment/industrial role of the site is retained as part of any redevelopment. Since the adoption of the Core Strategy, new evidence base on the demand for employment/industrial floorspace has been published at the regional level (to inform the new London Plan) and at the local level (to inform the Charlton Riverside SPD, adopted in 2017). The evidence suggests the need for a range of industrial uses within the B1(c), B2 and B8 use classes. The allocation has been updated to reflect the potential for co-location of industrial and residential uses, as set out in the new London Plan, and to clarify that B1a office uses are not generally suitable on sites outside town centres.

Carter Jonas	London Homebuilding Partnership LLP (Hyde)	Developer/Landowner	Charlton Riverside	CR2	The text in the Site Allocations document states that 'residential units should be dual aspect'. Whilst it is recognised that this is desirable and should be what is aimed for, it is not always possible to provide this across the board and therefore, we would ask that some flexibility is applied in the wording here to ensure that schemes can be delivered in an appropriate manner.	The London Plan, Core Strategy and London Housing SPG set out detailed design guidance for residential development, including that in general residential units should be dual aspect, that north facing single aspects units should be avoided, and that all residential units should be provided with private outside space. The Site Allocations Local Plan carries forward this guidance for all site allocations to ensure that any proposals brought forward provide a satisfactory level of amenity. Ensuring a good quality of residential amenity is particularly important for higher density schemes and/or schemes where the surrounding mix of land uses is varied. No evidence has been provided that proposals cannot meet minimum residential design standards/guidance.
Carter Jonas	London Homebuilding Partnership LLP (Hyde)	Developer/Landowner	Charlton Riverside	CR2	The importance of playspace, greenspace and amenity space is fully supported by Hyde and it is considered that there are significant opportunities across the site to considerably improve the current environment. In particular, there is real opportunity along the riverfront to try and entice existing and future residents in Charlton back to the riverfront.	Support for playspace, greenspace and amenity space noted.
Carter Jonas	London Homebuilding Partnership LLP (Hyde)	Developer/Landowner	Charlton Riverside	CR2	The reference to the riverside being a catalyst for development is really important, but equally it is acknowledged that this needs to be married very carefully with solutions that will support existing industry along the river and close work with the PLA and wharf operators in the vicinity is vital to ensure sustainable futures for all parties.	Reference to the Agent of Change principle in regards to the adjacent SIL and safeguarded wharves has been added to the allocation.
Carter Jonas	London Homebuilding Partnership LLP (Hyde)	Developer/Landowner	Charlton Riverside	CR2	There also appears to be very few references to affordable housing delivery in the draft document. This might be because this is covered by other policies in the Core Strategy, but as a Registered Provider Hyde would fully support the delivery of schemes that can maximise new affordable homes and create sustainable mixed and balanced communities coming forward.	Support for maximum delivery of affordable housing noted.
Carter Jonas	London Homebuilding Partnership LLP (Hyde)	Developer/Landowner	Charlton Riverside	CR2	The reference to small-scale retail/café/leisure uses being appropriate along the Thames is welcome and will help to support a diverse mix of uses across the site, which can respond to the needs of existing employers and future residents at Charlton Riverside.	Support noted.

Firstplan	Angerstein , Murphy's and Riverside Wharves Operators	General consultation body - business	Charlton Riverside	CR2	Note that in two recent applications within CR2 (VIP Trading Estate and Flint Glass Wharf) that there have been challenges due to wharf operations not being considered early enough in design process, and the importance of noise assessments being undertaken in full consultation with wharf operators to ensure all noise sources/activities are appropriately captured. While conditions can go some way to address concerns, issues should be designed out from the being in a proactive way. A clear policy direction at the detailed Site Allocation stage at the detailed Site Allocations stage is critical ensuring that applications have appropriate regard to the requirement to ensure the existing and future operations of the Safeguarded Wharves are not prejudiced. This is something that should be expressly required to be dealt with from pre-application stage and ideally in consultation with the Safeguarded Wharf Operators and the PLA.	The Development Guidelines have been updated to advise that noise assessments are undertaken in full consultation with wharf operators, and emphasise that potential issues identified should be designed out during the process of developing proposals.
Firstplan	Angerstein , Murphy's and Riverside Wharves Operators	General consultation body - business	Charlton Riverside	CR2	Welcome the references to safeguarded wharves under site context and development guidelines. In sub-area 2 Woolwich Road and sub-area 3 West of Anchor and Hope Lane no reference is made to applications having consideration to safeguarded wharves. While this is appropriate for Riverside Wharf as noise associated with this wharf will not be an issue, the low-frequency dredger noise sources at Angerstein/Murphy's Wharves could be an issue for dwellings proposed at height where they would have unobstructed views towards those wharves and this should be highlighted.	The site-wide development guidelines have been updated to highlight that noise from Angerstein/Murphy's Wharf may be an issue for dwellings throughout the area where they would have unobstructed views towards these wharves.
Firstplan	Angerstein , Murphy's and Riverside Wharves Operators	General consultation body - business	Charlton Riverside	CR2	Amendments to development guidelines covering site wide references are proposed: - Inclusion of reference to a sitewide requirement to not prejudice the operational requirements of the Safeguarded Wharves. This can potentially be inserted at end of the second para: ' <i>...This includes not prejudicing the operation of requirement of existing uses and the Safeguarded Riverside, Murphy's and Angerstein Wharves</i> '. - A requirement to engage at an early stage (pre-application) with the Wharf Operators and the PLA particularly to agree how any noise assessment will be undertaken to ensure all activities and noise sources are captured. - A requirement to demonstrate in any application submission how the development proposals have been designed, laid out and mitigated to ensure the operation of the three safeguarded wharves is not prejudiced.	Site requirements have been updated to include requirement to not prejudice operational requirements of wharves, and development guidelines updated to reflect the requirement for early engagement with wharf operators/PLA and how design has responded to potential issues .
Firstplan	Angerstein , Murphy's and	General consultation body - business	Charlton Riverside	CR2	Amendments to development guidelines covering sub-area 1 Riverside are proposed:	Development guidelines amended as per comments.

	Riverside Wharves Operators				- Clarification that requirements to sufficiently safeguard 'nearby wharf operations' is not limited to Riverside Wharf but also includes Angerstein/Murphy's Wharves. This is because the low frequency noise from dredger unloading at these wharves will need to be taken into account in the design of any new development.	
Firstplan	Angerstein, Murphy's and Riverside Wharves Operators	General consultation body - business	Charlton Riverside	CR2	Amendments to development guidelines covering sub-area 2 and 3 are proposed: - Inclusion of reference to the requirement that any application proposals which includes residential dwellings at a height where they would have views to Angerstein and Murphy's Wharves will need to assess the potential for low frequency noise impacts from dredger unloading.	Development guidelines amended as per comments.
	Sport England	General consultation body - national	Charlton Riverside	CR2	It is proposed to provide a large amount of new housing at this site. Sport England recommends that the Council considers carefully how the needs of new residents for sport and recreation provision will be met either on site or at locations close to the site. Sport England, in conjunction with Public Health England, has produced 'Active Design' (October 2015), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. Sport England would commend the use of the guidance in the master planning process for new residential developments. The document can be downloaded via the following link: <a href="http://www.sportengland.org/activedesign">http://www.sportengland.org/activedesign</a>	The development guidelines have been update to include additional guidance on sport and recreation provision, having regard to the principles in 'Active Design' produced by Sport England/Public Health England.
		Individual	Charlton Riverside	CR2	I highly support this proposal. The riverside beyond Greenwich is deeply underutilised and can invigorate the RBG & Woolwich area. Mixed use residential, evening and overall uses would be deeply favourable. The connection from the city of London to Greenwich, then to Woolwich that maximises the river front is vital and key to revitalising the area. The housing would add further richness to the borough. Additionally, the area is highly attractive based on it's industrial, warehouse, artsy vibe. If this was done well, it can become the 'Dumbo and Williamsburg part of London' in reach of the Thames, skyline and waterfront offering. Lastly, if done well, the riverboat if worked well with TFL can create a stop here in the long run that will further support the area.	Support noted.

	CCG	Specific Consultation Body	Charlton Riverside	CR2	Hope the final version identifies a site for new and enhanced health care within the site allocations and evidences how this will be brought forward with contributions from developers from across the site. It must be affordable to the CCG.	The requirement to provide a new healthcare facility in the medium term, and the nature of this facility, has been clarified.
	Environment Agency	Specific Consultation Body	Charlton Riverside	CR2	Site represents an excellent opportunity to improve aquatic biodiversity and improve flood defence with set back intertidal terracing. We would urge you to incorporate this approach in all riverside site allocations.	A new section has been added to the introductory section of the document focusing specifically on riverside sites and setting out common objectives for all of these sites based on opportunities/requirements identified by the EA for riverside sites.
	Environment Agency	Specific Consultation Body	Charlton Riverside	CR2	With respect to groundwater protection, please note that there is an Environment Agency groundwater level observation borehole present within this area, around TQ 413 789. We would wish to correspond with developers at an early stage to preserve this important source of monitoring data.	Site context updated to identify presence of borehole.
	GLA	Specific Consultation Body	Charlton Riverside	CR2	Whilst released from SIL, this site still contains a significant amount of industrial floorspace. The Charlton Riverside and Employment Study 2017 shows low vacancy rates across the area and a demand for a variety of industrial uses. In line with draft London Plan E1, B1(a) offices should be directed to town centres. Overall, this is not a sustainable location for offices. Business use on this site should be informed by the local evidence which suggests the need for a range of industrial uses within the B1(c), B2 and B8 use classes. In line with draft London Plan policy E7, the Mayor would support B1(c), B2, B8 co-location with residential use.	The allocation has been updated to reflect the potential for co-location of industrial and residential uses, as set out in the new London Plan, and to clarify that E-class office uses are not generally suitable on sites outside town centres.
	GLA	Specific Consultation Body	Charlton Riverside	CR2	<p>To ensure no net loss of waste capacity across London, site requirement should be strengthened to state:  “Proposals that impact existing waste sites must identify <b>and appropriately/adequately secure</b> compensatory site provision in an appropriate location that meets the maximum throughput the existing site could have achieved. <b>Existing waste sites can only be redeveloped once compensatory capacity has been re-provided elsewhere and is operational.</b>”</p> <p>and development guidelines should be amended to state:  “Existing waste sites are defined as those with planning permission for a waste use or a permit from the Environment Agency, and are safeguarded by the London Plan and Core Strategy. Proposals affecting existing waste sites that would result in the loss of the waste use from the site will be required to demonstrate satisfactory relocation of the waste site or reprovision of the maximum throughput elsewhere in London, either on a standalone site or <b>through the intensification of an existing waste site with excess capacity.</b>”</p>	The allocation has been updated to incorporate amended wording.

	GLA	Specific Consultation Body	Charlton Riverside	CR2	Given the adjoining SIL, the 24-hour waste site, the aggregates site, the traffic movements to and from the safeguarded wharf and the demand for a range of industrial uses, the Mayor questions whether dispersing residential development throughout the site is appropriate. There should be a strong buffer to the adjoining SIL, in line with draft new London Plan policy E5 as well as to existing waste and aggregates sites. The residential development must avoid conflict with the long-term operation of the wharf, including transport movements to and from the wharf.	Reference to the Agent of Change principle in regards to the adjacent SIL, existing industrial uses and nearby safeguarded wharves has been further strengthened in the allocation, as has the requirement for strong buffers from these uses support for development that does not include residential use in proximity to these uses.
	GLA	Specific Consultation Body	Charlton Riverside	CR2	The Mayor agrees that the intensification of the site will require a holistic improvement to the transport infrastructure of the site creating permeability through the site and improving connections to the riverside and surrounding areas. Likewise, increased residential provision should additionally be supported by the improved provision of physical and social infrastructure such as schools, health care facilities, parks and play spaces.	Support for infrastructure provision noted.
	GLA	Specific Consultation Body	Charlton Riverside	CR2	The site allocation must ensure the long term continued use of the safeguarded Riverside Wharf Tarmac by specifically including the protection of the wharf, providing a buffer to and access to it in the Development Guidelines.	The development guidelines have been updated to clarify the safeguarded status of Riverside Wharf and associated constraints on development in proximity to the wharf.
	PLA	Specific Consultation Body	Charlton Riverside	CR2	The PLA welcomes the references within the site allocation to the Safeguarded Riverside Wharf, noting that this facility operates 24 hours a day, 7 days a week as well as to Angerstein and Murphy's Safeguarded Wharves located to the west of the site allocation. The PLA supports the reference that developers should engage with the PLA and all wharf operators in the vicinity to ensure that the mix of uses and detailed design measures sufficiently safeguarded wharf operations. Reference must specifically be given to the Agent of Change Principle and Riverside, Angerstein and Murphy's Wharves.	Support noted. The allocation has been amended to refer to the Agent of Change principle and early engagement with the PLA and wharf operator.

	PLA	Specific Consultation Body	Charlton Riverside	CR2	Reference must also be made to the use of the nearby Safeguarded Wharves for the delivery of construction materials via the river, rather than by road. The PLA supports the reference to the aspiration for “Direct, legible pedestrian and cycle connections through the site and connecting to Thames path and the residential neighbourhoods to the south of the site.”	Support noted. Reference to the wharves use for the delivery of construction materials has been included in the site context.
	PLA	Specific Consultation Body	Charlton Riverside	CR2	Within the development guidelines section of the allocation, it is noted that careful consideration will need to be given for vehicular access requirements for new and existing BI and industrial uses. The PLA supports this as well as the reference to the need to ensure that 24 hour access is maintained to the Thames Barrier, via Eastmoor Street, including during the demolition and construction stages of the development.	Support noted.
	PLA	Specific Consultation Body	Charlton Riverside	CR2	With regard to the western part of the site allocation (Sub area 3: West of Anchor & Hope Lane) the PLA supports the recognition that the western boundary is made up of the Charlton Riverside West Strategic Industrial Location, and that as a result of this, proposals will need to demonstrate that they do not comprise the integrity or effectiveness of the adjoining industrial areas in accommodating industrial type activities. However this must be amended to specifically to the Safeguarded Wharves reference Angerstein and Murphy’s wharves. Cory’s Barge works facility also located to the within this area of SIL must also be considered.	Support noted. Reference specifically to the wharves and bargeworks facility has been added.
	PLA	Specific Consultation Body	Charlton Riverside	CR2	It is also important that Sub Area (2) (Woolwich Road East) of the allocation also includes reference to all nearby Safeguarded Wharves, as part of the Agent of Change principle, particularly where development proposals in this sub area may result in views of the Safeguarded Wharves to the west.	The site-wide development guidelines have been updated to highlight that noise from Angerstein/Murphy’s Wharf may be an issues for dwellings throughout the area where they would have unobstructed views towards these wharves.
	PLA	Specific Consultation Body	Charlton Riverside	CR2	Under the site requirements section, it is noted that “substantial public transport improvements” are highlighted, including provision of a new east-west road capable of accommodating bus rapid transport. The PLA considers that reference must also be given to the proposed river bus services in this area, as included in the adopted Charlton Riverside Supplementary Planning Document (SPD) (2017).	The allocation requires development to support the delivery of new public transport, walking and cycling infrastructure on the site. While the priority for the site is the delivery of a new east-west bus corridor and walking and cycling routes across the site, there may be potential for the provision of river bus services in the longer term.



	TfL	Specific Consultation Body	Charlton Riverside	CR2	<p>Support the requirement to provide a new east-west road capable of accommodating BRT, introduction of new north-south connections and enhancements to Woolwich Road. This should include walking and cycling facilities. All proposals should also enable a road capable of accommodating buses for safe and efficient operations to the north of the site. Safe conditions for people walking and cycling should be provided on the 'riverside route' along Herringham Road linking to Anchor and Hope Lane.</p> <p>Support the following site development guidelines for:</p> <ul style="list-style-type: none"> <li>• Future building layouts to enable the delivery of new public transport, walking and cycling infrastructure through the area to be based on pedestrian-oriented routes to create legible, well-connected spaces. This will support the provision of direct, legible pedestrian and cycle connections through the site and creating connections to the Thames Path and the residential neighbourhoods to the south of the site and proposals along Woolwich Road to enhance the pedestrian/cycle environment.</li> <li>• Minimum corridor widths to accommodate BRT and recommend further design work to define the minimum width of road.</li> <li>• The primary movement network to extend Herringham Road to connect through to Anchor and Hope Lane . We recommend that this new road is filtered to prevent through traffic and that a short section of the new road connecting Anchor and Hope Lane should be bus, pedestrian and cycle only.</li> <li>• Delivery of a site-wide Controlled Parking Zone (CPZ).</li> <li>• Bus standing and turning facilities, which may need to be provided in the north of the site if developments around Herringham Road come forward. This will enable the provision of a bus service with a bus loop as an interim measure to serve the site until the roads are fully connected.</li> </ul>	Support noted. The allocation has been amended to include reference to the primary route network to the north of the site also accommodating buses, the need for all new routes to include walking/cycling facilities that are safe for users, the potential use of modal filters to prevent through traffic, the requirement for a site wide CPZ and the need to consider provision of bus standing and turning facilities in the northern part of the site as an interim measure to support riverside development prior to delivery of through routes.
	TfL	Specific Consultation Body	Charlton Riverside	CR2	<p>We note the requirement to deliver a substantial net increase in industrial floorspace and would urge careful consideration of how good-quality street environments can be provided for any future residential developments in the area. A masterplanned approach could potentially support this and allow heavier industrial activity to be more separated from residential.</p> <p>The existing wharf should be examined for opportunities to intensify river freight.</p>	The allocation has been strengthened regarding the need to ensure separation between heavier industrial activity and residential use. The existing wharf is outside the allocation, however reference to the Agent of Change principle has been included to ensure that the wharf can operate at its maximum capacity.

	Environment Agency	Specific Consultation Body	Charlton Riverside	CR2-CR3	<p>Development in the proximity of the Thames Barrier should have no impact on our operations and security. We insist that the height of new buildings does not obstruct sightlines from the control tower. We require that our operational area is not overlooked by new neighbours. It is therefore unlikely we would be in support of any building height in the area that is outside the heights specified in the Charlton Riverside Master Plan (10 storeys).</p> <p>The Thames Barrier Park on Eastmoor Street is Environment Agency land and must be safeguarded for future operational use. It cannot be considered by developments as new amenity space. It is unlikely we would support the shared use of the green space that is part of our Estate due to maintenance / responsibility concerns which could impact on our Public Safety Impact Assessment. The text regarding our operational access to the Thames Barrier could be clarified as follows: "The Environment Agency requires that 24hr/365 access to the Thames Barrier via Eastmoor Street is maintained for vehicles / fire engines / HGVs (including cranes)"</p>	Development guidelines amended as per comments to clarify Thames Barrier operational requirements and limitations on use of Thames Barrier Park.
	Environment Agency	Specific Consultation Body	Charlton Riverside	CR2-CR3	<p>Due to the riverside location of the majority of the sites proposed, coupled with the potential for historic contamination from the areas industrial heritage, please note that the scope for infiltration drainage as a sustainable option for surface water drainage is limited. Developers should take this into account when considering options for surface water drainage, as groundwater levels within the chalk are fairly close to the surface in the Charlton Riverside area.</p>	A new section has been added to the introductory section of the document focusing on riverside sites and setting out common objectives for all of these sites based on opportunities/requirements identified by the EA for riverside sites.
	U and I Group PLC	Developer/Landowner	Charlton Riverside	CR3	<p>With the purpose of an allocations document being to identify the key land uses and key issues for individual sites without stifling design flair, it would be helpful if the descriptive text (for all sites) sets out the anticipated delivery content without seeking to establish arbitrary parameters based on untested assessment. For site CR3, it would be helpful for minimum delivery quantum to be set out as necessary to meet identified strategic targets. Important that allocations match up to new London Plan increased targets; this is essential for implementation of the RBG Core Strategy and new London Plan.</p>	The allocations have been informed by a design led approach, including area wide capacity studies undertaken as part of the preparation of supplementary guidance for the Strategic Development Locations in the Core Strategy. The Proposed Submission version of the allocations includes indicative area wide capacities.
	U and I Group PLC	Developer/Landowner	Charlton Riverside	CR3	<p>Allocations need to set out the basis for a development which is both sustainable and viable. To do otherwise sets up the strategic plan for failure. We have indicated in pre-application discussions for the site that the Council's suggested three pillars of no demolitions within the conservation area, no buildings above 10 storeys and 35% affordable housing cannot provide for a viable development. The planning application soon to be submitted will confirm this in more detail in its supporting documentation, and this should be used by RBG as required</p>	No evidence has been submitted as part of the response to the Site Allocations Preferred Approach in regards to the highlighted issues.

					by NPPF and PPG also to inform this plan-making stage. Do not consider the preferred approach should be viewed as viable, and propose rewording.	
	U and I Group PLC	Developer/Landowner	Charlton Riverside	CR3	Consider that there is undue emphasis on 37 Bowater Road rather than on the conservation area as a whole. Wording of allocation should reflect legislation which is 'preserve or enhance' conservation areas, not 'preserve and enhance' as stated in the site requirements.	Since consulting on the Preferred Approach, 37 Bowater Road has been Grade II Listed. The allocation has been updated to reflect the statutory listing, as well as correcting the requirement for development to preserve or enhance the conservation area as set out in the Regulations.
	U and I Group PLC	Developer/Landowner	Charlton Riverside	CR3	It would be appropriate to the allocation to follow HE website guidance which notes that the NPPF sets out decision-making policies using different terminology to the statutory requirements, referring to 'conservation of significance'. Accordingly, the approach to delivery of site CR3 should reflect the desirability of maintaining the significance of the area through management of change which either preserves or enhances the character and appearance of the locality rather than identify the outcome for any particular locally listed building as a key measure of acceptability in heritage terms. Consider that the current wording does not meet the statutory requirement nor the appropriate response to NPPF requirements.	Since consulting on the Preferred Approach, 37 Bowater Road has been Grade II Listed. The allocation has been updated to reflect the statutory listing, as well as correcting the requirement for development to preserve or enhance the conservation area as set out in the Regulations.
	U and I Group PLC	Developer/Landowner	Charlton Riverside	CR3	Policy DH2 of the Core Strategy notes that Charlton Riverside is one of the identified locations where tall buildings may be appropriate. This should be recorded in the policy context description.	The London Plan requires a design-led approach to determining the optimum development capacity of sites that responds to a site's context and capacity for growth and encourages boroughs to set out acceptable building heights, scale massing and indicative layouts for allocated sites. The allocations have been informed by a design led approach, including area wide capacity studies undertaken as part of the preparation of supplementary guidance for the Strategic Development Locations in the Core Strategy. As set out in Policy D2 of the London Plan, density should be linked to the provision of future planned levels of infrastructure and be proportionate to the site's connectivity. The design guidelines set out in the allocation in terms of use, scale and massing have taken into account the surrounding built form, uses and character (including the likelihood of change of these factors) as well the capacity for growth. Where tall buildings may be an appropriate form of development, this is included in the allocation; this site is not suitable for tall buildings.
	U and I Group PLC	Developer/Landowner	Charlton Riverside	CR3	The site is capable of early implementation as evidenced by the imminent planning application and should be categorised as 'short term'.	Noted.

	U and I Group PLC	Developer/Landowner	Charlton Riverside	CR3	Site requirements should identify the need for significant housing delivery as a main component of the mixed-use development requirement.	The strategic objectives for the Charlton Riverside area, as set out in the Core Strategy, are not based on 'residential-led' development or significant housing delivery at this site. Since the adoption of the Core Strategy, new evidence base on the demand for employment/industrial floorspace has been published at the regional level (to inform the new London Plan) and at the local level (to inform the Charlton Riverside SPD, adopted in 2017). The evidence suggests the need for a range of industrial uses within the B1(c), B2 and B8 use classes. The allocation has been updated to reflect the potential for co-location of industrial and residential uses, as set out in the new London Plan, and to clarify that B1a office uses are not generally suitable on sites outside town centres.
	U and I Group PLC	Developer/Landowner	Charlton Riverside	CR3	It may be necessary to incorporate further changes to reflect the preparation and adoption of the new London Plan as required by section 38(5) of the PCPA 2004 - <i>"if a policy contained in a development plan for an area conflicts with another policy in the development plan, the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approved or published"</i> .	Section 38(5) of the PCPA 2004 refers to decision-taking. The assessment of general conformity with the London Plan is one of the soundness tests for Local Plans in London, and this will be assessed as part of the Examination Process.
		Individual	Charlton Riverside	CR3	Same as above. I strongly support the site and area. The area is rich and not too typical for the riverside. The area again can be the Williamsburg and Dumbo of London as in New York due to the Warehouse, artsy and industrial vibe. Shoreditch comes to Woolwich. If done well, this can bring an even richer sense to the borough to connect the industrial, diversity, artsy, and interesting areas to the borough. Please see link here of what other cities have done with this type of space and industrial set-up.	Support noted.
	Environment Agency	Specific Consultation Body	Charlton Riverside	CR3	The site requirements section refers to <b>"New</b> public open space connecting to Eastmoor Street Park". We ask that this be amended to emphasise that the green space that is our land must be safeguarded for future operational use and cannot be considered by developments as new public open space connecting to Eastmoor Street amenity space..	Development guidelines amended as per comments to clarify Thames Barrier operational requirements and limitations on use of Thames Barrier Park.
	GLA	Specific Consultation Body	Charlton Riverside	CR3	This site is industrial in nature. In line with draft London Plan E1, B1(a) offices should be directed to town centres. Overall, this is not a sustainable location for offices and the site allocation should clearly state B1(a) is not appropriate. Employment use on this site should be informed by the local evidence which shows a demand for a variety of industrial uses. The Mayor's evidence suggests greatest demand for B8 capacity across London. In line with draft London Plan policy E7, the Mayor would support B1(c), B2, B8 co-location with residential use. The site allocation should reference the Agent of Change to protect	The allocation has been updated to reflect the potential for co-location of industrial and residential uses and the Agent of Change Principle, as set out in the new London Plan, and to clarify that B1a office uses are not generally suitable on sites outside town centres.

					existing industrial uses on the site and adjoining sites, including those in the SIL.Design can also be used to minimise the impact of noise and air pollution on new residents and workers.	
	TfL	Specific Consultation Body	Charlton Riverside	CR3	There are opportunities to improve the public transport connectivity of the site (including PTAL) through financial and/or in-kind contributions, which could also improve access to site CR2.	Noted.
Firstplan	Angerstein , Murphy's and Riverside Wharves Operators	General consultation body - business	Charlton Riverside/ Greenwich Peninsula		One third of all of London's primary aggregate needs comes through the Greenwich Wharves. They are strategically critical and irreplaceable – something recognised at national, London and local plan policy level. The three wharves are safeguarded by Ministerial Direction and there is no prospect that this will change in the foreseeable future. Jointly the Operators run a number of aggregate related industrial operations from the three Safeguarded Wharves as follows - Aggregate Industries and Cemex operate from Angerstein Wharf, Day Group operates from Murphy's Wharf, Tarmac operates from Murphy's Wharf and Riverside Wharf. Background information relates to how wharves currently operate, policy context for safeguarded wharves and experience to date of Operators in ensuring their operations are not prejudiced by development in proximity to wharves.	Background, policy context and operator experience noted.
Firstplan	Angerstein , Murphy's and Riverside Wharves Operators	General consultation body - business	Charlton Riverside/ Greenwich Peninsula		The Site Allocations document should provide clear guidance to land owners and developers who may bring forward development proposals in the areas identified of the issues to be considered by development in proximity to the Safeguarded Wharves and the need to engage at an early stage in the preparation of development proposals with both the Wharf Operators and the Port of London Authority (PLA). If proposals within the proposed Site Allocation areas are not appropriately designed, laid out, mitigated and controlled by condition they have the potential to introduce noise sensitive uses in close proximity to three Safeguarded Wharves which could give rise to complaints from the new residents. This could ultimately result in the curtailment of activities on the Wharves.	The Development Guidelines have been updated to reflect the requirement for engagement with both wharf operators and the PLA at an early stage of developing proposals.
	Cllr Spencer Drury	Cllr	Eltham	EI	Oppose the inclusion of this site as it provides a meeting place for local residents particularly older people. There is no indication Mecca Bingo want to sell the site and if the council bought the site this would be a poor use of public money.	It is considered that existing policies provide sufficient guidance regarding development of the site and it has been removed from the Site Allocations document.

Savills	Bellfower Group Ltd	Developer/ Landowner	Eltham	EI	Support the designation of the site for residential use. Agree with the scale and massing proposed. Object to the need to set the building back from the MOL and school boundary as this is too prescriptive. The impact on openness is not just down to the buildings location but its height, scale and massing and the impact on the school is also dependent upon room layouts, orientation and location. Object to the requirement for all dual aspect units, this is not in line with the guidance in GLA Housing SPD. No objection to minimising car parking and having a car free development. The wording changes proposed will ensure that the allocation allows a suitable amount of freedom for architects to optimise development potential.	It is considered that existing policies provide sufficient guidance regarding development of the site and it has been removed from the Site Allocations document.
	Eltham Society	General consultation body - residents group	Eltham	EI	Mecca Bingo Hall remains an important community facility, whilst bingo halls are not protected by the Core Strategy it should recognise the importance of buildings which are used by the community. The guidelines for this site are generally supported but any future use should consider the inclusion of community facilities in this area. Car free development suggests the residential development will not be occupied by families who will need a car.	It is considered that existing policies provide sufficient guidance regarding development of the site and it has been removed from the Site Allocations document.
	Old Page Residents Association	General consultation body - residents group	Eltham	EI	There would be local opposition to the loss of this community facility. Any redevelopment should reprovide a community facility if Mecca Bingo are interested. Housing is suitable for the rest of the site but it should be family housing not flats with 50% affordable housing and amenity space should be provided. The development should be 3-4 storeys, 3 storeys at the back and a maximum of 4 at the front. Bricks should be used.	It is considered that existing policies provide sufficient guidance regarding development of the site and it has been removed from the Site Allocations document.
	Cinema Theatre Association	General consultation body - voluntary	Eltham	EI	Strongly oppose this site allocation proposal. Mecca Bingo attracts 2,000 people through the doors each week and the busiest session has about 400 players. Bingo provides an important social benefit to the communities it serves and offers a safe social space. The site allocation should protect the cinema building and its existing D2 use on the grounds that it represents a high quality building with original features and provides a social and community benefit with associated health benefits to women and older people in particular which support the objectives of RBGs Corporate Plan. The building should be added to the local list.	It is considered that existing policies provide sufficient guidance regarding development of the site and it has been removed from the Site Allocations document.
		Individual	Eltham	EI	This needs to be made into housing association or council properties only!! No buying should be made available! The council say about how many are on the waiting list or in temporary accommodation surly this would help??	It is considered that existing policies provide sufficient guidance regarding development of the site and it has been removed from the Site Allocations document.

		Individual	Eltham	EI	I do not agree with any development being more than 4 storeys maximum. It would not be in keeping with the surrounding area and once one high rise development appears it would open the floodgates for a high rise area to develop throughout Eltham.	It is considered that existing policies provide sufficient guidance regarding development of the site and it has been removed from the Site Allocations document.
		Individual	Eltham	EI	I object to this site allocation. The Mecca Bingo provides a valuable service to the local population, particularly the elderly. There is no need for housing in the local area as there are already large amounts, additional housing will put pressure on schools and doctors surgeries. Parking is limited in this area. How will you ensure that there is sufficient parking and the existing services are not put under pressure? Site should be used for educational purposes for adjoining school.	It is considered that existing policies provide sufficient guidance regarding development of the site and it has been removed from the Site Allocations document.
		Individual	Eltham	EI	Object to allocation. New building would lower the value of my property and we will lose our privacy. There are already issues with parking in Kingsground and residents often can't park outside their flats. The two main bus routes down Kingsground also need to be considered - there are two bus stops taking up space which could be for cars!	It is considered that existing policies provide sufficient guidance regarding development of the site and it has been removed from the Site Allocations document.
		Individual	Eltham	EI	Eltham needs to improve its local infrastructure first before increasing the population - especially GPs and frequency of trains which are overcrowded. The proposed height is 3 to 4 storeys which is much taller than surrounding two storey buildings.	It is considered that existing policies provide sufficient guidance regarding development of the site and it has been removed from the Site Allocations document.
		Individual	Eltham	EI	If Mecca decides commercially that the site is under used, it is a business decision. Closure would mean a lack of amenities for elderly people. Too much housing on the site which isn't likely to be affordable. We know there is pressure on parking and you want people to reduce car use but restricting parking spaces for new developments is likely to lead to a huge increase in illegal parking.	It is considered that existing policies provide sufficient guidance regarding development of the site and it has been removed from the Site Allocations document.
		Individual	Eltham	EI	Mecca Bingo provides a well used, popular leisure facility and isn't in imminent danger of closing. To replace this with housing would be to the detriment of the public, taking away another place where people can go to socialise which isn't a pub.	It is considered that existing policies provide sufficient guidance regarding development of the site and it has been removed from the Site Allocations document.
		Individual	Eltham	EI	The site has been a bingo hall since 1967, employ local people and serves approximately 2000 local people each week. Concerned the impact this change of use will have on the community, particularly the elderly and associated health and social issues of isolation. The councils impact report highlights similar concerns.	It is considered that existing policies provide sufficient guidance regarding development of the site and it has been removed from the Site Allocations document.
		Individual	Eltham	EI	There is not the infrastructure to cater for all these homes, schools, doctors, hospitals	It is considered that existing policies provide sufficient guidance regarding development of the site and it has been removed from the Site Allocations document.

		Individual	Eltham	E1	Object to allocation. We don't need more housing or new buildings around here. There are already a lot of people living in this area and we can't even make a GP appointment. For 115 flats and only around 25 car parking spaces is a ridiculous plan, not enough parking for residents as it is. If want people to use public transport have more rental bikes first. We currently have good sunlight into our apartment until sunset from the direction of the Mecca Bingo parking area but it will significantly decrease if a building is built. That will impact our quality of life and is not acceptable.	It is considered that existing policies provide sufficient guidance regarding development of the site and it has been removed from the Site Allocations document.
	Cllr Spencer Drury	Cllr	Eltham	E2	The allocation doesn't reflect that the building in the middle of the site has now been purchased by a property developer wishing to build a hotel. The proposal to reduce car parking for Marks and Spencer should be withdrawn as this may be detrimental to the high street and lead to this shop leaving. Agree with finding suitable alternative for food bank but should do the same for Council depot using the site.	The M&S car park has been removed from the allocation. Since the publication of the Preferred Approach document, the food bank has been relocated.
Brunel Planning	Deco Design and Build LTD	Developer/ Landowner	Eltham	E2	Agree in principle with the allocation for mixed use development, however, would like the wording changed to reflect other town centre uses not just residential. Change 'proposed allocation' and 'site requirements' to say 'Mixed use development appropriate to the town centre at ground floor level, B1 workspace and residential and supporting town centre uses at upper floors'.	The allocation has been amended to reflect that other supporting town centre uses may be appropriate as well as residential.
	Eltham Society	General consultation body - residents group	Eltham	E2	Development Guidelines say that new buildings should create a continuous line along Orangery Lane and that "Mid-rise development of 4-6 stories would generally be appropriate across the site". This suggests a monolithic structure that would be to the detriment of housing in Dobell Road and the listed Orangery. Buildings should be 3-4 storeys in line with inspectors comments at previous appeal. Support the previous applicants proposal for a hotel although still have reservations about the height. Parking at Marks and Spencer's should be retained to ensure continued viability.	The current built form and low intensity of use does not realise the full potential of the site or reflect its town centre location. The proposed scale and massing balances this against the existing site context. The M&S car park has been removed from the allocation.
	Old Page Residents Association	General consultation body - residents group	Eltham	E2	Development should be 3 -4 storeys in line with the surrounding area and as found in the inspectors report at the recent appeal of 10 Orangery Lane. Disappointed the Council car park is not included in the site and that the site is medium to long term rather than short term. We support the Eltham Town Centre Masterplan vision for this site and whilst rationalising the parking may be medium to long term the delivery of housing should be short term as should the delivery of workspace for SME's. The council car park should be used for social housing but the foodbank site should not be used for housing as it is too constricted. We need to take a proactive approach Eltham and deliver the master plan.	There is no redevelopment potential associated with the Orangery or Council carpark and therefore this site has not been included as part of the allocation. The M&S car park has been removed from the allocation.



		Individual	Eltham	E2	A hotel is a joke! With greater austerity on the Horizon with brexit how can a food bank be closed in place of a hotel? Surely there is enough hotels with good transport links around the area! Is this really needed? Housing should always be council only!!	Since the publication of the Preferred Approach document, the food bank has been relocated. The allocation does not require a hotel use on the site, however hotels are an acceptable town centre use and if a proposal for a hotel was forthcoming there would be no in principle objection to this land use. A mix of housing is required in line with Core Strategy policies to create mixed and balanced communities.
		Individual	Eltham	E2	Again I disagree with any development higher than the Marks and Spencer building. The plan incorporates the Marks and Spencer car park but not the Lidl and council car park which means we would lose more car parking spaces and push this out into the local roads. Whatever you think people need their cars and will not or cannot use public transport which isn't very good or safe. If housing is on the site you will always get residents who own at least one car - where will they park. The car parks are full especially at weekends so once again they will force them to park in local roads.	The current built form and low intensity of use does not realise the full potential of the site or reflect its town centre location. The proposed scale and massing balances this against the existing site context. The M&S car park has been removed from the allocation.
		Individual	Eltham	E2	The Development Guidelines suggest mid-rise development of 4-6 stories would be appropriate. This appears to be influenced by the BT building equivalent to 6/7 stories. However the BT building is acknowledged as "an incongruous feature in the townscape which is predominately characterised by buildings of one to four stories. Surely the Development Guidelines should limit developments to 4 stories to reflect the surrounding townscape. The Development Guidelines make no mention of the Roper Street School. It should be included with a requirement to protect the school children from noise and pollution, and safeguard the children from being overlooked in their classrooms and playground.	The current built form and low intensity of use does not realise the full potential of the site or reflect its town centre location. The proposed scale and massing balances this against the existing site context. The allocation has been revised to acknowledge school and seek a reduction in vehicular movement across the site.
		Individual	Eltham	E2	Are their proposals to have another exit and entry road to the new proposed hotel and apartments other than via Archery road on the junction where the school playground sits. If not this would extend the already busy traffic travelling through this junction where school children and parents with younger children cross the road here and also have an impact on local residents who already suffer with cars going to the car parks and also the leisure centre and parents picking and dropping off at school. Also how high is this development going to be it should be sympathetic to the houses which will surround it.	The allocation does not require a hotel use on the site, however hotels are an acceptable town centre use and if a proposal for a hotel was forthcoming there would be no in principle objection to this land use. The M&S car park has been removed from the allocation. The site requirements have been amended to acknowledge school and seek a reduction in vehicular movement across the site.
		Individual	Eltham	E2	There is no reference to Eltham C of E school anywhere in either your "site requirements" or "development guidelines"! Children/parents/carers already have to battle daily with traffic using Archery road as a "rat run" for drivers trying to avoid traffic and lights between Well Hall road and the high street, huge lorries delivering to two of the high streets busiest shops and three car parks! In short,	The M&S car park has been removed from the allocation. The site requirements have been amended to acknowledge the school and seek a reduction in vehicular movement across the site.

					your vision suggests that not only is RBG more than happy to subject its children to road danger and pollution, it also seeks to introduce easy access for people that seek to prey on children, by encouraging developments of 4 -6 storeys, overlooking the school.	
		Individual	Eltham	E2	I am concerned that current hotel proposals do not fully take account of the potential negative impact by this type of development: access issues for delivery and refuse vehicles on a small, single dead end road. It will massively overshadow the listed Orangery building, not enhance it. Orangery Lane is ripe for an innovative development- enhance the retail offering, increase amenity space for residents, expand the night time economy, include a food court, high quality start ups, artisan shops, ROYAL Eltham museum, tourist information, etc. Not good enough every small space filled with a hotel or housing.	The allocation does not require a hotel use on the site, however hotels are an acceptable town centre use and if a proposal for a hotel was forthcoming there would be no in principle objection to this land use. The site allocation requires rationalisation of car parking and access/servicing arrangements across the site as a whole which will reduce vehicle movement. The proposals must significantly enhance the townscape, including the setting for the Grade II* listed Orangery. The current built form and low intensity of use does not realise the full potential of the site or reflect its town centre location. The proposed scale and massing balances this against the existing site context.
		Individual	Eltham	E2	Whatever use is made of this site it must provide car parking for all the residents/visitors, whether it is housing, a hotel or shops. The height of any development should also be in keeping with the area and not allow private gardens, houses etc to be overlooked.	Parking provision will be in line with London Plan policies and car free residential development will be encouraged to reduce car usage. Allocation has been amended to highlight amenity of adjacent occupiers. The M&S car park has been removed from the allocation.
		Individual	Eltham	E2	Support mixed use development but concerned about the impact on the neighbouring area and what might be lost to deliver it i.e. the foodbank and parking.	Since the publication of the Preferred Approach document, the food bank has been relocated. The M&S car park has been removed from the allocation.
		Individual	Eltham	E2	The large lorries are going to be putting children's lives at risk from exhaust fumes. You advocate that you are a council committed to cleaner air. There is already a big risk to children having 2 car parks nearby.	The site requirements have been amended to acknowledge school and seek a reduction in vehicular movement across the site.
		Individual	Eltham	E2	The idea of a hotel on this site is ludicrous. Our concerns are the same as with the previous proposed development; too high, lack of parking, invasive to local neighbours (particularly those in Dobell Road), access problems, safeguarding caused by overlooking of the school and increased pollution. The school is already like an island surrounded a sea of pollution caused by car parks, delivery lorries and main routes through Eltham. Any development here will only increase this problem.	The redevelopment of this site is in line with the 2012 Eltham Masterplan. Since the publication of the Preferred Approach document, the food bank has been relocated. The site requirements have been amended to acknowledge school and seek a reduction in vehicular movement across the site.
		Individual	Eltham	E2	Concern around access to and from the site especially with the multiple junctions and impact on the local school. Development would result in unacceptable levels of pollution in the local school children and there would be an increase in delivery vehicles parking illegally outside of the school while waiting to deliver. A hotel on the site	The M&S car park has been removed from the allocation. The site requirements have been amended to acknowledge school and seek a reduction in vehicular movement across the site.

					would also cause parking issues and issues with the school. Design should not overlook the school.	
	GLA	Specific Consultation Body	Eltham	E2	The provision of BI (a) or BI (c) should be informed by an up to date Local Employment Review. The loss of any B8 floorspace should be compensated for so that there is no net loss of industrial capacity across Greenwich. If traffic movements are an issue, Greenwich should demonstrate where this industrial capacity will be re-provided in a suitable location elsewhere in the borough. The reprovision of car parking should not exceed the car parking standards set out in the draft new London Plan. The Mayor would welcome a car free scheme.	The council depot will be reprovided elsewhere in the borough along with the food bank as required by the policy .There is a need for SME business space in town centres and the SME space provided as part of this site will help to meet this demand. The Eltham Town Centre Masterplan demonstrates a need for SME space in Eltham. The borough-wide Employment Land Review will be updated as part of the Local Plan review.
	Historic England	Specific Consultation Body	Eltham	E2	Recommend that site E2 current inclusion on the Heritage at Risk register should be specified both in the planning designations section and the development guidelines together with an indication that development proposals should seek to address its 'At Risk' condition.	The site does not include 95A Eltham High Street which is on the Heritage at Risk Register therefore cannot require developers to address its condition but the development guidelines have been amended to reflect that 95A is on the heritage at risk register.
	TFL	Specific Consultation Body	Eltham	E2	Strongly disagree with the need to provide sufficient car parking for M&S and allocation should be in line with Draft London Plan parking standards. Would also support improved infrastructure for walking and cycling.	The allocation has been revised to require improvements to cycling infrastructure as well as walking. The M&S car park has been removed from the allocation.
	Cllr Pat Greenwell	Cllr	Eltham	E3	Residents agree with the proposed scale and mass of development and that it should fit into low rise suburban character of area. Some residents are concerned (6-14 Southend Crescent) the effect the business units would have on their quality of life. Residents do not agree with access via Woodcroft Road this a private road residents pay to maintain. Concerns that if no car parking provision is made that residents will still own cars but have nowhere to park them.	The requirement for access via Woodcroft close has been removed from the allocation. London Plan policy encourages car free developments in areas with high PTAL levels such as Eltham to reduce car usage.
	Cllr Spencer Drury	Cllr	Eltham	E3	Agree with proposal if site can be acquired for reasonable price. Pleased document proposes any development is in keeping with the area in terms of size and needs to retain biodiversity and protect listed nature of buildings.	Support noted.

Phase 2 Planning	Quanta Homes & Clarion Housing Group	Developer/Landowner	Eltham	E3	<p>Oppose the re-provision of the existing quantum of floorspace (1000sqm). There is currently approximately 800sqm of useable space with the remainder derelict and unused. It is not just the existing use that is incompatible but any future commercial use because the access to the site is constrained and no longer suitable as likely to result in increased vehicle movements in and out of the site. A previously submitted planning application demonstrated that 1,000sqm of B1 floorspace is not viable. CHG and QH could support the provision of maximum 400sqm of affordable SME workspace and Greenwich Enterprise Board could deliver the workspace and have confirmed 400sqm would employ 30-50 people. The policy is too prescriptive. The policy seeks to secure access from Woodcroft Close, this is a private road held by residents who have made it clear they would not support access. Previous planning application demonstrated car free development is acceptable to the Council alongside 10% disabled and 4 commercial spaces therefore there is no need for alternative access arrangements. Improved pedestrian access to Southend Crescent is supported. Retention of 2-4 Southend Crescent is not supported, these are not designated heritage assets and their replacement was not objected to by the council during previously submitted planning application. The building heights should be more flexible with a mix of 2,3,4 and 5 storeys allowed. The council has no justification or support for requiring biodiversity enhancements and this is not deliverable.</p>	The reprovision of employment floorspace is for SMEs for which there is a demand for in Eltham as set out in the Eltham Town Centre Masterplan. As set out in London Plan and Core Strategy policies any loss of employment floorspace should be replaced, especially considering RBG's status as a 'retain' borough in the Draft London Plan. The building heights are in line with the surrounding character of the area and the biodiversity enhancements are a requirement of policy DH1.
	Eltham Society	General consultation body - residents group	Eltham	E3	Existing 2-4 and 6-14 Southend Crescent should be enhanced by sympathetic development next to it. Agree with replacement of business floorspace and houses rather than flats would be more sympathetic to the area.	Support noted.
	Old Page Residents Association	General consultation body - residents group	Eltham	E3	Support development of this site and support the need to restore 2-4 Southend Crescent ensuring developing is in keeping with the heights of the houses in Woodcroft Close.	Support noted.
		Individual	Eltham	E3	I would like to see most of this site used as a wildlife sanctuary, perhaps with part of it an open space or park. I am content to see some building development on the northern boundary to Eltham High Street; business and/or residential use are both acceptable. Any built environment – business premise or housing to be a similar density and height as adjacent properties. I am most sensitive to the aesthetics, scale and height of any development that might be approved. In particular, the height of any new building should be similar to those immediately adjacent to the site.	The development guidelines are clear that the mass, bulk and scale should not result in an unreasonable loss of privacy for adjacent residents and should be in keeping with the surrounding context.

		Individual	Eltham	E3	Concerned with the proposal because the local infrastructure is not suited to further development; there is already an issue with parking and schools and GPs are already over subscribed. Concerned with how access to any new residential and new businesses would work as Woodcroft Close is a private road and access would need approval from residents. There are safety concerns about the junction at Footscray Road and Southend Crescent. The proposal is not in keeping with the surrounding historical buildings, a scaffolding yard would cause noise pollution for local residents and it is unclear how the biodiversity of the woodland area would be protected.	Comments regarding access noted. The Infrastructure Delivery Plan (IDP) assesses existing infrastructure provision and includes work with providers to understand where future infrastructure is needed based on projected growth. The allocation seeks to retain and enhance local heritage assets and biodiversity in line with Core Strategy policies. It does not propose a scaffolding yard, however a scaffolding yard falls under B8 use class (the current lawful use of the site) and would therefore not need planning permission.
		Individual	Eltham	E3	Parking is a joke, housing not affordable, council places nonexistent and waiting list a joke yet all housing is to buy! The high street looks like a child's Lego toy mix and match, nothing blends well together	London Plan policy encourages car free developments in areas with high PTAL levels such as Eltham. Housing mix will need to be in line with London Plan and Core Strategy policies (minimum of 35% affordable housing) to create mixed and balanced communities.
		Individual	Eltham	E3	Any development should be low rise and no higher than existing buildings on the site. Higher rise buildings would spoil the character of the area and impact on light and outlook for neighbouring residents. Agree with protecting biodiversity, all mature trees should be protected and built around. This site is not suitable for car free development, there are not many families who are car free and any development without adequate parking will exasperate parking pressures in local area.	London Plan policy encourages car free developments in areas with high PTAL levels such as Eltham.
		Individual	Eltham	E3	The 'Development Guidelines' (page 50) in respect of the plot are assumptive in respect of the proposed separation of business and residential areas. The implication that Woodcroft Close was always intended to provide access to any future development is pure speculation. An opening up of the existing gated access via Southend Crescent could develop into a 'rat run. Any residential development must, as stated, be in keeping with the local environment in terms of scale & style. It is inconceivable that any residential development can be considered as car free; adequate parking provision must be considered as failure to do so will no doubt impact on what are already choked surrounding roads due to the displacement effect of the CPZ's to the north, west & east of the site. The section titled 'Notes' (page 51) states that boundary to the south of the site has been extended from the Issues and Options Consultation document to include an undesignated area of vegetation; it is the understanding of a number of local residents that this land does not form part of the Whitewoods site but is in fact owned by an unrelated third party?	London Plan and Core Strategy Policies encourage car free developments in areas with high PTAL levels such as Eltham in line with the NPPF in order to increase sustainable travel. Given the current climate change emergency, it is important to reduce car usage as much as possible. The site boundary has been amended according to land ownership.
		Individual	Eltham	E3	Woodcroft Close is a private road and under no circumstances will access for vehicles or pedestrians be agreed. Any development should	The requirement for access via Woodcroft close has been removed from the allocation. London Plan policy encourages car free

					not be car free as this will exacerbate existing parking problems in the area.	developments in areas with high PTAL levels such as Eltham to reduce car usage.
		Individual	Eltham	E3	Woodcroft Close is a private road and unsuitable for high levels of vehicle movement. The current access point to Whitewoods is not suitable for access either due to the nature of the manually operated controls. This arrangement would not work for increased vehicle movement. There is a narrow passageway directly into the Whitewoods site next to 28/30 Southend Crescent. The house at number 30/32 is unoccupied (ex NHS unit) and appears empty, this could be used at the access point.	The requirement for access via Woodcroft close has been removed from the allocation.
		Individual	Eltham	E3	As I understand it, Whitewoods have not made a planning application, but are currently using the site for B8 (storage and distribution) business use, which could include a scaffolding yard as suggested in the flyer delivered to some properties last week. If this site is to be developed or changed, it raises some concerns for us as property owners - how many of the trees will be removed exposing the site and radically changing the view residents currently enjoy? Residents views should be protected. In previous applications for the sites, the proposed buildings have been far too high and too close to the current properties on Southend Crescent and Woodcroft Close. Buildings in any proposal should be set as far back from current homes as is possible and windows positioned so as to not overlook existing properties. In previous applications, the vegetation and trees on the existing site have also been completely stripped back to very little so this would have removed all privacy for us. We hope this is an issue which can be considered. Under "Site Requirements", it states Residential access to be provided via Woodcroft Close. This implies business access would be from elsewhere. This is a private road and the residents pay for it's maintenance and upkeep, so there are lots of issues here including how developers are going to contribute to the road's maintenance.	The requirement for access via Woodcroft close has been removed from the allocation. The development guidelines are clear that the mass, bulk and scale should not result in an unreasonable loss of privacy for adjacent residents.
		Individual	Eltham	E3	Get the traffic lights in place for the crossing. Sort out the traffic lights timing at the top of the High Street by Christchurch. There are now queues into Footscray Road, queues down the High Street with cars queuing and unable to move out of Blunts Road. Passey Place needs to be monitored more appropriately to ensure that it is truly pedestrian and vehicle free. Please keep looking at the 'top line' roofs of the shops; some have beautiful architecture! We need to keep Eltham independent and unique, We do not want it to be a homogenous copy of Woolwich or Bexleyheath.	Noted.

		Individual	Eltham	E3	<p>There must be sufficient parking allocated for whatever development goes here. It is unacceptable to say that people will use public transport as experience shows that is not the case.</p> <p>Additional Comments: Why does the council persist in saying that car parking isn't required when it is obvious that any current housing without sufficient parking facilities merely pushes the problem onto the neighbouring area. Even if public transport is significantly increased in all areas both at peak times and through the night, people want a car to travel further distances, for shopping etc. and for convenience. A poll of how many of your staff and councillors do not use a car might give you an indication of the scale of the problem you will be creating.</p>	London Plan and Core Strategy Policies encourage car free developments in areas with high PTAL levels such as Eltham in line with the NPPF in order to increase sustainable travel. Given the current climate change emergency, it is important to reduce car usage as much as possible.
		Individual	Eltham	E3	<p>Council should liaise with neighbouring properties and the Woodcraft Club to ensure their local amenity is enhanced and protected.</p> <p>Enhancements to biodiversity are welcomed.</p>	Support noted.
		Individual	Eltham	E3	<p>Proposals are generally reasonable and car free development is a good idea but unrealistic. If no parking is provided people will park in the near by roads where parking is already an issue. The junction at Southend Crescent is already difficult to manage, it cannot handle further complexity. Any development needs to be supported by infrastructure such as schools and GPs.</p>	London Plan policy encourages car free developments in areas with high PTAL levels such as Eltham. The Infrastructure Delivery Plan (IDP) assesses existing infrastructure provision and works with providers to understand where future infrastructure is needed based on growth.
		Individual	Eltham	E3	<p>The site should be low rise, low density housing no more than two storeys high with recreational areas possibly with some business use but this should not cause a nuisance to the residential. There should be an increase in infrastructure to support the new housing especially a new GP or dentist. As much vegetation should be left at the south of the site as possible to provide privacy. Disagree with the development being car free, parking is already a problem in the area with parking spilling into residential streets. Parking must be provided to avoid further road congestion. Woodcroft Road is a private road and cannot be used for access. The junction at the north of the site is already dangerous and numerous accidents have happened here recently. Scaffolding yard here would cause nuisance and noise pollution.</p>	The requirement for access via Woodcroft close has been removed from the allocation. London Plan policy encourages car free developments in areas with high PTAL levels such as Eltham to reduce car usage. The allocation does not propose a scaffolding yard, however a scaffolding yard falls under B8 use class and would therefore not need planning permission. The Infrastructure Delivery Plan (IDP) assesses existing infrastructure provision and works with providers to understand where future infrastructure is needed based on growth.
		Individual	Eltham	E3	<p>I am writing to share my concern over increased noise, dirt, access provision to any intensive housing and high rise housing schemes such as flats or large house I am also concerned about privacy concerns. I am concerned if the site is changed into any kind of garbage/recycling centre due to noise, smell and cleanliness. I have concerns re the access to the property in terms of safety, increased traffic and where this will be situated.</p>	The development guidelines are clear that the mass, bulk and scale should not result in an unreasonable loss of privacy for adjacent residents and should be in keeping with the surrounding context. There are no plans to change the site to a recycling centre.

		Individual	Eltham	E3	Woodcroft Close is a private road and should remain so. Parking should be provided as part of any development on site E3 as all families have a car (every flat owner in Woodcroft has 1 if not 2 cars) and parking is a nightmare. Would oppose a scaffolding firm on the site due to noise pollution and vehicle movements. Any development should not be higher than 3 storeys. Leave the trees and green areas as they are.	The requirement for access via Woodcroft close has been removed from the allocation. London Plan policy encourages car free developments in areas with high PTAL levels such as Eltham. The allocation does not propose a scaffolding yard, however a scaffolding yard falls under B8 use class and would therefore not need planning permission.
		Individual	Eltham	E3	As much of the greenery should be retained as possible. Woodcroft is a private road paid for by residents and developers and future residents would need to pay for its maintenance and upkeep. It is also mentioned that the development is to be car free, this will cause issues as nearby streets are already at parking capacity.	The requirement for access via Woodcroft close has been removed from the allocation. London Plan policy encourages car free developments in areas with high PTAL levels such as Eltham.
		Individual	Eltham	E3	As I understand it, Whitewoods have not made a planning application, but are currently using the site for B8 (storage and distribution) business use, which could include a scaffolding yard as suggested in the flyer delivered to some properties last week. If this site is to be developed or changed, it raises some concerns for us as property owners - how many of the trees will be removed exposing the site and radically changing the view residents currently enjoy? Residents views should be protected. In previous applications for the sites, the proposed buildings have been far too high and too close to the current properties on Southend Crescent and Woodcroft Close. Buildings in any proposal should be set as far back from current homes as is possible and windows positioned so as to not overlook existing properties. In previous applications, the vegetation and trees on the existing site have also been completely stripped back to very little so this would have removed all privacy for us. We hope this is an issue which can be considered. Under "Site Requirements", it states Residential access to be provided via Woodcroft Close. This implies business access would be from elsewhere. This is a private road and the residents pay for it's maintenance and upkeep, so there are lots of issues here including how developers are going to contribute to the road's maintenance.	The requirement for access via Woodcroft close has been removed from the allocation. The development guidelines are clear that the mass, bulk and scale should not result in an unreasonable loss of privacy for adjacent residents.
		Individual	Eltham	E3	Car free development will lead to parking in adjoining roads, particularly Southend Crescent. Suggest underground car parking. Woodcroft Close is a private road and should not be used for access. There are already queues of stationary traffic in the area.	The requirement for access via Woodcroft close has been removed from the allocation. London Plan policy encourages car free developments in areas with high PTAL levels such as Eltham.
		Individual	Eltham	E3	Woodcroft Close is a private road and should remain so. Parking should be provided as part of any development on site E3 as all families have a car (every flat owner in Woodcroft has 1 if not 2 cars) and parking is a nightmare. Would oppose a scaffolding firm on the site due	The requirement for access via Woodcroft close has been removed from the allocation. London Plan policy encourages car free developments in areas with high PTAL levels such as Eltham. The allocation does not propose a scaffolding yard, however a scaffolding



					to noise pollution and vehicle movements. Any development should not be higher than 3 storeys. Leave the trees and green areas as they are.	yard falls under B8 use class and would therefore not need planning permission.
	GLA	Specific Consultation Body	Eltham	E3	This is not a suitable site for offices and site allocation should say that B1(a) is inappropriate. The employment use should be informed by local evidence. The mayor's evidence suggests greatest demand for B8 capacity in London. If traffic movements are an issue Greenwich should demonstrate where the B8 capacity will be reprovided in the borough.	Traffic movements are an issue for this site and the increasing HGV movements of the current B8 use are no longer compatible with this site and its surrounds. Any future use would need to be compatible with the surrounding residential uses and busy junction. There is a need for SME space in Eltham as required by the allocation and set out in the Eltham Town Centre Masterplan.
	Eltham Society	General consultation body - residents group	Eltham	New site	Although only buildings over 0.25ha included, the redundant building in Messeter Place between Pound Place and Elm Terrace is of 'Strategic importance' to Eltham and would be suitable for B1 on the ground floor and residential above.	The size of the site is insufficient to make a significant contribution to the delivery of the Core Strategy, and existing policies provide necessary guidance should redevelopment proposals be forthcoming.
	Old Page Residents Association	General consultation body - residents group	Eltham	New site	Eltham Police Station - this site has been sold, if it is redeveloped there should be early public consultation.	This is a small site. Existing policies provide sufficient guidance regarding development of the site.
	TFL CP	Specific Consultation Body	Eltham	New site	Eltham bus station is 0.5ha and could provide additional housing or retail/commercial uses, however the site is located on top of the A2 dual carriage way and would require significant infrastructure investment to be viable.	This is a constrained site due to location above A2. Existing policies provide sufficient guidance regarding development of the site.
	Cllr Spencer Drury	Cllr	Eltham		General comment - Each development should not be car free, a realistic amount of parking should be provided rather than expecting residents will not drive at all. There is already pressure on parking in surrounding area.	London Plan policy encourages car free developments in areas with high PTAL levels such as Eltham.
	Cllr Spencer Drury	Cllr	Eltham		Surprised that Eltham Police Station is not included given it has closed. If it were to be included some kind of police station would need to be included in the redevelopment.	This is a small site of less than 0.25ha. Existing policies provide sufficient guidance regarding development of the site.
	Eltham Society	General consultation body - residents group	Eltham		There is very much a need for mixed development. There should be provision for business and work, and for leisure activities as well as residential development. This is recognised in the site allocations detail but it must be brought out in the general text. In addition, any proposal should not reduce the viability for an adjacent activity.	Noted.
		Individual	Eltham		Concerns that the wider Kidbrooke area is at risk of being over developed without the supporting infrastructure required.	The need for infrastructure to support future development is addressed in the Infrastructure Delivery Plan (IDP).
		Individual	Eltham	E1	I am totally opposed to any development of 5 or 6 storeys on this site. This is completely out of character with the surrounding area. It is fine to have the 'ideal' of a car free' development But the reality is the location and 'life' means cars are a necessity to many. There is no	It is considered that existing policies provide sufficient guidance regarding development of the site and it has been removed from the Site Allocations document.

					reason why, in any development, that underground parking cannot be provided.	
		Individual	Eltham	E2	Why was Marks and Spencer private car park included but the Lidl car park and the Council's Orangery Lane car parks not included? All of these car parks should remain. The Orangery Studios development should be seen as the standard for any future development in the site location as it complements the listed Orangery. Four storeys not appropriate - 3rd storey of M&S level with 6th storey of BT building because site slopes. The Orangery Grade 2* listed building has been recognised as being part of the site. but neither Cliefden House or Former Stables of Cliefden House have been identified even though both Grade 2* listed.	The M&S car park has been removed from the allocation. The current built form and low intensity of use does not realise the full potential of the site or reflect its town centre location. The proposed scale and massing balances this against the existing site context. The site requirements have been amended to seek a reduction in vehicular movement across the site and have regard to adjacent primary school.
		Individual	Eltham	E3	The proposals for this site seem to be reasonable.	Support noted.
	Ashburnham Triangle Association	General consultation body - residents group	Greenwich Creekside	GCI	Welcome the long overdue redevelopment of this site. Welcome the headline commitment to improve public access to the Creek, the list of Site Requirements relating to public access, and a connection to the public footway to the north of the site. However, there should be a similar commitment to connecting to a public footpath to the south of the site. There should be an acknowledgement in this document that it is Council policy to create a linked pathway that runs the full length of the east (Greenwich) side of the Creek. AND that it will therefore be a requirement for the Brookmarsh site to link to the anticipated public footway to the south as well. I also welcome the description of a layout for Brookmarsh (Para 3, p.54) that ensures "routes to the Creek are evident from the public realm", and will link to what will be "demonstrably a public route".	Support noted for the new public footpath. We see this site forming part of the future footpath running the full length of Deptford Creek; however the site to the south does not currently have public access to the Creekside. Given that the site allocation expects the provision of public access to the Creekside, and that the planning policy expects public access to be provided as sites come forward for redevelopment along the length of the creek, specific reference to this future connection is not necessary as part of the allocation.
		Individual	Greenwich Creekside	GCI	The inclusion of so few sites in the Greenwich creekside area is unwelcome. For example, there are number of sites nearby which are prime sites for redevelopment once the Thames Tideway work is complete. These include but are not limited to: Ravensbourne Wharf Greenwich Centre Business Park 55 to 71 Norman Road (Toulhouse Plant Hire) 73 Norman Road (GCL maintenance site) - The GCL concession comes to an end in the next couple of years The land trapped between the mainline railway and the DLR The former Greenwich Pumping Site Furthermore, it is not clear whether the GCI includes the railway arches under the mainline railway All of these sites should be developed in concert and should be subject to a master plan or at least included within the site allocations to ensure cohesive and harmonious development.	The suggested sites do not meet the site selection criteria for inclusion in the document. The railway arches are outside the boundary of GCI.

	Environment Agency	Specific Consultation Body	Greenwich Creekside	GCI	We support the site requirements and design guidelines in particular those relating to TE2100, ecological enhancement of Deptford Creek, provision of public footway and flood risk management. The flood defences at this site require improvement and raising in line with the TE2100 Plan	Support noted
	GLA	Specific Consultation Body	Greenwich Creekside	GCI	The site allocation should reference the Agent of Change to protect existing industrial uses on the site and adjoining sites, including those in the SIL.	The allocation has been updated to reflect the potential for co-location of industrial and residential uses, as set out in the new London Plan. However the site is within Greenwich District Centre therefore a range of non-residential uses would be acceptable in principle on this site.
	Historic England	Specific Consultation Body	Greenwich Creekside	GCI	We note that part of site GCI is already consented, we would point out that taller building development in this area may well have an effect on the view of Greenwich town centre from College Way – a Locally Important View as set out in the World Heritage Site Management Plan. We consider this should be identified in the planning designations and development guidelines sections.	The allocation has been updated to reflect the potential of development on this site to have an effect on the view of Greenwich Town Centre from College Way.
	LB Lewisham	Specific Consultation Body	Greenwich Creekside	GCI	Brookmarsh Industrial Estate and Saxon Wharf lies in close proximity to our borough boundary. We support the provision of a public footway with unrestricted access along Dartford Creek, enhancing the industrial heritage of the area, ensuring ground floors accommodate uses that will animate the space and provide passive surveillance and protecting the operational requirements of the safeguarded Brewery Wharf.	Support noted.
	PLA	Specific Consultation Body	Greenwich Creekside	GCI	The PLA supports the extension of the Creekside walk through this proposed location and welcomes the reference for development at this site allocation to have regard to the operational requirements of the Safeguarded Brewery Wharf, ensuring that appropriate design mitigation measures are included. The PLA considers that this reference must be made stronger, by referring specifically to the Agent of Change principle with regard to Brewery Wharf and on the need for early engagement with the PLA and the Wharf Operator with regard to the design mitigation measures.	Support noted. The allocation has been amended to refer to the Agent of Change principle and early engagement with the PLA and wharf operator.
	Greenwich Society	General Consultation Body	Greenwich Creekside	GCI, GPI-GP5	Contents of document relating to sites GCI and GPI-5, especially the site requirements and development guidelines are generally acceptable. Welcome the attention given to open space, Thames Path and public access to Deptford Creek, heritage, protecting and enhancing ecology and combatting noise and pollution.	Support noted.

Q-Square	London Hotel Group	Developer/Landowner	Greenwich Creekside	New site	Representation relates specifically to the land at 7-9 Blackheath Road, & 2 Greenwich High Road, Greenwich, SE10 8PE ('the Site') and the potential to optimise this vacant brownfield site which is subject to a pending planning application for hotel-led mixed-use development. A planning application (reference 19/1367/F) was submitted on 12 April 2019 at the Site of the former Greenwich Magistrates Court (including rear car park) on behalf of LHG for: 'Redevelopment of the Site, including the refurbishment of the existing Grade II Listed Magistrates Court and part demolition of existing rear buildings, for a new hotel including ancillary facilities, flexible Class A1/A2/A3/A4/D1/D2/ancillary C1 floorspace, a publicly accessible square with associated soft and hard landscaping, ancillary refuse and recycling storage, cycle parking, wheelchair parking, coach and taxi drop off bays and servicing arrangements. Seeks a Site Allocation consistent with the submitted application to deliver a hotel-led mixed use development.	Full planning permission has been granted. There is nothing further that an allocation could add.
Q-Square	London Square Developments	Developer/Landowner	Greenwich Creekside	New site	Representation relates specifically to the land at Greenwich Police Station, 31 Royal Hill and Under-Croft Space within Swan House, Gloucester Circus, SE10 8RR. A planning application (reference 19/1409/F) was submitted on 15 April 2019 at the Site of the former Greenwich Police Station ('FGPS') (including part of the ground floor of Swan House) on behalf of London Square. The application is currently pending consideration. The proposal is for: 'Construction of a part 4, part 5 and part 6 storey building, comprising 59 dwellings (Use Class C3) and 140 sqm. of non-residential floorspace (Use Class D1 / D2) with associated hard and soft landscaping, communal amenity space and play space, modified vehicular access, cycle parking, disabled car parking, refuse storage, following demolition of the Former Greenwich Police Station and annexe (Use Class Sui Generis).' Seeking a Site Allocation consistent with the above scheme to deliver a residential-led development (C3 Use Class) with ground floor community facility.	The site is 0.15ha in size and does not meet the size threshold for inclusion in the Site Allocations document. Existing policies provide sufficient guidance regarding development of the site, and following grant of planning permission the site is under construction.
	Greenwich Society	General Consultation Body	Greenwich Creekside		Welcome the removal of site G1 which provides an essential service for local residents and should be protected from development.	Noted.

	Greenwich Society	General Consultation Body	Greenwich Peninsula	GCI, GPI - GP5	Would like guidance on the residential densities which would be favoured by the council for each site and a less permissive approach to tall buildings.	The allocations have been informed by a design led approach, including area wide capacity studies undertaken as part of the preparation of supplementary guidance for the Strategic Development Locations in the Core Strategy. The design guidelines set out clear parameters for use, scale and massing on sites based on an assessment of the surrounding built form, character and uses. Where tall buildings may be an appropriate form of development, this is included in the allocations. Proposals for tall buildings will be assessed against relevant development plan policies/supplementary guidance taking into account their visual, functional and environmental impacts. Where a site allocation identifies that there may be potential for a tall building, this does not mean that any/all tall buildings will be granted permission; all proposals are subject to a detailed assessment at the time of application.
	Greenwich Society	General Consultation Body	Greenwich Peninsula	GCI, GPI - GP5	There should be a clearer requirement for some workspace provision for manufacturing activities which would not be suitably located amidst housing, retail and many service activities. Such businesses exist, or have existed until recently on a number of these sites and provide jobs.	Where appropriate, allocations have been updated to reflect the potential for co-location of industrial and residential uses, as set out in the new London Plan.
	Greenwich Society	General Consultation Body	Greenwich Peninsula	GCI, GPI - GP5	Development guidelines should be more than aspirational. Planning applications and S73 amendments to consented scheme which attempt to water them down should be resisted. Knight Dragon for example are proposing changes to their outline consent which would delay workspace and social provision while increasing housing densities. This would undermine several key objectives of the Local Plan].	When adopted, the Site Allocations will form part of the statutory development plan against which applications and S73 amendments are assessed. On strategic scale sites which benefit from outline permission, such as the Peninsula, the site requirements are explicit that any proposals to increase residential units must also provide for the infrastructure requirements associated with the proposed uplift in unit numbers.
Avison Young	Criterion Capital	Developer/Landowner	Greenwich Peninsula	GPI	Support the allocation of Enderby Place for residential-mixed use development, and the principle of not designating the site to deliver a cruise liner terminal. Consider that the emerging context strongly justifies the decision to identify Enderby Place for redevelopment.	Support noted.
Avison Young	Criterion Capital	Developer/Landowner	Greenwich Peninsula	GPI	Further clarification is required as to the type of employment space that is expected to be delivered, as well as the quantum of floorspace which is considered to be appropriate and deliverable. Recommend that the allocation is reworded to require a comparable number of jobs to existing permission 15/0973/F(88 FTE) and to provide flexibility to recognise that jobs can be created by a range of non-residential uses as opposed to solely BI. The site has been vacant for at least the last decade, and on this basis the delivery of any non-residential use will result in an uplift in employment opportunities compared to existing.	The allocation has been clarified regarding the nature and scale of industrial employment space appropriate to the site, in line with the new London Plan. The site was released from SIL designation with the adoption of the Core Strategy in 2014, however it still in proximity to SIL and safeguarded wharves.

Avison Young	Criterion Capital	Developer/Landowner	Greenwich Peninsula	GPI	There is no new evidence base which identifies the demand for additional employment land, specifically B1 use, in the Greenwich Peninsula, and the promotion of the site for the significant delivery of B1 use is contrary to conclusions of the 2017 London Office Policy Review. The site is outside a designated centre, where the Review considers that new B1 floorspace might appeal to SMEs. The 2012 ELR recommended the release of the site from SIL to allow for mixed use regeneration, and recognised that the area's public transport accessibility and 'bad neighbourhood issues' limits its suitability for employment use. A large quantum of B1 floorspace has already been permitted or delivered around North Greenwich Station, which is a more suitable location for B1 use than Enderby Place. There is also vacancy at the Mitre Building and Enderby Wharf. The requirement for additional B1 floorspace is inconsistent with market demand.	The allocation has been clarified regarding the nature and scale of industrial employment space appropriate to the site, in line with the new London Plan. The site was released from SIL designation with the adoption of the Core Strategy in 2014, however it still in proximity to SIL and safeguarded wharves.
Avison Young	Criterion Capital	Developer/Landowner	Greenwich Peninsula	GPI	Consider that the requirement for new office floorspace is inconsistent with Draft London Plan Policy E1D as Enderby Place fails to meet any of the four criteria identified. The aspiration for the sites' mixed use redevelopment would subsequently be better realised by a more flexible approach to non-residential uses on the site.	The allocation has been clarified regarding the nature and scale of industrial employment space appropriate to the site, in line with the new London Plan. The site was released from SIL designation with the adoption of the Core Strategy in 2014, however it still in proximity to SIL and safeguarded wharves.
Avison Young	Criterion Capital	Developer/Landowner	Greenwich Peninsula	GPI	Seek the removal of "If tall buildings are retained in revised proposals, the scale should reflect that there is no longer a requirement to landmark an international cruise liner terminal" on the grounds that: - The context has changed since application 15/0973/F was permitted. We are aware that an application for Morden Wharf will be submitted next year for up to 38 storeys and there are now a number of tall buildings in Greenwich Peninsula. - The ambition to optimise housing potential is at the forefront of the New London Plan. This sees the removal of the existing density range guidance and identifies Opportunities as an appropriate location for tall buildings (Draft Policy D6) . We would welcome a similar design-led approach to density and height in RB Greenwich's emerging Local Plan. Although height is not commensurate with density, we recommend a more flexible approach to tall building heights than the current wording of Draft Site Allocation GPI. - The townscape and visual impact of a tall building was considered acceptable under application 15/0973/F. This application was supported by a townscape and visual impact assessment, which included twenty views. The TVIA considered the proposal to positively enhance the setting of the CAs, relate successfully to the emerging character of the townscape on the Greenwich Peninsula, aid local wayfinding, be a high	The immediate context of the site is unchanged since the 2015 permission, and there have been no permissions for tall buildings granted on adjacent sites other than that referenced in the draft allocation. The tall buildings emerging on the Knight Dragon Site are not in the immediate context of the site. Whilst the previous planning application may be a material consideration, the Core Strategy vision for the area was based on the delivery of the cruise liner terminal as was the previous planning permission. The design guidelines set out clear parameters for use, scale and massing on sites based on an assessment of the surrounding built form, character and uses. Where tall buildings may be an appropriate form of development, this is included in the allocations. Proposals for tall buildings will be assessed against relevant development plan policies/supplementary guidance taking into account their visual, functional and environmental impacts. Where a site allocation identifies that there may be potential for a tall building, this does not mean that any/all tall buildings will be granted permission; all proposals are subject to a detailed assessment at the time of application.

					<p>quality point of interest on the waterfront and have no adverse effects on protected, distant or local views.</p> <p>- Wording does not recognise other design attributes which would affect the site's suitability for a tall building</p>	
Avison Young	Criterion Capital	Developer/Landowner	Greenwich Peninsula	GPI	Request that build to rent sector is identified as an appropriate housing type within the allocation to take a more proactive and positive approach to build to rent housing, which has not yet come forward in Greenwich Peninsula.	It is not necessary to identify specific types of market housing in site allocations as Build to Rent is sufficiently addressed in the London Plan.
Avison Young	Criterion Capital	Developer/Landowner	Greenwich Peninsula	GPI	Consider that the current wording of the draft Site Allocation is too prescriptive with regards to housing standards, specifically the requirement for all dwellings to possess private amenity space and be dual aspect. Design flexibility is particularly value for the build to rent sector, where the Mayoral Affordable Housing and Viability Supplementary Planning Guidance 2017 encourages LPAs to "utilise the flexibilities that already exist in London Plan policies to support high quality Build to Rent developments" and "take account of the distinct economics of Build to Rent, where potential yields and investment risk can be affected by increases in the number of large units within a scheme". The proposed re-wording of Site Allocation GPI to allow for the flexible application of housing standards, including amenity provision, units per core, unit mix and the number of single aspect units, would therefore accord with this approach.	The London Plan, Core Strategy and London Housing SPG set out detailed design guidance for residential development, including that in general residential units should be dual aspect, that north facing single aspects units should be avoided, and that all residential units should be provided with private outside space. The Site Allocations Local Plan carries forward this guidance for all site allocations to ensure that any proposals brought forward provide a satisfactory level of amenity. Ensuring a good quality of residential amenity is particularly important for higher density schemes and/or schemes where the surrounding mix of land uses is varied. No evidence has been provided that Build to Rent schemes cannot meet minimum residential design standards/guidance.
	East Greenwich Residents Association	General consultation body - residents group	Greenwich Peninsula	GPI	Would like to see cruise ship terminal finally removed from this site - it is now utterly inappropriate	The site allocation does not include a requirement to deliver the permitted cruise liner terminal.
		Individual	Greenwich Peninsula	GPI	Love what's happening in the area. Continue to think of ways to bring - greenery - space for cycling - sculptures - open spaces with greenery, parks for children, etc. If done well, the area can become more than	Support noted.

					just a walk/cycle way, it can become a walk/cycle way, children's playground, art sculpture walkway, etc	
	Environment Agency	Specific Consultation Body	Greenwich Peninsula	GPI	We support the site requirements and design guidelines	Support noted.
	GLA	Specific Consultation Body	Greenwich Peninsula	GPI	In line with draft London Plan EI, BI(a) offices should be directed to town centres. Overall, this is not a sustainable location for offices and the site allocation should clearly state BI(a) is not appropriate. The site allocation should reference the Agent of Change to protect existing industrial uses on the site and adjoining sites, including those in the SIL.	The allocation has been clarified regarding the nature and scale of industrial employment appropriate to the site, in line with the new London Plan. The site is currently cleared and vacant. Reference to the Agent of Change principle in regards to the adjacent SIL and nearby safeguarded wharf has been added to the allocation.
	PLA	Specific Consultation Body	Greenwich Peninsula	GPI	PLA believes that the inclusion of a river bus service in this area must be a priority even if the current permission for a cruise terminal does not proceed. The site should consider the current designation as a safeguarded wharf as well as the future proposal to move the site north of Morden wharf; which although will mean this site may no longer directly border a Safeguarded Wharf, Safeguarded Wharf activities will still be in operation in close proximity to the site and will need to be fully considered, in line with the Agent of Change principle.	The draft site allocation has been amended to reflect agent of change principle and to address issues of proximity to safeguarded wharves
	TFL	Specific Consultation Body	Greenwich Peninsula	GPI	Potential for GPI and GP2 to both contribute towards the infrastructure for river bus services. These sites are also large enough to accommodate bus standing, which could facilitate the extension of one or more bus routes from North Greenwich station, increasing the PTAL of the sites.	The draft site allocation has been amended to reflect the requirement to deliver a pier for riverbus services and the potential for bus standing infrastructure.
Lichfields	Cathedral Ltd	Developer/Landowner	Greenwich Peninsula	GP2	Extend boundary include the whole of the Morden Wharf South site, including both the Tunnel Avenue Frontage land and the Southern warehouse within SIL (but excluding the proposed Safeguarded Wharf to its north) to reflect pre-application discussions. A flexible approach should be taken to SIL boundaries in line with the Core Strategy inspectors report and a mixed use residential and BI building may be an acceptable buffer.	Core Strategy and London Plan policies set out clear requirements for proposals within SIL and it is not necessary to provide further guidance for SIL within the Site Allocations document. The Core Strategy Inspector's Report confirms that it would not be appropriate to seek to review SIL boundaries through a Site Allocations document.
Lichfields	Cathedral Ltd	Developer/Landowner	Greenwich Peninsula	GP2	The mix of uses proposed is inflexible and the words 'significant quantum' of BI floorspace should be removed. Object to reference to BI work space at ground and first floor, there are ways to design a building to mitigate the impact of SIL and the provision of family units at ground floor level should not be excluded as per the Greenwich Peninsula West SPD. Amend text to allow active uses at ground level and that any design is in line with agent of change principles.	Local Plan and London Plan policies seek to optimise potential housing within the context of the local area. The allocation reflects the context of the local area and the adjacent SIL and ensures an appropriate buffer between potentially conflicting uses. The allocation has been updated to reflect the potential for co-location of industrial and residential uses, as set out in the new London Plan.



Lichfields	Cathedral Ltd	Developer/ Landowner	Greenwich Peninsula	GP2	Allocation fails to reflect the potential of the site to deliver a significant amount of housing. Should reflect LP policy to optimise housing potential on sites. Remove the reference to 4 to 8 storeys as this is overly prescriptive and should be assessed through a Townscape and Visual Impact Assessment.	The London Plan requires a design-led approach to determining the optimum development capacity of sites that responds to a site's context and capacity for growth and encourages boroughs to set out acceptable building heights, scale massing and indicative layouts for allocated sites. As set out in Policy D2 of the London Plan, density should be linked to the provision of future planned levels of infrastructure and be proportionate to the site's connectivity. The design guidelines set out in the allocation in terms of use, scale and massing have taken into account the surrounding built form, uses and character (including the likelihood of change of these factors) as well as the capacity for growth. A form of development wholly reliant on tall buildings would not be appropriate to the context and would result in a density that exceeded the site's capacity for growth. TVIAs are inadequate for assessing the impacts of tall buildings, as the London Plan requires that the visual, functional and environmental impacts be considered.
Lichfields	Cathedral Ltd	Developer/ Landowner	Greenwich Peninsula	GP2	The allocation states a 16m safeguarding zone free from development along the Thames must be provided but this is not consistent with the approach agreed by the EA to have a 10m buffer.	The requirement for a 16m buffer zone is set out in the TE2100 Plan. It would not be appropriate to indicate a buffer zone less than that identified in the TE2100 Plan.
Lichfields	Cathedral Ltd	Developer/ Landowner	Greenwich Peninsula	GP2	The draft site requirements text identifies the need for "substantial public transport improvements". This is not something that can be delivered by the Morden Wharf Scheme alone nor is it justified by the proposed extent of development alone, noting there is already extensive other redevelopment (recently completed, underway and proposed) in the vicinity. It is nevertheless noted that there are significant improvements proposed by TfL as part of the Silvertown Tunnel scheme, including an upgraded pedestrian/cycle crossing of the A102 and potential relocation of bus stops serving Tunnel Avenue. The proposed scheme will therefore include a package of measures to promote the use of more sustainable forms of transport. This will include provision of measures to enhance access to the proposed development by sustainable/active modes, which are being designed to be compatible with, and complement, wider transport infrastructure improvements by TfL.	The site is currently not well-connected by existing public transport, and there are no planned improvements to public transport directly related to the site. However the allocation does acknowledge that should substantial improvements to public transport provision be brought forward in tandem with proposals that the optimum capacity of the site may be increased. In identifying the site as suitable for predominantly mid-rise buildings with the potential for some taller buildings, the guidelines have already taken into account the increased levels of active travel that will be supported by the improvements to sustainable travel in the wider vicinity of the site that will be delivered as part of the Silvertown Tunnel. TfL have advised that the site is large enough to accommodate bus standing to facilitate expansion of bus services from North Greenwich, and the allocation has been updated to reflect this as well as the need to make a financial contribution to the provision of riverbus services at site GPI.
Gerald Eve	Morden College	Developer/ Landowner	Greenwich Peninsula	GP2	The freehold interest in all the land within this site allocation, and also the land and property directly to the north and east of the site, is held by the College. The College has a development partnership with U+I plc which also owns land to the east of the existing allocation boundary. Site boundary does not match the boundary proposed in the	Core Strategy and London Plan policies set out clear requirements for proposals within SIL and it is not necessary to provide further guidance for SIL within the Site Allocations document. The Core Strategy Inspector's Report confirms that it would not be appropriate

					current pre app proposals. Extend boundary include the whole of the Morden Wharf South site, including both the Tunnel Avenue Frontage land and the Southern warehouse within SIL (but excluding the proposed Safeguarded Wharf to its north) to reflect pre-application discussions.	to seek to review SIL boundaries through a Site Allocations document.
Gerald Eve	Morden College	Developer/ Landowner	Greenwich Peninsula	GP2	Wording does not adequately reflect the potential of the site to deliver a substantial quantum of residential space, along with supporting uses such as retail, leisure, community and employment generating uses outside B1 classification. Should be amended to reflect the fact that while the proposed redevelopment of the site should include B1 use, acceptable uses should also include: a range of employment generating uses which complement the adjacent SIL designation; a significant quantum of housing as part of a residential led, mixed use development of the western and southern parts of the site; and development of the north and east of the site (designated SIL) to include B1c, B2 and B8 uses. We note that on page 63 it is stated that B1 work space should be provided at ground floor and first floor level along the northern and eastern edges of the site, as a means of providing physical separation between the SIL and more sensitive uses. We would suggest that this is too prescriptive and the wording should recognise that a variety of uses and/or designs can be used to ensure there is no conflict between the SIL and non-SIL uses. We request that the wording is therefore changed to refer to active uses (not simply B1 use) and for designs to be in line with the Agent of Change principles identified in the London Plan.	Local Plan and London Plan policies seek to optimise housing potential within the context of the local area. The allocation reflects the context of the local area and the adjacent SIL and ensures an appropriate buffer between potentially conflicting uses. The allocation has been updated to reflect the potential for co-location of industrial and residential uses, as set out in the new London Plan.
Gerald Eve	Morden College	Developer/ Landowner	Greenwich Peninsula	GP2	Acknowledge and welcome indication that Morden Wharf is an appropriate site for tall buildings. However, we note the same page of the document states that heights at Morden Wharf should be demonstrably subordinate to those developed at Enderby Wharf, and that a mix of taller and mid-rise buildings of 4 –8 storeys should also be provided. No justification is provided for this, and in our opinion this is too prescriptive. Consider that the scale and height of buildings should instead be informed by appropriate urban design analysis and justified at application stage by a Townscape and Visual Impact Assessment.	The London Plan requires a design-led approach to determining the optimum development capacity of sites that responds to a site's context and capacity for growth and encourages boroughs to set out acceptable building heights, scale massing and indicative layouts for allocated sites. As set out in Policy D2 of the London Plan, density should be linked to the provision of future planned levels of infrastructure and be proportionate to the site's connectivity. The design guidelines set out in the allocation in terms of use, scale and massing have taken into account the surrounding built form, uses and character (including the likelihood of change of these factors) as well the capacity for growth. A form of development wholly reliant on tall buildings would not be appropriate to the context and would result in a density that exceeded the site's capacity for growth. TVIAs are inadequate for assessing the impacts of tall buildings, as the London Plan requires that the visual, functional and environmental impacts be considered.

Gerald Eve	Morden College	Developer/ Landowner	Greenwich Peninsula	GP2	Requirement for 16m zone safeguarded zone free from development along the Thames is provided to enable potential new or re-aligned flood defences is too prescriptive and is not consistent with the approach the College's development partners (U+I Plc) have agreed with the EA for a 10m buffer to be provided between the proposed buildings and the landward face of the flood defence wall. Revise wording to reflect agreed position with EA.	The requirement for a 16m buffer zone is set out in the TE2100 Plan. It would not be appropriate to indicate a buffer zone less than that identified in the TE2100 Plan.
Gerald Eve	Morden College	Developer/ Landowner	Greenwich Peninsula	GP2	Requirements section refers to substantial transport improvements being needed; but does not recognise that while development at Morden Wharf can deliver a package of measures to promote and enhance access to sustainable forms of transport, these would sit alongside transport infrastructure improvements being undertaken by TfL to the wider network.	The site is currently not well-connected by existing public transport, and there are no planned improvements to public transport directly related to the site. However the allocation does acknowledge that should substantial improvements to public transport provision be brought forward in tandem with proposals that the optimum capacity of the site may be increased. In identifying the site as suitable for predominantly mid-rise buildings with the potential for some taller buildings, the guidelines have already taken into account the increased levels of active travel that will be supported by the improvements to sustainable travel in the wider vicinity of the site that will be delivered as part of the Silvertown Tunnel. TfL have advised that the site is large enough to accommodate bus standing to facilitate expansion of bus services from North Greenwich, and the allocation has been updated to reflect this as well as the need to make a financial contribution to the provision of riverbus services at site GPI.
	East Greenwich Residents Association	General consultation body - residents group	Greenwich Peninsula	GP2	Very concerned that the Wharf swap being contemplated by Morden College/U+I with Primrose Pier (for the last 25 years a public open space) being swapped for Tunnel Wharf so that Siver can install overhead conveyors to move construction waste on and off barges. Lots of problems with this - Siver are the biggest bunch of cowboys in the business; Tunnel Wharf has not yet been surveyed and has always been believed to be structurally unsound with lots of missing woodwork; There is no commitment to construct the new public space before Primrose Pier is lost to the public realm (and who is going to pay for it? Siver? Morden College?) This is a cavalier approach to safeguarding wharves - if Tunnel is safeguarded today but can be swapped tomorrow is this a meaningful category? The works at Siver are supposed to be subject to regular planning application process - isn't this jumping the gun to include this in this survey? Locally many people believe that given our experience of the planning process, Primrose Pier will be taken over and no replacement will be provided. This is an important consideration in an area with almost no open	The review of Safeguarded Wharves is outside the scope of the Site Allocations Document. The Mayor had recommended that the safeguarding be revised, and the Secretary of State has now approved this recommendation. The site requirements include the provision of a new soft landscaped public open space and improvements to the Thames Path.

					space and with a very poor record of delivery of public realm by developers.	
		Individual	Greenwich Peninsula	GP2	Love what's happening in the area. Continue to think of ways to bring - greenery - space for cycling - sculptures - open spaces with greenery, parks for children, etc. If done well, the area can become more than just a walk/cycle way, it can become a walk/cycle way, children's playground, art sculpture walkway, etc	Support noted.
	Environment Agency	Specific Consultation Body	Greenwich Peninsula	GP2	We support the site requirements and design guidelines	Support noted
	GLA	Specific Consultation Body	Greenwich Peninsula	GP2	This is not a sustainable location for offices and the site allocation should clearly state B1(a) is not appropriate. The mayor's evidence suggests greatest demand for B8 capacity in London. Employment on this site should be informed by local evidence. Morden's wharf is referred to as 'Tunnel Glucose Wharf' in the Mayor of London's safeguarded wharves review and in the safeguarding directions and this should be made clear in site allocation.	The allocation has been updated to reflect the potential for co-location of industrial and residential uses, as set out in the new London Plan. Reference to Tunnel Glucose Wharf, as referred to in the Safeguarded Wharves Review, has been included in the allocation.
	PLA	Specific Consultation Body	Greenwich Peninsula	GP2	Refer to the agent of change principle for Tunnel Wharf and the Safeguarded Victoria Deep Water Terminal and the non safeguarded Bay Wharf. Welcome the reference to engaging with the PLA and the need to provide a new riverside path.	The draft site allocation has been amended to reflect agent of change principle and to address issues of proximity to safeguarded wharves
	TFL	Specific Consultation Body	Greenwich Peninsula	GP2	Potential for GP1 and GP2 to both contribute towards the infrastructure for river bus services. These sites are also large enough to accommodate bus standing, which could facilitate the extension of one or more bus routes from North Greenwich station, increasing the PTAL of the sites.	The draft site allocation has been amended to reflect the requirement to contribute to riverbus services and the potential for bus standing infrastructure.
Carter Jonas	Lidoka Estates Ltd	Developer/Landowner	Greenwich Peninsula	GP3	Representations relate to 'Former Lorry Park, Boord Street, Greenwich', between A102 and Millennium Way. The site is comprised mainly of hardstanding alongside a single storey structure to the east of the site, a single storey detached portakabin to the northeast and a curved prefabricated warehouse structure to the south. Most recent use of the site was as distribution centre for London Evening Standard (under 5-year temporary permission for B8). Lidoka Estates Ltd is supportive of the site allocation.	Support noted.
Carter Jonas	Lidoka Estates Ltd	Developer/Landowner	Greenwich	GP3	Given the medium to long term indicative delivery timescale for the delivery of the site as a result of a number of constraints such as	The allocation has been updated to reflect the potential for meanwhile uses.

			Peninsula		contamination, delivery of the Silvertown Tunnel and the status of the Brenntag HSE zones, we consider that a series of meanwhile or temporary uses should be encouraged on site including but not limited to car parking, leisure uses, temporary exhibition space and advertising.	
Carter Jonas	Lidoka Estates Ltd	Developer/ Landowner	Greenwich Peninsula	GP3	LEL shares RBG's ambition for the comprehensive redevelopment of the site. However it is capable of being developed in phases and, if required to, part of the site is able to be brought forward for development early. LEL is open to maintaining engagement with neighbouring landowners in order to bring forward both comprehensive and complementary development proposals. LEL remains of the opinion that the Hazardous Substances Consent related to the Brenntag site should be reduced, if not removed completely. However unless the Hazardous Substances Consent is removed or reduced in the future, then it is clear that a phased approach would be the most appropriate approach to the redevelopment of the site. Furthermore, part of site GP3 is the subject of the Silvertown Tunnel Order 2018 which is also one of the key constraints to the redevelopment of the site and again a phased approach to redevelopment would be appropriate given this constraint.	The allocation does not preclude development coming forward in phases. While land parcels within the allocation may come forward individually, to ensure that the optimum development capacity is achieved within the constraints of the site, the site must be planned in a comprehensive manner that does not prejudice the future of existing businesses and employment uses on the site. To ensure that earlier phases do not prejudice the delivery of later phases, all phases must be developed within the context of the site wide requirements and guidelines.
Carter Jonas	Lidoka Estates Ltd	Developer/ Landowner	Greenwich Peninsula	GP3	Given that the Planning Brief, the recent Brenntag UK appeal decision and the proposed Silvertown Tunnel development restrict residential development to the east of the site, LEL is seeking a relaxation on any prescriptive height provisions to enable the site to fully contribute to the regeneration and redevelopment of the area and the optimisation of the site. If any height restrictions were to be in place on site, this would greatly restrict the quantity of residential development which is able to be brought forward in this location as a result of the constraints particularly in the southwest of the site. The Knight Dragon development located adjacent to the site has outline permission with a maximum building height of up to 75m above AOD opposite the site and a planning application is currently pending for the site to the southeast of GP3 for the construction of a building up to 18 storeys to provide a 300 bed hotel (ref: 19/0939/F). A tall building on this site would appropriately relate to the wider context and emerging townscape. Any tall building in this location would also act as a buffer from the activity along the A102 as well as the Wharves therefore we do not consider that the site's potential should be constrained by any height restraints nor the heights of the development on the Knight Dragon site. The Greenwich Peninsula is gradually transitioning from an industrial area to a commercial and residential area therefore the redevelopment of the site to	The London Plan requires a design-led approach to determining the optimum development capacity of sites that responds to a site's context and capacity for growth and encourages boroughs to set out acceptable building heights, scale massing and indicative layouts for allocated sites. The allocations have been informed by a design led approach, including area wide capacity studies undertaken as part of the preparation of supplementary guidance for the Strategic Development Locations in the Core Strategy. As set out in Policy D2 of the London Plan, density should be linked to the provision of future planned levels of infrastructure and be proportionate to the site's connectivity. The design guidelines set out in the allocation in terms of use, scale and massing have taken into account the surrounding built form, uses and character (including the likelihood of change of these factors) as well as the capacity for growth. A form of development wholly reliant on tall buildings would not be appropriate to the context and would result in a density that exceeded the site's capacity for growth. While there are tall buildings proposed on the Knight Dragon Site along Millennium Way, the context surrounding the site is varied. Where a site allocation identifies that there may be potential for a tall building, this does not mean that any/all tall buildings will be granted permission; all proposals are subject to a detailed assessment at the time of application.

					provide high density residential, in line with the ambitions of the Greenwich Peninsula Opportunity Area, would be appropriate in this area.	
	GLA	Specific Consultation Body	Greenwich Peninsula	GP3	In line with draft London Plan EI, BI(a) offices should be directed to town centres. Overall, this is not a sustainable location for offices and the site allocation should not support additional BI(a) floorspace. The site allocation should reference the Agent of Change to protect existing industrial uses on the site and adjoining sites, including those in the SIL.	There are existing office and industrial uses on the site, and in accordance with Local Plan and London Plan policies where there are employment/industrial uses on a site the employment/industrial role of the site is retained as part of any redevelopment.
	PLA	Specific Consultation Body	Greenwich Peninsula	GP3	Support the need to improve permeability to the site. Where the allocation states 'that buildings along the western boundary of the site must be sensitively designed to mitigate against any potential noise and air quality impacts' specific reference to Tunnel Wharf and Victoria Deep Water Terminal should be made as well as Bay Wharf and the need to ensure development does not negatively impact on their operation in line with the agent of change principle. Reference should also be made to using the safeguarded wharf for the transportation of construction materials for the site.	The draft site allocation has been amended to reflect agent of change principle and to address issues of proximity to safeguarded wharves.
Quod	SGN	Specific Consultation Body	Greenwich Peninsula	GP3	Request clarification on if the Site Allocations document has been prepared to meet the minimum housing requirement of 3204 homes per year; if not what housing target does the document seek to meet; what is the minimum housing capacity of the document; and if the document has been subject to a viability assessment.	Indicative area wide residential capacities have been included in the Proposed Submission document. As part of the Authority Monitoring Report (AMR), RBG identifies and updates a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against the London Plan housing requirement. The five year supply is set within the context of the 15 year housing trajectory, which is also updated on annual basis and provides full details of the large site (0.25ha and above) included in the trajectory, including their indicative capacity and phasing. All site allocations in this Proposed Submission document are included in the 2019/20 housing trajectory. RBG can accommodate all its identified housing need within the borough.

Quod	SGN	Specific Consultation Body	Greenwich Peninsula	GP3	Site Allocation GP3 covers distinct sites with different characteristics. However the policy text doesn't differentiate between the sites therefore difficult to determine which site the allocation refers to and the sites should be separated. Reference to proposals being guided by a masterplan should be removed as the Gas Holder brief has already been adopted. Site allocations assumes the delivery of Silvertown Tunnel. Therefore must assume the HSC consultation zones associated with the Brenntag HSC will no longer apply and should be removed. Reword requirement for 'dual aspect' units to align with London Plan. Question if site allocations have been subject to a viability test.	The allocation does not preclude development coming forward in phases. While land parcels within the allocation may come forward individually, to ensure that the optimum development capacity is achieved within the constraints of the site, the site must be planned in a comprehensive manner that does not prejudice the future of existing businesses and employment uses on the site. To ensure that earlier phases do not prejudice the delivery of later phases, all phases must be developed within the context of the site wide requirements and guidelines.
Quod	SGN	Specific Consultation Body	Greenwich Peninsula	GP3	Object to housing being concentrated in the east of the site. The west of the site is the part of the site that suffers from decommissioning constraints and suffers from viability issues so housing should be focused in this area. The requirement for community facilities is unclear and not justified, there is no demand for such facilities. Object to requiring commercial uses to the west of the site. This is not required in the site GP3 planning brief. The London Plan policy H1 does not require surplus utilities sites to reprovide industrial capacity.	The development principles set out in the planning brief are based on a commercial led zone on the western part of the site (along the A102) to provide a buffer from the A102 and industrial uses, including safeguarded wharves to the west, and a residential led zone on the eastern part of the site (along Millennium Way). The western side of the site is exposed to severe noise levels from the adjacent A102, and the concentration of traffic/associated air quality issues from the A102 will be further impacted by the Silvertown Town. Focusing residential use on the western part of the site would therefore be inappropriate. All major developments are required to provide supporting infrastructure including community facilities in order to make the development acceptable in planning terms. The Planning Brief for the site identifies an indicative capacity range of 600 - 1200 residential units, which would generate a significant additional residential population in an area where there is currently no residential population, with associated social infrastructure requirements. Local Plan and London Plan policies require that where there are employment/industrial uses on a site that the employment/industrial role of the site is retained as part of any redevelopment.
Quod	SGN	Specific Consultation Body	Greenwich Peninsula	GP3	Unclear what local context exists to define the low-mid rise character of the site, the south west part of the site does not define the site. Appeal decision on the site confirms the site will deliver high density residential development.	The London Plan requires a design-led approach to determining the optimum development capacity of sites that responds to a site's context and capacity for growth and encourages boroughs to set out acceptable building heights, scale massing and indicative layouts for allocated sites. As set out in Policy D2 of the London Plan, density should be linked to the provision of future planned levels of infrastructure and be proportionate to the site's connectivity. The design guidelines set out in the allocation in terms of use, scale and massing have taken into account the surrounding built form, uses and character (including the likelihood of change of these factors) as well

						the capacity for growth. A form of development wholly reliant on tall buildings would not be appropriate to the context and would result in a density that exceeded the site's capacity for growth. While there are tall buildings proposed on the Knight Dragon Site along Millennium Way, the context surrounding the site is varied. Where a site allocation identifies that there may be potential for a tall building, this does not mean that any/all tall buildings will be granted permission; all proposals are subject to a detailed assessment at the time of application.
Quod	SGN	Specific Consultation Body	Greenwich Peninsula	GP3	The text stating that "development should build on the heritage value of the gas holder..." should be removed as a prior notification has been approved and demolition has commenced.	The site's industrial heritage is an important element of its character and the allocation acknowledges this while retaining sufficient flexibility to enable creative reuse of elements of the gasholder without unduly constraining the development options for the site. It is noted that SGN has recently carried out a design competition seeking ideas for reuse of elements of the structure as public art on the site.
Quod	SGN	Specific Consultation Body	Greenwich Peninsula	GP3	Reword requirement for 'dual aspect' units to align with London Plan.	The London Plan, Core Strategy and London Housing SPG set out detailed design guidance for residential development, including that in general residential units should be dual aspect, that north facing single aspects units should be avoided, and that all residential units should be provided with private outside space. The Site Allocations Local Plan carries forward this guidance for all site allocations to ensure that any proposals brought forward provide a satisfactory level of amenity. Ensuring a good quality of residential amenity is particularly important for higher density schemes and/or schemes where the surrounding mix of land uses is varied and/or constraints pose a challenge to achieving a good level of residential amenity.
	TFL	Specific Consultation Body	Greenwich Peninsula	GP3	Support improved permeability through the site to north Greenwich and enhance northeast to southwest pedestrian and cycle connections with specific reference to crossing Millennium Way. Strongly support car free development.	Support noted.



Lichfield	Knight Dragon	Developer/ Landowner	Greenwich Peninsula	GP4	<p>Site Requirements: Remove reference to the film studio in Upper Brickfields as the new 2019 outline application seeks to replace it with additional residential units, employment space, multi storey car park and social infrastructure. The text referring to tallest buildings should be reworded to make reference to these buildings also framing the park in alignment with the Design Guidelines for the site. Delivery of the community facilities in each neighbourhood should be reworded to reflect other permitted uses in the masterplan.</p> <p>Development guidelines - state detailed design proposals for the primary school in Meriden Quays Neighbourhood should allow for potential expansion to accommodate additional forms of entry up to 4 forms but the land designated in the approved ground level land use parameter Plan is not capable of accommodating 4 form entry, the largest is a 3 form entry.</p> <p>Reference to development zones should be removed as they were deleted from the masterplan under ref 17/1373/NM.</p> <p>In general this section is too prescriptive particularly the reference to building heights. It doesn't allow for adaptation to meet changing demographics, market pressures and demands. Remove reference to family sized units as the southern end of the Peninsula as family dwellings will be delivered as per the masterplans. Requirement for dual aspect units should be removed as this is not practical in all cases.</p>	The allocation has been updated to remove reference to the film studio and better reflect the permitted masterplan.
	Sport England	General consultation body - national	Greenwich Peninsula	GP4	<p>It is noted that there is a golf driving range within this site allocation. Paragraph 97 of the NPPF (and the Council's own development plan policies) seek to protect sports facilities from development. This policy does not appear to address the future of this driving range and Sport England therefore objects to its loss.</p>	The golf driving range within the allocation is a temporary/meanwhile use and not protected by the NPPF/Local Plan.
	East Greenwich Residents Association	General consultation body - residents group	Greenwich Peninsula	GP4	<p>This just gets more and more densely built at each revision of the Masterplan. It looks as if the Site Allocations document does not include all the high rise buildings in the current version of the Masterplan so it is already out of date. The erosion of green space is significant and the absence of play space is deplorable. The opportunity to make something interesting and liveable on Greenwich Peninsula has been irretrievably lost now.</p>	The site requirements are explicit that any proposals to increase residential units must also provide for the infrastructure requirements associated with the proposed uplift in unit numbers. The site guidelines have been updated to clarify that this includes consideration of play space and public open space requirements.
	CCG	Specific Consultation Body	Greenwich Peninsula	GP4	<p>The scale of development will require additional infrastructure across all parts of health care not only Primary Care. The site should reflect the potential to expand GMV to accommodate some future growth.</p>	The potential for the expansion of the Millennium Health Centre to accommodate further population growth would be considered as part of assessing the additional social infrastructure needs arising from any proposed uplift to permitted residential capacities at GP4, as well as other sites in the Greenwich Peninsula area.

	Environment Agency	Specific Consultation Body	Greenwich Peninsula	GP4	We support the site requirements and design guidelines. Please include 'all proposed riverside improvements must be discussed and agreed with the Environment Agency'.	Allocation has been updated to include suggested text.
	PLA	Specific Consultation Body	Greenwich Peninsula	GP4	Clarification is needed as to whether a river bus terminal is planned in addition to the river bus service referred to in GP1 and GP2 and if so specify its proposed location.	The permitted masterplan includes a river bus terminal to the north west tip of the Peninsula that would provide for cross river and charter services. This would complement the proposed new pier at GP1 which would provide linear services.
	TFL	Specific Consultation Body	Greenwich Peninsula	GP4	Recommend this site should contribute to Millennium Way walk and cycle connections recommended in site GP3.	The draft site allocation has been amended to reflect contribution of site to Millennium Way walk and cycle connections.
	TFL CP	Specific Consultation Body	Greenwich Peninsula	GP4	Support the allocation but consider there is scope to increase the overall quantum of development to ensure the most efficient use of land.	The site has outline planning permission. Any proposals to increase the overall quantum of development will be assessed against relevant development plan policies.
Gerald Eve	GMVL	Developer/Landowner	Greenwich Peninsula	GP5	The proposed allocation aligns with the outline permission and GMVL are committed to delivering the masterplan. Wording of site requirement regarding BI workspace should be revised to reflect 19/1545/MA which has a resolution to grant permission. Suggest that site requirement should refer to provision of BI workspace along part of Bugsby's Way, not to workspace at ground and first floor level along Bugsby's Way.	Support noted. Site requirement regarding workspace has been amended to refer to provision along part of Bugsby's Way.
Gerald Eve	GMVL	Developer/Landowner	Greenwich Peninsula	GP5	In addition to the four requirements listed, a further requirement should be added to state that the potential delivery of new housing should be optimised within the site in accordance with the aspirations of the Local Plan and Local Plan.	It is not necessary to repeat policies from the Local Plan or London Plan in the Site Allocations as all documents comprise the statutory development plan.
Gerald Eve	GMVL	Developer/Landowner	Greenwich Peninsula	GP5	Given the various constraints of the site, which have resulted in a reduction in height of Plot 201, there has to be a degree of flexibility afforded to the development guidelines. Whilst GMV will strive to deliver dual aspect units and amenity space, this is not always possible in practicality. In addition, with regards to green walls, the working should be revised to align with the outline consent, that green wall should be created in appropriate areas of the proposed development.	The London Plan, Core Strategy and London Housing SPG set out detailed design guidance for residential development, including that in general residential units should be dual aspect, that north facing single aspect units should be avoided, and that all residential units should be provided with private outside space. The Site Allocations Local Plan carries forward this guidance for all site allocations to ensure that any proposals brought forward provide a satisfactory level of amenity. Ensuring a good quality of residential amenity is particularly important for higher density schemes and/or schemes where the surrounding mix of land uses is varied. No evidence has been provided that the reserved matters proposals cannot meet minimum residential design standards/guidance.

Firstplan	Angerstein , Murphy's and Riverside Wharves Operators	General consultation body - business	Greenwich Peninsula	GP5	Highlight that agreed noise mitigation measures and noise control measures are working well, and reflect the close working between wharf operators, PLA, RBG and developer.	Noted.
Firstplan	Angerstein , Murphy's and Riverside Wharves Operators	General consultation body - business	Greenwich Peninsula	GP5	Either under the heading 'Site Requirements' or 'Site Guidelines' there should be express reference confirming that all proposals: - Will be required to ensure that they do not prejudice the operation of the adjacent Safeguarded Wharves; - Will need to comply with the noise principles/conditions established by the outline permission; - Should be progressed in consultation with the Safeguarded Wharf Operators and PLA.	Development guidelines amended as per comments.
	GLA	Specific Consultation Body	Greenwich Peninsula	GP5	In line with draft London Plan EI , BI(a) offices should be directed to town centres. Overall, this is not a sustainable location for offices and the site allocation should clearly state BI(a) is not appropriate. Employment use on this site should be informed by local evidence. The Mayor's evidence suggests greatest demand for B8 capacity across London.	The outline permission for the site includes up to 4462sqm B-uses, which includes office uses.
	PLA	Specific Consultation Body	Greenwich Peninsula	GP5	It would still be beneficial if the site allocation specifically highlighted the need to ensure that any additional proposed development near to Angerstein and Murphy's Safeguarded Wharves are designed to minimise the potential for conflicts of use and disturbance, in line with the Agent of Change principle	The draft site allocation has been amended to reflect agent of change principle and to address issues of proximity to safeguarded wharves
	Greenwich Society	General Consultation Body	Greenwich Peninsula		Concerned about the removal of GP8, deleting a site earmarked for open space sends the wrong signal.	GP8 related to open space associated with the O2 arena.
	Derreb Ltd	Developer/ Landowner	Kidbrooke	KI	Objects to requirement to provide 50% affordable housing.	The site was released from open space designation for the specific purpose of delivering 50% affordable housing, as set out in the Kidbrooke SPD. This site is considered a greenfield site as defined in the Mayor's Affordable Housing and Viability SPG, which expects such sites to provide 50% affordable housing or demonstrate through a viability assessment that this cannot be achieved.
	Sport England	General consultation body - national	Kidbrooke	KI	Objects to allocation on the grounds that it includes a publicly accessible sports pitch that is floodlit.	The site does not contain a sports pitch. The site is vacant and overgrown.
	Old Page Residents Association	General consultation body - residents group	Kidbrooke	KI	Access to KI is limited and proposals should accept that constraint. Would benefit from having family sized houses not apartments.	The allocation acknowledges the surrounding character and context of the site.

Judy Smith	OPERA	General consultation body - residents group	Kidbrooke	K1	Allocation should reflect the limited access to the site. Site would benefit from family-sized houses rather than apartments.	The allocation acknowledges the surrounding character and context of the site.
		Individual	Kidbrooke	K1	Agree with proposal for 50% affordable housing alongside supporting amenities.	Support noted
		Individual	Kidbrooke	K1	Housing is fine.	Support noted.
	GLA	Specific consultation body	Kidbrooke	K1	Recommends that RBG ensure sufficient outdoor sporting provision in this area over the lifetime of the plan. 50% affordable housing is supported. Site should optimise housing capacity.	Support noted
	Department for Education	General consultation body - national	Kidbrooke	K2	Supports inclusion of primary school provision in allocation.	Support noted.
		Individual	Kidbrooke	K2	Objects to heights within the development and costs of units.	All phases of the site have full planning permission and the allocation reflects these permissions.
		Individual	Kidbrooke	K2	Housing is fine.	Support noted.
	TfL	Specific consultation body	Kidbrooke	K2	Recommends inclusion of bus standing space. Should seek further improvements to Kidbrooke Station interchange alongside K3.	There is limited scope within this site to provide bus standing space, particularly given that most of it is subject to extant planning permissions.
Litchfields	Kidbrooke Partnership	Developer/Landowner	Kidbrooke	K3	Supports the allocation. Recommends amendments to the wording of the site requirements: add flexibility to the description of access improvements to Kidbrooke Station, add flexibility in terms of building heights; and the development guidelines: add flexibility regarding the range of uses that would be acceptable, add flexibility regarding access to sunlight in amenity spaces, add flexibility regarding cycle and pedestrian connections, remove restriction on ground floor residential use, add flexibility in terms of single aspect units.	Support noted. Flexibility added to the wording regarding appropriate uses on the site. Development guidelines amended to ensure direct sunlight to part of all public spaces rather than their entirety. The height requirements have also been amended to add flexibility while ensuring a transition to the low-rise surrounding neighbourhoods. Given the nature of the site, ground-floor residential units are unlikely to achieve a satisfactory level of amenity, and single aspect units are generally unlikely to be appropriate given that the site is surrounded by noise and pollution generating infrastructure.
	Old Page Residents Association	General consultation body - residents group	Kidbrooke	K3	The experience of the planning application for K3 Kidbrooke Station Square site shows how damaging over development can be, and all that was learnt from that site must apply to any further proposals for it.	Noted
		Individual	Kidbrooke	K3	Concerns about the scale of this development and the impact it will have on local people adding additional demand to social and transport infrastructure. Therefore question whether the prescriptive nature of this proposed site is appropriate considering application currently called in by the Mayor.	The need for infrastructure to support future development is addressed in the Infrastructure Delivery Plan (IDP).

		Individual	Kidbrooke	K3	Objects to heights within the allocation and lack of car parking.	The site has full planning permission and the allocations reflects the permission.
		Individual	Kidbrooke	K3	Housing is fine.	Support noted.
	GLA	Specific consultation body	Kidbrooke	K3	Supports improved bus interchange, site should optimise housing capacity.	Support noted, allocation applies design-led approach to optimising development density.
	TfL	Specific consultation body	Kidbrooke	K3	Supports reference to bus terminal. Bus stands located at Henley Cross should be retained. Site should seek further improvements to Kidbrooke Station alongside K2.	Improvements to public transport interchange have been included in the allocation. Given the layout of the site, it may not be suitable for bus standing space.
	Old Page Residents Association	General consultation body - residents group	Kidbrooke	K4	Will require safe access to the main Kidbrooke hub for health services and youth services and to the railway station and consideration should be given as to how to provide this. K4 must not be allowed to overshadow the new Thomas Tallis school. Would benefit from having family sized houses not apartments.	The suitability for family housing is recognised in the development guidelines.
	OPERA	General consultation body - residents group	Kidbrooke	K4	Site requires safe access to Kidbrooke Village Centre. Site would benefit by having family-sized houses rather than apartments.	The suitability for family housing is recognised in the development guidelines.
		Individual	Kidbrooke	K4	Recommends additional school spaces be provided to serve the development.	The need for additional school places to meet the projected level of growth is set out in the Infrastructure Delivery Plan.
		Individual	Kidbrooke	K4	Get on and build.	Support noted.
	GLA	Specific consultation body	Kidbrooke	K4	50% affordable housing supported. Site should optimise housing capacity.	Support noted, allocation applies design-led approach to optimising development density.
		Individual	Kidbrooke	K5	Supports retention of supermarket.	The site has been removed from the Site Allocations document as it has been purchased and refurbished as a supermarket.
		Individual	Kidbrooke	K5	Should be mixed use.	Support noted.
Turley	Aviva Investors	Developer/Landowner	Kidbrooke	New Site	Propose allocation of land at Old Post Office Lane, Kidbrooke for residential-led mixed use development. The exiting units on the site are occupied, but there will shortly be the opportunity to redevelop the site. There is approximately 12,075 sqm of B-Class employment space on the site. However, the significant majority of this (approximately 10,220 sqm) is a B8 secure document storage warehouse, where employment density is very low. In total, the land supports approximately 50 jobs, although a large number of these are mobile (drivers and external operatives). The present use of the land at Old Post Office Lane means that effective use of the land is	The site is currently occupied by B8 industrial use and the existing buildings are in good condition and provide modern industrial space with dedicated service yards. Allocating the site for residential use with significantly reduced industrial capacity would be contrary to the new London Plan as the existing industrial use is protected and there is an evident market demand for B8 space in Greenwich.

					not being achieved and it is not optimising its contribution to meeting employment / housing needs.	
Turley	Aviva Investors	Developer/ Landowner	Kidbrooke	New Site	The land can assist in meeting and providing for the critical needs of new and affordable homes – and new employment space to support new jobs in the borough, encourage investment, innovation and economic growth. Consider the site has the potential to deliver in the order of 650 residential units and 2800sqm of largely B1 and B8 employment space, based on preliminary site capacity work. The type and format of the employment space which can be created – and the expected quantum – can be flexible to meet market or occupier requirements. It can potentially include incubator, managed workspaces, maker spaces, design and creative studios, self-storage, last-mile logistics and/or consolidation spaces. These uses tend to have much higher employment densities and support a wide range of innovative and start-up businesses which are of benefit to a much wider range of people with diverse skills. This can much more effectively support the aspirations for economic growth expressed in the London Plan and the ambitions for the Borough.	The site is currently occupied by B8 industrial use and the existing buildings are in good condition and provide modern industrial space with dedicated service yards. Allocating the site for residential use with significantly reduced industrial capacity would be contrary to the new London Plan as the existing industrial use is protected and there is an evident market demand for B8 space in Greenwich.
Turley	Aviva Investors	Developer/ Landowner	Kidbrooke	New Site	The Aviva land is adjacent to draft allocation ref. K4 for the former Thomas Tallis playing fields. There are enhanced benefits to be gained from joint consideration and (in due course) masterplanning of site allocation K4 and the adjoining Aviva land, including: - the opportunity for enhanced unit (and affordable housing) yield on the Council's land (site K4); - plus scope for integrated design and enhanced quality of place-making so that the Aviva and Council land relate to each other in design, layout, amenity and orientation to create improved quality of place for people living and working there. - There are also potential benefits in terms of shared costs of procurement and delivery of infrastructure, such as access, power and drainage.	The majority of the Aviva land is bounded by allotments, and only a very small part of the boundary is shared with proposed allocation K4. It is unclear how the response would address the allotments and therefore unclear what, if any, additional benefits would be realised from considering the two sites together.
Turley	Aviva Investors	Developer/ Landowner	Kidbrooke	New Site	Aviva has also considered how the Council's land and Aviva land could be developed with regard to each other. The combined potential yield is over 1,250 residential units and more than 6,500 sqm of flexible B-Class floorspace. As such, it can significantly contribute to meeting housing and employment needs. Applying a 35% affordable housing ratio to this would equate to almost 440 affordable homes. Applying	The majority of the Aviva land is bounded by allotments, and only a very small part of the boundary is shared with proposed allocation K4. It is unclear how the response would address the allotments and therefore unclear what, if any, additional benefits would be realised from considering the two sites together.

					50% to the Council's land would increase this figure even further. There are compelling grounds for the allocation of the two sites to be considered and framed with regard to each other in a comprehensive manner.	
Turley	Aviva Investors	Developer/ Landowner	Kidbrooke	New Site	<p>To respond to the soundness issues arising from omission of the Aviva land through non-compliance with London Plan policies and the clear stance of the NPPF, a new allocation for the land should be added to the Site Allocations document (or Local Plan in due course). The principal elements of this new allocation comprising the Aviva land could be as follows:</p> <ul style="list-style-type: none"> <li>- Redevelopment of land at Old Post Office Lane to contribute to the new sustainable neighbourhood at Kidbrooke, providing new homes and new employment space as part of a high density mixed use development. Employment floorspace can include a range of B1 / B8 uses;</li> <li>- A comprehensive but phased approach to planning for this allocation and the adjacent Thomas Tallis land allocation (Site K4); [Note: Equivalent wording to be added to the policy for site allocation K4];</li> <li>- Improvement to the sense of arrival and greater density as a gateway into Kidbrooke from the north, and along Old Post Office Lane; and</li> <li>- Built development to sensitively address the boundaries of the site, particularly with neighbouring residential development and the allotments.</li> </ul>	The site is currently occupied by B8 industrial use and the existing buildings are in good condition and provide modern industrial space with dedicated service yards. Allocating the site for residential use with significantly reduced industrial capacity would be contrary to the new London Plan as the existing industrial use is protected and there is an evident market demand for B8 space in Greenwich.
	Heathway Residents & Neighbourhood Watch Association	General consultation body - residents group	Kidbrooke		All 5 sites in Kidbrooke include substantial residential development. It will be essential that provision is made for associated infrastructure including transport, schools and other services including clinics, shops and opportunities for employment.	The development of key infrastructure has been included in the allocations, in accordance with the Infrastructure Delivery Plan.
	Heathway Residents & Neighbourhood Watch Association	General consultation body - residents group	Kidbrooke		The proposed new bus route 335 from Kidbrooke to North Greenwich via the Blackheath Standard will make a contribution but there will be, in addition, a substantial increase in vehicular traffic, much of which will use the already congested Shooters Hill Road. What is to be done about this road? In addition, there will be substantial additional traffic for the Blackwall Tunnel pending completion of the Silvertown tunnel. Increased population will make increased demands on the Borough's road system, despite welcome additional rail capacity.	The allocations seek to reduce car use by limiting on-site parking, improving walking and cycling infrastructure and contributing to wider public transport infrastructure.

BPTW	London South East Colleges (LSEC)	Developer/ Landowner	Plumstead	New site	<p>LSEC Greenwich Campus, 95 Plumstead Road, Woolwich, SE18 7DQ presents an opportunity for educational and residential uses and warrants allocation.</p> <p>the Site is deliverable and developable within the plan period</p> <p>The Site has been subject to pre-application discussions and there is an intention to submit a planning application for the mixed-use redevelopment of the Site in early 2020.</p> <p>The principle of mixed-use development (continued Educational D1 Use and introduction of Residential C3 Use) has been agreed at pre-app with the site having the potential to deliver up to 320 residential dwellings.</p> <p>The Site is deliverable and developable within the plan period.</p>	Existing policies provide sufficient guidance regarding development of the site. A planning application has been submitted.
	Positive Plumstead	General consultation body - residents group	Plumstead	PI	S&M motors – Would like to see existing businesses kept if they wish to stay in the area. The current church on the site contributes to parking issues locally when services are on.	The Development Guidelines state that 'Consideration should be given to relocating the motor services provision to the nearby Strategic Industrial Location (SIL) to enable the introduction of residential use to the site and the introduction of commercial/employment uses that are more appropriate to the prominent High Street location.' This is considered to be more appropriate than re-providing for them on a redeveloped site.
		Individual	Plumstead	PI	Plumstead lacks quality and affordable children's, young people's clubs for after school and holiday which risks children and young people growing up on the street and engage in anti-social behaviours. Quality and safe playing and learning environment for the newest generations is a vital investment to everyone's future. I could envisage some soft play/adventure playground to the smallest children and some creative/media places for older kids, potentially performing arts/sports clubs. Family friendly restaurants and cafes would also be welcome, especially ones that would be able to incorporate some of the above mentioned activities.	The allocation is for mixed use development to include both commercial and community uses. The type of development proposed would therefore be acceptable on the site, should such an operator be interested.
		Individual	Plumstead	PI	Housing needed with shops	Support noted
	Positive Plumstead	General consultation body - residents group	Plumstead	P2	Car wash – note that the church in the maxi building currently causes traffic and parking problems when services are on. There are a large number of existing businesses (light manufacturing etc) on this site that should be retained if possible.	Site requirements' includes 'retention and enhancement of workspace', which could be occupied by existing businesses if they desire.
		Individual	Plumstead	P2	Plumstead lacks quality and affordable children's, young people's clubs for after school and holiday which risks children and young people growing up on the street and engage in anti-social behaviours. Quality and safe playing and learning environment for the newest generations is a vital investment to everyone's future. I could envisage some soft play/adventure playground to the smallest children and some	The allocation is for mixed use development appropriate to the town centre. The type of development proposed would therefore be acceptable on the site, should such an operator be interested.



					creative/media places for older kids, potentially performing arts/sports clubs. Family friendly restaurants and cafes would also be welcome, especially ones that would be able to incorporate some of the above mentioned activities.	
		Individual	Plumstead	P2	Housing needed with shops	Support noted
	Positive Plumstead	General consultation body - residents group	Plumstead	P3	White Hart Rd – can the links between industrial land retention requirements and the suggestions in the GNGF bid of a more “arty/makers” space be clarified? This is now referred to as “ancillary” (comment 44; and page 105) There was support from Councillors earlier in the year as to the change of industrial land to a church and nursery in White Hart Road at a Planning Board in 2019. Is industrial land designation important, or not?	The site allocation has been updated to clarify that it does not seek to restrict the range of industrial uses, and that the function of the site should remain part of the SIL.
		Individual	Plumstead	P3	Plumstead lacks quality and affordable children's, young people's clubs for after school and holiday which risks children and young people growing up on the street and engage in anti-social behaviours. Quality and safe playing and learning environment for the newest generations is a vital investment to everyone's future. I could envisage some soft play/adventure playground to the smallest children and some creative/media places for older kids, potentially performing arts/sports clubs. Family friendly restaurants and cafes would also be welcome, especially ones that would be able to incorporate some of the above mentioned activities.	The site is within SIL, and would therefore not be suitable for the uses proposed which are not compatible with the SIL designation.
		Individual	Plumstead	P3	Not a priority	The site is subject to a Good Growth Funding agreement with the GLA and gives an opportunity to provide flexible and affordable space for small businesses, while bringing a listed building back in to use.
	GLA	Specific Consultation Body	Plumstead	P3	The site is within SIL and subject to the compatibility with the heritage listing, the site allocation should support the broadest range of industrial uses.	The site allocation has been updated to clarify that it does not seek to restrict the range of industrial uses, and that the function of the site should remain part of the SIL.
	TfL	Specific Consultation Body	Plumstead	P3	This is the only site which could have potential impacts with the Crossrail construction works as tunnels will be approximately 4 metres deep at this location. We therefore welcome reference to the Crossrail emergency evacuation route in this site that may restrict development in the south of the site.	Support noted
	Sport England	General consultation body - national	Plumstead	P4	Object - The loss of a sports centre site is contrary to paragraph 97 of the National Planning Policy Framework. It is understood that this leisure centre has been relocated and replaced? If so, this should be referenced in the policy.	The 'justification' references the 'relocation of leisure uses within the library building'.

	Positive Plumstead	General consultation body - residents group	Plumstead	P4	Housing - there is reference to the former Leisure centre land housing being only 50% affordable. We had been given to understand that this land was going to be given over to council homes. Can this be clarified?	The site allocation references the need to provide 50% affordable housing as this is a Local Authority owned site. However, the site is part of the Local Authority New Build (LANB) programme where it is intended that 100% affordable units be provided.
		Individual	Plumstead	P4	Plumstead lacks quality and affordable children's, young people's clubs for after school and holiday which risks children and young people growing up on the street and engage in anti-social behaviours. Quality and safe playing and learning environment for the newest generations is a vital investment to everyone's future. I could envisage some soft play/adventure playground to the smallest children and some creative/media places for older kids, potentially performing arts/sports clubs. Family friendly restaurants and cafes would also be welcome, especially ones that would be able to incorporate some of the above mentioned activities.	The Site Allocation is for residential development, and is linked to the redevelopment of the Plumstead Centre, which provides leisure facilities alongside an improved library and a soft-play facility.
		Individual	Plumstead	P4	Housing	Support noted
	GLA	Specific Consultation Body	Plumstead	P4	The Mayor welcomes a 50% affordable housing requirement.	Support Noted
	Positive Plumstead	General consultation body - residents group	Plumstead		Para 4.13: We remain concerned about the loss of leisure facilities with the closure of the old leisure centre. While we are pleased that the remodelled Library will go some way to close the gap, but not enough, particularly by way of increasing the number of accessible and affordable community space to help community cohesion. So this is not a like for like provision. Where is the indoor bowls alley replacement? We ask again, why has the Kinara not been retained for community use?	The new Plumstead Centre provides a 33 station gym, badminton court, fitness and dance studios, a soft play facility, cafe and meeting rooms for hire alongside the improved library.
	Positive Plumstead	General consultation body - residents group	Plumstead		Para 4.14 (former P1 site) we very much support the retention of the Abery St Car park. When the library relocates to the main site, what will happen to the temporary building that is currently there? Will the site return in full to car parking? What is meant by the reference to "proposed retail frontage" (response to comment 44)	This is a small site, and future development can be sufficiently guided by existing Local Plan policies.
	Environment Agency	Specific Consultation Body	Plumstead		We are pleased that advice we provided in previous consultations in terms of groundwater protection and contaminated land has been given due regard in this document regarding the Plumstead sites	Support Noted

CBRE	Peabody	Developer/ Landowner	Thames mead	TI	<p>Peabody is supportive of the identification of the site for residential development with public open space provision. The site is located within the RBG Housing Zone and represents a key site contributing towards the housing target.</p> <p>We do not consider that the provision of a primary school on site is justified. The wording of the site allocation itself states <i>'if a school is required'</i> highlighting ambiguity and uncertainty in the policy wording. Indicative massing and options studies have indicated a development capacity of circa 670 homes; this should be added to the site allocation. The heights set out in the allocation text should not artificially constrain the design evolution process. Peabody is supportive of the proposed improvements to the Grade II Listed Broadwater Lock and Swing Bridge as part of the development.</p>	<p>Indicative area wide residential capacities have been included in the Proposed Submission document. As part of the Authority Monitoring Report (AMR), RBG identifies and updates a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against the London Plan housing requirement. The five year supply is set within the context of the 15 year housing trajectory, which is also updated on annual basis and provides full details of the large site (0.25ha and above) included in the trajectory, including their indicative capacity and phasing. All site allocations in this Proposed Submission document are included in the 2019/20 housing trajectory. RBG can accommodate all its identified housing need within the borough.</p> <p>Reconfiguration of the open space will be acceptable provided that unrestricted public access is provided and qualitative improvements are made over and above the existing provision.</p> <p>There are no existing primary schools in the vicinity of the site, existing schools are not easily accessible. Should a new school be required given the projected population growth in the area, it is considered that this site would be appropriate; both a 2FE primary school and a significant quantum of residential development could be provided on the site. It is considered that the current reference to school provision is therefore appropriate.</p> <p>The heights set out in the allocation text are development guidelines based on the surrounding context; they need not constrain the design evolution process.</p>
		Individual	Thames mead	TI	Get on and build. Bring back the lake which is an asset	Support noted. The Site Requirements allow for reconfiguration of the open space and state that use of the infilled canal as green pedestrian / cycle link should be considered.
		Individual	Thames mead	TI	Strongly support the development of this area. Similar to Greenwich and Deptford, the entire riverfront beyond Greenwich is underutilised and can generate income for the borough, bring the borough together more and generate more space, enjoyment and greenery. The development, greenery, riverside activation and connection to the greater borough would serve the diversity of our borough.	Support noted.
	Environment Agency	Specific Consultation Body	Thames mead	TI	Please include delivery of improvements to flood defences in line with the TE2100 Plan in the site requirements and design guidelines section.	Reference to flood defence improvements / TE2100 added.

	GLA	Specific Consultation Body	Thames mead	T1	There should be no loss in quantum of open space. The Mayor strongly supports creating access to the open space.	This open space, while designated as Community Open Space, is not currently publicly accessible. Development of this site offers the opportunity to reconfigure the open space, providing qualitative improvements and unrestricted public access.
	TfL	Specific Consultation Body	Thames mead	T1	<p>We support the reference to improved pedestrian and cycle access in the site requirements section. Move the following from the development guidelines section to the site requirements section. 'Site layout and open space configuration should ensure visual and physical connections to the River Thames and Thames Path are provided. Significant gaps should be left between buildings along the waterfront to allow physical and visual access to the River Thames.'</p> <p>Ament development guidelines section to include reference for new developments to:</p> <ul style="list-style-type: none"> <li>• Integrate well with the existing street network, maximising opportunities to have active frontages on streets</li> <li>• Ensure that walk and cycle routes are made the most attractive ways to travel to/from and within the site, maximising access to public transport to support car free travel</li> </ul>	Allocation amended as per proposed wording.
CBRE	Peabody	Developer/ Landowner	Thames mead	T2	<p>The site is in a range of ownerships, with Peabody owning an area of vacant land on the north-eastern boundary of the proposed allocation in addition to the trade counter units. The area of vacant land within Peabody's ownership forms part of a wider scheme known as Plumstead – West Thamesmead Site. Peabody is supportive of the principle of allocating the vacant land for a residential-led mixed use development. The proposed allocation for the whole (including land not owned by Peabody) reflects the development potential of this parcel of land. However, in terms of redevelopment, Peabody is not aware of any interdependency between the different land parcels comprised within this area, and the single allocation implies that it must be brought forward on a comprehensive basis. Peabody considers that the proposed allocation should be split down into separate allocations to ensure that identifying a solution for the adjacent Royal Mail and Stage Coach Site does not prevent development from occurring on the Housing Zone part of the site. If the allocation remains 'as is', the policy and supporting text must make it clear that it is capable of being brought forward in smaller parcels, on the basis that any such scheme would need to demonstrate that it would not prejudice wider development.</p>	<p>A site allocation does not need to be in one ownership, nor does it need to be subject to one planning application nor brought forward at one time. The existing site allocation has a strong physical boundary, in the form of the road, and makes a sensible single site. Indicative area wide residential capacities have been included in the Proposed Submission document. As part of the Authority Monitoring Report (AMR), RBG identifies and updates a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against the London Plan housing requirement. The five year supply is set within the context of the 15 year housing trajectory, which is also updated on annual basis and provides full details of the large site (0.25ha and above) included in the trajectory, including their indicative capacity and phasing. All site allocations in this Proposed Submission document are included in the 2019/20 housing trajectory. RBG can accommodate all its identified housing need within the borough.</p> <p>Wording has been amended from 'must' to 'should' where appropriate</p>

Gerald Eve	Peabody and Berkeley Homes	Developer/Landowner	Thames mead	T2	<p>Plumstead - West Thamesmead Site (PWT) is a key development site, previously occupied by industrial units, now cleared. Proposed development is for a residential-led mixed use scheme providing an element of flexible industrial floorspace within a co-location building. Development would deliver 1,750 units, 40% affordable and a quantum of flexible industrial uses. There have been extensive pre-application discussions and submission of a planning application is anticipated, as part of a wider strategic objective for the comprehensive redevelopment of Peabody's industrial portfolio; this ambition should be reflected in the Site Allocations.</p> <p>Issues and Options Site T9 applied to entire PWT site, now only part, at Pettman Crescent is allocated as T2. Removal of T9 and piecemeal allocation of T2 fails to recognise the opportunity to significantly upgrade the area in a holistic and cohesive way, creating a new place and sense of arrival for Plumstead. The Site Allocations does not identify common constraints and challenges in the area which is a missed opportunity that a comprehensive approach would help to resolve. The PWT site in its entirety was allocated as T9 due to its location within the Thamesmead Housing Zone. Inclusion of the entire site would support delivery through a coordinated approach.</p> <p>Inclusion of the entire site offers the opportunity to deliver homes and jobs as well as the SIL policy objectives of the draft new London Plan. The SIL area is in need of a co-ordinated masterplan and investment approach and Peabody's objectives are to bring forward new industrial accommodation. Improving the area's profile and attractiveness is critical to upgrading the area over the long term.</p> <p>The appropriateness of the PWT site for residential led development is agreed in principle with GLA and RBG, as reflected in the emerging OAPF. Draft New London Plan seeks to achieve more than double the number of homes in the area while draft policy requires no net loss of floorspace in SIL. Proposals for the PWT site and surrounding SIL will ensure this policy objective is achieved over the plan period. Nathan Way/ White Hart Triangle SIL have potential to absorb industrial floorspace of the PWT site to be re-provided off site within SIL.</p> <p>Draft Policy E7 of the London Plan and GLA Practice note dated Nov 2019 both identify opportunities for co-location of residential uses in SIL through intensification of industrial uses to ensure no net loss of industrial floorspace capacity. Peabody can demonstrate that the provision of residential accommodation on the PWT site will not prejudice the principle objective of no net loss of industrial floorspace capacity.</p>	<p>The site boundary was revised from that in the Issues and Options Consultation (T9) to include the entire Pettman Crescent Gyratory Island and to exclude the SIL to the east. The SIL was excluded as there is not the evidence to support the removal of SIL while RB Greenwich is identified as a 'retain capacity' borough for the purposes of industrial land management.</p> <p>The emerging OAPF identifies options for SIL intensification in West Thamesmead. Reference to the emerging OAPF will be added to the introduction to the Thamesmead section of the Site Allocations.</p> <p>The exclusion of the SIL from the Site Allocation does not prevent a planning application from coming forward that includes the SIL and only part of the Site Allocation.</p>
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		Individual	Thames mead	T2	Change to two way road. High density housing	The allocation states that one of the site requirements is that 'Proposals must enable and contribute to the downgrading and reconfiguration of Pettman Crescent and the provision of a Bus Rapid Transit Route.' This downgrading could include removal of the one-way system. The proposed allocation is for residential led mixed use development.
	GLA	Specific Consultation Body	Thames mead	T2	<p>The Mayor welcomes the reprovision of industrial capacity on this site, including its co-location with residential development.</p> <p>The site allocation should reference the Agent of Change to protect industrial uses.</p> <p>The Mayor would welcome car free development.</p>	Support welcomed. Reference to the Agent of Change principle added to the Development Guidelines
	TfL	Specific Consultation Body	Thames mead	T2	<p>We support reference to the existing Stagecoach bus depot to be incorporated into new development, or re-provided elsewhere, subject to operator agreement.</p> <p>To strengthen the site requirements for pedestrian and cycle links within the site, the area should also be made more permeable with footways on both sides of the road throughout the site.</p>	Support noted. Reference to permeability through the site added to development guidelines

CBRE	Peabody	Developer/ Landowner	Thames mead	T3	<p>Support the principle of the allocation of sites within the growth area referred to as Thamesmead Waterfront, which has the potential to accommodate strategic scale growth. The approach here is consistent with the NPPF, focusing on strategic policies that set out an overall strategy, avoiding detailed matters more appropriately dealt with through non-strategic policies.</p> <p><u>Strategic Allocation:</u> Projects of the scale envisaged have a long gestation period, Peabody currently anticipates development commencing towards the end of the plan period, with a planning application currently targeted for submission around the mid-2020s. Projects of this scale need as much certainty as possible, and it is therefore critical that the area is allocated within the draft plan.</p> <p><u>Infrastructure:</u> Further work is needed to establish the scale and nature of growth and the infrastructure necessary to support this. This work should determine what needs to be provided in order to sustain the existing and proposed population. It is premature and inappropriate for emerging policy to define specific infrastructure requirements, ahead of this. The 2012 IDP and the Thamesmead and Abbey Wood SPD (2009) are now outdated for the purposes of plan-making. All references to specific infrastructure should be omitted from emerging policies as they relate to sites T3, T4 and T5; it is sufficient for the draft plan to set the framework to ensure that the infrastructure needed to support the scale of growth envisaged is identified through an up-to-date assessment.</p> <p><u>Requirement for a Masterplan-Led Strategic Allocation:</u> A strategic allocation would establish the framework and vision for the area, to enable a high-level conceptual masterplan to be produced, and for the abovementioned infrastructure assessment to be undertaken. The strategic allocation should make it clear that the site does not need to be delivered simultaneously; constituent parts of the strategic allocation could come forward separately.</p> <p><u>Site Allocations:</u> It is still appropriate to retain the proposed site allocations but T3, T4 and T5 would benefit from a contextual introduction to link to the strategic allocation referred to above. For ease of reference, our suggested changes would result in a strategic allocation for the Thamesmead Waterfront area in respect of which a conceptual masterplan would be produced with site masterplans for T3, T4 and T5.</p> <p><u>MOL:</u> RBG Green Infrastructure Study suggests the potential to introduce non-MOL land as new MOL, based on an assessment of the performance of land against the relevant MOL functions. In north</p>	<p>Support noted.</p> <p>The inclusion of separate site allocations does not preclude the developer from developing a Masterplan across several sites.</p> <p>The development is already identified as having a long term indicative delivery timescale.</p> <p>Additional evidence base work for the OAPF confirms that an all through school is required on the site. It is considered necessary to clearly include this requirement in the site allocation.</p> <p>It is not considered appropriate to dilute the reference to heritage protection, from 'must' to 'should'</p>
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	Sport England	General consultation body - national	Thames mead	T3	<p>Comment - Sport England welcomes the intention within this policy to provide playing fields for the new school with a primary and secondary school. It is noted that there is a lapsed permission for a primary school on the site. It is further noted that the it is intended that it is intended to create a District Park with public access (can include school playing fields). Sport England supports schools in opening up their facilities to the community but this requires careful management. The School and the park management (if that is the Council) will need to consider how best to manage this in order to allow appropriate safeguarding for children at the school.</p> <p><a href="https://www.sportengland.org/facilities-and-planning/use-our-school/">https://www.sportengland.org/facilities-and-planning/use-our-school/</a> It is noted that this is a former landfill site. New grass playing fields can be expensive to establish and careful consideration will need to be given to the associated cost of this. It is recommended that the Council provide more information within the policy to the size and location of the intended park and school playing fields.</p>	The detail of the size and location of the intended District Park and school playing fields are unknown at this time. Reference to the need to involve Sport England in detailed design and to consider safeguarding and future management has been added. Reference is already made in the Development Guidelines section to the need for future studies of contamination.
		Individual	Thames mead	T3	Need DLR and LO	The Thamesmead & Abbey Wood OAPF sets out the transport interventions necessary to support growth on this site. Options for public transport improvements are currently being investigated, including the implementation of a Bus Rapid Transit and DLR extension to Thamesmead. This long term potential is complemented



						by short/medium term opportunities in Abbey Wood arising from the opening of Crossrail.
		Individual	Thames mead	T3	Strongly support the development of this area. Similar to Greenwich and Deptford, the entire riverfront beyond Greenwich is underutilised and can generate income for the borough, bring the borough together more and generate more space, enjoyment and greenery. The development, greenery, riverside activation and connection to the greater borough would serve the diversity of our borough.	Support noted.
	Environment Agency	Specific Consultation Body	Thames mead	T3	Please include delivery of improvements to flood defences in line with the TE2100 Plan in the site requirements and design guidelines section. In partnership with Peabody we are exploring a possible project to link Lake 5 and Lake 4 with a new section of canal	Reference to flood defence improvements / TE2100 to be added to Site requirements and Development Guidelines
	GLA	Specific Consultation Body	Thames mead	T3	The MOL should not be developed and the Mayor strongly supports public access to the MOL.	Support noted
	TfL	Specific Consultation Body	Thames mead	T3	It is essential for walk and cycle infrastructure and routes to be provided across the site to support the future public transport investment in this area and car free development. As this site is located next to the town centre, we strongly recommend that walk and cycle links are provided to Thamesmead town centre. Site requirements should also reference the need for walking and cycling connections to the Thames Path and existing network of streets and paths. The development of this site should maximise the potential of the proposed DLR extension to Thamesmead and BRT stops. Development guidelines should therefore specify that links to Thamesmead town centre and any proposed DLR station and BRT stops must be incorporated into the development connected to the cycling and walking network.	References to links to BRT stops added, and clarified that appropriate walking and cycling connections must be provided.

CBRE	Peabody	Developer/ Landowner	Thames mead	T4	<p>Support the principle of the allocation of sites within the growth area referred to as Thamesmead Waterfront, which has the potential to accommodate strategic scale growth. The approach here is consistent with the NPPF, focusing on strategic policies that set out an overall strategy, avoiding detailed matters more appropriately dealt with through non-strategic policies.</p> <p><u>Strategic Allocation:</u> Projects of the scale envisaged have a long gestation period, Peabody currently anticipates development commencing towards the end of the plan period, with a planning application currently targeted for submission around the mid-2020s. Projects of this scale need as much certainty as possible, and it is therefore critical that the area is allocated within the draft plan.</p> <p><u>Infrastructure:</u> Further work is needed to establish the scale and nature of growth and the infrastructure necessary to support this. This work should determine what needs to be provided in order to sustain the existing and proposed population. It is premature and inappropriate for emerging policy to define specific infrastructure requirements, ahead of this. The 2012 IDP and the Thamesmead and Abbey Wood SPD (2009) are now outdated for the purposes of plan-making. All references to specific infrastructure should be omitted from emerging policies as they relate to sites T3, T4 and T5; it is sufficient for the draft plan to set the framework to ensure that the infrastructure needed to support the scale of growth envisaged is identified through an up-to-date assessment.</p> <p><u>Requirement for a Masterplan-Led Strategic Allocation:</u> A strategic allocation would establish the framework and vision for the area, to enable a high-level conceptual masterplan to be produced, and for the abovementioned infrastructure assessment to be undertaken. The strategic allocation should make it clear that the site does not need to be delivered simultaneously; constituent parts of the strategic allocation could come forward separately.</p> <p><u>Site Allocations:</u> It is still appropriate to retain the proposed site allocations but T3, T4 and T5 would benefit from a contextual introduction to link to the strategic allocation referred to above. For ease of reference, our suggested changes would result in a strategic allocation for the Thamesmead Waterfront area in respect of which a conceptual masterplan would be produced with site masterplans for T3, T4 and T5.</p> <p><u>MOL:</u> RBG Green Infrastructure Study suggests the potential to introduce non-MOL land as new MOL, based on an assessment of the performance of land against the relevant MOL functions. In north</p>	<p>The inclusion of separate site allocations does not preclude the developer from developing a Masterplan across several sites.</p> <p>The development is already identified as having a medium to long term indicative delivery timescale.</p> <p>The Infrastructure Delivery Plan is currently being updated. Further evidence base work has been carried out to support the preparation of the OAPF</p> <p>Proposed changes regarding viability are not considered to be appropriate. The starting point must be an intention to retain the quantity of retail provision, particularly given the housing growth planned in the Thamesmead Town Centre catchment area.</p> <p>Agree to reference existing housing in the Site Context section. However, it is not considered appropriate to delete the requirement that this be retained.</p> <p>Indicative height ranges have been added to each site allocation. The height range provided here, 4-8 storeys with higher blocks at key nodes, is considered to be sufficiently flexible.</p>
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					<p>Thamesmead, deficiencies are detailed as being access to a range of open space hierarchies, which is different to a quantitative deficiency. Therefore, the allocation should provide the flexibility to test the release of MOL for development in return for the introduction of new MOL, which could lead to the realisation of wider, broader benefits. Any such proposals would be tested through a masterplan-led approach.</p> <p><u>DLR Extension:</u> Emerging policies should be clear about the broad dependency between delivering growth and the extension to the DLR; some development may be possible ahead of the DLR extension being operational. The draft site allocations refer to capacity being determined by the DLR extension, (which does not necessarily imply a moratorium on development absent of the DLR extension); this should be consistent through the Plan. Welcome the introduction of new rapid transport corridors to improve accessibility.</p> <p><u>Thames Gateway Bridge at Gallions Reach:</u> Peabody is committed to working to remove this designation.</p> <p><u>Red Line:</u> The extent of land included within the proposed strategic allocation, and in Site Allocation T3, needs to be amended to be consistent with both the extent of Peabody's landownership.</p>	
		Individual	Thames mead	T4	Rebuild with homes	Significant residential development can be accommodated within the improved town centre, particularly in proximity to any new public transport hub.
		Individual	Thames mead	T4	Strongly support the development of this area. Similar to Greenwich and Deptford, the entire riverfront beyond Greenwich is underutilised and can generate income for the borough, bring the borough together more and generate more space, enjoyment and greenery. The development, greenery, riverside activation and connection to the greater borough would serve the diversity of our borough.	Support noted.
	GLA	Specific Consultation Body	Thames mead	T4	Welcome the optimisation of this site for town centre uses and residential development.	Support noted
	TfL	Specific Consultation Body	Thames mead	T4	<p>We support the site requirements which state that development proposals should focus on providing a more typical town centre and a renewed sense of place.</p> <p>The location of bus stops should be considered, and this should be referenced in the site requirements. Both sites T4 and T5 should provide for an appropriate bus station and should take account of the need for interchange with the future DLR station.</p> <p>Recommend that the site requirements also include:</p>	The development guidelines already make reference to a public transport interchange. Reference to street based town centre retail and to Central Way added.

					<p>'Street based town centre retail, walkable and well served by public transport'</p> <p>Recommend adding a reference to Central Way in the development guidelines to read: 'New and/or improved facilities for pedestrians and cycles to cross Central Way will help to reduce severance and improve the look and feel of the area'</p>	
CBRE	Peabody	Developer/ Landowner	Thames mead	T5	<p>Support the principle of the allocation of sites within the growth area referred to as Thamesmead Waterfront, which has the potential to accommodate strategic scale growth. The approach here is consistent with the NPPF, focusing on strategic policies that set out an overall strategy, avoiding detailed matters more appropriately dealt with through non-strategic policies.</p> <p><u>Strategic Allocation:</u> Projects of the scale envisaged have a long gestation period, Peabody currently anticipates development commencing towards the end of the plan period, with a planning application currently targeted for submission around the mid-2020s. Projects of this scale need as much certainty as possible, and it is therefore critical that the area is allocated within the draft plan.</p> <p><u>Infrastructure:</u> Further work is needed to establish the scale and nature of growth and the infrastructure necessary to support this. This work should determine what needs to be provided in order to sustain the existing and proposed population. It is premature and inappropriate for emerging policy to define specific infrastructure requirements, ahead of this. The 2012 IDP and the Thamesmead and Abbey Wood SPD (2009) are now outdated for the purposes of plan-making. All references to specific infrastructure should be omitted from emerging policies as they relate to sites T3, T4 and T5; it is sufficient for the draft plan to set the framework to ensure that the infrastructure needed to support the scale of growth envisaged is identified through an up-to-date assessment.</p> <p><u>Requirement for a Masterplan-Led Strategic Allocation:</u> A strategic allocation would establish the framework and vision for the area, to enable a high-level conceptual masterplan to be produced, and for the abovementioned infrastructure assessment to be undertaken. The strategic allocation should make it clear that the site does not need to be delivered simultaneously; constituent parts of the strategic allocation could come forward separately.</p> <p><u>Site Allocations:</u> It is still appropriate to retain the proposed site allocations but T3, T4 and T5 would benefit from a contextual</p>	<p>Support noted.</p> <p>The inclusion of separate site allocations does not preclude the developer from developing a Masterplan across several sites.</p> <p>The development is already identified as having a medium to long term indicative delivery timescale.</p> <p>The Infrastructure Delivery Plan is currently being updated. Further evidence base work has been carried out to support the preparation of the OAPF</p> <p>The suggestion to amend form 'must not' to 'should not' have a detrimental impact on biodiversity is not considered appropriate</p>

					<p>introduction to link to the strategic allocation referred to above. For ease of reference, our suggested changes would result in a strategic allocation for the Thamesmead Waterfront area in respect of which a conceptual masterplan would be produced with site masterplans for T3, T4 and T5.</p> <p><u>MOL</u>: RBG Green Infrastructure Study suggests the potential to introduce non-MOL land as new MOL, based on an assessment of the performance of land against the relevant MOL functions. In north Thamesmead, deficiencies are detailed as being access to a range of open space hierarchies, which is different to a quantitative deficiency. Therefore, the allocation should provide the flexibility to test the release of MOL for development in return for the introduction of new MOL, which could lead to the realisation of wider, broader benefits. Any such proposals would be tested through a masterplan-led approach.</p> <p><u>DLR Extension</u>: Emerging policies should be clear about the broad dependency between delivering growth and the extension to the DLR; some development may be possible ahead of the DLR extension being operational. The draft site allocations refer to capacity being determined by the DLR extension, (which does not necessarily imply a moratorium on development absent of the DLR extension); this should be consistent through the Plan. Welcome the introduction of new rapid transport corridors to improve accessibility.</p> <p><u>Thames Gateway Bridge at Gallions Reach</u>: Peabody is committed to working to remove this designation.</p> <p><u>Red Line</u>: The extent of land included within the proposed strategic allocation, and in Site Allocation T3, needs to be amended to be consistent with both the extent of Peabody's landownership.</p>	
		Individual	Thames mead	T5	Housing	The proposed allocation is for mixed-use development to include community provision (expansion / reconfiguration of leisure centre and library) with residential above.
	TfL	Specific Consultation Body	Thames mead	T5	Development guidelines that link to Thamesmead town centre and the proposed new DLR station should be improved. Links to new bus stops along the proposed BRT route should also be improved. Both sites T4 and T5 should provide for an appropriate bus station and should take account of the need for interchange with the future DLR station.	Reference to improved links to stops on the BRT route, and to the creation of an interchange between the bus terminus and a future DLR station added.
Barton Willmore	Abbey Wood LLP	Developer/ Landowner	Thames mead	T6	Support the proposed allocation of the site to include residential and commercial uses as Abbey Wood LLP is in the process of implementing Planning Permission Ref 16/2878/F, for the erection of 245 residential	Support noted.

					units and 882sqm of flexible commercial space (Use Classes A1-A5/B1/D1)	
CBRE	Peabody	Developer/ Landowner	Thames mead	T6	<p>Peabody is supportive of the identification of the site as a mixed-use development allocation. Given the proximity to Abbey Wood Station it is appropriate that the site should be considered as a car free development that seeks to minimise the level of car parking provided. Peabody is at an early stage in considering its options for the site and flexibility in the form of 'mixed'-use' development is supported to retain flexibility whilst options are fully explored. With the site in multiple ownership, it is important the text of the proposed allocation does not unintentionally prevent development from occurring on the site. The reference within the policy to a 'holistic approach' should be clear that this refers to how application on the site are assessed rather than a requirement for one application to be submitted for the whole of the site. In this sense, planning applications could be submitted by individual landowners but they will need to demonstrate through the submission that they have considered the holistic intent of the allocation, and that their scheme would not hinder the ability of other sites within the allocation being developed.</p>	<p>Support for mixed-use and car free development noted.</p> <p>The development guidenlines are not intended to be read that one planning application must be made to cover the entire site and the text has been clarified accordingly.</p>
Savills	Sabreleagu e	Developer/ Landowner	Thames mead	T6	<p>Sabreleague Ltd fully supports and endorses the inclusion of Lyndean Industrial Estate as part of T6, however, as currently draft the site allocation is too restrictive and not in conformity with the NPPF, London Plan or the draft London Plan.</p> <p>The site has a PTAL rating of 4-5 which will improve upon the completion of Crossrail. The development guidelines require further clarification to reflect the high levels of accessibility to public transport that the site benefits from. It is requested that Lyndean Industrial Estate is identified as a specific location for tall buildings. Given the site's proximity to public transport and its corresponding high PTAL rating, it is further requested that the site allocation development guidelines should be amended to support optimise density through a design-led approach. This will bring the site allocation into conformity with the draft London Plan and NPPF.</p> <p>The proposed guidelines on height are too restrictive and not consistent with national and regional policy. Thamesmead and Abbey Wood is identified as an Opportunity Area where development proposals should seek to optimise residential and non-residential output and densities, and to contribute towards meeting or exceeding the minimum guidelines for housing. Core Strategy Policy DH2, and the</p>	<p>General support noted.</p> <p>Although the area around Abbey Wood station is a location identified in the Core Strategy as suitable for tall buildings, Lyndean Industrial Estate it is not considered to be suitable for identification as a specific location for tall buildings, given the surrounding low rise residential development.</p>

					<p>Tall Buildings Assessment, identify the area directly surrounding Abbey Wood station as appropriate for tall buildings.</p> <p>Permission has been granted for a 21 storey building directly adjacent to the site (and within the same Site Allocation), Sabreleague Ltd strongly contends that its site would be a suitable location to deliver tall building(s). Prescribing that the site can accommodate development of up to 8 storeys, will not allow a design led development proposal to be brought forward that optimises the provision of both residential and non-residential accommodation on the site. The prescribed height of 8 storeys also restricts the ability to deliver a range of employment opportunities and an appropriate housing choice for the area. The development guidelines should be amended to show that 8 storeys is a minimum building requirement. The Housing Delivery Test results show that RB Greenwich has under delivered housing for the past three years. This clearly demonstrates that further land is required to deliver residential development across the borough and justifies the delivery of a tall building here. The site allocation description requires the reprovision of the existing quantum of B-use floorspace on Lyndean Industrial Estate in a form suitable for SMEs. Whilst this requirement is accepted, Sabreleague Ltd strongly contends that any redevelopment of the site should be residential led.</p>	
	London Gypsies & Travellers	General consultation body - voluntary	Thames mead	T6	<p>In our response to the previous consultation on the Site Allocations DPD in March 2016 we suggested a number of sites where the allocation should make reference to the provision of a small number of pitches alongside other uses. In particular, we strongly recommend that the allocation T6 Cross Quarter and Lyndean Industrial Estate include provision for Gypsy and Traveller pitches. In addition, T6 development guidelines should ensure minimal disruption and negative impacts on the residents on Thistlebrook.</p>	<p>While the Thistlebrook Site is mentioned in the Site Context section, it is agreed that the development guidelines should address the boundary with the Thistlebrook Site and specify that there should be no adverse impact on the residents and the allocation has been amended accordingly. The part of the site which adjoins the Thistlebrook Gypsy and Traveller site has full planning permission, and as such extension of the site is not possible.</p>
		Individual	Thames mead	T6	<p>Why exclude Lidl shed near Crossrail station and the other industrial estate? Both should be mixed use with severe need for homes and near brand new rail line.</p>	<p>The Lidl and Eynsham Drive Industrial Estate are separated from the site allocation by the Thistlebrook Gypsy and Travellers Site. Existing policies provide sufficient guidance should this site come forward for redevelopment.</p>
	GLA	Specific Consultation Body	Thames mead	T6	<p>This site is industrial in nature. In line with draft London Plan E1, B1 (a) offices should be directed to town centres. Overall, this is not a sustainable location for offices and the site allocation should clearly state B1 (a) is not appropriate. Employment use on this site should be informed by local evidence. The Mayor's evidence suggests greatest demand for B8 capacity across London.</p> <p>In line with draft London Plan policy E7, the Mayor would support B1 (c), B2, B8 co-location with residential use.</p>	<p>It is not intended that this site be for office provision, and the Site Allocation has been amended accordingly to clarify that industrial uses are intended. Reference the Agent of Change to protect industrial uses has been added. The part of the site which adjoins the Thistlebrook Gypsy and Traveller site has full planning permission, and as such extension of the site is not possible.</p>

					<p>The site allocation should reference the Agent of Change to protect industrial uses.</p> <p>The Mayor would support the extension of the existing Gypsies and Travellers site to the north, if additional pitches are required.</p>	
		Individual	Thames mead	T7	Housing is fine. Could go high here	The allocation is for residential development. While this is an area identified in the Core Strategy as potentially suitable for tall buildings, the impact on low-rise traditional residential development in the vicinity of the site must be considered. Mid-rise development of 4-8 residential storeys is considered to be appropriate.
	GLA	Specific Consultation Body	Thames mead	T7	<p>The site allocation should reference the Agent of Change to protect new residential development.</p> <p>The Mayor would welcome car free development.</p>	Support for car-free development noted. Reference the Agent of Change to protect industrial uses has been added.
CBRE	Peabody	Developer/ Landowner	Thamesmead		<p>Peabody welcomes the identification of several sites within its ownership for proposed allocation in the draft plan. The identified sites will assist in delivering the mutual vision and objectives shared by RBG and Peabody for the Abbey Wood and Thamesmead area. We welcome the inclusion of the supporting text at 2.60 of the draft plan. To provide additional clarity when reading the draft plan, we suggest that the sentiment and intent behind Paragraph 2.60 is incorporated into its own standalone policy against which all site allocations can be considered.</p> <p>Whilst we acknowledge that the draft plan should not impose development capacities that are untested, as a minimum they should look to provide an indicative range/ figure that can be used as part of the overall framework for the site. it is acknowledged that the scale of proposed development and associated infrastructure needs at Thamesmead Waterfront would make it inappropriate to set a development quantum for the proposals at this stage, but it would be helpful to indicate a minimum anticipated capacity.</p> <p>The cited evidence base documents are also now dated, and we do not think it would be appropriate to use these as the basis to formalise policies on acceptable building heights. Peabody considers that it is neither appropriate nor necessary to impose height limitations through emerging policies, as this might frustrate the ability to properly optimise the capacity of sites, and may artificially constrain the design evolution process.</p> <p>Peabody is fully supportive of the need to ensure that the proposed housing (and economic) growth is supported by the appropriate</p>	Indicative area wide residential capacities have been included in the Proposed Submission document. As part of the Authority Monitoring Report (AMR), RBG identifies and updates a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against the London Plan housing requirement. The five year supply is set within the context of the 15 year housing trajectory, which is also updated on annual basis and provides full details of the large site (0.25ha and above) included in the trajectory, including their indicative capacity and phasing. All site allocations in this Proposed Submission document are included in the 2019/20 housing trajectory. RBG can accommodate all its identified housing need within the borough. The detailed development capacity work undertaken to inform the OAPF and the OAPF itself form part of the evidence based for the allocations in Thamesmead.



				<p>infrastructure to meet the needs of the existing and new communities. However, the 'appropriate infrastructure' needs to be founded on a clear evidence base. A critical component of the IDP is how the required infrastructure is to be funded. If a significant proportion of this is assumed to be through developer contributions, this will have implications for scheme viability and require a clear assessment of the development quantum of site allocations to ensure that the infrastructure being identified is viable and can be provided for. At present, the proposed infrastructure identified for individual sites is unjustified as it has no available evidence base to underpin it. The School Place Planning Data that was reported in November 2018 at Children and Young Person Scrutiny Panel I does not provide evidence to support the need for additional primary school places to be developed in the Abbey Wood and Thamesmead area within the plan period (to 2028).</p> <p>Thamesmead Waterfront represents a development of significant scale consistent with Paragraph 135 of the NPPF with the potential to constitute exceptional circumstances to review MOL boundaries, and the policy should acknowledge this. Thamesmead has one of the greatest deficiencies in access to a range of open space. The identified deficiency is access, not quantum. Flexibility should be incorporated into the draft plan to allow new MOL to be included whilst allowing land to be released that may be better served as development land. The Draft Plan should include an overarching policy for small sites that lists those sites that are assumed to be contributing to the 10% of supply. Peabody's sites at Titmuss Avenue and the Princess Alice restaurant could fall in to this category.</p>	
CBRE	Peabody	Developer/ Landowner	Thamesmead	We agree with the response provided by RBG and acknowledge that the existing strategic industrial land (SIL) designation and adopted Local Plan (2014) provide sufficient context for development on the site to be progressed.	Support noted
CBRE	Peabody	Developer/ Landowner	Thamesmead	Former Site T7 should be reinstated. There is the opportunity for the re-provision of the allotment and playspace to be co-ordinated and rationalised such that it can be re-provided as part of another allocation. . Potential DLR extension could change the context of the site.	The playspace and allotments are well-used and would need to be re-provided as part of any redevelopment. Existing policies provide sufficient guidance regarding development of the site.
CBRE	Peabody	Developer/ Landowner	Thamesmead	Princess Alice Restaurant should be included as a small site, to meet the overall requirement for 10% small sites provision.	This site is too small to be included in the Site Allocations. Existing policies provide sufficient guidance regarding development of the site. It should be noted that the Core Strategy Policy EA(b) Pubs would apply.

CBRE	Peabody	Developer/ Landowner	Thamesmead		Former site T9 should be re-instated. The site is identified as a 'Potential Area of Change' in the OPAF, which has three options for the approach to the site. The SALP should acknowledge these options and make clear that all 3 would be acceptable in principle.	The site is within SIL and existing policies provide clear direction on appropriate types of development within SIL.
	Environment Agency	Specific Consultation Body	Thamesmead		We are pleased that advice we provided in previous consultations in terms of groundwater protection and contaminated land has been given due regard in this document regarding the Thamesmead sites.	Support noted
	LB Bexley	Specific Consultation Body	Thamesmead		Para 9.5 states that 'the opening of the Elizabeth Line which will enhance Abbey Wood's role as the eastern gateway to Thamesmead' but should read as the 'central gateway.' Thamesmead and Abbey Wood encompass areas on both sides of the Greenwich and Bexley borders.	Agree that reference to the 'eastern gateway' is incorrect, however, consider that 'southern gateway' is more appropriate.
	TfL	Specific Consultation Body	Thamesmead		We request that the public transport improvements are referenced in the introduction to the Thamesmead Strategic Development site. Add in "Options for public transport improvements are currently being investigated, including the implementation of a Bus Rapid Transit and DLR extension to Thamesmead."	Amended as requested.
	PLA	Specific Consultation Body	Thamesmead	T1	The PLA welcome references to improving the Thames Path and routes to riverside areas as part of the site allocation.	Support noted
	PLA	Specific Consultation Body	Thamesmead	T3	<p>It is noted that the capacity of the site is dependent upon significant public transport improvements, including the extension of the DLR via a crossing over/under the River Thames and Bus Rapid Transport. The PLA must be consulted on any potential new river crossings as they are developed.</p> <p>It is welcomed that the site allocation states that new development must have a relationship with the River Thames, with development alongside the river requiring regular gaps to ensure a visual and physical connection to the river. The PLA would welcome further discussion on how any proposed development in this area can make the most of its location adjacent to the River Thames.</p> <p>As stated in the PLA's previous response as part of the Issues and Options consultation, this site allocation should be updated to make it clear that any use(s) of the land must take account to the PLA's lighthouse at Tripcock point and ensure that the PLA's access requirements are maintained or if possible enhanced.</p>	General support noted. Reference in Thamesmead section introduction to consulting the PLA on any potential new river crossings as they are developed has been added, as has reference that any development must take account to the PLA's lighthouse at Tripcock point and ensure that the PLA's access requirements are maintained or if possible enhanced.

	PLA	Specific Consultation Body	Thames mead	T4	The PLA supports the reference in the site requirements section for an improved public realm and access to the River Thames and the Thamesmead Canals, including for a potential footbridge to connect the Town Centre to the River Thames. In addition, it is noted that the proposed allocation is predominantly for Town Centre uses with significant residential development, which may be partly dependent on the potential DLR extension into the area. The PLA considers that reference must also be given in the allocation to the potential provision of a future river bus terminal, as highlighted in the adopted Thamesmead and Abbey Wood SPD (2009) and in the PLA's Thames Vision.	General support noted. Reference to the potential future provision of a river bus terminal added.
	LB Bexley	Specific Consultation Body	Thames mead	T6	<p>This site includes a requirement for 'Active frontages delivered by appropriate non-residential uses at ground floors fronting Harrow Manorway and Felixstowe Road.' Town centre uses in this location would be considered 'out-of-centre' by national policy; however, if they were to be included within a new Local Centre boundary for Abbey Wood Village there may be scope for this frontage, including the Sainsbury's store and the Felixstowe Rd car park on the Bexley side, to form a new Local Centre, capitalising on the sub-regional importance of the Crossrail Station and paving the way for future connectivity improvements north and south of the railway line.</p> <p>We hope that joint working on this matter can continue to explore future options for the Wilton Road/Harrow Manor Way commercial area.</p> <p>In addition, the Site Context states that 'the approved Peabody Masterplan on the east side of Harrow ManorWay (within London Borough of Bexley) will introduce heights of up to 20 storeys.' This is incorrect and should be revised as the approved planning application within Bexley sets a street corridor along Harrow Manor Way of a maximum of ten storeys with 'townscape markers' of 12 to 14 storeys at specific locations only. Within this context we would consider that 15 storeys would be a more appropriate maximum height allowed for site T6.</p>	<p>This site requirement for 'Active frontages delivered by appropriate non-residential uses at ground floors fronting Harrow Manorway and Felixstowe Road' does not imply that this is considered to be a suitable location for 'Town-centre' (retail) uses.</p> <p>It is not considered appropriate to designate a 'Local Centre boundary' for Abbey Wood Village, to include the Site Allocation and the Sainsburys superstore; the floorspace associated with the Superstore would be out of scale for a local centre.</p> <p>The reference to the Peabody Masterplan on the east side of Harrow ManorWay (within London Borough of Bexley) will be corrected. It is not considered appropriate to set a maximum height of 15 storeys across the Site Allocation. The development guidelines are deliberately less prescriptive, to allow development to respond to the surrounding context which is clearly set out in the allocation.</p>
	CCG	Specific Consultation Body	Thamesmead		<p>Currently no reference to new or additional health facilities in Thamesmead/ Plumstead, whilst the area includes a number of smaller practices it may not be physically possible to accomdate future growth in these practices.</p> <p>Support Oxleas Foundation Trust response to include Goldie Leigh hospital MUII in site allocations</p>	The future infrastrucutre requirements are set out in more detail in the Infrastructure Delivery Plan which is being updated alongside the Site Allocations Local Plan. The Thamesmead & Abbey Wood OAPF contains further detail relating to population growth in the Thamesmead and Abbeywood Area, and identifies the requirement to upgrade Gallions Health Centre to meet the health needs of the new population.

Litchfield	British Land	Developer/Landowner	Woolwich	New site	Sites at the junction of Powis and Hare Streets and Powis Street and Beresford Square should be allocated for mixed-use redevelopment, with flexibility in terms of heights and scale of development.	The proposed sites are currently fully occupied and within Woolwich Town Centre/Woolwich Conservation Area where existing policies provide necessary guidance should redevelopment be forthcoming.
Avison Young	Defense Infrastructure Organisation	Developer/Landowner	Woolwich	New site	Consider the draft SAPA document to be 'unsound' in accordance with Paragraph 35 of the NPPF on the grounds that the draft SAPA fails to positively plan, and identify a plan-led strategy, for the Site which is a significant strategic landholding within the Borough capable of being sustainably redeveloped, and of delivering significant homes and other complimentary uses, within the medium-term. We consider that, through allocating the Site (for the reasons, and following the approach, set out within the enclosed), the SAPA document could be made 'sound' in accordance with the NPPF.	The site is designated MOL and an Area of Special Character as well as within the Woolwich Conservation Area and having numerous designated heritage assets. There is insufficient evidence to allocate the site for the proposed uses at this stage, however the LDS commits to preparing an SPD to guide disposal of the site.
Avison Young	Defense Infrastructure Organisation	Developer/Landowner	Woolwich	New site	As part of Better Defence Estates for the Army, Woolwich Station has been announced for disposal. Vacation of existing defence-related occupiers at the Site, and disposal, will likely take place on a phased basis between 2022 and 2028. The decision to dispose of Woolwich Station was made following extensive consideration by the military. It is a large site that is expensive to operate and maintain, and the receipts it will generate will be reinvested to support a modern, better, fit for purpose estate for our armed forces. The method of disposal is yet to be confirmed, however it is anticipated that a 'land sale development partner' approach will be taken.	The site is designated MOL and an Area of Special Character as well as within the Woolwich Conservation Area and having numerous designated heritage assets. There is insufficient evidence to allocate the site for the proposed uses at this stage, however the LDS commits to preparing an SPD to guide disposal of the site.
Avison Young	Defense Infrastructure Organisation	Developer/Landowner	Woolwich	New site	The site extends to approximately 103ha, with a PTAL ranging from 1-6a. It is currently in use as a military barracks (use class C2A – Secure Residential Institution). It accommodates around 79,000sqm of existing built floorspace, including the Grade II* listed Royal Artillery Barracks, Grade II listed Gun Pak Buildings and Grade II* listed Rotunda. The previously developed area/zones on site total 19.79ha. The majority of open space is designated MOL and Repository Woods is a Grade II listed Park & Garden. There are several other listed buildings/structures on the site, and the site is within the Woolwich Common CA and an Area of Special Character.	The site is designated MOL and an Area of Special Character as well as within the Woolwich Conservation Area and having numerous designated heritage assets. There is insufficient evidence to allocate the site for the proposed uses at this stage, however the LDS commits to preparing an SPD to guide disposal of the site.
Avison Young	Defense Infrastructure Organisation	Developer/Landowner	Woolwich	New site	There is an opportunity to re-purpose the site to provide a new residential-led mixed use community for Woolwich, which embraces its heritage and open space assets to provide a unique and distinctive place. Propose the site for allocation for residential-led, mixed-use development which retains listed buildings and delivers significant numbers of new homes, associated retail/community uses and public realm, public access and landscaping. Site Requirements to include: - Provision of residential-led development, optimising the Site for the delivery of new homes.	The site is designated MOL and an Area of Special Character as well as within the Woolwich Conservation Area and having numerous designated heritage assets. There is insufficient evidence to allocate the site for the proposed uses at this stage, however the LDS commits to preparing an SPD to guide disposal of the site.

					<ul style="list-style-type: none"> <li>- Provision of complimentary local retail and community facilities.</li> <li>- Layout, scale and massing should be optimised to reflect Site's close proximity to public transport networks.</li> <li>- Proposals should respect character and setting of listed buildings on site.</li> <li>- Public access and ongoing management of MOL to be secured through planning process alongside development.</li> </ul>	
Avison Young	Defense Infrastructure Organisation	Developer/Landowner	Woolwich	New site	We do not consider it necessary for the allocation to provide any further detail beyond the proposed site requirements. The SPD (as referred to above and committed to in the Council's Local Development Scheme) would be an appropriate mechanism to establish further detail. Development guidelines to be set out in an SPD.	The site is designated MOL and an Area of Special Character as well as within the Woolwich Conservation Area and having numerous designated heritage assets. There is insufficient evidence to allocate the site for the proposed uses at this stage, however the LDS commits to preparing an SPD to guide disposal of the site.
Avison Young	Defense Infrastructure Organisation	Developer/Landowner	Woolwich	New site	The Council's 2019 LDS confirms that a Planning Brief (SPD) is to be prepared for the site in 2020, which we strongly support. While this could be underpinned by existing strategic London Plan and Core Strategy strategic policies we consider it appropriate for this to be supported by a site specific policy (i.e. an allocation) in the local plan. In practice, a site specific policy could be included in the SAPA or in a full review of the local plan (as committed to in the LDS). Bearing in mind that vacant possession and disposal of the site will commence in 2022 (with marketing activities starting in 2020) and the timescale uncertainties associated with a full local plan review, combined with the NPPF focus on taking a plan-led approach and requirement to be proactive, we consider there to be an urgency that justifies the site's inclusion in the SAPA (as opposed to waiting for the full review). In procedural terms, the allocation of the site in the SAPA would be entirely acceptable on the basis that this would be consistent with the strategic policies set out in the Core Strategy, current London Plan, and draft London Plan.	The site is designated MOL and an Area of Special Character as well as within the Woolwich Conservation Area and having numerous designated heritage assets. There is insufficient evidence to allocate the site for the proposed uses at this stage, however the LDS commits to preparing an SPD to guide disposal of the site.
Avison Young	Defense Infrastructure Organisation	Developer/Landowner	Woolwich	New site	The decision to vacate and dispose of the site had not been made at the point in time that the current London Plan and Core Strategy were prepared. Therefore it is not possible for it to be specifically accounted for in their strategic policies. However, in line with NPPF paragraph 11 these policies accommodate flexibility to account for changing circumstances over the operative period of the plan which allow for policies to be brought forward in subsequent 'subserving' plans (such as the SAPA document) which were not anticipated by the strategic policies as long as any potential policy conflicts are appropriately	The site is designated MOL and an Area of Special Character as well as within the Woolwich Conservation Area and having numerous designated heritage assets. There is insufficient evidence to allocate the site for the proposed uses at this stage, however the LDS commits to preparing an SPD to guide disposal of the site.

					managed. In this instance, the allocation of the site would be broadly consistent with these strategic policies so there is no conflict. The decision to vacate and dispose of the site had not been made at the point in time that initial public consultation was undertaken on the previous draft of the SAPA (2016). The current consultation is the first formal opportunity for the landowner to promote the Site to the Council. There will be a need for the proposed allocation to be properly considered in an update to the Integrated Impact Assessment as part of the preparation of the Proposed Submission version of the plan.	
Avison Young	Defense Infrastructure Organisation	Developer/Landowner	Woolwich	New site	<p>Through allocating the Site, the Borough would have the opportunity to deliver a meaningful contribution to both its own housing needs and targets, and the needs of London more generally. In this sense, the Site is capable of performing a strategically important role in the generation of new high-quality homes for RBG residents and for Londoners in general. In addition to significant new homes, the proposed site allocation would also ensure that a suite of other accompanying planning and public benefits are realised, including:</p> <ul style="list-style-type: none"> <li>- Delivering significant heritage benefits notably through securing a sustainable long term future use and preservation of the listed buildings;</li> <li>- Delivering public access into the Site and enhancing pedestrian permeability throughout, therefore enhancing how the local community and other site visitors experience this historic premises;</li> <li>- Introducing complimentary publicly accessible uses there in tandem with residential development, such as local retail and community uses;</li> <li>- Ensuring that Metropolitan Open Land on-site is successfully managed and maintained in the future; and</li> <li>- Delivery of significant socio-economic benefits, including new jobs for civilians.</li> </ul>	The site is designated MOL and an Area of Special Character as well as within the Woolwich Conservation Area and having numerous designated heritage assets. There is insufficient evidence to allocate the site for the proposed uses at this stage, however the LDS commits to preparing an SPD to guide disposal of the site.
	Speak Out Woolwich	General consultation body - residents group	Woolwich	WI	Retention of Furlong Garage building; maximum height of six storeys; introduce ground floor residential; family size homes; retention of listed buildings; provision of social housing; creation of new public square; new community and play facilities; co-working space for SMEs; discounted let of majority of community and commercial space for community groups; potential for job creation; retain architectural features of existing buildings.	While the furlong garage building has architectural and historic value, it is undesignated. We encourage any development to retain the building, but cannot require it. In accordance with the Urban Design Strategy, we expect development to continue the existing street frontage where there is a consistent character; along Powis Street, this means three-four storeys. Where the existing frontage is inconsistent we would expect the height of the street frontage to reflect the width of the street and the heights of those buildings and structures that contribute to the character. Along Woolwich High Street, we believe a height of around six storeys is appropriate. These are the expected heights of the street frontages, taller elements may

						be acceptable set back from the frontage depending on their impact on neighbouring amenity.
		Individual	Woolwich	W1	Retain existing buildings on the site.	The allocation includes retention of heritage assets.
		Individual	Woolwich	W1	Support development, retain alleyways.	Support noted.
	PLA	Specific Consultation Body	Woolwich	W1	Welcomes enhancement to route between Powis Street and the river.	Support noted
	TfL	Specific Consultation Body	Woolwich	W1	Allocation should ensure provision is retained for a bus stand on Hare Street. Development should ensure that it is sensitive to bus standing in terms of layout and location of residential units.	This allocation does not include Hare Street, and no part of the development would face directly onto Hare Street.
	Sport England	General consultation body - national	Woolwich	W2	There should be a clear link in this allocation to W9 to ensure that the demolition and re-provision of the leisure centre are linked.	Link has been added.
	Speak Out Woolwich	General consultation body - residents group	Woolwich	W2	Housing development should be council/social housing; Opening up riverfront, making it more permeable, improving pedestrian and cyclist environment; Question need to demolish leisure centre; Public consultation should be carried out to determine whether to demolish leisure centre; Improvements to public transport.	The existing development plan policies are considered sufficiently robust to provide social housing on all sites. Noted that SOW supports improved access to the riverfront. The business case for demolishing and re-providing the leisure centre was approved by cabinet and is outside the remit of planning, it is on this basis that the site has been included. Site Allocations cannot require public consultation; however consultation on planning applications is required by legislation. The site has a PTAL of 6a and several high-frequency bus routes stop at the site.
		Individual	Woolwich	W2	Swimming pools needed	Allocation W9 provides for the relocation of the Woolwich Leisure Centre, including a swimming pool.
		Individual	Woolwich	W2	Rebuild asap	The site allocations cannot mandate timings for redevelopment, the timescale indicated is a prediction based on evidence of interest in the site.
		Individual	Woolwich	W2	Improve access for disabled people	Comment noted, inclusive access to the riverfront is prioritised in the allocations.
		Individual	Woolwich	W2	Support redevelopment of the site. Recommend relocating bus stops.	Support for allocation noted. The location of the bus stops is beyond the scope of the allocation.
	Environment Agency	Specific Consultation Body	Woolwich	W2	Allocation should include provision of flood defences as part of the TE2100 Plan	Reference added to allocation to need to provide flood defences in accordance with the TE2100 Plan.

	PLA	Specific Consultation Body	Woolwich	W2	Welcomes creation of connection to the river and reference to need to preserve the foot tunnel and operational needs of the ferry. Request the PLA be involved in any plans or investigations into decommissioning the draw dock or constructing planting in the river.	Allocation has been revised to require PLA involvement in developing proposals.
	Speak Out Woolwich	General consultation body - residents group	Woolwich	W3	Retain Lidl; Improve pedestrian access and increase active frontages; Improve connection between Royal Arsenal and Woolwich Town Centre; Improve pick up and drop off for Lidl; retain current shops.	The site allocations cannot require specific businesses. The allocation includes an expectation that development will expand active frontages across the site. In introducing active frontages, the allocation seeks to enhance the connection between Powis Street and the Royal Arsenal. The need for improved pick-up and drop-off space is noted and reference has been added to the development guidelines to the need to retain loading spaces. The only existing shop on the site is the Lidl, so it is unclear what this comment refers to. As noted earlier, site allocations cannot mandate specific businesses.
		Individual	Woolwich	W3	Housing	Support for the allocation is noted.
Quod	Legal and General	Developer/ Landowner	Woolwich	W4	Questions whether the site allocation has been viability tested and whether it suitably responds to market signals. Argues that site allocation is unsound due to lack of conformity with NPPF, but does not specify which elements of the site allocation are not in conformity. Objects to the scale of the site, arguing that the boundary should be drawn to include only the developer's area of ownership. Argues that several points within the allocation are ambiguous because of the size of the site.	Ambiguities have been addressed by specifying locations within the development guidelines.
RPS	Powis Street Estates	Developer/ Landowner	Woolwich	W4	Objects to the principle of heights stepping up gradually from Beresford Square towards Riverside House. Questions whether this was tested and based on evidence.	This principle is based on the tall buildings approach within the Woolwich Town Centre Urban Design Strategy. Various scenarios with a variety of heights and layouts were tested, and found that the gradual stepping up was necessary to ensure that the development would not have a detrimental impact on the settings of the Grade I listed Royal Brass Foundry, the Grade II listed Gateway Building and Elephant and Castle pub, and the Woolwich and Royal Arsenal Conservation Areas.



	Speak Out Woolwich	General consultation body - residents group	Woolwich	W4	<p>Recommends ground floor residential units rather than commercial units; encourages design that references the history of the area; landscaping and green space; materials used to be in keeping with climate emergency; family homes; social housing; do not create wind tunnels; height of buildings not to overshadow Powis Street; not too dense; do not demolish the remaining historic features on the site, including the Electricity Company workshops; retain the historic houses on Macbean Street; ground floor accessible units; parking for disabled residents; provision of public realm and discussion regarding its use; possibility of spaces to be used by the community.</p>	<p>Because of the centrality of the site and the quality of the surrounding streets, ground floor residential uses are unlikely to have a reasonable level of amenity; however, further investigation as part of a planning application would be considered. The allocation encourages design to have regard to the historic character of the area. The allocation includes an area of landscaped space. It is unclear what materials the comment is referring to. The location of the site at the core of the town centre, with limited access to social infrastructure makes it less suitable for family units than other sites at the periphery of the town centre; the existing policies in the development plan are sufficient to ensure a suitable mix of unit sizes on this site. The existing policies are also sufficient to ensure that the development of this site does not result in a wind tunnel effect, though the allocation does draw attention to the impact of a development on the quality of Macbean Street. The existing policies and the allocation requirement to step down towards Powis Street are sufficient to ensure that there is no overshadowing to Powis Street. It is unclear what is meant by "not too dense". The former electric company workshop is not a designated heritage asset; while it could add to the character and appearance of a development, there is no policy basis for its retention. The historic houses on Macbean Street do not form part of this allocation. Existing development plan policies are sufficient to ensure that accessible units are provided, though these may be on upper floors served by lifts. Parking for disabled residents is also required by existing development plan policies. As mentioned above, the provision of public realm is within the allocation.</p>
		Individual	Woolwich	W4	Housing	Support for the allocation is noted.
		Individual	Woolwich	W4	Supports redevelopment of the site, but recommends inclusion of chain restaurants.	Support for allocation noted. The allocation cannot mandate specific businesses or types of food.
	Speak Out Woolwich	General consultation body - residents group	Woolwich	W5	<p>Potential for meanwhile uses; housing must be council/social rent; improve attractiveness of pedestrian crossings and cycle routes along A205; potential for family-sized townhouses; removing unnecessary roundabouts; improve public realm; car parking needed somewhere in Woolwich.</p>	<p>The support for meanwhile uses is noted. Existing development plan policies are sufficient to ensure the provision of affordable housing. Support for improved pedestrian realm is noted. The A205 is outside of the site allocation. Support for townhouses is noted. Support for improved public realm is noted. The overall strategy for Woolwich Town Centre is a reduction in levels of parking in accordance with existing development plan policies and in recognition of the climate emergency.</p>
		Individual	Woolwich	W5	Housing	Support for the allocation is noted.

		Individual	Woolwich	W5	Improve safety of the car park	Support noted.
		Individual	Woolwich	W5	Objects to loss of car parking space in the town centre, particularly for Council staff	The London Plan and the Core Strategy both include as an objective reducing car use.
		Individual	Woolwich	W5	Supports redevelopment of the site, but recommends that any meanwhile uses have regard to potential impacts of noise on neighbouring residents.	Support for allocation noted, the development guidelines have been updated to ensure that meanwhile uses do not have a negative impact on adjacent residents.
RPS	Powis Street Estates	Developer/Landowner	Woolwich	W6	Request that reference in the allocation to workspace suitable for SMEs be removed to ensure that the allocation is in accordance with the approved development.	While we note that the workspace provided in the application for this site is not explicitly provided for SMEs or at affordable rent, the inclusion of this point in the site allocation is based on evidence demonstrating that Woolwich has a high demand for low-cost workspace from SMEs .
	Speak Out Woolwich	General consultation body - residents group	Woolwich	W6	Retain historic buildings at corner of Thomas Street and Wellington Street; family sized homes; social housing; keeping historic buildings and courtyards; height of buildings no higher than heritage buildings; creative, cultural area within this area.	Support for retention of heritage assets is noted. The site's location at the core of the town centre and quality of the surrounding streets makes it unsuitable for a higher proportion of family housing than that expected by existing development plan policies. The existing development plan policies are sufficient to ensure the provision of affordable housing. A townscape assessment of the site indicates that the development can exceed the heights of the heritage assets by several storeys without undermining their significance or having a detrimental impact on the existing character of the area. The allocation retains the Millenium Performing Arts Academy, which plays a major role in the creative industry in Woolwich and London.
		Individual	Woolwich	W6	Housing	Support for the allocation is noted.
		Individual	Woolwich	W6	Supports redevelopment of Island Site, recommends that the historic Bathway Quarter buildings be renovated and that the quality of the public realm be improved.	Support for allocation noted. The boundary of this site excludes the Bathway Quarter.
Avison Young	Meyer Homes	Developer/Landowner	Woolwich	W7	Objects to the lack of flexibility, objects to the expectation that development will step down in height and scale to act as a transition between the town centre and the surrounding small-scale neighbourhoods. Objects to the development guidelines, arguing that they are too inflexible. Argues that Royal Artillery Barracks does not draw significance from its views or setting and should therefore be excluded from consideration.	The allocation encourages development to step down towards the scale and heights of the adjacent neighbourhoods. This is supported by the Urban Design Strategy and reflects the principles inherent in the draft London Plan's design policies and Chapter 12 of the NPPF. The Historic England list entry for the Royal Artillery Barracks explains that the views towards the Barracks and the consistency of its Georgian character when viewed from the south are key elements of its significance.
	Speak Out Woolwich	General consultation body - residents group	Woolwich	W7	High proportion of family-sized dwellings, including at ground floor; social housing should be priority.	The support for a high proportion of family-sized dwellings is noted. The existing development plan policies are sufficient to ensure the provision of affordable housing.

		Individual	Woolwich	W7	Housing	Support for the allocation is noted.
		Individual	Woolwich	W7	Strongly support	Support noted.
Avison Young	Meyer Homes	Developer/Landowner	Woolwich	W8	Objects to the references to specific ground floor uses in development guidelines, objects to references to the existing context, objects to year-round sunlight in public realm; objects to provision of landscaping and communal amenity space; objects to recommended heights.	The consistent building heights around the edge of the site are derived from the Urban Design Strategy, which recommends these heights along the frontage to create a positive sense of enclosure to the square, to respond to the scale and character of the surrounding streets and to ensure that the development does not undermine the prominence of Equitable House. As discussed in the allocation, this principle does not preclude the inclusion of a taller element provided it is set back away from the street frontage. The allocated uses refer to a mix of uses appropriate to a town centre. The development guidelines are intended as guidelines to support the implementation of the Urban Design Strategy and the emerging Woolwich Town Centre SPD. The uses recommended in this section are based on the conclusions of the Retail and Leisure Study and the principle in the emerging SPD of consolidating retail uses along the core of Powis Street and enhancing and expanding existing clusters of food and drink uses. The unreasonableness of expecting year-round sunlight into Love Lane is recognised and this has been amended. The provision of communal amenity space is required by the London Plan in order to provide space for play and informal recreation. The distance between this site and site W7 means that a proposal that relies on W7 to provide play space for this site would not be policy compliant.
	Speak Out Woolwich	General consultation body - residents group	Woolwich	W8	Do not agree that the site is suitable for housing; green space should be retained and enhanced; do not agree that the area is suitable for taller building, if there is any building it should be very low rise, constructed from sustainable materials and used as community/cafe space only.	The site was designated for a mixed use development including housing as part of the UDP and in the Woolwich Town Centre SPD (2012); given its town centre location and its adjacency to the Tesco development, the site is suitable for a residential-led development. The allocation allows for a taller element provided it is set back from the street frontage and does not undermine the existing character of the area or the settings of the surrounding heritage assets.
	Theatres Trust	General consultation body - voluntary	Woolwich	W8	Residential uses should be directed away from the Tramshed theatre to avoid conflict.	Comment noted, the revised draft makes reference to reducing risk of conflict between uses.
		Individual	Woolwich	W8	Keep open	The development of this site was established in the Woolwich Town Centre SPD (2012) and the saved UDP Site Proposals Schedule. It is previously developed land in a highly accessible location.

		Individual	Woolwich	W8	Strongly support	Support noted.
	Speak Out Woolwich	General consultation body - residents group	Woolwich	W9	Any housing must be council/social rent; question need to relocate leisure centre; concern regarding overlooking to gardens on Burrage Road; provide high-quality public toilets; need to open up Tramshed for much greater community/café use and to make this a landmark building on the square.	The decision to relocate the leisure centre onto this site has been made by cabinet, and the site allocations are proceeding on the basis that this development will come forward. It is unclear which gardens on Burrage Road are at risk of overlooking; the site does not extend to Burrage Road or near it. The support for the provision of public toilets is noted. The support for improvements to the Tramshed is noted.
	Theatres Trust	General consultation body - voluntary	Woolwich	W9	Residential uses should be directed away from the Tramshed theatre to avoid conflict.	Comment noted, the revised draft makes reference to reducing risk of conflict between uses.
		Individual	Woolwich	W9	Mixed use	Support for the allocation is noted.
		Individual	Woolwich	W9	Strongly support	Support noted.
	Speak Out Woolwich	General consultation body - residents group	Woolwich	W10	Create one unified entrance to railway and DLR; improve accessibility of entrance; more attractive pedestrian area; expand Costa Coffee; take height into consideration and public consultation.	The existing entrance arrangements to the DLR and railway station are unlikely to change within the plan period and the connection between the two stations is sufficient. Given that the entrance is unlikely to change, improvements or changes to its layout are not relevant. Height has been taken into consideration.
		Individual	Woolwich	W10	Mixed use	Support for the allocation is noted.
		Individual	Woolwich	W10	Strongly support	Support noted.
	TFL	Specific Consultation Body	Woolwich	W10	Supports the allocation, but recommends that it make reference to the site's suitability for a tall building.	Support noted. Given the site's proximity to the Woolwich Conservation Area and several designated heritage assets, it is sensitive to height and scale.
Litchfields	Spray Street LLP	Developer/Landowner	Woolwich	W11	The allocation should be made more flexible to allow the developer to propose a suitable design response to the site. The wording should reflect the wording in the NPPF in respect of heritage assets and use "should" rather than "must". The building heights should be less prescriptive to recognise the financial pressure of retaining the Grade II-listed covered market.	The design guidelines and requirements are based on the Woolwich Town Centre Urban Design Strategy, which forms a sufficient evidence base to determine where different heights are likely to be acceptable. Further, the guidelines are derived from the design chapter of the Draft London Plan as well as the Core Strategy. The borough-wide retail and leisure study demonstrates that there is some limited potential to increase food and drink floorspace in Woolwich, especially in concert with a new cinema. However, this is in the context of an oversupply of retail floorspace in the town centre. Our emerging strategy, as demonstrated in the draft Woolwich Town Centre SPD is to consolidate retail floorspace onto the core stretch of Powis Street and to support changes of use to

						food and drink uses within identified clusters. An oversupply of food and drink on this site would seriously undermine that approach and impact the viability of the rest of the town centre.
	Speak Out Woolwich	General consultation body - residents group	Woolwich	W11	Covered market should be creative use at low cost rents; cinema use should not occupy the whole of the covered market; do not agree on heights up to 19 storeys, wind tunnel effect on A206; brick/wood materials rather than concrete; social housing family homes; retain local retailers; expand Woolwich Conservation Area boundary to include more of site.	The use of the covered market building would be assessed as part of a planning application in relation to its heritage designation. The allocation suggests is based on tall elements set back from the street frontage and subject to the development not having a detrimental impact on the significance of the surrounding heritage assets, the neighbouring amenity or the character of the surrounding area. The materials used in the scheme would be assessed as part of a planning application, but it should be noted that, even where the external materials are wood and brick, the majority of modern construction, and more or less all construction over 4 storeys, is concrete-framed. The expansion of the Woolwich Conservation Area is not relevant to the site allocation.
		Individual	Woolwich	W11	Mixed use	Support for the allocation is noted.
		Individual	Woolwich	W11	Strongly supports the allocation, but recommends inclusion of large restaurant chains.	Support noted. The allocation cannot mandate specific businesses or types of food.
Barton Willmore	Berkeley Homes	Developer/Landowner	Woolwich	W12	Site should be allocated for mixed-use development in accordance with its town centre location and proximity to new public transport infrastructure.	Draft London Plan Policy E4 expects boroughs to ensure that there is a sufficient supply of land and facilities to meet the needs for industrial floorspace as assessed in a strategic or local Employment Land Review. The London Industrial Land Demand Study indicates that there is a positive demand for industrial uses in Greenwich. RBG's Employment Land Review demonstrates that there is significant demand for industrial floorspace within Woolwich and specifically within the Royal Arsenal Industrial Estate, and currently the estate is very well occupied with premises in good condition. The uses within this site predominantly provide distribution services for central London and NIOD. While there may be scope for intensification or co-location within the site in the future, the age of the buildings and the intensity of their occupation means that such a redevelopment would be unsustainable during the plan period.

Avison Young	Gunnery Property Ltd	Developer/ Landowner	Woolwich	W12	Remove Gunnery Terrace from proposed LSIS site allocation to allow for a mixed-use redevelopment of the site including residential and B1 office uses.	Draft London Plan Policy E4 expects boroughs to ensure that there is a sufficient supply of land and facilities to meet the needs for industrial floorspace as assessed in a strategic or local Employment Land Review. The London Industrial Land Demand Study indicates that there is a positive demand for industrial uses in Greenwich. RBG's Employment Land Review demonstrates that there is significant demand for industrial floorspace within Woolwich and specifically within the Royal Arsenal Industrial Estate, and currently the estate is very well occupied with premises in good condition. The uses within this site predominantly provide distribution services for central London and NIOD. While there may be scope for intensification or co-location within the site in the future, the age of the buildings and the intensity of their occupation means that such a redevelopment would be unsustainable during the plan period.
		Individual	Woolwich	W12	Mixed use	Draft London Plan Policy E4 expects boroughs to ensure that there is a sufficient supply of land and facilities to meet the needs for industrial floorspace as assessed in a strategic or local Employment Land Review. The London Industrial Land Demand Study indicates that there is a positive demand for industrial uses in Greenwich. RBG's Employment Land Review demonstrates that there is significant demand for industrial floorspace within Woolwich and specifically within the Royal Arsenal Industrial Estate, and currently the estate is very well occupied with premises in good condition. The uses within this site predominantly provide distribution services for central London and NIOD. While there may be scope for intensification or co-location within the site in the future, the age of the buildings and the intensity of their occupation means that such a redevelopment would be unsustainable during the plan period.
		Individual	Woolwich	W12	Strongly support.	Support noted.
	GLA	Specific Consultation Body	Woolwich	W12	Mayor supports retention of industrial land, recommends investigation of opportunities to intensify B8 use	Support noted.
	TfL	Specific Consultation Body	Woolwich	W12	Site could accommodate new bus stands without negative impacts on residential amenity.	The allocation does not include the adjacent streets, however given the nature of the uses on site and the allocation there would be not impediment to introducing bus standing adjacent to the site.
	CCG	Specific Consultation Body	Woolwich		Reference should be added to the Woolwich sites about the requirement for additional health facilities to meet increasing need. This should ideally be addressed with opportunities for co-location with the Council to integrate health and well being activities.	Requirement added to future leisure centre (Site W9) to provide bookable rooms for health services as part of leisure-health co-location.

	Historic England	Specific Consultation Body	Woolwich		Historic England recently announced that Woolwich town centre has been selected as a High Street Heritage Action Zone, where investment in historic high streets will improve the wider social, cultural and economic outcomes for localities and communities. The detailed strategy for Woolwich is still being worked on, but it will look to enhance economic and social activity across Powis Street and improve connectivity and footfall between the Royal Arsenal/Cultural Quarter and the commercial core of the town. This will include repairs and refurbishment of shops, public realm improvements and cultural events. All new development in and around the town centre must take proper account of and support the aims of the Heritage Action Zone.	Allocations have been drafted to support the aims of the Woolwich Heritage Action Zone.
	Historic England	Specific Consultation Body	Woolwich		We note the number of proposed site allocations across Woolwich that include the potential for taller buildings, for example W4 Macbean Street. Given the sensitivity of large parts of the town centre in heritage terms, we would suggest that greater clarity as to overall building heights in individual allocations would be helpful in ensuring development is appropriate to its location. A definition of what would be regarded as tall for each site would be helpful, as would a cross-reference to policy DH2 of the adopted Core Strategy and its supporting text.	In the interests of not being overly prescriptive, the allocations do not generally dictate heights, but provide guidance regarding the relationship to the surrounding context.
	Historic England	Specific Consultation Body	Woolwich		There is a degree of inconsistency in the way locally listed buildings are considered across the proposed site allocations. Whereas a number of locally listed buildings are both identified in or near the relevant sites and their retention and enhancement identified in the site requirements section (see for example W6 Island Site), a number are not, such as the Tramshed Theatre and 14 Vincent Street in relation to site W9. We recommend that the retention of assets such as these should be explicitly identified in the explanatory text. While not designated, we would also encourage the retention of Furlong's Garage as part of any proposals for the redevelopment of site W1 given its positive contribution to the streetscape and the character of the newly designated Woolwich conservation area. To aid clarity, we suggest that heritage designations should be indicated on the relevant site map to make clear to all involved likely historic environment considerations to be addressed by any development proposals.	Allocations have been revised to refer to locally listed buildings within sites and where development is likely to have an impact.
	Greenwich Society	General Consultation Body	General comment		There should be quantification of the development potential of the sites; ranges could be used.	The proposed submission version of the allocations includes indicative area wide capacities

	Positive Plumstead	General consultation body - residents group	General comment	<p>Some general points we would like to have considered:</p> <p>A) need for public spaces eg toilets, community meeting provision to improve community cohesion</p> <p>B) better landscaping/greening/ongoing decluttering of street furniture - sustainable approach to change</p> <p>C) better paving/quality material making more attractive for pedestrians</p> <p>D) impact of additional housing etc on public transport and services</p> <p>E) improving parking and traffic flow</p>	Where relevant to individual allocations, the development guidelines have considered the general points raised.
	London Gypsies & Travellers	General consultation body - voluntary	General comment	<p>Concerned that the approach taken in the Site Allocations DPD fails to adequately consider the accommodation needs of Gypsy and Traveller communities in the borough and plan accordingly to meet these needs in an inclusive way alongside the provision of other types of housing. The Housing and Planning Act 2016 clearly specifies that local authorities have 'a duty to consider the needs of people residing in or resorting to their district with respect to the provision of—</p> <p>(a)sites on which caravans can be stationed,</p> <p>(b)places on inland waterways where houseboats can be moored.'</p> <p>Although the 2016 GTANA suggests that none of the Gypsy and Traveller families interviewed in the study meet the PPTS definition, the council is still required to assess their needs as part of the overall housing need for the borough. Furthermore, the Public Sector Equality Duty requires the council to have due regard to the need to advance equality of opportunity between those who share protected characteristics and those who don't, which includes to 'take steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people'.</p>	The 2016 Gypsy and Traveller Needs Assessment (GTNAA) was carried out in line with the national definition in the Planning Policy for Traveller Sites. The GTNAA concluded that there were no additional pitches required to meet the needs of those defined as travellers by the PPTS. In addition, a Lawful Development Certificate for a residential caravan site for up to 12 caravans at Horn Link Way was granted in March 2019 which has increased pitch provision. Core Strategy policy H4 is also supportive of new pitch provision in appropriate locations.
	London Gypsies & Travellers	General consultation body - voluntary	General comment	<p>In addition, since the Draft London Plan Policy H16 has been published requiring local authorities to use a more inclusive definition of Gypsies and Travellers, many local GTANA studies conducted by the same consultant have employed a different approach, explicitly including a breakdown of need for Gypsy and Traveller families not meeting the PPTS definition, as well as for 'unknown' households. This methodology aligns more with the requirements of the Equality Act and also with the possibility of having a different policy once the London Plan is adopted.</p>	The SOS directed the Mayor to delete part B of policy H14 of the intend to publish London Plan to align the plan with the definition in the PPTS.



	London Gypsies & Travellers	General consultation body - voluntary	General comment	Concerned that RB Greenwich has not met previously identified needs prior to the PPTS change of definition – the 2008 London GTANA identified a need between 22-45 new pitches; and is now continuing to ignore the accommodation needs of Gypsy and Traveller communities which have been residents of the borough for many generations, despite clear evidence of overcrowding and family growth. By excluding provision for these communities from future development in the borough, the council is actually reinforcing the inequalities that Gypsies and Travellers face in accessing culturally suitable accommodation which contributes to broader inequalities in terms of health and wellbeing, education, culture and identity. Delaying the refresh of accommodation needs until a future Local Plan review does not demonstrate a justified and positive approach and does not meet the requirements under the Equality Act.	An up to date needs assessment was undertaken in 2016 in line with the new PPTS definition. Royal Greenwich therefore has a robust up to date assesement of gypsies and travellers accomodation need which is in conformity with national planning policy.
	London Gypsies & Travellers	General consultation body - voluntary	General comment	In line with the Draft London Plan Policy H16 we recommend that the council use the baseline figure of need of 34 new pitches which reflects backlog requirements, and revise the Site Allocations DPD to include provision for new Gypsy and Traveller pitches to be made as part of larger residential and mixed use schemes.	An up to date needs assessment was undertaken in 2016 in line with the new PPTS definition. Royal Greenwich therefore has a robust up to date assesement of gypsies and travellers accomodation need which is in conformity with national planning policy.
		Individual	General comment	Too much potential not realised from underutilising sites. Mixed use has to be the key to housing shortage whether it be commercial/industry. Much more potential around Woolwich and Abbey Wood stations. Thistlebrook should be rebuilt as so close to the station. Other people had to leave for higher density due to shortage so some groups should not be protected - have to think of the greater good.	The majority of allocations promote mixed use development. Thistlebrook is safeguarded as the borough's Gypsy and Traveller site and is not appropriate for redevelopment.
		Individual	General comment	You need to review your policy on parking places. Each new small housing site should ensure each home has an allocated space. You cannot reduce residents' car ownership or usage this way. Just end up with lots of really angry people	The Local Plan and London Plan require car free and/or car lite development in locations with good public transport accessibility.
	GLA	Specific Consultation Body	General comment	Greenwich should: - retain and intensify B2/B8 and heavier industrial capacity across the borough - carry out design studies or masterplans reflecting the draft new London Plan design policies to retain and intensify B2/B8, co-locate land uses (where appropriate) optimise housing delivery and town centre uses, and to justify building heights - include in all the relevant site allocations that land owners with sites along the river, subject to flooding or that could be contaminated engage with the Environment Agency as early as possible in the planning and design process	Noted. It is not considered necessary to repeat London Plan policy requirements regarding affordable housing thresholds within the Site Allocations Local Plan.

				<ul style="list-style-type: none"> <li>- note in all the relevant site allocations where industrial capacity is to be lost, the affordable housing threshold is 50%</li> <li>- In line with draft new London Plan T6.1, for Site Allocations with a PTAL of 5 and higher or in a major town centre, the site requirement should be for car free residential development, as opposed to being in the development guidelines.</li> </ul>	
	GLA	Specific Consultation Body	General comment	Greenwich is strongly encouraged to review its Local Plan in line with the latest version of the London Plan. This review could examine the contribution that the Opportunity Areas in Greenwich could make to new homes and jobs. In particular, at Woolwich a review should reflect the increased transport connectivity from the Elizabeth Line, and at Charlton Riverside the updated employment and industrial demand employment evidence and infrastructure requirements. It should be noted that Kidbrooke is no longer an Area of Intensification in the new London Plan.	The review of the Core Strategy with Detailed Policies commenced in July 2019. This review is being carried out in line with the new London Plan, however the identified Strategic Development Locations will not change as these locations reflect the borough's reservoir of brownfield land.
	GLA	Specific Consultation Body	General comment	In line with draft London Plan policy D1, the site allocations should be informed by a design led approach and area wide capacity to ensure appropriate building heights and site capacity. The area wide and site capacity should reflect improved public transport provision and access to local services.	The allocations have been informed by a design led approach, including area wide capacity studies undertaken as part of the preparation of supplementary guidance for the Strategic Development Locations in the Core Strategy. The Proposed Submission version of the allocations includes indicative area wide capacities.
	GLA	Specific Consultation Body	General comment	<p>The Mayor supports:</p> <ul style="list-style-type: none"> <li>- The intensification of sites and areas where transport capacity is to be improved. For large sites and areas such as Woolwich, this should be informed by area wide capacity study as set out in draft new London Plan Policies D1, D1A and D1B.</li> <li>- Car free development</li> </ul>	Noted.
	GLA	Specific Consultation Body	General comment	<p>The Mayor objects to:</p> <ul style="list-style-type: none"> <li>- The introduction of offices outside town centres</li> </ul>	Noted.
	Historic England	Specific Consultation Body	General comment	There is much to welcome in the consultation document, including the focus on the local historic environment providing the basis of the vision for development as at Charlton Riverside. We also note the detailed understanding of the historic environment set out in many of the allocations, together with the development guidelines which reference the designated heritage assets either on site or nearby and that will need to be considered at the design stage of any new development. These offer extremely helpful parameters which should help ensure	Support Noted

				development on these sites is contextual and conserves and enhances the significance of individual heritage assets.	
	Historic England	Specific Consultation Body	General comment	We note the substantial size of a number of the proposed allocations, as well as the degree of development that is already underway across both these and wider areas of the Borough. In order to deliver the aspirations of the document in relation to the historic environment, we would stress that this will mean coordinated planning is critical to avoid piecemeal development that fails to respond to the evolving local context, or indeed work against it.	Where sites are in multiple ownership, the need for coordination to optimise development capacity and avoid piecemeal development is emphasised.
	LB Lewisham	Specific Consultation Body	General comment	We acknowledge that your overall approach to development fits well with the overall approach to development across the South East London sub-region, as advocated by the current and draft new London Plan. The preferred approach seeks to cater for additional growth and has the potential to transform your borough. This will help to ensure the needs of Greenwich's residents can be met within your own borough without exacerbating demand for housing, retail, employment, transport and community facilities in neighbouring boroughs.	Support noted
	LB Lewisham	Specific Consultation Body	General comment	The individual site allocations do not identify indicative site capacities and there are no total cumulative figures for the whole borough for proposed residential units and proposed retail and employment floorspace. This makes it difficult to interpret the overall quantum of growth that this Plan is seeking to accommodate, particularly in relation to your adopted Core Strategy 2014. It will be helpful for the Plan to provide more clarity on the extent of local housing need, the level of housing that is being planned for, and whether it is expected that there will be any housing need that cannot be accommodated in Greenwich borough.	Indicative area wide residential capacities have been included in the Proposed Submission document. As part of the Authority Monitoring Report (AMR), RBG identifies and updates a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against the London Plan housing requirement. The five year supply is set within the context of the 15 year housing trajectory, which is also updated on annual basis and provides full details of the large site (0.25ha and above) included in the trajectory, including their indicative capacity and phasing. All site allocations in this Proposed Submission document are included in the 2019/20 housing trajectory. RBG can accommodate all its identified housing need within the borough.
	National Grid	Specific Consultation Body	General comment	No comments	n/a
	PLA	Specific Consultation Body	General comment	All site allocations which border the River Thames need to emphasise the importance of the need for appropriate Riparian Life Saving Equipment (such as grab chains, life buoys and escape ladders) to a standard recommended in the 1991 Hayes Report on the inquiry into river safety. Reference to this need must be included as a site requirement for these proposed allocations. In addition, consideration	While this is an important consideration, it is outside the scope of the Site Allocations document.

				must also be given to the need for appropriate suicide prevention measures in suitable locations (such as CCTV and signage with information to access support) and also referenced in relevant site allocations.	
	PLA	Specific Consultation Body	General comment	There must be consistency with regard to the protection and use of Safeguarded Wharves; there should be direct reference to the Agent of Change principle in all relevant site allocations in close proximity to the boroughs Safeguarded Wharves. Wording must be added into the site requirements section of the need for developers to engage with the PLA and Wharf Operators at an early stage, particularly to agree on how any noise assessments will be undertaken to ensure all activities and noise sources are captured and evaluated, to enable appropriate mitigation measures to be designed in at an early stage of a proposed development.	Support noted. Relevant allocations have been amended to refer to the Agent of Change principle and early engagement with the PLA and wharf operators.
	PLA	Specific Consultation Body	General comment	Other riverside based operations located in close proximity to the allocations, (including Cory's barge works and Bay Wharf), are in use and protected under the current and emerging London Plan and require full consideration in this Site Allocations document. Wording must be added into the site requirements section of the need for developers to engage with the PLA and Wharf Operators at an early stage, particularly to agree on how any noise assessments will be undertaken to ensure all activities and noise sources are captured and evaluated, to enable appropriate mitigation measures to be designed in at an early stage of a proposed development.	Support noted. Relevant allocations have been amended to refer to the Agent of Change principle and early engagement with the PLA and wharf operators.
	Historic England	Specific Consultation Body	General comment	<p>There remains a gap with regard to non-designated archaeology and which when addressed will strengthen the document in relation to the NPPF requirements. A number of the sites identified in the document are located in Areas of High Archaeological Potential, as defined by the Greater London Archaeological Advisory Service (GLAAS). (NB These are now due for review.)</p> <p>Given the likely potential for archaeological remains being present in these locations, we recommend that any AHAP is identified in the section on the relevant planning designations in order to make clear the range of archaeological considerations in relation to future development. This would also better reflect para 28 of the NPPF in relation to conserving and enhancing the historic environment at a site-specific level and in terms of evidence base requirements. Details of when to consult GLAAS can be found at <a href="https://historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/">https://historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/</a>.</p>	The 'planning designations' section of relevant allocations has been updated to identify where sites fall within AHAPs.

		Individual	General comment - Evidence Base	<p>Surprised the Appendix D Evidence base does not refer to The English Heritage 2011 document "LBG Areas of High Archaeological Potential". We note that no fewer than 12 of the 40 sites identified are in central Woolwich, and that there is a somewhat cursory treatment of CR2 Charlton Riverside Central. This is an historically important site. In addition we note that the London Plan requires a special treatment of riparian ares defined as Thames policy areas.</p>	The 'planning designations' section of relevant allocations has been updated to identify where sites fall within AHAPs.
	GLA	Specific Consultation Body	General comment - Evidence Base	<p>Review of evidence, Housing – subject to other land use requirements, the Site Allocations should optimise housing delivery in order to make the fullest contribution to meeting the RB Greenwich's new housing target of 32,040 homes between 2019/20 and 2028/29.</p>	The Proposed Submisison version of the allocations includes indicative area wide capacities.
	GLA	Specific Consultation Body	General comment - Evidence Base	<p>Review of evidence, Employment - The draft new London Plan takes a more restrictive approach to the loss of designated industrial areas, and emphasising the need to intensify industrial activities. Under the draft new London Plan, the RB Greenwich is now a 'retain industrial' capacity borough, although the draft new London Plan evidence suggests that there will be demand for 29ha of industrial capacity in Greenwich. The Mayor agrees with the RB Greenwich's statement that the current evidence base does not support the loss of industrial capacity.</p> <p>Greenwich should produce local evidence to support its approach to the provision of BI floorspace and should clarify where BI(a) and BI(c) are expected to be delivered. In line with draft London Plan policy EI BI(a) office floorspace should be directed to town centres. In addition, the Mayor questions the demand for the quantum of BI(c) suggested by the site allocations. The London Office Policy Review 2017 concludes that supply of stock suitable for small and medium enterprises (SMEs) should be sought in most centres. This should be reflected in the Site Allocations.</p>	The allocations have been updated to clarify that BIa office uses are not generally suitable on sites outside town centres, and that the priority for provision within centres is space suitable for SMEs.
	GLA	Specific Consultation Body	General comment - Evidence Base	<p>Review of evidence, Safeguarded Wharves - The Mayor has recently undertaken a second round of consultation on a small number of changes proposed in response to round 1 submissions to the Safeguarded Wharves Review. The Mayor will submit his recommendations for safeguarding to the Secretary of State who will determine if they support the recommendations.</p>	Noted.
	GLA	Specific Consultation Body	General comment - Evidence Base	<p>Review of evidence, Gypsies and Travellers – RBG should carry out a Gypsies and Travellers Accommodation Assessment using the definition set out in the draft new London Plan. Should there be need for additional pitches, Greenwich should allocate an appropriate site. It is noted that Site Allocation T6 is adjacent to an existing Gypsies and</p>	RBGs most recent Gypsy and Traveller Needs Assessment was carried out in 2016, in accordance with national requirements.

				Travellers site, which could potentially be extended onto this site, if required.	
	GLA	Specific Consultation Body	General comment - Evidence Base	Review of evidence, MOL – The Mayor strongly supports the extent of the current MOL and would welcome the provision of access to MOL where there is currently no public access. His Good Growth strategy to meet London’s housing and employment needs does not rely on the release of the Green Belt or MOL.	Noted. The site allocations document does not propose revisions to MOL boundaries.
	LB Bexley	Specific Consultation Body	General comment - Evidence Base	Issues and Options document suggested that the Site Allocations document would review the designated town centre boundaries and propose changes as appropriate. However, due to the outcomes of RBG town centre health checks, boundary changes are now not considered necessary. Nonetheless the benefits from the Elizabeth Line should be maximised. The Wilton Road Neighbourhood Centre combined with existing units and development sites in both boroughs, should development sites in both boroughs, should be designated as a local centre, to be known as Abbey Wood Village. Early findings from Bexley’s Retail Capacity Study suggest that an upgrade to Abbey Wood Village’s position in the centre hierarchy would require working in partnership with Greenwich. We would welcome further discussion this matter because we believe in matter because we believe in the area’s potential.	The status and extent of local centres will be considered as part of the Local Plan review.
	LB Bexley	Specific Consultation Body	General comment - Evidence Base	Bexley notes that Greenwich has identified that new primary school places will be required in the Thamesmead area in the medium to long term due to planned significant development. Clarification is needed to understand whether the Broadwater Dock site T1 is meant to address this need or if Greenwich is planning on allocating further sites for primary education at a later date in the plan period. With regards to secondary school provision it is understood that although there is a growing need for secondary schools in Greenwich borough, suitable sites to meet this need have now been secured.	The potential requirement for new primary provision in the Thamesmead area is identified on sites T1, T3 and T4 and additional secondary provision on site T3, consistent with the Thamesmead & Abbey Wood OAPF. This will be kept under review as proposals emerge and as part of the IDP.
	Environment Agency	Specific Consultation Body	General comment - physical infrastructure	Need to set expectations within the document that new riverside development must maximize opportunities to raise flood defences to meet climate change and enhance the riverside environment in line with the Thames Estuary TE2100 Plan. Need to encourage developers to consider the impact on the visual amenity of the development of raising the flood defences in line with TE2100 in the future.	A new section has been added to the introductory section of the document focusing specifically on riverside sites and setting out common objectives for all of these sites based on opportunities/requirements identified by the EA for riverside sites.

	Environment Agency	Specific Consultation Body	General comment - physical infrastructure	<p>The site requirements and design guidelines for the riverside sites could be improved by providing more detail regarding the requirements for tidal flood defence improvement to ensure that future management of the flood defences can be achieved in a sustainable manner.</p> <p>Our requirements for developments next to the River Thames affecting the tidal flood defences are as follows:</p> <ul style="list-style-type: none"> <li>□ Defences raised to the height as set out in the TE2100 Plan.</li> <li>□ Development set back from the river. We expect a 16m setback for undeveloped sites. No balconies which could restrict access to the defences for maintenance/repair.</li> <li>□ Land needed for flood defences is identified and available when required.</li> <li>□ Maintenance, replacement and improvement works to flood defence assets, maximising value for money and useful lifetime, whilst maintaining the standard of protection set out in the TE2100 Plan.</li> <li>□ Where works to defences are on the site of the new development these defences should be designed to accommodate future raising if not raised at replacement.</li> <li>□ Any partners or third parties undertaking work to flood defences have explored opportunities to incorporate wider environmental enhancements, such as new habitat creation, with these works.</li> <li>□ Development is not negatively impacted by flood defences.</li> <li>□ Development is not encroaching into the river or floodplain</li> <li>□ Local communities and river users have high quality and uninterrupted access to the riverside, including a continuous Thames.</li> </ul>	A new section has been added to the introductory section of the document focusing specifically on riverside sites and setting out common objectives for all of these sites based on opportunities/requirements identified by the EA for riverside sites.
	Environment Agency	Specific Consultation Body	General comment - physical infrastructure	Should apply a more holistic approach to sustainability with SuDS schemes and intertidal setbacks not only to improve flood risk but also to add to biodiversity net gain, as laid out in the NPPF.	A new section has been added to the introductory section of the document focusing specifically on riverside sites and setting out common objectives for all of these sites based on opportunities/requirements identified by the EA for riverside sites.
	Environment Agency	Specific Consultation Body	General comment - physical infrastructure	Support the use of the river for transport by operators such as the Thames Clipper where appropriate, provided habitat sustainability can be addressed by monitoring and mitigating the wave wash effect on the BAP priority foreshore habitat.	Support noted.
	Environment Agency	Specific Consultation Body	General comment - physical infrastructure	Developers should include habitat enhancements wherever possible referring to our Estuary Edges guidance.	A new section has been added to the introductory section of the document focusing specifically on riverside sites and setting out common objectives for all of these sites based on opportunities/requirements identified by the EA for riverside sites.

	Environment Agency	Specific Consultation Body	General comment - physical infrastructure	<p>As part of the EIA process for major applications we encourage developers to include a chapter on Waste Management. Key issues and opportunities to assess are:</p> <ul style="list-style-type: none"> <li>□ The number of permitted waste sites within 250 metres of the proposed development</li> <li>□ The number of environmental incidents received in last 12 months within 500 metres of the proposed development site.</li> <li>□ Raising the profile of the Waste duty of care and ensuring developers understand their role in preventing environmental damage and reducing waste crime.</li> <li>□ Identify steps to ensure vacant sites have high standards of security to protect them from illegal waste activities.</li> <li>□ For new or modernising waste management sites it's essential they are designed with high quality infrastructure</li> <li>□ If a waste management site is being lost to residential uses an assessment should be made on what impact this will have across the borough and the cumulative impact of loss of waste management sites and how that will be managed.</li> </ul>	The EIA process for major applications is outside the scope of the Site Allocations Local Plan. Where allocations include existing waste uses, the allocation sets out clear requirements for compensatory re-provision in line with the Local Plan and London Plan.
	Environment Agency	Specific Consultation Body	General comment - physical infrastructure	The site allocations process should consider if the permitted waste activities across the borough and the local authority waste management site at Nathan Way, Thamesmead, have sufficient capacity / are resilient to cope with a population across the Royal Borough of Greenwich and, if not, whether new or extra waste management facilities are required in addition to the current sites.	The South East London Joint Waste Technical Paper, demonstrates that the boroughs of Greenwich, Bexley, Bromley, Lewisham and Southwark together have sufficient land safeguarded for waste, to meet their pooled London Plan waste apportionment.
	Thames Water	Specific Consultation Body	General comment - physical infrastructure	There are no details on the quantum of development that would be delivered on each site which makes it difficult to confirm if there will be water or waste infrastructure issues. Add supporting text to encourage developers to discuss their proposals and timescales for delivery at an early stage.	Text has been added to the introductory section to encourage developers to discuss their proposals with Thames Water at an early stage. Indicative area based capacities are included in the proposed submission version of Site Allocations.
	Department for Education	General consultation body - national	General comment - social infrastructure	We aim to work closely with local authority education departments and planning authorities to meet the demand for new school places and new schools. DfE supports the Council's allocation and safeguarding of land for schools as set out in the following locations within the 'Site Requirements' section of the proposed site allocations: • CR2 – Charlton Riverside • GP4 - Greenwich Peninsula • K2 - Kidbrooke Village • T1 - Broadwater Dock, Thamesmead • T3 - Thamesmead Waterfront. It is noted that the above requirements are reduced from the 2016 issues and options consultation, and that this is due to the general update in the need position for the next 3-5 years (i.e. sufficient places identified for primary and secondary including the proposed abovementioned site allocations). This is notwithstanding further uplift	Support noted for allocations that include education provision. The need for school provision and proposed delivery of school places is updated annually in the school place planning projections.



				in residential numbers beyond RBG's current assumption based on committed schemes and allocations. DfE considers therefore that the Plan should make explicit reference to the need to review allocations and proposed delivery of school places alongside new evidence and data. Whilst the Plan notes that there are sufficient places for the next five years with the exception of the north and north west of RBG where site allocations are proposed to address this, it is considered that RBG should keep this under review alongside housing growth and relevant emerging data. This is to ensure that the plan is able to respond flexibly to the need for school places.	
	Department for Education	General consultation body - national	General comment - social infrastructure	<p>Reference should be made to viability implications for delivering infrastructure. DfE recommends an update to the viability assessment alongside the IDP to take proper account of education requirements. Given the significant cross-boundary movement of school pupils between RBG and adjoining Boroughs, DfE recommends RBG covers this matter and the outcomes of cooperation to address it as part of its Statement of Common Ground.</p> <p>The plan is currently silent on the funding mechanism in relation to infrastructure- for plan to be 'effective' there's a need to ensure education contributions are sufficient to deliver school places generated by the additional demand. The total cumulative cost of complying with all relevant policies should not undermine deliverability of the plan, so it is important that anticipated education needs and costs of provision are properly incorporated in the Local Plan evidence base, to inform local decisions about site selection and infrastructure priorities.</p>	The funding mechanism for infrastructure will be set out in the Infrastructure Funding Statement and the need for future infrastructure provision will be set out in the Infrastructure Delivery Plan. The Infrastructure Delivery Plan is being updated alongside the Site Allocations to ensure that providers are informed, insofar as possible, regarding the future development potential of the area and that appropriate on- and off-site mitigation measures are secured.
	Sport England	General consultation body - national	General comment - social infrastructure	General comment – it is noted that the Council intends to bring forward a large number of new homes within this site allocation document. What isn't clear is what new indoor and outdoor sports facilities will be provided to meet the needs of these new residents and if no on site facilities are being provided, how will contributions be collected from these developments to help meet the needs of these new residents? The Council has existing strategies but these now require updating. I would welcome the opportunity to meet with you to discuss this matter further and how to also resolve the objections made to the text of the site allocation policies.	LB to answer - refer to IDP plus for large sites specific reference to provision? The future infrastructure requirements are set out in more detail in the Infrastructure Delivery Plan which is being updated alongside the Site Allocations Local Plan. On large sites provision of specific sports facilities are included, for example, GP4 includes reference to the provision of a public swimming pool.
		Individual	General comment - social infrastructure	I strongly believe that the Borough should invest into youth services and create inspiring places to young people and children for generations to come. Places that are free to use and places that are affordable for charities and organizations working with the vulnerable in the borough as well as places for the often forgotten average/normal	Investment in youth services is outside the scope of the Site Allocations Local Plan. The Infrastructure Delivery Plan (IDP) assesses existing infrastructure provision and works with providers to understand where future infrastructure is needed based on growth, including the approach to community facilities.

					child who needs a safe and interesting place to be after school or during holidays.	
	Greenwich Society	General Consultation Body	IIA		The amount of complexity is disproportionate to the results, although this may well be prescribed by the government.	The complexity of the IIA is a result of the range of data that are incorporated, which are also used in assessing the performance of other Local Plan documents. While we assess the impacts of all sites to all categories, the majority of the impacts are not significant enough to warrant more detailed discussion.
	CCG	Specific Consultation Body	IIA		The IIA identifies the issues of an ageing population but makes little reference to the impact of the overall population growth of the increase in children and young people. Will need an increase in the scale and range of health facilities to respond to the growing population. Health facilities are only referenced in Charlton Riverside and Greenwich Peninsula and it is important that all site allocations make reference to health infrastructure and all types of health services.	While all residential developments will result in an increase in the population, thereby necessitating increased health infrastructure, the role of the site allocations is to identify locations where this new infrastructure can be provided. Contributions to health infrastructure from all developments is secured through CIL and S106 contributions, and are adequately addressed through existing local plan policies.
	Environment Agency	Specific Consultation Body	IIA		<p>We recommend the Integrated Impact Assessment (IIA) February 2019 is updated to include the key waste management strategies listed below. We need to move towards a holistic approach, resource efficiency and a circular economy and moving away from seeking disposal options for waste. These strategies are promoting an integrated approach to resource and waste management, promoting circular economy and reducing waste crime. The planning system has an important role to play in their successful delivery.</p> <p>The following new strategies and document should be reviewed and added into the IIA, to see if they affect the proposed site allocations and ongoing regeneration plans:</p> <ul style="list-style-type: none"> <li>□ 25 Year Environment Plan</li> <li>□ Resources and waste strategy for England (December 2018)</li> <li>□ Independent review into serious and organised crime in the waste sector (November 2018)</li> </ul>	These strategies have been added to the updated IIA.
Quod	Lewisham College	Developer/Landowner	Other	New site	Lewisham College's Deptford Campus falls partly within the London Borough of Lewisham and partly within the Royal Borough of Greenwich. The site covers an area of approximately 1.9 hectares and is currently in use as a further education college (use class D1). It falls within the Deptford Creek/Greenwich Riverside Opportunity Area identified in the London Plan, and the Deptford Creek/Greenwich Riverside Opportunity Area Strategic Development Location in the Core Strategy. The site of the existing Lewisham College is appropriate for redevelopment, which could retain a proportion of further	No detailed information has been provided, such as LeSoCo's Estates Strategy, as to why the site, which is in existing further education use, should be allocated for mixed use development or how allocating the site would clearly link to the delivery of Core Strategy objectives/policies.

					<p>education uses (Use Class D1), along with the potential for a residential mixed used development. This could include:</p> <ul style="list-style-type: none"> <li>- Residential: subject to further testing, the site could accommodate approximately 800 homes;</li> <li>- Older person and extra care housing;</li> <li>- Student Housing;</li> <li>- Commercial: the site could also accommodate a range of commercial uses including office, workspace, retail and leisure uses.</li> </ul> <p>The part of the site of Lewisham College that sits within RBG should therefore be allocated within the Site Allocations document for mixed-use. The inclusion of this site would be effective by ensuring that the policies are deliverable over the plan period and based on effective joint working on cross-boundary strategic matters (paragraph 35, NPPF February 2019).</p>	
Quod	Lewisham College	Developer/ Landowner	Other	New site	<p>The following constraints can be managed through design and mitigation:</p> <ul style="list-style-type: none"> <li>• Site located within Flood Zones 2 and 3, but benefits from flood defences</li> <li>• The site is located within an Air Quality Management Area</li> <li>• The site is previously developed land and has the potential for land contamination</li> <li>• Adjacent to a Site of Importance for Nature Conservation</li> <li>• Adjacent to a Conservation Area</li> <li>• Adjacent to Grade II listed building – Mumfords Grain Silo, Greenwich High Road</li> </ul>	No detailed information has been provided, such as LeSoCo's Estates Strategy, as to why the site, which is in existing further education use, should be allocated for mixed use development or how allocating the site would clearly link to the delivery of Core Strategy objectives/policies.
Quod	Lewisham College	Developer/ Landowner	Other	New site	<p>The Lewisham College site meets the criteria for an allocated site as identified by the Site Allocations Preferred Approach document as follows:</p> <ul style="list-style-type: none"> <li>• Meets the Core Strategy objectives by delivering sustainable development in a strategic development location</li> <li>• Is of sufficient size (more than 0.25ha) to make a significant contribution to the delivery of the Core Strategy</li> <li>• Is not currently allocated within the Site Allocations Preferred Approach document</li> <li>• Aligns with the London Plan allocation of the Deptford Creek/Greenwich Riverside Opportunity Area and identified provision of jobs and homes</li> <li>• The site would be delivered within the plan period timeframe subject to planning permission</li> </ul>	No detailed information has been provided, such as LeSoCo's Estates Strategy, as to why the site, which is in existing further education use, should be allocated for mixed use development or how allocating the site would clearly link to the delivery of Core Strategy objectives/policies.

Savills	Oxleas NHS Foundation Trust	Specific Consultation Body	Other	New Site	The Trust owns the site known as Goldie Leigh Hospital, measuring approximately 7ha. The site is within MOL, an area of special character, the Goldie Leigh Hospital Conservation Area and partially within a SIN. In its current form, the site accommodates a variety of services including but not limited to inpatient services for people with mental health and learning disabilities, day services for adults and older people with learning disabilities, children's physiotherapy, hydrotherapy services and Trust offices. There are a number of vacant buildings in a poor state of repair, some of which have been boarded up for safety reasons. As part of the Trust's estate strategy, a strategic estates partnership known as the Oxleas Property Partnership (TOPP) was established in July 2017 to provide the commercial property expertise not available in the Trust. These representations set out that the saved UDP site allocation should not be removed – it should instead be retained as a site allocation and carried over to RBG's Site Allocations Local Plan.	The site in a conservation area and designated MOL and an extension to existing facilities has already taken place. Existing policies provide sufficient guidance should proposals for the identified uses be forthcoming.
Savills	Oxleas NHS Foundation Trust	Specific Consultation Body	Other	New Site	Appendix I of the Site Allocations Issues and Options Consultation document (2016) proposed to remove the site from the site proposals schedule stating that <i>"this site is a community facility where expansion has already taken place and as such there is no need to continue to identify it as a development site"</i> . Appendix C of the 2019 Consultation document identifies the site as a UDP saved site not carried forward into the Preferred Approach with the justification stating that <i>"expansion has been completed"</i> . Disagree with the justification and consider the site has significant potential to deliver sensitive redevelopment, including enabling development, which can allow resources to go back to the Trust so that essential services can continue, providing the best quality health and social care to its service users, carers and the local community.	The site in a conservation area and designated MOL and an extension to existing facilities has already taken place. Existing policies provide sufficient guidance should proposals for the identified uses be forthcoming.
Savills	Oxleas NHS Foundation Trust	Specific Consultation Body	Other	New Site	Ongoing discussions with RBG service providers suggest that RBG have a number of identified needs. The site provides potential opportunities to contribute to meeting some of these identified needs. Future, potential land uses could also include an expansion of the existing uses, as well as supported living, care, extra care and residential uses. Having regards to the planning designations and the site's existing built form, sensitive site redevelopment would allow opportunities to deliver significant public and planning benefits. These could include improvements, enhancements and potential expansion of the existing provisions. It could also include enhancements to heritage assets, ecological enrichments, visual amenity improvements and so on.	The site in a conservation area and designated MOL and an extension to existing facilities has already taken place. Existing policies provide sufficient guidance should proposals for the identified uses be forthcoming.

